Initial Study

Cormorant Energy Storage Project

Prepared by

In Consultation with

DAVID J. POWERS & ASSOCIATES, INC.
ENVIRONMENTAL CONSULTANTS & PLANNERS

November 2024

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Section 1.0 Introduction and Purpose

1.1 Purpose of the Initial Study

The City of Daly City, as the Lead Agency, has prepared this Initial Study for the Cormorant Energy Storage project in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of City of Daly City, California.

The project proposes to construct a battery energy storage system (BESS), substation, and an underground transmission line along one of three alignments connecting to the substation to the Pacific Gas & Electric (PG&E) Martin Substation. This Initial Study evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.2 Public Review Period

Publication of this Initial Study marks the beginning of a 30-day public review and comment period. During this period, the Initial Study will be available to local, state, and federal agencies and to interested organizations and individuals for review. Written comments concerning the environmental review contained in this Initial Study during the 30-day public review period should be sent to:

Sam Fielding
City of Daly City, Planning Division
333 90th Street
Daly City, CA 94015
(650) 991-8156; sfielding@dalycity.org

1.3 Consideration of the Initial Study and Project

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

1.4 Notice of Determination

If the project is approved, the City of Daly City will file a Notice of Determination (NOD), which will be available for public inspection and posted within 24 hours of receipt at the County Clerk's Office

for 30 days. The filing of the NOD starts a 30-day statute of limitations on court challenges to the approval under CEQA (CEQA Guidelines Section 15075(g)).

Section 2.0 Project Information

2.1 Project Title

Cormorant Energy Storage Project (GP-11-22-015959, ZC-11-22-015960, UPR-11-22-015962, DR-11-22-015961)

2.2 Lead Agency Contact

Sam Fielding
City of Daly City, Planning Division
333 90th Street
Daly City, CA 94015
(650) 991-8156; sfielding@dalycity.org

2.3 Project Applicant

Aron Branam
Arevon Energy
8800 N Gainey Center Dr Suite 250
Scottsdale, AZ 85258
(713) 899-5193

2.4 Project Location

The project is located at 2150 Geneva Avenue in the City of Daly City. Regional, vicinity, and aerial maps of the project site are shown on Figure 2.8-1, Figure 2.8-2, and Figure 2.8-3, respectively.

2.5 Assessor's Parcel Number

Assessor's Parcel Number (APN): 005-050-020

2.6 General Plan Designation and Zoning District

General Plan Designation:	Commercial Retail and Office (C-RO)
Existing Zoning Designation:	Light Commercial (C1)

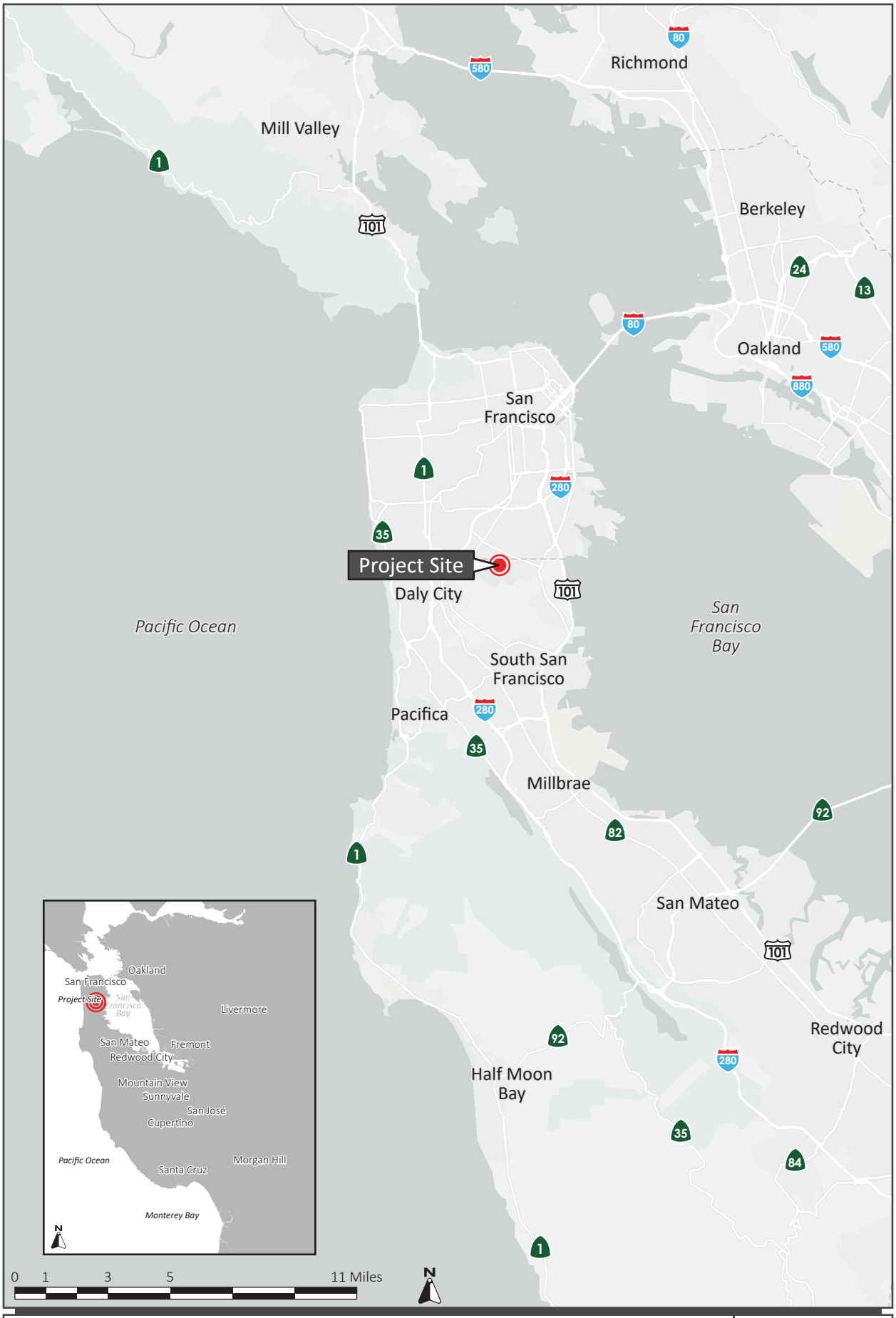
2.7 Habitat Plan Designation

The project site is not located within the San Bruno Mountain Habitat Conservation Plan limits.

2.8 Project-Related Discretionary Approvals, Agreements, and Permits

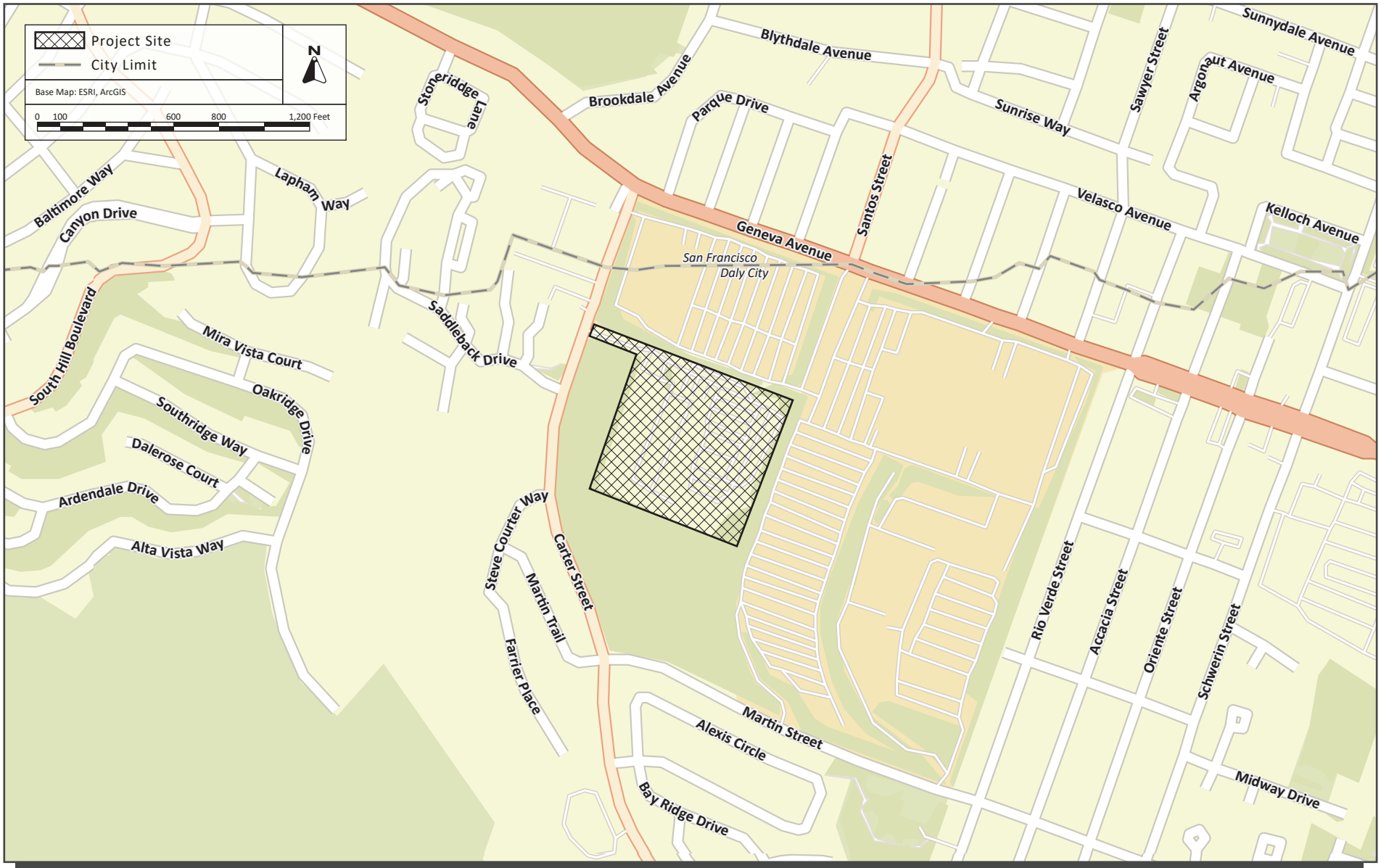
This Initial Study/MND provides decision-makers in the City of Daly City (the Lead Agency), responsible agencies, and the general public with relevant environmental information to use in considering the proposed project. It is intended that this Initial Study be used for discretionary approvals necessary to implement the project, as proposed. These discretionary actions may include, but are not limited to, the following:

- General Plan Amendment
- Rezoning
- Design Review Permit
- Use Permit



REGIONAL MAP

FIGURE 2.8-1



VICINITY MAP

FIGURE 2.8-2

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.8-3

Section 3.0 Project Description

3.1 Project Location

The proposed project is located in the northeastern portion of the City of Daly City. The project at 2150 Geneva Avenue (APN 005-050-020) has two main components: 1) the approximately 6.9-acre BESS facility with associated 0.71-acre substation, and 2) an underground 115 kilovolts (kV) transmission line to the PG&E Martin Substation. The transmission line would travel underground for up to 1.2 miles along one of three alignments to the PG&E Martin Substation, as described below.

3.1.1 Existing Site Conditions

The BESS and substation site at 2150 Geneva Avenue is designated in the General Plan as Commercial Retail and Office (C-RO) and zoned Light Commercial (C1). The project site is bordered by the Bay Club South San Francisco building and Cow Palace parking lot to the north, the Cow Palace to the east, open space to the south, and Carter Street and residential condos to the west. The project site is currently vacant and used for vehicle and building material storage. Trees and shrubs surround the project site on all sides.

The proposed transmission line would run along one of three potential alignments. Alignment 1 would run though the northern end of the Cow Palace, which is designated in the General Plan as Public Facility (PF) and zoned Heavy Commercial (C2), and then turn east and run along Ottilia Street, a two-lane roadway through a residential neighborhood (General Plan-designated and zoned residential), until it reaches the PG&E Martin Substation. Alignment 2 and 3 would run south along Carter Street and then turn east onto Martin Street. Alignment 2 would turn north along Schwerin Street, while Alignment 3 would turn north along Oriente Street and then east on Ottilia Street. Carter Street, Martin Street, Schwerin Street, and Oriente Street are all two-lane roadways through residential neighborhoods (General Plan-designated and zoned residential).

3.2 Project Description

The project involves construction of a 250 megawatt (MW) BESS, substation, and underground transmission line, which will provide a service to the regional electric grid by receiving energy (charging) from the PG&E electric transmission system, storing energy on site, and then later delivering energy (discharging) back to the point of interconnection. At project completion, the 11.5-acre parcel would be developed with the BESS facility on 6.9 acres, substation on 0.71-acre, and the remainder of the site used for a driveway, access road, and landscaping.

3.2.1 Project Components

3.2.1.1 *General Plan Amendment and Rezoning*

The project site has a General Plan land use designation of Commercial Retail and Office (C-RO) and is zoned Light Commercial (C1). In order to develop the proposed project, the project proposes to amend the General Plan land use designation to Industrial (I) and rezone the site to Heavy Commercial (C2). Rezoning the site would allow the project to develop the BESS and substation with a use permit.

3.2.1.2 *Battery Energy Storage System (BESS)*

The proposed project would construct a BESS facility to house lithium-iron phosphate batteries that would store excess energy generated by the electrical grid during the day (see Figure 3.2-1). No power would be generated on-site. The batteries would be housed in approximately nine-foot-tall purpose-built enclosures (see Figure 3.2-2), version Megapack 2 XL produced by Tesla, and mounted on racks that are seismically anchored to the ground and constructed of non-flammable aluminum and steel. In addition to the batteries, inverters and medium-voltage transformers would be installed outside the battery enclosures. Once fully operational, the BESS would be able to store up to 250 MW of electricity from the PG&E Martin Substation.

Chemicals are contained within the individual sealed battery cells. Risk of exposure occurs only if the battery is mechanically or electrically abused or altered. The batteries are not considered hazardous as the electrolyte is non-toxic and does not contain cobalt or other toxic elements.

A fire protection system would be installed as part of the BESS and include built-in failsafe and cooling systems designed to prevent thermal runaway and the spread of fire.

Intermittently throughout the lifetime of the project, there may be a requirement to provide additional energy storage augmentation, which will result in several trips to the site to deliver and install additional battery augmentation units over a period of several weeks. All grading and foundations necessary to accommodate these augmentation units will be completed with the initial construction of the project, such that installation of the augmentation units will require no additional site preparation or disturbance.

3.2.1.3 *Substation*

Open rack, air insulated switchgear, a power transformer, and additional electrical equipment would be installed adjacent to the BESS facility within a 0.71-acre substation (see Figure 3.2-1). The substation is needed to transform the electricity voltage for storage and use consistent with PG&E requirements. The substation would operate 24 hours per day and 365 days per year, similar to other area electrical substations. Substation electrical equipment would be housed in National Electrical Manufacturers Association (NEMA) enclosures and screened from view. Substation

electrical cabling would be installed underground. The substation equipment would be approximately 65 feet in height (see Figure 3.2-2).

3.2.1.4 *Transmission Line*

The BESS and substation would connect to the PG&E Martin Substation via a 115 kV transmission line. The transmission line would follow one of three potential alignments to the PG&E Martin Substation. All three alignments would be entirely underground.

Alignment 1 is approximately 0.7-mile long and would exit the project site near the northeast property line and travel through the Cow Palace parking lot. The transmission line would be located along the northern border of the Cow Palace and then turn south along the eastern border of the Cow Palace property for approximately 600 feet. The transmission line would then exit the Cow Palace property at Ottilia Street and ultimately connect into the PG&E Martin Substation on Schwerin Street approximately 150 feet south of Ottilia Street (see Figure 3.2-3).

Alignment 2 is approximately 1.1 miles long and would exit the project site via the existing driveway along Carter Street. The transmission line would then travel south along Carter Street until it turns east along Martin Street. The transmission line would then travel east along Martin Street until it turns north along Schwerin Street for approximately 1,200 feet to ultimately connect into the PG&E Martin Substation at the same location as Alignment 1 (see Figure 3.2-4).

Alignment 3 is approximately 1.2 miles long and would follow the same initial route as Alignment 2, except Alignment 3 would turn north along Oriente Street instead of Schwerin Street. The transmission line would extend north along Oriente Street for approximately 1,300 feet until it turns east onto Ottilia Street and ultimately connects into the PG&E Martin Substation at the same location as Alignment 1 (see Figure 3.2-4).

In order to connect the transmission line to the Martin Substation, all three alignments would connect to a Point of Change of Ownership (POCO) pole, up to 120 feet tall. PG&E identified the following improvements to be completed by PG&E within the existing Martin Substation area:

- Install a line relay package, voltage transformers, dead-end, underground riser, line switch, and fiber terminations.
- Complete breaker and a half (BAAH) bay, install two circuit breakers.
- Construction of a 115 kV transmission line from the POCO pole to the termination point within the substation (0.25-mile above ground and 0.05-mile underground).

3.2.2 Site Access and Circulation

Access to the BESS and substation would be provided via an existing driveway from Carter Street, at the northwest corner of the project site. An eight-foot-tall concrete wall with wrought iron climbing deterrent would surround the project site, including a sliding security gate at the entry driveway. A

26-foot-wide public access road and associated retaining wall would be constructed on the west side of the security fencing (see Figure 3.2-1).

3.2.3 Operation and Staffing

The BESS would be monitored remotely with maintenance staff visiting the site periodically throughout the year. No permanent employees would occupy the project site. Remote access to battery status, meters, schedules, and other data would be available to off-site personnel.

In the event of an unforeseen emergency, including but not limited to a change in battery temperature, the monitoring system would immediately notify local operations and maintenance personnel in the vicinity. If necessary, a temporary shutdown of the facility would be automatically triggered until the issue is diagnosed and resolved.

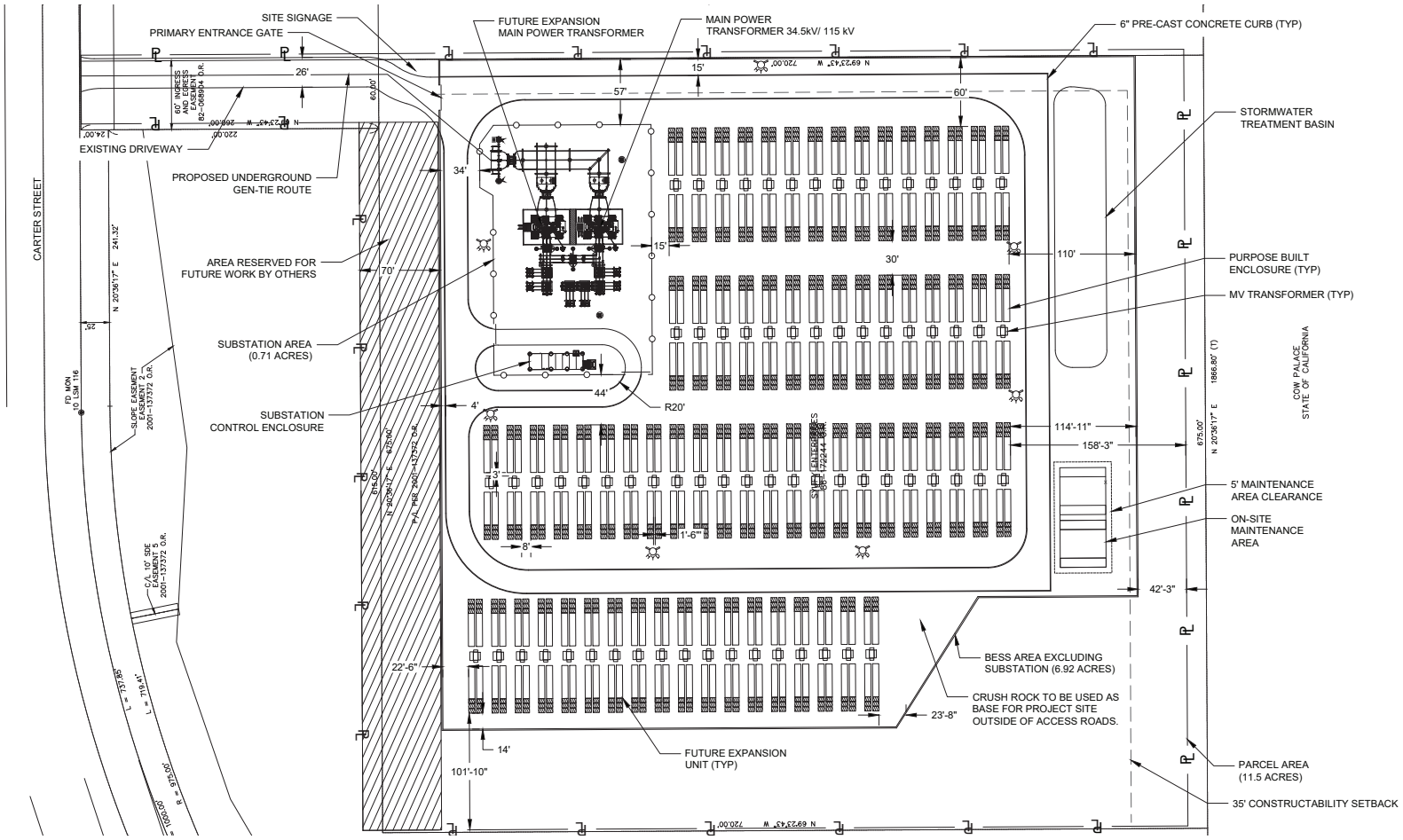
3.2.4 Stormwater Treatment and Landscaping

The project proposes a stormwater treatment area in the northeast corner of the BESS facility. The project would also plant approximately 95 trees on the site at the entry driveway, along the west side of the access road, and along the southerly fence line of the BESS facility and substation.

3.2.5 Construction

3.2.5.1 *Battery Energy Storage System and Substation*

Construction of the proposed BESS and substation would take approximately 10 months and require site grading and excavation to a depth of up to approximately five feet across the majority of the site to allow installation of the underground electrical equipment. A small portion of the site will be excavated up to 15 feet to accommodate the main power transformer foundation. Overall, construction of the project would require 26,400 cubic yards (cy) of soil export. At the end of the project's operational term, the project may be decommissioned and all BESS and substation infrastructure removed. Decommissioning of the project site would take approximately one month. Aboveground equipment that would be removed includes battery containers/enclosures, inverters, transformers, substation steel bus work and enclosures, electrical wiring, etc. Equipment would be de-energized prior to removal, salvaged (where possible), placed in appropriate shipping containers, and secured in a truck transport trailer for shipment off site to be recycled or disposed of at an appropriately licensed disposal facility. Site infrastructure would be removed, including the fences and the concrete pads that may support the battery containers/enclosures, inverters, transformers, and related equipment.



LEGEND:

- PROPERTY LINE
- 8'-6" PRE-CAST CONCRETE WALL W/ 1'-6" CLIMBING DETERRENT
- 8' TUBULAR METAL FENCE
- SLIDING GATE
- FIRE HYDRANT

ABBREVIATION LIST:

BESS - BATTERY ENERGY STORAGE SYSTEM
MV - MEDIUM VOLTAGE
POI - POINT OF INTERCONNECTION
TYP - TYPICAL
BOL - BEGINING OF LIFE
EOL - END OF LIFE

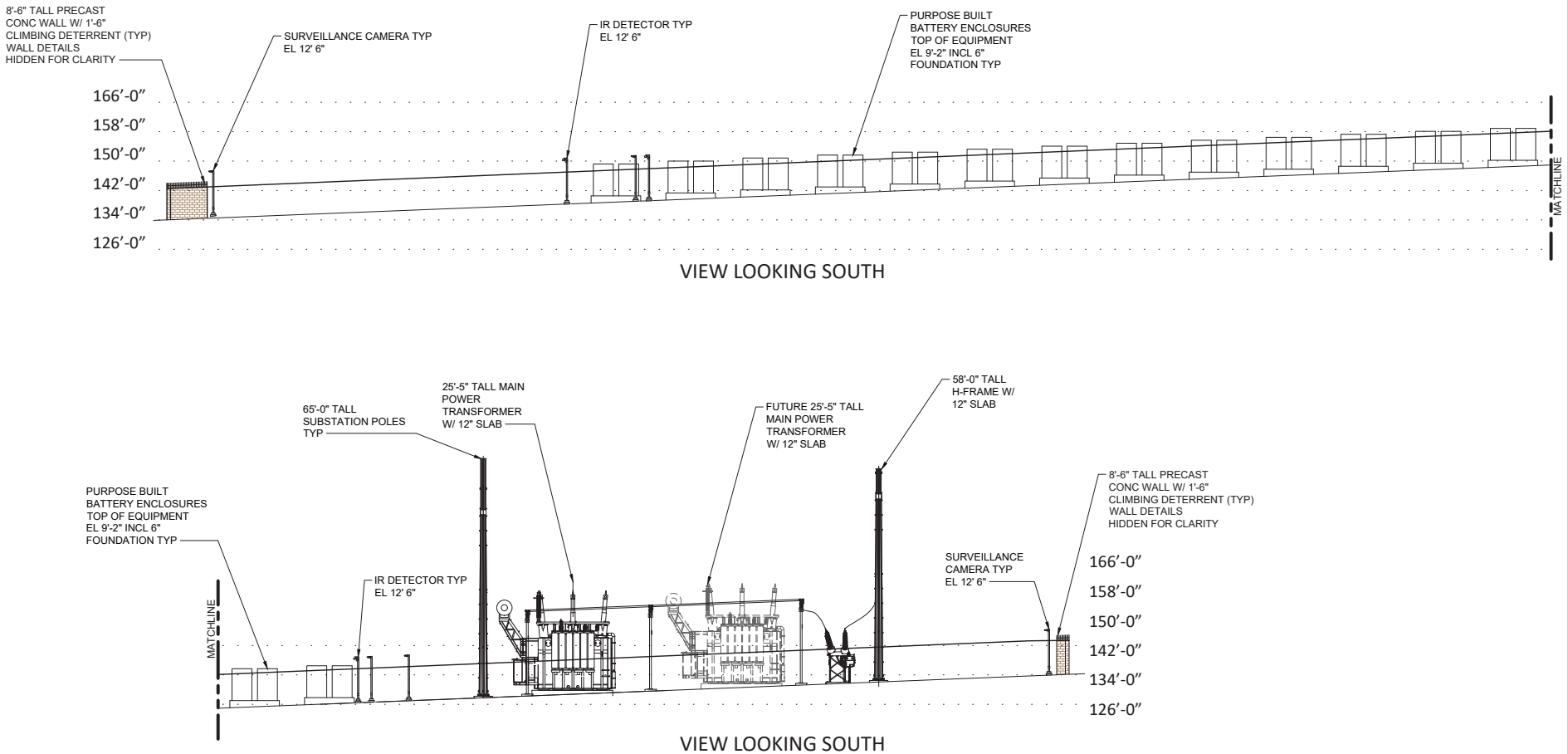
ENERGY STORAGE SYSTEM DESCRIPTION	
NAMEPLATE PHASE 1	188 MW / 752 MWH
NAMEPLATE PHASE 2	62 MW / 248 MWH
NAMEPLATE TOTAL	250 MW / 1000 MWH

BESS MATERIAL LIST	
NUMBER OF BATTERY ENCLOSURES (BOL)	212
NUMBER OF BATTERY ENCLOSURES (EOL)	284
NUMBER OF MV TRANSFORMERS (BOL)	53
NUMBER OF MV TRANSFORMERS (EOL)	71

Source: Burns & McDonnell Engineering Co, Inc., August 9, 2024.

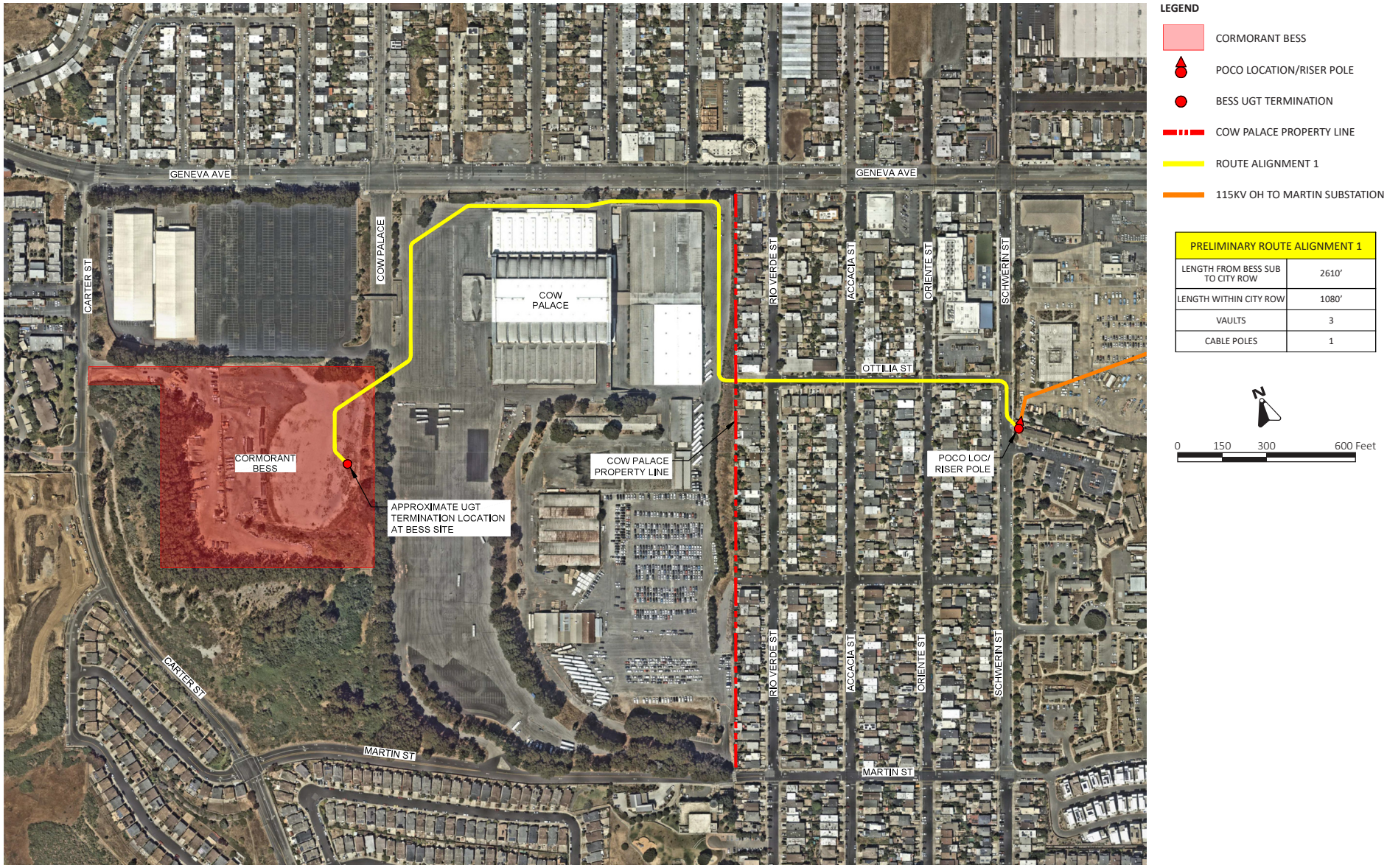
CONCEPTUAL SITE PLAN

FIGURE 3.2-1



Source: Burns & McDonnell Engineering Co., Inc., June 7, 2024.

CONCEPTUAL EQUIPMENT ELEVATIONS | FIGURE 3.2-2



CONCEPTUAL TRANSMISSION LINE ALIGNMENT 1

FIGURE 3.2-3

LEGEND

- CORMORANT BESS
- POCO LOCATION/RISER POLE
- BESS UGT TERMINATION
- ROUTE ALIGNMENT 2
- ROUTE ALIGNMENT 3
- 115KV OH TO MARTIN SUBSTATION

PRELIMINARY ROUTE ALIGNMENTS			
	LENGTH	VAULTS	RISER POLE
ALIGNMENT 2	5880'	4	1
ALIGNMENT 3	6190'	4	1

N

0 150 300 600 Feet

CONCEPTUAL TRANSMISSION LINE ALIGNMENT 2/3

FIGURE 3.2-4

3.2.5.2 *Transmission Line*

Construction of the transmission line would take approximately three months and occur primarily within the City right-of-way (ROW) in developed areas, or on state lands (within parking areas and on the perimeter of the Cow Palace property). The work area would be located within the roadway ROW and/or franchise position, and a permit application will be submitted to the City under separate cover.[1] The transmission line would exit the proposed substation and would immediately transition to underground before exiting the project site via one of the three alignments described above and shown in Figure 3.2-3 and Figure 3.2-4. A three-foot-wide by six-foot-deep trench would be dug to accommodate the transmission line and occur within an approximately 20-foot-wide work area. Once the transmission lines reach the PG&E Martin Substation east of the project site, the transmission line would transition to above-ground via a POCO pole.[2] The connection will cross overhead into the Martin Substation and continue overhead for approximately 0.25-mile and then return underground for the remainder of the routing into the substation. The POCO pole and overhead lines within the Martin Substation would require a seven-foot-wide by 30-foot-deep foundation to be excavated. The construction of the PG&E portion of the transmission line is anticipated to take up to eight months to complete and would occur entirely within the PG&E Martin Substation property.

3.2.5.3 *Tree Removal*

Construction of the BESS and substation would require the removal of 326 trees. Construction of the transmission line along Alignment 1 would require the removal of seven trees as the transmission line exits the BESS site and enters the Cow Palace property to the northeast. Construction of the transmission line along Alignments 2 and 3 would not require the removal or pruning of trees.

[1] Franchise positions are contracts with public/private utility companies granting them the right to use the public ROWs for installation, maintenance, and repair of their facilities, typically underground pipes and conduits or above-ground cables and lights on poles.
[2] Point of change of ownership (POCO)

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

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

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

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection 1) includes the recommended checklist questions from Appendix G of the CEQA Guidelines to assess impacts and 2) discusses the project's impact on the environmental subject as related to the checklist questions. For significant impacts, feasible mitigation measures are identified. "Mitigation measures" are measures that will minimize, avoid, or eliminate a significant impact (CEQA Guidelines Section 15370). Each impact is numbered to correspond to the checklist question being answered. For example, Impact BIO-1 answers the first checklist question in the Biological Resources section. Mitigation measures are also numbered to correspond to the impact they address. For example, MM BIO-1.2 refers to the second mitigation measure for the first impact in the Biological Resources section.

4.1 Aesthetics

4.1.1 Environmental Setting

4.1.1.1 *Regulatory Framework*

State

Scenic Highways Program

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

Local

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy LU-16	Regulate the size, quantity, and location of signs to maintain and enhance the visual appearance of Daly City.
Policy RME-20	Recognize the physical differences between different parts of the City and regulate land uses within these areas accordingly.
Task RME-20.4	Incorporate design features in new development that reflect the character of the neighborhood, to ensure that new construction is compatible with existing development.
Policy LU-17	Ensure that private development is responsible for providing any on-or off-site improvements related to and/or mitigating the impacts it causes.

4.1.1.2 *Existing Conditions*

The project site, located at 2150 Geneva Avenue, is currently vacant and used as a construction staging area and for vehicle storage. Numerous mature trees are present around the perimeter of the project site.

An underground transmission line would run from the proposed substation at 2150 Geneva Avenue to the PG&E Martin Substation to the east along one of three alignments. Alignment 1 would travel through the parking lot and along the northern and eastern borders of the Cow Palace before turning east along Ottilia Street. Alignments 2 and 3 would travel along Carter Street and Martin Street before turning north towards the PG&E Martin Substation along Schwerin Street or Oriente Street. Carter Street, Martin Street, Ottilia Street, Schwerin Street, and Oriente Street are two-lane roadways. Views of the project site can be seen in Figure 4.1-1 and Photos 1 through 8 below.

Surrounding Land Uses

The surrounding area contains a mix of land uses and building types, including multi-family homes to the west, single-family homes to the south, and commercial uses to the north (Bay Club) and to the east (Cow Palace). As a result, there is no dominant visual character in the project area. The multi-family residential buildings to the west are four-stories with painted wood siding. Single-family homes to the south are two-stories with a mix of wood and stucco siding. The commercial use to the north is the Bay Club sports building, which is a large concrete warehouse building and associated surface parking. The commercial use to the east is the Cow Palace, a concrete event center with associated surface parking and warehouses.

Scenic Vistas and Resources

San Bruno Mountain reaches approximately 1,000 feet in elevation and is visible from various locations throughout the City, including the project site, which is about 1.5 miles north of the San Bruno Mountain summit. Views of the coastline or San Francisco Bay are not visible from the project site. The project site is not visible from any state or County designated scenic highways or roadways.

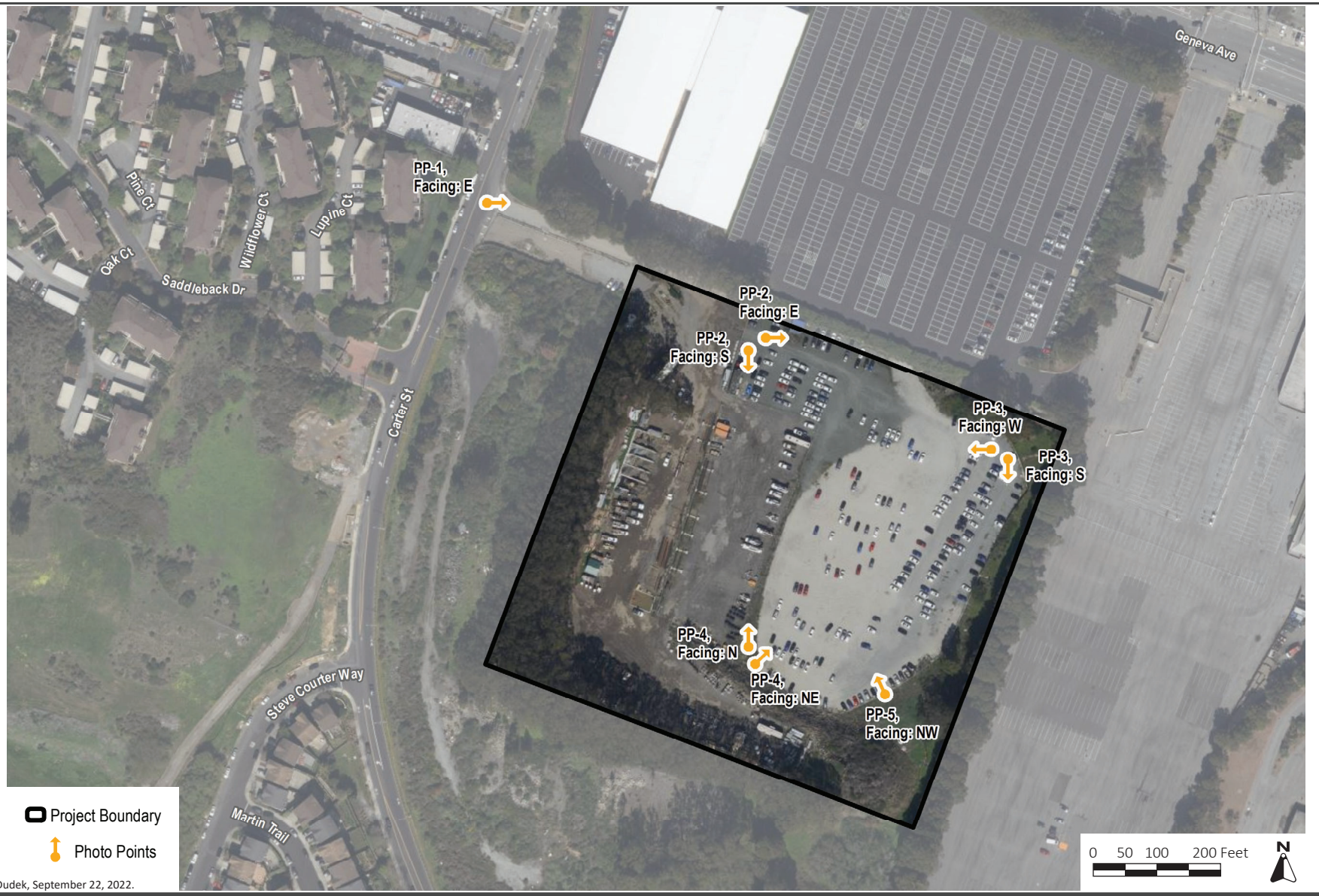


PHOTO LOCATIONS

FIGURE 4.1-1

Photo 1 - Photo Point 1, facing east: View of site from access on Carter Street.

Photo 2 - Photo Point 2, facing east: View of northern perimeter of site parcel.

Source: Dudek, October 2022.

PHOTOS 1 & 2

Photo 3 - Photo Point 2, facing south: View of western side of site parcel.

Photo 4 - Photo Point 3, facing south: View of eastern side of site parcel.

Source: Dudek, October 2022.

PHOTOS 3 & 4

Photo 5 - Photo Point 3, facing west: View toward center of site parcel.

Photo 6 - Photo Point 4, facing north: View toward northern end of site parcel.

Source: Dudek, October 2022.

PHOTOS 5 & 6

Photo 7 - Photo Point 4, facing northeast: View toward center of site parcel.

Photo 8 - Photo Point 5, facing northwest: View toward center of site parcel.

Source: Dudek, October 2022.

PHOTOS 7 & 8

4.1.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[3] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect on a scenic vista?

The City's General Plan does not identify any State or County designated scenic highways located in Daly City. However, several roadways have been recognized as having scenic quality. The General Plan identifies John Daly Boulevard and Lake Merced Boulevard as scenic corridors; however, these roadways are not located within the vicinity of the project site. The County has also recognized Guadalupe Canyon Parkway as having scenic quality which indicates that it has the potential to be designated as an official scenic highway by the State or County. Elements of the roadway that contribute to its scenic quality include views of San Bruno Mountain and the San Francisco Bay.

The project proposes the construction of a BESS and substation on-site. The BESS enclosures would have a low profile at a height of approximately nine feet and the substation equipment would have a maximum height of 65 feet. In addition, the project site is downhill from the surrounding residential uses and shielded from view due to the elevation changes and mature trees surrounding the project site. The removal of trees within the project site would not impact mature trees around the perimeter that provide screening of the proposed facility. All three proposed transmission line alignments would be entirely underground and not visible from surrounding viewpoints. The proposed POCO pole in the PG&E Martin Substation would be up to 120 feet tall and the overhead poles within the substation would be approximately 100 feet tall; however, these poles would be of similar height and style to existing poles within the PG&E Martin Substation and surrounding area.

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

For these reasons, the project would not have an adverse effect on a scenic vista. **(Less than Significant Impact)**

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

As previously noted, SR 35, SR 1, and I-280 are the three eligible State scenic highways within the City of Daly City. The project site is not visible from any of these highways; therefore, the project would not damage scenic resources within a state scenic highway. **(Less than Significant Impact)**

c) Would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is partially visible from Carter Street at the project driveway; however, the project site is mostly obscured from view from all directions by tree cover and sloping topography. Although tree removal would occur within the project site, mature trees on the site perimeter would provide screening from adjacent roadways. In addition, the proposed POCO and PG&E poles would be of similar height and style to existing poles within the PG&E Martin Substation and surrounding area. While the proposed project would result in a change in visual character at the site, the project would be consistent with the urban and commercial uses in the project area. Due to the limited public viewshed of the project site, and the character of the surrounding area, the proposed project would have a less than significant impact on the visual character and quality of the site. **(Less than Significant Impact)**

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The light and glare that exists within the project area is typical of its urban setting. Nighttime lighting impacts are considered significant when they interfere with or intrude into sensitive adjacent uses, including neighboring residences. Light pollution is typically related to the use of high voltage light fixtures with inadequate shields and improper positioning or orientation. The project proposes permanent motion-sensitive, directional security lights to provide adequate illumination around the substation area and points of ingress/egress. All lighting would be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties. The project would also comply with the Design Review process outlined in the City's Zoning Ordinance, which requires that general architectural considerations, such as exterior lighting, are compatible with the design and character of other adjacent buildings. For these reasons, the proposed project would not result in significant light and glare impacts. **(Less than Significant Impact)**

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

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

California Land Conservation Act

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

Fire and Resource Assessment Program

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

[4] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed April 3, 2023. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[5] California Department of Conservation. "Williamson Act." Accessed April 3, 2023. http://www.conservation.ca.gov/dlrp/lca.
[6] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[7] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed April 3, 2023. http://frap.fire.ca.gov/.

4.2.1.2 *Existing Conditions*

According to the San Mateo County Important Farmland 2018 Map, the project site is designated as Other Land. Other land is defined as land not included in any other mapping category, such as vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as other land.[8]

The project site is not zoned or used for agricultural purposes, nor it is the subject of a Williamson Act contract.[9] The project site is located in an urban area of Daly City and is not used for agricultural or timber production.

4.2.2 Impact Discussion

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

[8] California Department of Conservation. *San Mateo County Important Farmland Map 2018.* September 2019.
[9] San Mateo County. "Williamson Act Parcels" Accessed April 3, 2023. https://data.smcgov.org/Housing-Development/Williamson-Act-Parcels/sq6e-7j5j.

a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site is designated Other Land in the San Mateo County Important Farmland 2018 Map and is not considered a significant agricultural resource under CEQA Section 21060.1(a); therefore, the project would not convert farmland to a non-agricultural use. **(No Impact)**

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The project site is not designated for agricultural uses in the General Plan; nor is it zoned or used as farmland or for other agricultural purposes. The project site is not under a Williamson Act contract. Thus, the proposed project would not conflict with existing zoning for agricultural use, or a Williamson Act contract and there would be no impact. **(No Impact)**

c) Would the project conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

The project site and surrounding area are not zoned forest land, timberland, or Timberland Production; therefore, the proposed project would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. Thus, there would be no impact. **(No Impact)**

d) Would the project result in a loss of forest land or conversion of forest land to non-forest use?

The project site and surrounding area are not forest land. The proposed project would not result in a loss of forest land or conversion of forest land to non-forest use and there would be no impact. **(No Impact)**

e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

The proposed project does not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use. The project, therefore, would have no impact to agriculture or forest land. **(No Impact)**

4.3 Air Quality

The following discussion is based in part on a Construction Health Risk Assessment prepared by Illingworth & Rodkin, Inc. in September 2024. This document is included as Appendix A to this Initial Study.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Criteria air pollutants are pollutants that have established federal or state standards for outdoor concentrations to protect public health. Pursuant to the federal and state Clean Air Act, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established and enforce the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS address the following criteria air pollutants: ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM_{10}), particulate matter with a diameter of 2.5 micros or less ($PM_{2.5}$), sulfur dioxide (SO_2), and lead. The CAAQS also includes visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Toxic Air Contaminants

Toxic air contaminants (TACs) include airborne chemicals that are known to have short- and long-term adverse health effects. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., diesel particulate matter [DPM] near a freeway). Unlike criteria air pollutants, which have a regional impact, TACs are highly localized and regulated at the individual emissions source level.

DPM is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways. The majority of DPM is small enough to be inhaled into the lungs. Most inhaled particles are subsequently exhaled, but some deposit on the lung surface or are deposited in the deepest regions of the lungs (most susceptible to injury).[10] Chemicals in diesel exhaust, such as benzene and formaldehyde, are also TACs identified by the CARB.

An overview of the sources of criteria pollutants and TACs, as well as their associated health effects, is provided in Table 4.3-1.

[10] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed July 5, 2023. https://ww2.arb.ca.gov/resources/overview-diesel-exhaust-and-health.

Table 4.3-1: Sources and Health Effects of Criteria Air Pollutants and Toxic Air Contaminants

Pollutants	Description and Sources	Primary Effects
Ozone (O_3)	O_3 is a secondary criteria air pollutant that is the result of a photochemical (sunlight) reaction between reactive organic gases (ROG) and nitrogen oxides (NO_x). Pollutants emitted by motor vehicles, power plants, industrial boilers, refineries, and chemical plants are the common source for this reaction. High O_3 levels are caused by the cumulative emissions of ROG and NO_X. These precursor pollutants react under certain meteorological conditions to form high O_3 levels. Commons sources of ROG and NO_x are vehicles, industrial plants, and consumer products	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	NO_2 is a reactive gas that combines with nitric oxide (NO) to form NO_x. NO_2 the byproduct of fuel combustion with common sources of NO_2 being emissions from cars, trucks, buses, power plants, and off-road equipment. Sources of NO_2 include motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	• Aggravation of respiratory illness • Reduced visibility
Carbon Monoxide (CO)	CO is a colorless, odorless, and toxic gas that is the product of incomplete combustion of carbon-containing substances (e.g., when something is burned). Common outdoor sources of CO include mobile vehicles (passenger cars and trucks) and machinery that burn fossil fuels.	• Interferes with oxygen delivery to the body's organ due to binding with the hemoglobin in the blood • Fatigue, headaches, confusion, and dizziness
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Particulate Matter is any material that is emitted as liquid or solid particles or a gaseous material, such as dust, soot, aerosols, and fumes. PM_{10} and $PM_{2.5}$ are both small enough particulates to be inhaled into the human lungs, and $PM_{2.5}$ is small enough to deposit into the lungs, which poses an increased health risk compared to PM_{10}. Typical sources of particular matter include stationary combustion of solid fuels, construction activities, vehicles, industrial processes, and atmospheric chemical reactions.	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Sulfur Dioxide (SO_2)	SO_2 is a pungent and colorless gaseous pollutant that is part of the sulfur oxides (SO_x) group and is the pollutant of greatest concern in the SO_x group. SO_x can react with other compounds in the atmosphere to form small particles. These particles contribute to particulate matter pollution. SO_2 is primarily formed from fossil fuel combustion at power plants and other industrial facilities. Sources of SO_2 include motor vehicles, locomotives, ships, and off-road diesel equipment that are operated with fuels that contain high levels of sulfur. Industrial processes, such as natural gas and petroleum extraction, oil refining, and metal processing.	• Aggravation of respiratory illness • Respiratory irritation such as wheezing, shortness of breath and chest tightness • Increased incidence of pulmonary symptoms and disease, decreased pulmonary function

Pollutants	Description and Sources	Primary Effects
Lead	Lead is a naturally occurring element that can be found in all parts of the environment including the air, soil, and water. As an air pollutant, lead is present in small particles. The most common historic source of lead exposure was the past use of leaded gasoline in motor vehicles. The exhaust resulting from use of leaded gasoline would release lead emissions into the air. Now, major sources of lead in the air are from ore and metals processing plants and piston-engine aircraft operating on leaded aviation fuel. Other sources are waste incinerators, utilities, and lead-acid battery manufacturers. The highest air concentrations of lead are usually found near lead smelters.	• Adversely affect the nervous system, kidney function, immune system, reproductive and developmental systems and the cardiovascular system
Toxic Air Contaminants (TACs)	TACs include certain air pollutants known to increase the risk of cancer and/or other serious health effects that range from eye irritation, respiratory issues, and neurological damage. Sources of TAC include, but are not limited to, cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

Sensitive Receptors

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

4.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the EPA is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously): PM, O_3, CO, SO_2, NO_2, and lead.[11]

CARB is the state agency that regulates mobile sources throughout the state and oversees implementation of the state air quality laws and regulations, including the California Clean Air Act.

[11] NO_x is the group of nitrogen compounds (NO_2 and nitric oxide [NO]) that typically represents NO_2 emissions because NO_2 emissions contribute the majority of NO_x exhaust emissions emitted from fuel combustion.

The EPA and the CARB have adopted ambient air quality standards establishing permissible levels of these pollutants to protect public health and the climate. Violations of ambient air quality standards are based on air pollutant monitoring data and are determined for each air pollutant. Attainment status for a pollutant means that a given air district meets the standard set by the EPA and/or CARB.

Diesel Risk Reduction Plan

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

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how federal and state air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan. The 2017 Clean Air Plan focuses on the following two related BAAQMD goals and how to achieve them:

- Protect air quality and health at the regional and local scale by attaining all state and national air quality standards and eliminating disparities among Bay Area communities in cancer health risk from TAC; and
- Protect the climate by reducing Bay Area GHG emissions 40 percent below 1990 levels by 2040 and 80 percent below 1990 levels by 2050.[12]

CEQA Air Quality Guidelines

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2022 CEQA Air Quality Guidelines adopted in April 2023 by the Air District Board of Directors.

[12] Bay Area Air Quality Management District. *Final 2017 Clean Air Plan.* April 19, 2017. Page 12.

Local

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy RME-5	Assess projected air emissions from new development and associated construction and demolition activities in conformance with the BAAQMD CEQA Guidelines, and relative to state and federal standards.
Task RME-5.3	Consider cumulative air quality impacts consistent with the region's Clean Air Plan and State law.
Task RME-5.4	Require the preparation of a Transportation Systems Management plan for new development that has been determined to contribute to a reduction in location air quality.
Task RME-5.5	Consult with BAAQMD to identify stationary and mobile TAC sources and determine the need for and requirements of a health risk assessment for proposed developments.
Policy RME-6	Minimize exposure of residents to objectionable smoke and odors by proactively regulating potential sources.

4.3.1.3 *Existing Conditions*

The project is located in San Mateo County, which is in the San Francisco Bay Area Air Basin. The project area's proximity to both the Pacific Ocean and the San Francisco Bay has a moderating influence on the climate. The Bay Area is considered a nonattainment area for ground-level O_3 and $PM_{2.5}$ under both the federal Clean Air Act and state Clean Air Act. The area is also considered in nonattainment for PM_{10} under the state act, but not the federal act. The area has attained both state and federal ambient air quality standards for CO. As part of an effort to attain and maintain ambient air quality standards for O_3 and PM_{10}, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O_3 precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$, and apply to both construction period and operational period impacts.

The closest sensitive receptors to the project are the residences along Martin Street, Oriente Street, Schwerin Street, and Ottilia Street that are approximately 30 feet from where the future transmission line would be placed underground. The nearest sensitive receptors to the proposed BESS and substation are existing residences located approximately 700 feet to the west and 800 feet to the southwest, as measured from the center of the BESS and substation site.

4.3.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Note: Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the determinations.

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of Daly City has considered the air quality thresholds updated by BAAQMD in April 2023 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds for criteria air pollutants and fugitive dust used in this analysis are identified in Table 4.3-2. Table 4.3-3 below lists the BAAQMD health risk and hazards thresholds for single-source and cumulative sources.

Table 4.3-2: BAAQMD Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds*	Operation Thresholds	Operation Thresholds
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Annual Average Emissions (tons/year)
ROG and NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	

Note: * The Air District recommends for construction projects that require less than one year to complete, lead agencies should annualize impacts over the scope of actual days that peak impacts would occur rather than over the full year. Additionally, for phased projects that result in concurrent construction and operational emissions, construction-related exhaust emissions should be combined with operational emissions for all phases where construction and operations overlap.

Source: Bay Area Air Quality Management District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

Table 4.3-3: BAAQMD Health Risks and Hazards Thresholds

Health Risk	Single Source	Combined Cumulative Sources
Cancer Risk	10 per one million	100 per one million
Non-Cancer Hazard Index	1.0	10.0
Annual $PM_{2.5}$ Concentration	0.3 µg/m^3	0.8 µg/m^3 (average)

Notes: µg/m^3 = micrograms per cubic meter; $PM_{2.5}$= fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less

Thresholds are applicable to construction and operational activities.

Source: Bay Area Air Quality Management District. *2022 California Environmental Quality Act Air Quality Guidelines*. April 2023. Pages 3-5 and 3-6.

a) Would the project conflict with or obstruct implementation of the applicable air quality plan?

BAAQMD recommends that the agency approving a project where an air quality plan consistency determination is required analyze the project with respect to the following questions.

- Does the project support the primary goals of the CAP?
- Does the project include applicable control measures from the CAP?
- Does the project disrupt or hinder the implementation of any CAP control measures?

The proposed project supports the primary goals of the 2017 CAP. As discussed below, project construction and operation would not exceed the BAAQMD thresholds for ozone precursor pollutant (ROG, NO_x) and exhaust (PM_{10}, $PM_{2.5}$) emissions during the construction period with implementation of mitigation measures MM AIR-1.1 and MM AIR-1.2.

The 2017 CAP also contains control strategy BL2, intended to decarbonize buildings. The proposed project would store clean energy (wind and solar) so that peak-hour dependence of natural gas or coal-fired electricity could be lessened, fulfilling control strategy BL2. For these reasons, the proposed project would not inhibit BAAQMD or partner agencies from attaining state and federal air quality standards. Therefore, the project would not result in a significant impact related to consistency with the 2017 CAP. **(Less than Significant Impact with Mitigation Incorporated)**

Construction Period Emissions

The California Air Pollution Control Officers Association's California Emissions Estimator Model (CalEEMod) computes annual emissions for construction of projects based on the project type, size, and acreage. CalEEMod provides emission estimates for both on-site and off-site construction activities. On-site activities are primarily made up of construction equipment emissions, while off-site activities include worker and truck traffic. The CalEEMod modeling of project-generated construction emissions was based on the applicant-provided schedule and equipment usage assumptions for construction of the BESS, substation, and transmission line. It is estimated that the project would be built over a period of approximately 20 months. The decommissioning phase of the project was also included and is anticipated to occur in the year 2051 and take one month to complete.

Table 4.3-4 below shows project's estimated average daily construction emissions of ROG, NOx, PM_{10} exhaust, and $PM_{2.5}$ exhaust.

Table 4.3-4: Construction Criteria Pollutant Emissions

Year	ROG	NO_x	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Average Daily (pounds/day)*				
Construction				
2025 (220 construction workdays)	6.14	**55.83**	2.26	2.08
2026 (184 construction workdays)	1.12	10.39	0.38	0.35
Decommissioning				
2051 (23 construction workdays)	3.26	30.77	1.26	1.17
Significance Threshold (pounds per day)	54	54	82	54
Significant?	*No*	***Yes***	*No*	*No*

Note: *Average daily emissions calculated by dividing the construction emissions by the number of construction workdays.

As shown in Table 4.3-4 above, the project would generate significant levels of average daily NO_x emissions during construction of the project. Additionally, construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. The BAAQMD CEQA Air Quality Guidelines consider these impacts to be less than significant if best management practices (BMPs) are implemented to reduce these emissions.

Impact AIR-1: Construction of the project would generate fugitive dust emissions and result in significant NO_x emissions. **(Significant Impact)**

Mitigation Measures: The project shall implement the following mitigation measures to reduce fugitive dust and NO_x emissions to a less than significant level:

MM AIR-1.1: BAAQMD Best Management Practices: The project shall implement the Bay Area Air Quality Management District's (BAAQMD's) recommended best management practices (BMPs) and additional measures to reduce construction equipment exhaust emissions. These measures shall include the following:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as practicable. Building pads shall be laid as soon as practicable after grading unless seeding or soil binders are used.
- All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
- All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
- Unpaved roads providing access to site located 100 feet of further from a paved road shall be treated with a 6- to 12-inch layer of compacted layer of wood chips, mulch, or gravel.
- Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within

48 hours. The Air District's General Air Pollution Complaints number shall be visible to ensure compliance with applicable regulations.

- Limit the simultaneous occurrence of excavation, grading, and ground-disturbing construction activities.
- Install wind breaks (e.g., trees, fences) on the windward side(s) of actively disturbed areas of construction. Wind breaks should have at maximum 50 percent air porosity.
- Plant vegetative ground cover (e.g., fast-germinating native grass seed) in disturbed areas as soon as possible and water appropriately until vegetation is established.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways from sites with a slope greater than one percent.
- Minimize the amount of excavated material or waste materials stored at the site.
- Hydroseed or apply non-toxic soil stabilizers to construction areas, including previously graded areas, that are inactive for at least 10 calendar days.

MM AIR-1.2: Selection of Construction Equipment: All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. Environmental Protection Agency (EPA) Tier 4 emission standards for NO_x.

MM AIR-1.1 and MM AIR-1.2 would reduce NO_x emissions by 12 percent, to 49.07 pounds/day, resulting in NO_x emissions below the BAAQMD significance threshold. Therefore, with implementation of MM AIR-1.1 and MM AIR-1.2, project construction emissions would be reduced to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Operational Period Emissions

The proposed BESS batteries would be housed in purpose-built enclosures located outside. The project would be remotely monitored throughout the day and night, with no permanent full-time or part-time employees commuting to the site on a daily basis. Operational emissions would be generated primarily by electricity use (security lighting and remote monitoring equipment) and occasional maintenance vehicles accessing the project site. The BAAQMD CEQA Air Quality Guidelines contain screening thresholds for operational criteria air pollutants. If a project is below the screening threshold, it is assumed to have less than significant operational criteria air pollutant emissions. The BAAQMD screening threshold for the proposed project (general heavy industry) is 1.009 million square feet.[13] The BESS and substation would be approximately 436,000 square feet,

[13] Bay Area Air Quality Management District. *CEQA Air Quality Guidelines*. April 2022. Page 4-4.

which is below the BAAQMD screening threshold; therefore, the project would have less than significant operational period emissions. **(Less than Significant Impact)**

b) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

As discussed in Section 4.3.1.3 Existing Conditions, the Bay Area is considered a non-attainment area for ground-level O_3, $PM_{2.5}$, and PM_{10} under federal and/or state acts. As part of an effort to attain and maintain ambient air quality standards for O_3 and PM_{10}, BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for O_3 precursor pollutants (ROG and NO_X), PM_{10}, and $PM_{2.5}$, and apply to both construction period and operational period impacts. The project's construction and operational period air pollutant emissions were estimated and discussed under Impact AIR-1. As discussed under Impact AIR-1, the project's construction period emissions would be below the BAAQMD thresholds of significance with implementation of MM AIR-1.1 and MM AIR-1.2, and the project's operational period emissions are screened out (i.e., assumed to be less than significant); therefore, the project would have a less than significant increase in criteria pollutants. **(Less than Significant Impact with Mitigation Incorporated)**

c) Would the project expose sensitive receptors to substantial pollutant concentrations?

Community Health Risk

Projects may result in impacts due to increased community health risk by introducing new sources of pollutant emissions during either construction or operation, or by introducing new sensitive receptors, including residents, to TAC emissions from existing sources.

Project operation is not expected to result in localized air pollutant emissions or TACs, due to the low vehicle traffic due to remote monitoring, and the absence of any stationary emissions sources, such as generators.

Construction Health Risk

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Community risk impacts are addressed by predicting increased lifetime cancer risk, the increase in annual $PM_{2.5}$ concentrations and computing the Hazard Index (HI) for non-cancer health risks. The maximum modeled annual DPM and $PM_{2.5}$ concentrations, which includes both the DPM and fugitive $PM_{2.5}$ concentrations, were identified at nearby sensitive receptors, including the maximally exposed individual (MEI). The construction off-site MEI is shown on Figure 4.3-1.

Source: Illingworth & Rodkin, Inc., April 29, 2024.

LOCATION OF OFF-SITE MEI

FIGURE 4.3-1

Table 4.3-5 summarizes the maximum cancer risks, $PM_{2.5}$ concentrations, and HI for project related construction activities (including all three transmission line alignments) affecting the off-site MEI. The unmitigated maximum increased cancer risk, $PM_{2.5}$ concentration, and HI do not exceed the BAAQMD single-source thresholds of greater than 10 per million, 0.3 $\mu g/m^3$, and 1.0, respectively. The health risk at other nearby sensitive receptors would be lower than at the MEI. **(Less than Significant Impact)**

Table 4.3-5: Project Health Risk Impacts at the MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Site Construction with Alignment 1	9.16	0.09	0.01
Project Site Construction with Alignment 2	9.75	0.09	0.01
Project Site Construction with Alignment 3	9.72	0.09	0.01
BAAQMD Single-Source Threshold	10	0.3	1.0
Significant?	*No*	*No*	*No*

Cumulative Community Health Risk

The geographic area for cumulative health risk impacts to sensitive receptors is within 1,000 feet of the project site. This distance is recommended by BAAQMD because adverse effects are the greatest within this distance. A review of the project area indicated existing sources of TACs within 1,000 feet of the project site with the potential to affect the MEI that include Geneva Avenue (high-volume roadway) and one stationary source (diesel generator). Table 4.3-6, below, summarizes the cumulative community risk at the off-site MEI from project construction with Alignment 2, vehicles traveling on Geneva Avenue, and stationary source emissions. Cumulative health risks for Alignments 1 and 3 would be less than those shown in Table 4.3-6. The results show cumulative community risk at the off-site MEI would not exceed the cumulative-source threshold for cancer risk, $PM_{2.5}$, or HI. **(Less than Significant Impact)**

Table 4.3-6: Unmitigated Cumulative Health Risk Impacts at the MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction with Alignment 2	9.75	0.09	0.01
New Cingular Wireless PCS LLC dba AT&T Mobility (Facility ID #200387, Generator)	0.25	<0.01	<0.01
Geneva Avenue	3.25	0.09	0.01
Cumulative Total	13.25	<0.19	<0.03
BAAQMD Cumulative Source Threshold	100	0.8	10.0
Significant?	*No*	*No*	*No*

Health Effects from Project Criteria Air Pollutant Emissions

In a 2018 decision (*Sierra Club v. County of Fresno*), the state Supreme Court determined CEQA requires that when a project's criteria air pollutant emissions would exceed applicable thresholds and contribute a cumulatively considerable contribution to a significant cumulative regional criteria pollutant impact, the potential for the project's emissions to affect human health in the air basin must be disclosed. State and federal ambient air quality standards are health-based standards, and exceedances of those standards result in continued unhealthy levels of air pollutants. As stated in the 2022 BAAQMD CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts. In developing thresholds of significance for air pollutants, BAAQMD considered the emission levels for which a project's individual emissions would be cumulatively considerable. If a project has a less than significant impact for criteria pollutants, it is assumed to have no adverse health effect.

As discussed under Impact AIR-1, the project would not generate significant amounts of criteria air pollutant emissions during construction or operation with mitigation incorporated. For this reason, the project's less than significant criteria air pollution emissions is concluded to have no adverse health effect. **(Less than Significant Impact with Mitigation Incorporated)**

d) Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable by adjacent receptors; however, the odors from these emissions would be localized and temporary and would not affect a substantial number of people. Additionally, the project would implement BAAQMD BMPs as part of mitigation measure MM AIR-1.1 (see Impact AIR-1), which includes measures that would further reduce odor generated during construction. For these reasons, implementation of the proposed project would not result in significant odors affecting a substantial number of people. **(Less than Significant Impact)**

4.4 Biological Resources

The following discussion is based in part on an Arborist Report prepared by Dudek in June 2024, and a Biological Resources Constraints Memo prepared by WRA, Inc. in September 2024. These documents are included as Appendix B and Appendix C to this Initial Study, respectively.

4.4.1 Environmental Setting

4.4.1.1 *Regulatory Framework*

Federal and State

Endangered Species Act

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

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

Migratory Bird Treaty Act

The federal Migratory Bird Treaty Act (MBTA) prohibits killing, capture, possession, or trade of migratory birds except in accordance with regulations prescribed by the Secretary of the Interior. Hunting and poaching are also prohibited. This includes direct and indirect acts, except for harassment and habitat modification, which are not included unless they result in direct loss of birds, nests, or eggs. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

Sensitive Habitat Regulations

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

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

Fish and Game Code Section 1602

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

Regional

San Bruno Mountain Habitat Conservation Plan

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

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

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

The majority of the project site is approximately 0.2-mile north of the San Bruno HCP boundary; however, the end point of the proposed transmission line, within the PG&E Martin Substation, is located within the San Bruno HCP boundary.

Local

Daly City General Plan

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

General Plan Policies and Tasks

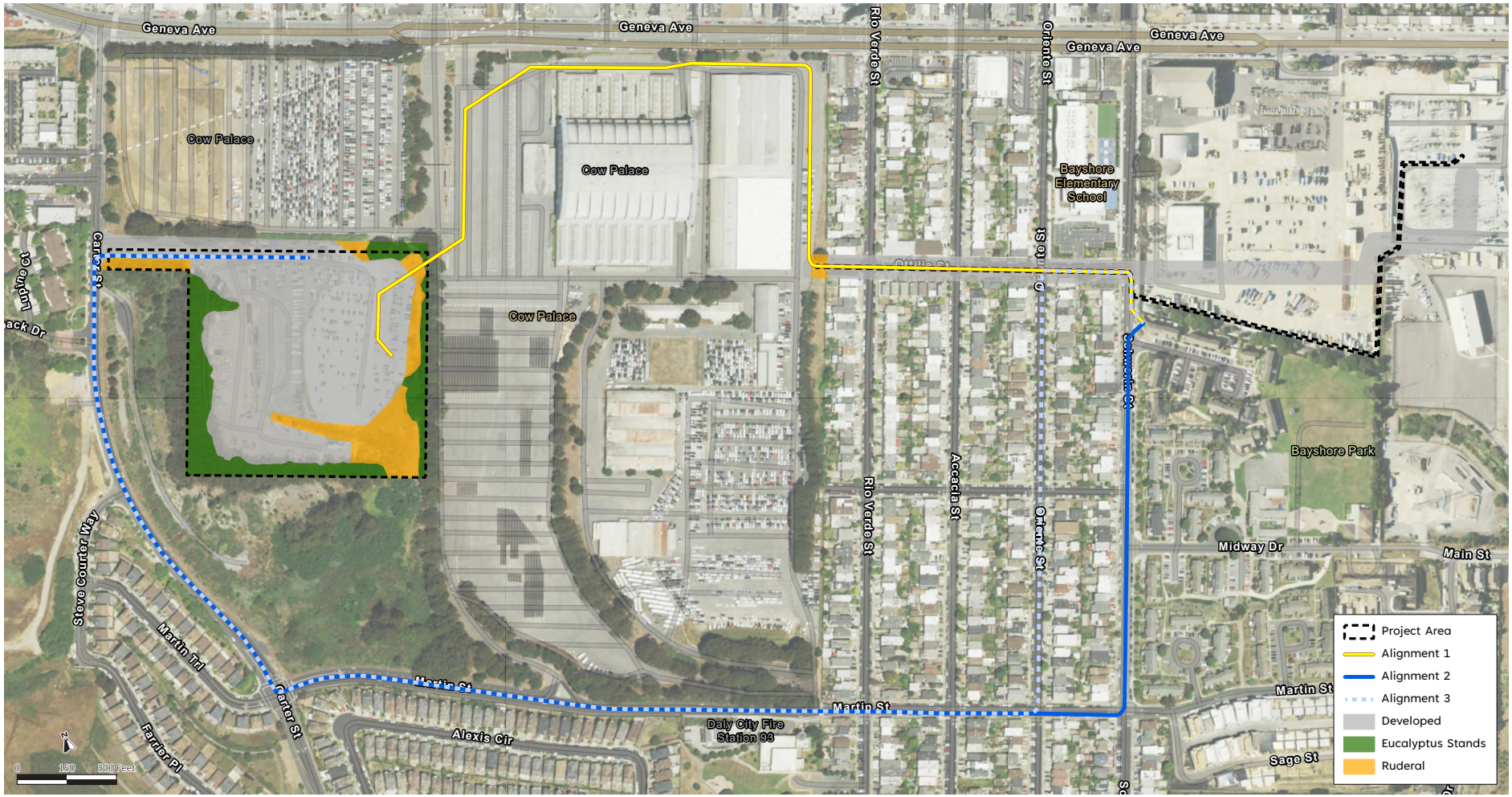
Policy/Task	Description
Policy LU-17:	Ensure that private development is responsible for providing any on- or off-site improvements related to and/or mitigating the impacts it causes.
Policy LU-18:	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Policy RME-16:	The City shall continue to recognize the importance of the San Bruno Mountain Habitat Conservation Plan (HCP), uphold the integrity of the concepts behind the plan, and respect the agreements that serve to implement it.

Daly City Municipal Code

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

4.4.1.2 *Existing Conditions*

The project site is located within an urbanized area of Daly City and consists mostly of developed land, including buildings, paved and concrete areas, landscaped areas, bare dirt, and gravel. Small portions of the project site, located east and south of the proposed BESS and substation and east of the Cow Palace along the proposed transmission line, contain ruderal areas of non-native plant species. These ruderal areas are mostly comprised of non-native herbs such as Cretan mallow (*Malva multiflora*), ripgut brome (*Bromus diandrus*), Italian thistle (*Carduus pycnocephalus*), fennel (*Foeniculum vulgare*), Bermuda buttercup (*Oxalis pes-caprae*), rattail fescue (*Festuca myuros*), bird's-foot trefoil (*Lotus corniculatus*), fumitory (*Fumaria sp.*), purple pampas grass (*Cortaderia jubata*), Harding grass (*Phalaris aquatica*), cotoneaster (*Cotoneaster sp.*), French broom (*Genista monspessulana*), and gorse (*Ulex europaeus*). Eucalyptus stands are located along the project site boundaries surrounding the proposed BESS and substation. The overstory of these stands are comprised of blue gum eucalyptus (*Eucalyptus globulus*), with occasional Monterey pine (*Pinus radiata*). A map showing the different biological land cover types is shown in Figure 4.4-1 below.



Source: WRA, Inc., September 6, 2024.

BIOLOGICAL LAND COVER

FIGURE 4.4-1

Sensitive Natural Communities

No riparian, native grassland, valley oak woodland, or other sensitive natural communities are present within the project site. As documented in Appendix C, there are no rare or threatened plants on the project site; therefore, the project site does not meet CDFW's definition of a sensitive natural community with special status under federal and state law (refer to Section 4.4.1.1 Regulatory Framework).

Special-Status Species

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

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

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

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

Special-Status Plants

No special-status plant species were observed on the project site during surveys conducted by WRA. Based on a review of resource databases, 66 special-status plant species have been documented in the vicinity of the project site; however, all are unlikely or have no potential to occur on the project site due to lack of suitable conditions (i.e., soil conditions, topography, unique pH, associated natural communities, low levels of disturbance).

Special-Status Wildlife

No special-status wildlife species were observed during surveys conducted by WRA. Based on a review of resource databases, 32 special-status wildlife species have been documented in the vicinity of the project site; however, most of the special-status wildlife species are excluded from

the project site due to lack of habitat features (i.e., tidal march, old growth redwood or fir forest, grassland, sandy beaches, and specific plant hosts).

Bird nests of migratory bird species are protected under federal and state law (refer to Section 4.4.1.1 Regulatory Framework). No evidence of bird nests was observed during the aforementioned site visits, but suitable nesting habitat exists in the trees located along the project site perimeter.

There are no recorded occurrences of any special-status bat species within the project site and surrounding vicinity. However, the eucalyptus trees surrounding the project site could be used by bats for roosting.

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

a) Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS?

As discussed in Section 4.4.1.2 Existing Conditions above, there are no known occurrences of special-status plants or wildlife within the project site. However, trees and buildings present on-site may provide suitable nesting and roosting habitat for protected and/or special-status birds and bats. The potential impacts of the project on these species are discussed below.

Nesting Birds

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

Impact BIO-1: Construction of the project could result in significant impacts to nesting birds protected under the federal Migratory Bird Treaty Act and State Fish and Game Code. **(Significant Impact)**

Mitigation Measure: The project shall implement the following mitigation measure to reduce impacts to nesting birds to a less than significant level:

MM BIO-1.1: Initiation of construction activities during the avian nesting season (February 1 through August 31) shall be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction nesting bird surveys shall be conducted by a qualified biologist within 14 days of initial ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds. Surveys shall be used to detect the nests of special-status as well as non-special-status birds. Surveys shall encompass the entire construction area and the surrounding 500 feet. An exclusion zone where no construction would be allowed shall be established around any active nests of any protected avian species found in the Study Area until a qualified biologist has determined that all young have fledged and are independent of the nest. Suggested exclusion zone distances differ depending on species, location, and placement of the nest, and shall be at the discretion of the biologist and, if necessary, the California Department of Fish and Wildlife. These surveys would remain valid as long as construction activity is consistently occurring in a given area and shall be completed again if there is a lapse in construction activities of more than 14 consecutive days during the breeding bird season.

A report of findings shall be prepared by the qualified biologist and submitted to the Director of Economic and Community Development or Director's designee for review and approval prior to initiation of construction during the nesting season (February 1 to August 31). The report shall either confirm absence of any active nests or should confirm that any young are located within a designated no-disturbance zone and construction can proceed. No report of findings is required if construction is initiated during the non-nesting season (September 1 to January 31) and continues uninterrupted according to the above criteria.

With implementation of MM BIO-1.1, the project would avoid disturbance to birds nesting on or near the site and would result in a less than significant impact. **(Less than Significant Impact with Mitigation Incorporated)**

Special-Status Bats

The eucalyptus trees located within and along the perimeter of the project site may provide roosting habitat for special-status bats and other designated priority bat species. Tree trimming/ removal could displace any roosting bats, if present. Destruction of active roosts or indirect visual or acoustic disturbance to roosting special-status bats would constitute a significant impact under CEQA.

Impact BIO-2: Construction of the project could result in significant impacts to roosting special-status bats. **(Significant Impact)**

Mitigation Measure: The project shall implement the following mitigation measure to reduce impacts to roosting bats to a less than significant level:

MM BIO-2.1: Initiation of construction activities during the bat maternity season (generally April through October) shall be avoided to the extent feasible, any tree removal or trimming should be conducted outside of the bat maternity season. If this work window is not feasible, pre-construction bat roost assessments conducted by a qualified biologist at least 14 days and no more than 30 days prior to removal shall be conducted to determine if bats roosts are present that may be impacted by project activities. If special-status bat species or maternity roosts are detected during these surveys, a qualified biologist shall identify any additional measures required to protect the roosts, such as including avoidance of the roost sites until the end of the maternity roosting season.

Regardless of the timing of tree removal or trimming activities, all felled trees or large limbs should remain on the ground for at least 24-hours prior to chipping, off-site removal, or other processing to allow any roosting individual bats to vacate the premises of their own volition.

A report of findings shall be prepared by the qualified biologist and submitted to the Director of Economic and Community Development or Director's designee for review and approval prior to initiation of construction during the maternity roosting season (April through October). The report shall either confirm absence of any active maternity roosts or specify any additional measures necessary to protect roosts until the end of the maternity roosting season. No report of findings is required if construction is initiated during the non-maternity roosting season (November through March) and continues uninterrupted according to the above criteria.

With implementation of MM BIO-2.1, impacts to individual bats and non-special status individuals and colonies of bats would be avoided during project construction. **(Less than Significant Impact with Mitigation Incorporated)**

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

As discussed in Section 4.4.1.2 Existing Conditions above, no riparian habitat or sensitive natural communities are present within the project site. Therefore, since construction and operation of the proposed project would be constrained to the project site, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. **(No Impact)**

c) Would the project have a substantial adverse effect on state or federally protected wetlands through direct removal, filling, hydrological interruption, or other means?

As discussed in Section 4.4.1.2 Existing Conditions above, there are no wetlands present on or adjacent to the project site. Thus, the project would not have a substantial adverse effect on any state or federally protected wetlands. **(No Impact)**

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

As documented in Section 4.4.1.2 Existing Conditions above, the project site is located in an urban area and has been previously disturbed. No watercourses or other natural features are present that would serve as a movement corridor for migratory fish or wildlife species, or as a native wildlife nursery. The majority of trees and understory grasses, forbs, and other plants located on the perimeter of the project site would be preserved and continue to serve as habitat for local wildlife. Any wildlife present within the vicinity of the project site is already acclimated to human activity, and construction activities would not cause any significant impacts on wildlife movement in the

area. For these reasons, the project would not interfere with fish and wildlife movement or in the use of native wildlife nursery sites. **(Less than Significant Impact)**

e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As discussed under Impact BIO-1, the project would mitigate potential impacts to nesting birds and bats to a less than significant level (consistent with General Plan policies LU-17 and LU-18). Additionally, the project would not conflict with the San Bruno Mountain Habitat Conservation Plan (refer to the discussion under Impact BIO-6), consistent with General Plan Policy RME-16. Construction of the BESS and substation would require the removal of 326 trees and construction of the transmission line along Alignment 1 would require the removal of seven trees. Construction of the transmission line along Alignment 2 and Alignment 3 would not require the removal of trees. The City's Urban Forestry Ordinance applies to trees within the public right-of-way, the trees to be removed/pruned by the project are not within the public right-of-way; therefore, the Urban Forestry Ordinance does not apply to the proposed project. Accordingly, the project would not conflict with any local policies or ordinances protecting biological resources. **(Less than Significant Impact)**

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The PG&E Martin substation, the end point of the proposed transmission line, is located within the San Bruno HCP boundary. This PG&E Martin Substation, however, is fully developed with industrial uses, contains no special-status species habitat or other sensitive habitats, and is not a designated priority management area in the HCP. Thus, the construction of the proposed transmission line and its connection to the PG&E Martin Substation would not conflict with the provisions of the San Bruno HCP. **(Less than Significant Impact)**

4.5 Cultural Resources

The following discussion is based in part upon an Archaeological Sensitivity Analysis prepared by Archaeological/Historical Consultants in May 2024. A copy of the Archaeological Sensitivity Analysis, which is a confidential report, is on file at the City of Daly City Planning Division and is available upon request with appropriate credentials.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

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

California Register of Historical Resources

The California Register of Historical Resources (CRHR) is administered by the State Office of Historic Preservation and encourages protection of resources of architectural, historical, archeological, and cultural significance. The CRHR identifies historic resources for state and local planning purposes and affords protections under CEQA. Under Public Resources Code Section 5024.1(c), a resource may be eligible for listing in the CRHR if it meets any of the NRHP criteria.[14]

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

The concept of integrity is essential to identifying the important physical characteristics of historical resources and, therefore, in evaluating adverse changes to them. Integrity is defined as "the authenticity of a historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance." The processes of determining integrity are

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

similar for both the CRHR and NRHP and use the same seven variables or aspects to define integrity that are used to evaluate a resource's eligibility for listing. These seven characteristics include 1) location, 2) design, 3) setting, 4) materials, 5) workmanship, 6) feeling, and 7) association.

Senate Bill 18

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

California Native American Historical, Cultural, and Sacred Sites Act

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

Public Resources Code Sections 5097 and 5097.98

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

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

Local

Daly City General Plan

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

General Plan Policies and Tasks

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

4.5.1.2 *Existing Conditions*

Project Area

There are no known archaeological sites on the project site or PG&E Martin Substation, within the proposed transmission line alignments, or within 0.25-mile of the site. The nearest known archaeological sites are located 0.8- to 1.5-miles northeast of the project site and are Native American shellmounds near the San Francisco Bay.

The project site is vacant and, therefore, contains no historical resources on-site. The project site is, however, directly adjacent to the Cow Palace. The Cow Palace was built between 1935-1941 as a Works Progress Administration (WPA) project and is an indoor arena and event space. It has been used for sports, expositions, concerts, rodeos, and various other events. The Cow Palace is eligible for listing in the NRHP and is listed in the CRHR. No other historic resources are located within the project area.

Native American Consultation

The NAHC was contacted by Archaeological/Historical Consultants to request a review of the Sacred Land Files (SLF) for any evidence of cultural resources or traditional properties of potential concern that might be known on lands within or adjacent to the project area. On February 18, 2023, the NAHC responded that no tribal cultural resources were identified during the SLF review. The NAHC provided a contact list of eight Native American individuals/organizations who may know of cultural resources in this area or have specific concerns about the project. Per SB 18, the City of Daly City requested a tribal consultation list from the NAHC of tribes affiliated with the project area. The City received a list from the NAHC on December 27, 2022, and sent an email and physical letter to each of the identified individuals/organizations on January 5, 2023, inquiring whether they had any concerns about the proposed project. No responses were received within the 90-day response period and the City concluded consultation on April 4, 2023.

4.5.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?

The project site is a vacant lot with no existing permanent structures; thus, the project would not result in the demolition or physical alteration of any historic structures. The project site is adjacent to the Cow Palace, an NRHP eligible and CRHR listed resource; however, construction of the project would not affect the Cow Palace or its historic integrity. The proposed BESS and substation would not physically alter the Cow Palace, would be shielded from view of the Cow Palace by the existing tree line, and would be consistent with the existing land uses surrounding the Cow Palace. In addition, while the transmission line along Alignment 1 would run through the Cow Palace parking lot and along the northern and eastern borders of the Cow Palace property, it would be underground and would not physically alter the Cow Palace or its historic integrity. The project, therefore, would not result in impacts to historic resources. **(Less than Significant Impact)**

b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

As discussed above, there are no known archaeological resources within 0.25-mile of the project site, PG&E Martin Substation, or proposed transmission line route. In addition, the Archaeological Sensitivity Analysis concluded that the area near the Cow Palace along transmission line Alignment 1 has low sensitivity for historic-era resources. Based on the project location and lack of known resources, the archaeological sensitivity analysis concluded that the project area has a low sensitivity for archaeological resources. The project, however, could still result in significant impacts to undiscovered subsurface archaeological resources if encountered during construction-related ground disturbing activities.

Impact CUL-1: Construction of the project could result in significant impacts to previously undiscovered subsurface archeological resources. **(Significant Impact)**

Mitigation Measures: The project shall implement the following mitigation measures to reduce impacts to archaeological resources to a less than significant level:

MM CUL-1.1: Undiscovered Archaeological Resources. If evidence of an archaeological site or other suspected cultural resource as defined by CEQA Guideline Section 15064.5, including darkened soil representing past human activity ("midden"), that could conceal material remains (e.g., worked stone, worked bone, fired clay vessels, faunal bone, hearths, storage pits, or burials) is discovered during construction related earth-moving activities, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager shall be notified. The project sponsor shall hire a qualified archaeologist to conduct a field investigation. The City's Planning Manager shall consult with the archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through data recovery or other methods determined adequate by a qualified archaeologist and that are consistent with the Secretary of the Interior's Standards for Archaeological documentation. Any identified cultural resources shall be recorded on the appropriate DPR 523 (A-J) form and filed with the NWIC.

MM CUL-1.2: Report of Archaeological Resources. If archaeological resources are identified, a final report summarizing the discovery of cultural materials shall be submitted to the City's Planning Manager prior to issuance of certificate of occupancy. This report shall contain a description of the mitigation program that was implemented and its results, including a description of the monitoring and testing program, a list of the resources found and conclusion, and a description of the disposition/curation of the resources.

Implementation of MM CUL-1.1 would ensure that any potentially undiscovered archaeological resources are identified and appropriately treated and protected by a qualified archaeologist in accordance with the Secretary of the Interior's standards. Mitigation addressing subsurface archaeological resources would be documented and enforced through implementation of MM CUL-1.2. Therefore, the project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. **(Less than Significant Impact with Mitigation Incorporated)**

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

Human remains have the potential to be discovered during construction. If human remains were unearthed during project construction, damage to or destruction of significant human remains would be a potentially significant impact.

Impact CUL-2: Construction of the project could result in significant impacts to previously undiscovered human remains. **(Significant Impact)**

Mitigation Measure: The project shall implement the following mitigation measure to reduce impacts to human remains to a less than significant level:

MM CUL-2.1: Human Remains. If human remains are discovered during project construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the City's Planning Manager and the San Mateo County coroner shall be notified immediately, according to Section 5097.98 of the State Public Resources Code and Section 7050.5 of California's Health and Safety Code. If the remains are determined by the County coroner to be Native American, the Native American Heritage Commission (NAHC) shall be notified within 24 hours, and the guidelines of the NAHC shall be adhered to in the treatment and disposition of the remains. The project sponsor shall also retain a professional archaeologist with Native American burial experience to conduct a field investigation of the specific site and consult with the Most Likely Descendant, if any, identified by the NAHC. As necessary, the archaeologist may provide professional assistance to the Most Likely Descendant, including the excavation and removal of the human remains. The City of Daly City shall be responsible for approval of recommended mitigation as it deems appropriate, taking account of the provisions of State law, as set forth in CEQA Guidelines section 15064.5(e) and Public Resources Code section 5097.98. The project sponsor shall implement approved mitigation, to be verified by the City of Daly City, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

By following the process set forth in MM CUL-2.1, the project would ensure that any human remains encountered during ground-disturbing activities are appropriately identified and treated. **(Less than Significant Impact with Mitigation Incorporated)**

4.6 Energy

The following discussion is based in part on a Construction Health Risk Assessment prepared by Illingworth & Rodkin, Inc. in September 2024. This document is included as Appendix A to this Initial Study.

4.6.1 Environmental Setting

4.6.1.1 *Regulatory Framework*

Federal and State

Energy Star and Fuel Efficiency

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

Renewables Portfolio Standard Program

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

Executive Order B-55-18 To Achieve Carbon Neutrality

In September 2018, Governor Brown issued an executive order, EO-B-55-18 To Achieve Carbon Neutrality, setting a statewide goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." The executive order requires CARB to "ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal." EO-B-55-18 supplements EO S-3-05 by requiring not only emissions reductions, but also that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2 from the atmosphere through sequestration.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a

legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years.[15] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[16]

California Green Building Standards Code

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

Advanced Clean Cars Program

CARB adopted the Advanced Clean Cars program in 2012 in coordination with the EPA and National Highway Traffic Safety Administration. The program combines the control of smog-causing pollutants and GHG emissions into a single coordinated set of requirements for vehicle model years 2015 through 2025. The program promotes development of environmentally superior passenger cars and other vehicles, as well as saving the consumer money through fuel savings.[17]

Local

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

[15] California Building Standards Commission. "California Building Standards Code." Accessed April 3, 2023. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[16] California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed April 3, 2023. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.
[17] California Air Resources Board. "The Advanced Clean Cars Program." Accessed April 3, 2023. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program.

Daly City's Green Vision

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

Daly City Municipal Code

The City's Recycling and Diversion of Construction and Demolition ordinance (Municipal Code 15.64) requires that requires that all projects meet the minimum diversion percentage required under the latest locally adopted CALGreen standard for waste tonnage from construction, demolition, and alteration projects. Waste shall be diverted from disposal. This may be accomplished by delivering mixed debris to a recycling facility approved by the city, separating recyclables at the job site and delivering them to reuse and recycling facilities approved by the city, and/or reusing concrete or other waste materials at the jobsite.

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 7,359 trillion British thermal units (Btu) in the year 2021, the most recent year for which this data was available.[18] Out of the 50 states, California is ranked second in total energy consumption and 48th in energy consumption per capita. The breakdown by sector was approximately 20 percent (1,473 trillion Btu) for residential uses, 19 percent (1,397 trillion Btu) for commercial uses, 23.2 percent (1,704 trillion Btu) for industrial uses, and 37.8 percent (2,785 trillion Btu) for transportation.[19] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

In 2022, California's in-state electricity generated equaled about 80 percent of California electricity sales and the remaining 20 percent of the State's electricity supply came from out of state sources. In 2022, non-hydroelectric renewables provide 42 percent of California's total in-state electricity generation. The remaining source percentages are as follows: 42 percent from natural gas-fired power plants, eight percent from hydroelectric renewable resources, and eight percent from nuclear power.[20]

[18] United States Energy Information Administration. "California State Energy Profile." Last Updated April 20, 2023. Accessed September 29, 2023. https://www.eia.gov/state/print.php?sid=CA.
[19] Ibid.
[20] Ibid.

In 2022, a total of approximately 4,177 GWh of electricity was consumed in San Mateo County. The non-residential sector consumed approximately 2,580 GWh (62 percent) and the residential sector consumed approximately 1,597 GWh (38 percent).[21]

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources.[22] The project site is vacant and does not use any electricity.

Natural Gas

PG&E provides natural gas services within the City of Daly City. In 2022, California's natural gas supply came from a combination of in-state production and imported supplies from other western states and Canada.[23] In 2021, residential and commercial customers in California used 33 percent of the state's natural gas, power plants used 0.01 percent, the industrial sector used 33 percent.[24] In 2020, San Mateo County used less than one percent of the state's total consumption of natural gas.[25] The project site is vacant and does not use any natural gas.

Fuel for Motor Vehicles

In 2022, California produced approximately 124 million barrels of crude oil.[26] Approximately 13.64 billion gallons of gasoline and 2.3 billion gallons of diesel were sold in California in 2022.[27] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to

[21] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed October 9, 2023. https://ecdms.energy.ca.gov/Default.aspx.
[22] Sources: 1) Peninsula Clean Energy. "Frequently Asked Questions." Accessed March 13, 2023. https://www.peninsulacleanenergy.com/faq/. 2) Peninsula Clean Energy. "Energy Choices." Accessed March 13, 2023. https://www.peninsulacleanenergy.com/faq/.
[23] California Gas and Electric Utilities. 2022 *California Gas Report.* Accessed March 13, 2023. https://www.socalgas.com/sites/default/files/Joint_Utility_Biennial_Comprehensive_California_Gas_Report_2022.pdf.
[24] United States Energy Information Administration. "Natural Gas Consumption by End Use. 2021." Accessed March 13, 2023. https://www.eia.gov/state/?sid=CA#tabs-2.
[25] California Energy Commission. "Natural Gas Consumption by County." Accessed March 13, 2023. http://ecdms.energy.ca.gov/gasbycounty.aspx.
[26] U.S. Energy Information Administration. "Petroleum & Other Liquids, California Field Production of Crude Oil." September 27, 2023. https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a
[27]California Energy Commission. "2022 California Annual Retail Fuel Outlet Report Results (CEC-A15) Energy Assessments Division." August 16, 2023. Accessed September 29, 2023. https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting

25.4 mpg in 2021.[28] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026. [29,30] The project site is currently used as a construction staging and vehicle storage area. While there are periodic vehicle trips to and from the project site, for the purposes of this analysis, it is assumed that no gasoline is used under existing conditions.

4.6.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

Construction activities associated with the proposed project are estimated to occur at the site over an approximate 23-month period and would consist of site preparation, trenching, grading, paving, installation of the substation, installation of the transmission line, and improvements to the PG&E Martin Substation. The overall construction schedule and process is designed to be efficient in order to avoid excess monetary costs. That is, equipment and fuel are not typically used wastefully on the site because of the added expense associated with renting the equipment, as well as maintaining and fueling it. In addition, as discussed in Section 3.3 Air Quality, the project would implement mitigation measures to minimize the idling of construction equipment thus reducing the potential for energy waste. Further, the project would recycle at least 65 percent of construction and

[28] United States Environmental Protection Agency. "The 2022 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." December 2022. https://www.epa.gov/system/files/documents/2022-12/420r22029.pdf.

[29] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed March 13, 2023. http://www.afdc.energy.gov/laws/eisa.

[30] United States Department of Transportation. "USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed March 13, 2023. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026

demolition waste consistent with CALGreen requirements. For these reasons, construction of the project would not use energy in a wasteful manner. **(Less than Significant Impact)**

Operation

The project would develop a vacant lot and would result in an increase in energy use compared to existing conditions. The proposed BESS would be located outside in purpose-built enclosures; thus, the project would not require the typical energy needs of buildings (i.e., heating, cooling, water heater, indoor lighting). Electricity would be used to power outdoor security lighting and to run the remote monitoring equipment. No permanent full-time or part-time employees would occupy the site and the BESS would be monitored remotely with maintenance staff visiting the facilities periodically throughout the year. Assuming a 22-mile round trip for the maintenance truck, the project would generate 1,056 vehicle miles and associated gasoline use of 42 gallons per year. To ensure that energy is not wasted or unnecessarily consumed, the project would comply with Title 24 and CALGreen energy efficiency measures, as well as City of Daly City Green Vision requirements. These various requirements would reduce project energy demand by ensuring that the project would be built to current energy efficiency standards. For these reasons, operation of the project would not use energy in a wasteful manner. **(Less than Significant Impact)**

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

The project would conform to General Plan policies and regulations which promote the use and expansion of renewable energy resources, including solar and wind, by providing needed storage when the renewable energy is generated—thereby reducing the need for natural-gas electricity generation. By conforming to applicable General Plan policies related to renewable energy and energy efficiency, and the CBC and CALGreen, the project would not preclude the City from meeting local or state renewable energy or energy efficiency goals; rather, it would facilitate the City's objectives and state RPS requirements to meet these goals. **(Less than Significant Impact)**

4.7 Geology and Soils

4.7.1 Environmental Setting

4.7.1.1 *Regulatory Framework*

State

Alquist-Priolo Earthquake Fault Zoning Act

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

Seismic Hazards Mapping Act

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

California Building Standards Code

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

California Division of Occupational Safety and Health Regulations

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

Public Resources Code Section 5097.5

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

Local

Daly City General Plan

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

General Plan Policies and Tasks

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

Daly City Municipal Code

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

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

4.7.1.2 *Existing Conditions*

Soils

The project site is relatively flat and situated at an elevation of approximately 140 feet above mean sea level (msl). The project site is underlain by Urban land soils, which contain variable soil types textures.[31] The proposed transmission line route ranges from approximately 140 feet msl to 20 feet msl and is underlain by Urban land and Urban land-Orthents.[32] Urban land and Urban land-Orthents soils could contain expansive clays; thus, there is potential for expansive soils to be located on the project site and along the proposed transmission line route.[33]

Seismicity and Seismic-Related Hazards

The project site is situated in an area of high seismic activity. Several major fault zones are present in the Bay Area, including the San Andreas, San Gregorio, Hayward and Monte Vista faults. The project site would experience intense ground shaking in the event of a large earthquake. The project site is not, however, within a mapped State of California Earthquake Fault Zone, Fault Rupture Hazard Zone.[34] The closest active fault is the San Andreas fault, located approximately four miles southwest of the project site.

Liquefaction

Liquefaction is the temporary transformation of loose, saturated granular sediments from a solid state to a liquefied state as a result of seismic ground shaking. The project site and proposed transmission line route are located within a State of California Hazard Zone for potential liquefaction.[35]

Lateral Spreading

Lateral spreading is a type of ground failure related to liquefaction. It consists of the horizontal displacement of sloping, saturated soil deposits caused by earthquake-induced liquefaction, and often occurs along sloping creek banks. There are no creeks on or near the project site or proposed transmission line route.

[31] United States Department of Agriculture. "Web Soil Survey". Accessed April 5, 2023. https://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.
[32] Ibid.
[33] University of California Davis. "SoilWeb". Accessed April 5, 2023. https://casoilresource.lawr.ucdavis.edu/gmap/.
[34] California Department of Conservation. "California Earthquake Hazards Zone Application". Accessed April 5, 2023. https://maps.conservation.ca.gov/cgs/EQZApp/app/.
[35] Ibid.

Landslides

Landslide zones in the vicinity of the project site are located near the intersection of Carter Street and Martin Street. The project site is located on gently sloping land and would not be exposed to substantial slope instability, erosion, or landslide-related hazards. The proposed transmission line route would also not cross any designated landslide hazard areas.[36]

Paleontological Resources

The project site is not known to contain any subsurface paleontological or geological features. The project site is vacant and underlain with Urban land and Urban land-Orthent soils, which are a mix of various soil types and textures. These soils do not typically contain unique paleontological resources or geologic features. The proposed transmission line route would follow existing urban development and be located within the PG&E Martin Substation, which required previous excavation and grading to construct; thus, paleontological resources are unlikely to be found near the ground surface.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
– Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☒	☐
– Strong seismic ground shaking?	☐	☐	☒	☐
– Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
– Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

[36] Ibid.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure, including liquefaction; or landslides?

The project site is not located on or adjacent to a known earthquake fault, such that potential substantial adverse effects, including the risk of loss, injury, or death would occur from rupture of an earthquake fault. The project site is not prone to landslides; therefore, there would be no impact.

An earthquake of moderate to high magnitude generated within the San Francisco Bay Region could cause considerable ground shaking and seismic-related ground failure, including liquefaction, at the site. Consistent with the findings of the Daly City 2030 General Plan Environmental Impact Report (General Plan EIR), compliance with the building codes and construction standards established by the CBC as required by law would be sufficient to protect against building collapse and major injuries during a seismic event.[37] The project would comply with current CBC building codes and standards and be constructed in accordance with the recommendations of a site-specific geotechnical investigation (as required by the CBC) and the engineering geology report prepared as required by Chapter 15.62 of the Daly City Municipal Code.

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

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

b) Would the project result in substantial soil erosion or the loss of topsoil?

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

The City's National Pollutant Discharge Elimination System (NPDES) Municipal Permit and Chapter 15.62 of the City's Municipal Code are the City's primary means of enforcing erosion control measures through the grading and building permit process. Consistent with the findings of the General Plan EIR, compliance with the erosion control provisions included in the NPDES Municipal Permit and the erosion and sediment control plan required by Chapter 15.62 of the Municipal Code would ensure that the project would not result in substantial soil erosion or loss of topsoil.[38] **(Less than Significant Impact)**

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

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

d) Would the project be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?

Soils on the project site and along the transmission line route could be considered expansive. By conforming with current CBC building codes and standards and the recommendations of the site-specific geotechnical investigation and the engineering geology report, the project would not create direct or indirect risks to life or property. **(Less than Significant Impact)**

[38] Ibid. Page 3.5-17.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The proposed project would not generate wastewater and would not require the use of septic tanks or alternative wastewater disposal systems. **(No Impact)**

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Construction of the proposed BESS and substation would require excavation of up to 15 feet, construction of the proposed transmission line would excavation of up to six feet, and construction of the POCO pole would require excavation up to 30 feet. While it is unlikely that paleontological resources will be encountered at these excavation depths, the proposed project could potentially disturb undiscovered paleontological resources during construction activities.

Impact GEO-1: Construction of the project could result in significant impacts to previously undiscovered paleontological resources. **(Significant Impact)**

Mitigation Measure: The project shall implement the following mitigation measure to reduce impacts to human remains to a less than significant level:

MM GEO-1.1: Unique Paleontological and/or Geologic Features and Reporting. Should a unique paleontological resource, site, or unique geological feature be identified at the project site during any phase of construction, all ground disturbing activities within 25 feet shall cease and the City's Planning Manager notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. Treatment may include, but is not limited to, preparation and recovery of fossil materials so that they can be housed in an appropriate museum or university collection and may also include preparation of a report for publication describing the finds. The project applicant shall be responsible for implementing the recommendations of the qualified paleontologist. Upon completion of the paleontological assessment, a report shall be submitted to the City and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology.

Implementation of MM GEO-1.1 would ensure that any paleontological resource or unique geological feature encountered during project construction would be identified and subsequently evaluated and protected in accordance with California Public Resources Code Section 5097.5. As

such, impacts to unique paleontological resources would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

4.8.1.1 *Background Information*

Gases that trap heat in the atmosphere, GHGs, regulate the earth's temperature. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate. In GHG emission inventories, the weight of each gas is multiplied by its global warming potential (GWP) and is measured in units of CO_2 equivalents (CO_2e). The most common GHGs are carbon dioxide (CO_2) and water vapor but there are also several others, most importantly methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). These are released into the earth's atmosphere through a variety of natural processes and human activities. Sources of GHGs are generally as follows:

- CO_2 and N_2O are byproducts of fossil fuel combustion
- N_2O is associated with agricultural operations such as fertilization of crops
- CH_4 is commonly created by off-gassing from agricultural practices (e.g., keeping livestock) and landfill operations
- Chlorofluorocarbons (CFCs) were widely used as refrigerants, propellants, and cleaning solvents, but their production has been stopped by international treaty
- HFCs are now used as a substitute for CFCs in refrigeration and cooling
- PFCs and SF_6 emissions are commonly created by industries such as aluminum production and semiconductor manufacturing

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

4.8.1.2 *Regulatory Framework*

State

Assembly Bill 32 and State Bill 32

Under the California Global Warming Solutions Act, also known as AB 32, CARB established a statewide GHG emissions cap for 2020, adopted mandatory reporting rules for significant sources of GHGs, and adopted a comprehensive plan, known as the Climate Change Scoping Plan, identifying how emission reductions would be achieved from significant GHG sources. The first Scoping Plan was approved by CARB in 2008 and must be updated at least every five years. Since 2008, there have been two updates to the Scoping Plan.

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO_2e ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

2022 Scoping Plan

On December 15, 2022, CARB approved the 2022 Scoping Plan. The 2022 Scoping Plan provides a sector-by-sector guide on how to reduce man-made (i.e., anthropogenic) GHG emissions by 85 percent below 1990 levels and achieve carbon neutrality by 2045 over a 25-year horizon.[39] The primary focus of the 2022 Scoping Plan is to reduce the usage of fossil fuels by electricizing the transportation sector, procuring electricity from renewable resources, phasing out natural gas in land use developments, and building transit-oriented communities that encourage multi-modal transportation. If implemented successfully, the 2022 Scoping Plan would not only reduce GHG emissions but also reduce smog-forming air pollution (NO_x) by 71 percent and reduce fossil fuel demand by 94 percent. The 2022 Scoping Plan also details natural carbon capture and storage process along with mechanical carbon capture programs to address the remaining 15 of anthropogenic GHG emissions that will remain post-2045. To meet these goals, CARB also includes a revised goal of reducing state GHG emissions 48 percent below 1990 levels by 2030.

Senate Bill 375 and Plan Bay Area 2050

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

[39] CARB. *2022 Scoping Plan for Achieving Carbon Neutrality*. November 16, 2022. Page 5.

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2050.

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified priority development areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[40]

Play Bay Area 2050 includes a goal to increase the number of households that live within 0.5 mile of frequent transit by 2050. Plan Bay Area 2050 promotes strategies that support active and shared modes, combined with a transit-supportive land use patterns, which together are forecasted to lower the share of Bay Area residents that drive to work alone from 50 percent in 2015 to 33 percent in 2050, resulting in a decrease in GHG emissions. Plan Bay Area 2050 also includes goals to expand transportation demand management (TDM) initiatives that support and augment employers' commute programs, providing a path to emissions reductions.

Senate Bill 100

SB 100, known as "The 100 Percent Clean Energy Act of 2018," was adopted on September 10, 2018. The overall goal is to have all retail electricity sold in California procured from 100 percent renewable and zero-carbon resources by the year 2045. SB 100 also modified the renewables portfolio standard to 50 percent by 2025 and 60 percent by 2030.

Executive Order B-55-18 and Assembly Bill 1279

Executive Order B-55-18 was issued in September 2018. It ordered a new statewide goal of achieving carbon neutrality no later than 2045 and to maintain net negative emissions thereafter.

Assembly Bill 1279, also known as the California Climate Crisis Act, was approved in September 2022 and codifies the statewide goal set by Executive Order B-55-18 of achieving net zero GHG emissions no later than the year 2045 and maintaining net negative emissions thereafter. In addition, this bill has a statewide goal of reducing anthropogenic GHG emissions by 85 percent below the 1990 levels by the year 2045. The bill requires CARB to work with relevant state agencies to ensure that updates to the scoping plan identify and recommend measures to achieve these policy goals and implement strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California. The bill requires CARB to submit an annual report.

[40] Association of Bay Area Governments and Metropolitan Transportation Commission. Plan Bay Area 2050. October 21, 2021. Page 20.

Advanced Clean Cars II Regulation

To continue reducing air pollutants and GHG emissions in the transportation sector, CARB adopted the Advanced Clean Cars II Regulations (Resolution 22-12) in August 2022. The new regulation requires that by 2035 all new passenger cars, trucks, and SUVs sold in California will be zero emissions. This regulation bans the sale of new gasoline or diesel passenger cars, trucks, and SUVs in California from automakers. Beginning in the year 2026, 35 percent of new vehicle sales must be zero-emission vehicles and plug-in hybrid electric vehicles and that percentage will increase per year. By 2030, 70 percent of new vehicle sales will be zero-emissions vehicles and by the 2035 model year 100 percent of new vehicle sales will be zero-emissions. CARB will limit the use of plug-in hybrid electric vehicles in the percentage requirements to keep the manufacturing of zero-emissions as the primary goal. Existing gasoline cars can continue to be driven and sold as used cars beyond 2035. CARB is required to track and report on the zero-emissions vehicle market development annually.

California Building Standards Code – Title 24 Part 11 and Part 6

The CALGreen Code is part of the California Building Standards Code under Title 24, Part 11.[41] The CALGreen Code encourages sustainable construction standards that incorporate planning/design, energy efficiency, water efficiency resource efficiency, and environmental quality. These green building standard codes are mandatory statewide and are applicable to residential and non-residential developments. The most recent CALGreen Code (2022 CALGreen Code) was effective as of January 2023.

The California Building Energy Efficiency Standards (California Energy Code) is under Title 24, Part 6 and is overseen by the CEC. This code includes design requirements to conserve energy in new residential and non-residential developments. This Energy Code is enforced and verified by cities during the planning and building permit process. The 2022 Energy Code replaced the 2019 Energy Code as of January 1, 2023. There are new 2022 standards for single-family residences, multi-family residences, and non-residential uses.[42,43,44] Major changes include electric-ready single-family and multi-family residence and solar photovoltaic systems and energy storage systems for residential and commercial developments.

CALGreen also requires new construction and demolition projects to have a diversion of at least 65 percent of the construction waste generated.

[41] Refer to https://www.dgs.ca.gov/BSC/Resources/Page-Content/Building-Standards-Commission-Resources-List-Folder/CALGreen#:~:text=CALGreen%20is%20the%20first%2Din,to%201990%20levels%20by%202020.
[42] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Single-Family Residential." Revised July 15, 2022. Accessed January 18, 2023. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Single-family_Whats_New_Summary_ADA.pdf.
[43] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Multifamily." Revised August 4, 2022. Accessed January 18, 2023. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Multifamily_Whats_new_Summary_ADA.pdf.
[44] California Energy Commission. "2022 Building Energy Efficiency Standards What's New for Nonresidential." Revised August 4, 2022. Accessed January 18, 2023. https://www.energy.ca.gov/sites/default/files/2022-08/2022_Nonresidential_Whats_New_Summary_ADA.pdf.

Regional and Local

2017 Clean Air Plan

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

BAAQMD CEQA Thresholds for Evaluating Climate Impacts from Land Use Projects and Plans

In April 2022, the BAAQMD Board of Directors adopted the Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. The report includes BAAQMD's thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG thresholds replace the GHG thresholds set forth in the May 2017 BAAQMD CEQA Air Quality Guidelines and represent what is required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045.

Daly City General Plan

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

General Plan Policies and Tasks

Policy	Description
Policy HE-24	Mandate the inclusion of green building techniques into most new construction.
Policy HE-28	Promote alternative sources of energy in all homes.

Daly City Reach Code

In April 2021, the City Council of Daly City adopted a reach code ordinance to electrify buildings and vehicles in new construction. The new requirements are intended to result in safer and more comfortable buildings, increase electric vehicle charging infrastructure, and reduce carbon emissions. The ordinance requires all new buildings to be all-electric with some exceptions, such as non-residential buildings containing a commercial kitchen that may contain non-electric cooking appliances. The ordinance also requires electric vehicle charging infrastructure beyond that required in the 2019 California Green Building Standards Code.

Daly City's Green Vision

Daly City's Green Vision, A Climate Action Plan (CAP) for 2011-2020 and Beyond, was adopted in December 2010. Daly City's Green Vision guides the City towards a sustainable future that reduces GHG emissions from current levels, while promoting economic prosperity for present and future

generations. The Green Vision identifies ten goals and seeks to achieve these goals through cost-effective strategies by the year 2020. The GHG reduction goals include adopting a general plan with measurable policies for sustainable development, reducing energy use in buildings, reducing transportation emissions, reducing solid waste disposal, and GHG emissions reductions from municipal operations. Daly City completed an update to the General Plan which incorporated these goals in March 2013.

4.8.1.3 *Existing Conditions*

Unlike emissions of criteria and toxic air pollutants, which have regional and local impacts, emissions of GHGs have a broader, global impact. Global warming is a process whereby GHGs accumulating in the upper atmosphere contribute to an increase in the temperature of the earth and changes in weather patterns. The project site is currently vacant and used as a construction staging area and for vehicle storage. GHG emissions are generated from vehicle trips to and from the site.

4.8.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒	☐	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	☐	☒	☐	☐

The BAAQMD threshold of significance for land use development projects is to either A) incorporate project design elements and achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan or B) be consistent with a local GHG reduction strategy that meets the criteria of CEQA Guidelines Section 15183.5 (b).

Project-Level Impact

Pursuant with BAAQMD, for land use projects to result in a less than significant GHG emissions impact, the land use project would need to comply with threshold A or B below.

A. Projects must include, at a minimum, the following project design elements:
   1. Buildings
      a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).

b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2. Transportation

a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

i. Residential projects: 15 percent below the existing VMT per capita

ii. Office projects: 15 percent below the existing VMT per employee

iii. Retail projects: no net increase in existing VMT

a. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

a) Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction

Construction of the project would generate approximately 1,574 metric tons (MT) of CO_2e from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips.[45] Neither the City nor BAAQMD have an adopted threshold of significance for construction related GHG emissions. There is nothing atypical or unusual about the project's construction. In addition, the project would implement mitigation measure MM AIR-1.1 to restrict idling of construction equipment and utilize energy-efficient equipment, which would in turn reduce GHG emissions. For these reasons, the project's construction GHG emissions are less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

Operation

Pursuant to the BAAQMD thresholds of significance, if a land use project meets the following criteria, it would have a less than significant greenhouse gas impact;

- Projects must either not include natural gas appliances or plumbing;
- Not result in wasteful, inefficient, or unnecessary energy use;

[45] Illingworth & Rodkin, Inc. *2150 Geneva Avenue Battery Storage Construction Health Risk Assessment*. April 29, 2024.

- Achieve a 15 percent reduction in project-generated vehicle miles traveled (VMT) below the regional average; and
- Include off-street electric vehicle infrastructure consistent with CALGreen Tier 2 requirements.

The project would not include any natural gas and, as discussed in Section 4.6 Energy, would comply with Title 24 and CALGreen energy efficiency measures, as well as City of Daly City Green Vision requirements. In addition, the project would achieve a VMT rate of 15 percent below the regional average (see Section 4.17 Transportation). Since the project would be monitored remotely and not have any permanent employees, it does not propose any parking spaces for vehicles; thus, it is not subject to off-street electric vehicle infrastructure requirements. For these reasons, the project would not use energy in a wasteful or inefficient manner and would meet current BAAQMD GHG thresholds; therefore, the project would result in a less than significant operational GHG emissions impact. **(Less than Significant Impact)**

b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs?

2022 Scoping Plan

The 2022 Scoping Plan is a document that plans how the State will achieve carbon neutrality by 2045 and reduce anthropogenic emissions to 85 percent below 1990 levels by 2045. The BAAQMD qualitative thresholds were designed to ensure future projects complete their "fair share" of implementing carbon reduction design features to help achieve the State's carbon neutrality goal. A project that can meet the energy and transportation design elements outlined in the BAAQMD thresholds or is consistent with a qualified GHG reduction strategy is then consistent with the goals outlined in the 2022 Scoping Plan and would not hinder the State from achieving carbon neutrality. As described in Checklist Question a), the project would be consistent with the BAAQMD GHG energy and transportation design thresholds. In addition, the project itself, an energy storage project, would help the State achieve its goal of carbon neutrality. Therefore, the proposed project would not exacerbate the cumulative GHG problem and the project's contribution would not be cumulatively considerable as it does not impede California's ability to achieve carbon neutrality.

2017 Clean Air Plan

The BAAQMD 2017 CAP focuses on two goals: protecting public health and protecting the climate. The 2017 CAP includes air quality standards and control measures designed to reduce emissions of methane, carbon dioxide, and other super-GHGs. As discussed in Section 4.3 Air Quality under Impact AIR-1, the project is consistent with the 2017 Clean Air Plan because the project would not exceed BAAQMD criteria air pollutant emissions thresholds during construction with implementation of BAAQMD BMPs (MM AIR-1.1) and during operation. In addition, the project construction would implement mitigation measure MM AQ-1.1 by using energy-efficient alternative

fueled construction equipment to reduce air pollutant (DPM and $PM_{2.5}$) emissions. For these reasons, the proposed project would not conflict with the 2017 CAP goal to reduce GHG emissions. **(Less than Significant Impact with Mitigation Incorporated)**

Daly City General Plan

The project would be consistent with General Plan policy HE-24 because the project would comply with the requirements of the Green Building Ordinance and the Title 24 Building Code, which requires proposed buildings to be constructed with various measures that would reduce GHG emissions from the project. The project would be consistent with General Plan policy HE-28 because the project proposes to store electricity generated by renewable sources to be used as an alternative energy source. For these reasons, the project would be consistent with the City's General Plan. **(Less than Significant Impact)**

4.9 Hazards and Hazardous Materials

The following discussion is based in part on a Phase I Environmental Site Assessment (ESA) prepared by Alta Environmental in September 2020 and a Hazards Analysis Final Report prepared by MRS Environmental in September 2023. These documents are included as Appendix D and Appendix E to this Initial Study, respectively.

4.9.1 Environmental Setting

4.9.1.1 *Regulatory Framework*

Overview

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

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

Federal and State

<u>Federal Aviation Regulations Part 77</u>

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

<u>Resource Conservation and Recovery Act</u>

The Resource Conservation and Recovery Act (RCRA), enacted in 1976, is the principal federal law in the United States governing the disposal of solid waste and hazardous waste. RCRA gives the EPA the authority to control hazardous waste from the "cradle to the grave." This includes the

generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[46]

Government Code Section 65962.5

Section 65962.5 of the Government Code requires CalEPA to develop and update a list of hazardous waste and substances sites, known as the Cortese List. The Cortese List is used by state and local agencies and developers to comply with CEQA requirements. The Cortese List includes hazardous substance release sites identified by the Department of Toxic Substances Control (DTSC) and State Water Resources Control Board (SWRCB).[47]

Toxic Substances Control Act

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

California Accidental Release Prevention Program

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

Asbestos-Containing Materials

Friable asbestos is any asbestos-containing material (ACM) that, when dry, can easily be crumbled or pulverized to a powder by hand, allowing the asbestos particles to become airborne. Common examples of products that have been found to contain friable asbestos include acoustical ceilings, plaster, wallboard, and thermal insulation for water heaters and pipes. Common examples of non-

[46] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed April 5, 2023. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[47] California Environmental Protection Agency. "Cortese List Data Resources." Accessed April 5, 2023. https://calepa.ca.gov/sitecleanup/corteselist/.

friable ACMs are asphalt roofing shingles, vinyl floor tiles, and transite siding made with cement. The EPA phased out use of friable asbestos products between 1973 and 1978. National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

CCR Title 8, Section 1532.1

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

Hazardous Materials Business Plan

California's Health and Safety Code requires that any business that handles hazardous materials prepare a hazardous materials business plan (HMBP), which must include the following:

- Details, including floor plans, of the facility and business conducted at the site;
- An inventory of hazardous materials that are handled or stored on-site;
- An emergency response plan; and
- A safety and emergency response training program for new employees with annual refresher courses.

The goal of the HMBP program is to protect human and environmental health from adverse effects as a result of the storage or possible release of hazardous materials. This is done primarily by documenting significant amounts of hazardous materials so that emergency responders can effectively protect the public.

Regional

Municipal Regional Permit Provision C.12.f

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

With the adoption of the San Francisco Bay Region Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, Provision C.12.f requires that permittees develop an assessment methodology for applicable structures planned for demolition to ensure

PCBs do not enter municipal storm drain systems.[48] Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. Buildings constructed between 1950 and 1980 that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

San Mateo County Comprehensive Airport Land Use Plan

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

Local

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy LU-18	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Task LU-18.1	Ensure that potentially significant environmental impacts associated with development proposals are properly mitigated through conditions of approval, mitigation measures, project design, or project denial. In cases where the impacts may not be completely preventable but will not significantly disrupt the community, the City may recognize that the benefits of a project may outweigh the environmental consequences. In no case shall the City approve a project that endangers the health, safety, or welfare of the public.
Policy SE-4.1	Support efforts to locate, regulate, and maintain information regarding hazardous materials located or transported within the City.
Policy SE-4.2	Cooperate with the County of San Mateo in the regulation of hazardous materials and transportation in the Fire Prevention Services Bureau within the City.

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

4.9.1.2 *Existing Conditions*

On-Site Conditions

BESS and Substation

The project site was originally developed in 1938 with a grandstand and greyhound racetrack associated with the adjacent Cow Palace. Between 1946 and 1956, the site was redeveloped with a drive-in movie theater. In 2002, the structures on-site were demolished and the site has remained vacant since. The site is currently used as a construction staging area and for vehicle storage. According to the RCRA Small Quantity Generator database, the site was previously listed as a generator of hazardous waste under the facility name North Bay Pacific Theater. The type of hazardous waste was not listed, but no violations, leaks, or releases were reported. A review of federal, state, and local databases reveal there are no known hazardous materials spills or leaks at the project site.

Transmission Line and PG&E Martin Substation

A review of federal, state, and local databases reveals there is only one hazardous materials site along the proposed transmission line routes. The PG&E Martin Substation (end point of the proposed transmission line) is listed on the Cortese List due to a gas manufacturing plant (MGP) using oil as a feedstock operated at this site between the 1905 and 1916.[49] When it was dismantled, the soil beneath the Site became impacted by MGP residues including polycyclic aromatic hydrocarbons (PAHs). The contaminated soil was never removed and the site is subject to a land use covenant between the Department of Toxic Substances Control (DTSC) and PG&E. The land use covenant restricts certain land uses on the site and requires PG&E to submit project-specific Soil Management and Air Monitoring Plans to DTSC for any earthmoving projects.

Off-Site Conditions

A review of federal, state, and local databases shows there are three closed, leaking underground storage tank (LUST) cases near the project site. These LUST cases were located at the Cow Palace (LUST case closed as of 1995), 2750 Geneva Avenue (LUST case closed as of 2015), and at the intersection of Carter Street and Martin Street southwest of the project site (LUST case closed as of 1993). Based on location, distance, regulatory status, and/or apparent groundwater gradient, the Phase I ESA determined these sites were not of environmental concern. Refer to Appendix D for more information regarding nearby off-site sources of contamination.

Airport Hazards

The project site is approximately five miles north from the San Francisco International Airport (SFO) The project site is not located within the SFO CLUP Airport Influence Area B, safety compatibility zones, or Community Noise Equivalent Level (CNEL) noise contours for the airport.

[49] Department of Toxic Substances Control. "EnviroStor". Accessed April 5, 2023. https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=41360100.

Wildland Fire Hazards

The project site is in a Local Responsibility Area (LRA) which has not been mapped by CAL FIRE as being within a Very High Fire Hazard Severity Zone (refer to Section 3.20 Wildfire). San Bruno Mountain is identified as a Moderate Fire Hazard Severity Zone in a State Responsibility Area (SRA).[50]

4.9.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, will it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

[50] CAL FIRE. "Fire Hazard Severity Zones in State Responsibility Area." Accessed August 9, 2023. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008.

a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

No hazardous materials, liquids, or chemicals that would create a significant hazard are required to construct or operate the BESS. The chemicals associated with the lithium ion batteries that would be housed in seismically anchored, non-flammable purpose-built enclosures are contained within the individual sealed battery cells. Risk of exposure occurs only if the battery is mechanically or electrically abused or altered, leading to rupture of the cells. The batteries are not considered hazardous as the electrolyte is non-toxic and they do not contain cobalt or other toxic elements.

The battery system is designed with automatic software that monitors the system and can take certain batteries offline or power the whole system down (such as in the case of smoke or fire detection, loss of grid power, or other similar high-level threat). The battery system would be designed such that the batteries are isolated from each other, the power conversion system, and the grid. Additionally, on-call local contractors will be available 24 hours a day, 365 days a year to take action in the event of an issue and troubleshoot any issues that arise on-site.

During operation of the energy storage facility, some electronic waste would be generated from battery repair and maintenance work. Waste will be disposed of in accordance with applicable local, state, and federal requirements. For the reasons described above, the project would not create a significant hazard through routine transport, use, or disposal of hazardous materials.

The transformers located within the BESS and substation will use mineral transformer oil in transformers, high-voltage capacitors, fluorescent lamp ballasts, and high-voltage switches, and circuit breakers. A Spill Control and Countermeasure Plan and/or HMBP would be prepared for the site describing emergency procedures, secondary containment for the oil-filled transformers, and clean-up requirements. Compliance with these documents would ensure that a release of transformer oil at the substation would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials. **(Less than Significant Impact)**

b) Would the project 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?

Soil Contaminants

As discussed under Section 4.9.1.2 Existing Conditions, there are no hazardous materials sites on the project site or along the proposed transmission line routes, except at the end point of the PG&E Martin Substation. Soil in and around the PG&E Martin Substation may contain PAH residues from a past MGP. If not handled correctly during excavation, soils containing these chemicals could be

disturbed resulting in a release that could significantly impact the environment, project construction workers, or the public.

Impact HAZ-1: Construction of the transmission line near the PG&E Martin Substation could result in the release of contaminated soil. **(Significant Impact)**

Mitigation Measure: The project shall implement the following mitigation measure to reduce the possible release of contaminated soil to a less than significant level:

MM HAZ-1.1: Prior to any grading, excavation, or construction of the transmission line, the Department of Toxic Substances Control (DTSC) shall be notified of the proposed construction activities at the PG&E Martin Substation. Per the Land Use Covenant for the PG&E Martin Substation, a Soil Management Plan (SMP) and Health and Safety Plan (HSP) shall be prepared by a qualified environmental professional and submitted to DTSC for review and approval. The SMP and HSP and evidence of regulatory oversight shall be provided to the Director of Economic and Community Development.

With implementation of MM HAZ-2.1, impacts associated with the construction of the transmission line would be reduced to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Project Operations

A Hazards Analysis Final Report was prepared for the project to evaluate the reasonable, worst-case scenario, defined as the BESS control system failing or a puncture of one of the battery enclosures. The project includes an Emergency Response Guide for the BESS detailing hazards, firefighting measures, shutting down and disposal of materials and also recommends a number of firefighting measures. Fire prevention systems would include proposed cabinets designed to limit or eliminate the potential for fire to spread from one cabinet to another, infrared camera monitoring at the site for external fire detection and on-site fire hydrants. Additional items include video monitoring of the site, site lighting, site security, training, fire access planning and fire water flow design. The Battery Management System would monitor all cell voltages, currents and temperatures and shut down equipment if unsafe conditions are detected with monitoring and control by the Tesla Operations Center.

As determined in the Hazards Analysis Report for the Project, the reasonable worst-case battery cell malfunction scenarios would result in manageable hazards, with ground-level toxic, thermal and deflagration hazards remaining on-site (see Appendix E for detailed analysis). In the event of an on-site battery malfunction resulting in the release of toxic gas, resulting toxic gas plumes would not result in acute concentrations of toxins off-site. In the event of a fire, worst-case ground level smoke levels would extend as far as 60 feet from the battery location. The closest batteries to the property line are located approximately 54 feet from the northern property line adjacent to the Cow Palace parking lot, meaning ground level smoke impacts may extend six feet into the parking

lot. The potential for smoke impact to create a significant hazard to the public using the Cow Palace parking lot is limited given the infrequent use of the lot, limited potential for a worst-case fire and smoke scenario, and minimal extent of smoke impact onto the adjacent property. The potential for flammable vapors to be released due to a worst-case battery malfunction was also modeled and flames and explosion impacts were found to extend approximately 41 feet and, therefore, remain on-site. Thermal radiation from a fire due to battery malfunction was modeled and found not to extend beyond the property line.

As described above, modeled worst-case scenarios for battery malfunction on the site show that a hazardous materials release would result in a less than significant hazard to the public or environment. **(Less than Significant Impact)**

c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The nearest school to the project site is Bayshore Elementary school, located adjacent to the proposed transmission line route along Ottilia Street. As discussed under Impact HAZ-1, the project would not emit hazardous emissions and would handle all hazardous materials in compliance with federal, state, and county regulations. In addition, the project would implement mitigation measure MM HAZ-1.1 during construction of the proposed transmission line to ensure that hazardous materials and soils would not create a significant hazard to the public or environment. **(Less than Significant Impact with Mitigation Incorporated)**

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As discussed in Section 4.9.1.2 Existing Conditions, the end of the proposed transmission line routes is located on the PG&E Martin Substation site, which is listed on the Cortese List. As discussed under Impact HAZ-1 above, the project would implement mitigation measure MM HAZ-1.1 and shall implement a SMP and HSP to protect the environment, project construction workers, and the public from an accidental release of hazardous materials. **(Less than Significant Impact with Mitigation Incorporated)**

e) If located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site is located approximately five miles north of the SFO and is not within the SFO CLUP Airport Influence Area B, safety compatibility zones, or CNEL noise contours for the airport. **(No Impact)**

f) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would not impair or physically interfere with any adopted emergency response or evacuation plan. All project development would be constructed to comply with all applicable state and local building and fire codes. During construction and operation, roadways would not be blocked such that emergency vehicles would be unable to access the site or surrounding properties. During operation, emergency ingress and egress to the project site would be provided by the surrounding roadways. Therefore, the proposed project would not impair the implementation of or physically interfere with any emergency response or evacuation plan. **(Less than Significant Impact)**

g) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is located in an urbanized area of Daly City and is located near a state responsibility area that is classified as a moderate fire hazard severity zone. The adopted Local Responsibility Area maps do not identify the site as being in a fire hazard severity zone. All project development would be constructed in accordance with current state and local building and fire codes to ensure structural stability and safety and the final site design would be reviewed by the Daly City Fire Department for consistency with applicable fire department standards. The project, therefore, would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. **(Less than Significant Impact)**

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Federal and State

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

Under Section 303(d) of the federal Clean Water Act, the SWRCB and RWQCBs are required to identify impaired surface water bodies that do not meet water quality standards and develop total maximum daily loads (TMDLs) for contaminants of concern. The list of the state's identified impaired surface water bodies, known as the "303(d) list" can be found on the on the SWRCB's website.[51]

National Flood Insurance Program

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

Statewide Construction General Permit

The SWRCB has implemented an NPDES General Construction Permit for the State of California (Construction General Permit). For projects disturbing one acre or more of soil, a Notice of Intent (NOI) must be filed with the RWQCB by the project sponsor, and a Storm Water Pollution Prevention Plan (SWPPP) must be prepared by a qualified professional prior to commencement of construction and filed with the RWQCB by the project sponsor. The Construction General Permit includes requirements for training, inspections, record keeping, and, for projects of certain risk

[51] California State Water Resources Control Board. "2020-2022 California Integrated Report (Clean Water Act Section 303(d) List and 305(b) Report)." May 11, 2022. Accessed April 12, 2023. https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

levels, monitoring. The general purpose of the requirements is to minimize the discharge of pollutants and to protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges.

Regional and Local

San Francisco Bay Basin Plan

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

Municipal Regional Permit Provision C.3

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in May 2022 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[52] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g. rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

In addition to water quality controls, the MRP requires new development and redevelopment projects that create or replace one acre or more of impervious surface to manage development-related increases in peak runoff flow, volume, and duration, where such hydromodification is likely to cause increased erosion, silt pollutant generation, or other impacts to local rivers, streams, and creeks. Projects may be deemed exempt from these requirements if: (1) the post-project impervious surface area is less than, or the same as, the pre-project impervious surface area; (2) the project is located in a catchment that drains to a hardened (e.g., continuously lined with concrete) engineered channel or channels or enclosed pipes, which extend continuously to the Bay, Delta, or flow controlled reservoir, or, in a catchment that drains to channels that are tidally influenced; or

[52] California Regional Water Quality Control Board San Francisco Region. Municipal Regional Stormwater NPDES Permit, Order No. R2-2022-0018, NPDES Permit No. CAS612008. May 11, 2022.

(3) the project is located in a catchment or subwatershed that is highly developed (i.e., that is 70 percent or more impervious).[53]

Local

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with the applicable Municipal Regional Stormwater Permit by incorporating controls that reduce water quality impacts over the life of the project in ways that are both technically and economically feasible, and reduce pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.5	Ensure the regular inspection of stormwater treatment facilities as required by the Municipal Regional Stormwater NPDES Permit.
Policy SE-2.1	Protect the City of Daly City from unreasonable risk to life and property caused by flood hazards by designing and constructing drainage facilities to improve the flow capacity of the City's water system in order to accommodate the storm water runoff generated by a 100-year storm.

Daly City Municipal Code

Chapter 14.04 of the Daly City Municipal Code, also known as the Daly City Stormwater Management and Discharge Control Ordinance prohibits non-stormwater discharges to the City storm drain system. The purpose of the Ordinance is to eliminate non-stormwater discharges to the municipal separate storm drain system, control the discharge of spills, dumping or disposal of materials other than stormwater, and reduce pollutants in stormwater discharges into the storm drain system to the maximum extent practicable. Chapter 14.12 gives the City the authority to inspect projects to enforce any of the provisions of Title 14.

Chapter 15.62 of the Daly City Municipal Code, also known as the City of Daly City Grading, Erosion and Sediment Control Ordinance sets forth rules and regulations to control site clearing, vegetation disturbances, land-fills, land excavations, soil storage, and other such activities which may cause sediments and other pollutants to enter the public drainage facilities. The chapter establishes the regulations, permit requirements, procedures for administration and enforcement of permits to properly control the aforementioned activities to preserve and enhance public health, safety and

[53] The Hydromodification Applicability Maps developed by the permittees under Order No. R2-2009-0074 were prepared using this standard, adjusted to 65 percent imperviousness to account for the presence of vegetation on the photographic references used to determine imperviousness. Thus, the maps for Order No. R2-2009-0074 are accepted as meeting the 70 percent requirement.

environment. Section 15.62.230 requires the permittee to maintain a copy of the permit, approved plans and reports and make these available for city inspection. Section 15.62.270 gives the City engineer authority to suspend or revoke a permit for violation or non-compliance with Chapter 15.62.

4.10.1.2 *Existing Conditions*

Hydrology and Drainage

The project site is located within the Sunnydale watershed which drains to the San Francisco Bay via Brisbane.

The project site is gently sloping from west to east and situated at an elevation of approximately 140 feet msl. Surface runoff on-site is collected in drains or inlets and conveyed via below grade pipes to three storm drain outfalls located along the western property line. The outfall discharges to an existing 10-inch storm drain line that connects to the larger storm drain system within the Cow Palace property. This system flows towards Bayshore Boulevard and discharges into a 60-inch storm drain line through Brisbane and ultimately into San Francisco Bay, approximately 1.6 miles east of the project site.

The project site is approximately 92 percent impervious surfaces, primarily consisting of pavement, and eight percent pervious surfaces.

Surface Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as "non-point" source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Surface runoff from the project area is collected by storm drains and discharged to San Francisco Bay. Runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, and animal feces), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain. San Francisco Bay is currently listed on the 303(d) list for chlordane, dichlorodiphenyltrichloroethane (DDT), dieldrin, dioxin compounds, furan compounds, invasive species, mercury, PCBs, and trash.[54, 55]

[54] The Clean Water Act (CWA), Section 303, establishes water quality standards and Total Maximum Daily Load (TMDL) programs. The 303(d) list is a list of impaired water bodies.
[55] California Environmental Protection Agency, State Water Resources Control Board. "Impaired Water Bodies." Accessed April 12, 2023. https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml

Groundwater

The project site is located in the Visitacion Valley Groundwater Basin, which has not been identified as a groundwater basin in a state of overdraft.[56]

Groundwater in the project vicinity is projected to flow generally east-southeast towards the San Francisco Bay at a depth of approximately 16 to 19 feet below ground surface.[57] Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Flooding and Other Hazards

The Federal Emergency Management Agency (FEMA) has designated the project site as being located within Flood Zone X, an area of minimal flood hazard; thus, the project site is not located in a 100-year floodplain.[58]

Tsunami inundation maps prepared by the California Department of Conservation indicate that the project site is outside of tsunami hazard areas.[59] Seiches can occur in semi- or fully-enclosed bodies of water and inundate adjacent areas; the nearest semi- or fully-enclosed water body is Lake Merced, located approximately 3.6 miles west of the project site.

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

[56] California Department of Water Resources. "State Groundwater Management Act Basin Prioritization Dashboard." Accessed April 12, 2023. https://gis.water.ca.gov/app/bp-dashboard/final/

[57] Alta Environmental. *Phase I Environmental Site Assessment, 2150 Geneva Avenue, Daly City, CA.* September 2020.

[58] Federal Emergency Management Agency. *FIRM 06081C0035F.* April 5, 2019.

[59] California Department of Conservation. "San Mateo County Tsunami Hazard Areas." Accessed April 12, 2023. https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
– result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
– impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Construction Water Quality Impacts

Potential impacts related to water quality are constrained by existing regulatory systems from the federal to the local level. The Clean Water Act sets minimum water quality standards for all surface waters in the U.S. and requires that industrial, municipal, and construction-related sources of pollution are regulated through the NPDES. The City requires project applicants to submit a stormwater management plan that illustrates full compliance with the MRP. The project would be required to include stormwater controls and construction best management practices. Compliance with the MRP would ensure that project construction would not substantially degrade surface water or ground water quality. **(Less than Significant Impact)**

Post-Construction Water Quality Impacts

The proposed project would result in approximately 405,000 square feet (95 percent) of impervious surface area and 22,650 square feet (five percent) of pervious surface area on the site. Overall, the

project would result in a net increase of approximately 10,000 square feet of impervious surface area. To reduce water quality impacts post-construction, the project is required to comply with the MRP including Provision C.3 of the MRP regarding LID site design. LID features could include self-treating and self-retaining areas to allow on-site retention, percolation, and evaporation of stormwater runoff. The project proposes a dry retention basin that would retain stormwater on-site during a 25-year storm event. In addition, stormwater not directed to the retention basin would be directed to vegetated areas to enhance infiltration into the ground. Pervious surface area provided by the project would include landscaping and bioretention areas. With the implementation of stormwater treatment measures, the project would result in a less than significant impact to water quality. **(Less than Significant Impact)**

b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Daly City receives a large portion of its water supply from the San Francisco Public Utilities Commission (SFPUC) and supplements the SFPUC supply with groundwater pumped from six local wells. During dry periods, groundwater makes up a larger proportion (up to 45 percent) of the City's supply. The proposed project, consisting of a BESS, substation, and transmission line, would not result in the need for excessive groundwater pumping from the local wells, and would therefore not substantially decrease groundwater supplies (refer to water supply discussion in Section 4.19 Utilities and Service Systems).

There are no designated groundwater recharge areas within the Visitacion Valley Groundwater Basin.[60] The principal sources of recharge are direct infiltration of rainfall, infiltration of irrigation water, and leakage from water and sewer pipes. As described in Impact HYD-1, the proposed project would reduce the pervious area on-site, resulting in a corresponding decrease in infiltration capacity. However, the project's Stormwater Management Plan includes a large self-retaining, self-treating, bioretention area within the landscaping that would provide opportunities for stormwater infiltration. The project would therefore not be expected to substantially interfere with groundwater recharge or impede groundwater management of the basin. **(Less than Significant Impact)**

[60] California Department of Water Resources. "Bulletin 118: Visitacion Valley Basin". Accessed May 3, 2023. https://www.smcsustainability.org/wp-content/uploads/filebase/energy-water/groundwater/2-32.pdf.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows?

The project site does not contain, nor is it adjacent to, any waterway. Therefore, the proposed project would not alter the course of a stream or river. Construction on the site will comply with the City's stormwater regulations (Chapters 14.04 and 15.62 of the City's Municipal Code) to ensure construction activities on the site do not result in increased soil erosion and siltation, exceed capacity of the drainage system, or add substantial sources of polluted runoff. Consistent with the City's requirements, the project would not increase site runoff from a 10-year storm for a duration of two hours of rainfall and will retain any increased flow due to the reduction in pervious surfaces. **(Less than Significant Impact)**

d) Would the project risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones?

As described in Section 4.10.1.2 Existing Conditions, the project site is not located within a 100-year floodplain nor is it subject to tsunamis or seiches. **(No Impact)**

e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

As previously described, the project site is located within the Visitacion Valley Groundwater Basin. The Visitacion Valley Groundwater Basin is not required by the Department of Water Resources to have a sustainable groundwater management plan. The project site is not subject to a sustainable groundwater management plan and includes all required measures to treat stormwater runoff from the site. The project, therefore, would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. **(Less than Significant Impact)**

4.11 Land Use and Planning

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

Local

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

In 1967, the State legislature adopted legislation requiring the establishment of airport land use commissions in counties with one or more airports serving the general public. Amendments adopted by the legislature in 1970 required each commission to develop comprehensive ALUCPs. The purpose of the ALUCPs is to provide for the orderly growth of airports and the surrounding areas to minimize the public's exposure to excessive noise and safety hazards.

The project site is not located within the AIA of SFO. Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). Additionally, properties located within the 70 dB CNEL aircraft noise contour for SFO warrant land use controls to promote noise compatibility. The project site is not located within SFO's 70 dB CNEL aircraft noise contour.

The ALUCP also includes airspace protection/height limitation criteria based on Federal Avigation Regulations. Federal Aviation Regulations, Part 77, "Objects Affecting Navigable Airspace" (referred to as FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the FAA be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above ground. For the project site, any proposed structure of a height greater than approximately 200 feet above mean ground level is required under FAR Part 77 to be submitted to the FAA for review.

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy LU-18	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.
Task LU-18.1	Ensure that potentially significant environmental impacts associated with development proposals are properly mitigated through conditions of approval, mitigation measures, project design, or project denial. In cases where the impacts may not be completely preventable but will not significantly disrupt the community, the City may recognize that the benefits of a project may outweigh the environmental consequences. In no case shall the City approve a project that endangers the health, safety, or welfare of the public.
Task CE-20.7	As a part of all new development, require, where appropriate, the provision of pedestrian-oriented signs, pedestrian-scale lighting, benches, and other street furniture so as to make non-motorized forms of travel comfortable and attractive alternatives to the automobile. Where necessary in new development, the City may require additional sidewalk and/or right-of-way width to accommodate these amenities.
Policy RME-20	Recognize the physical differences between different parts of the City and regulate land uses within these areas accordingly.
Task RME-20.4	Incorporate design features in new development that reflects the character of the neighborhood, to ensure that new construction is compatible with existing development.

Daly City Zoning Ordinance

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

4.11.1.2 *Existing Conditions*

The project site has a General Plan land use designation of Commercial Retail and Office (C-RO) and is zoned Light Commercial (C1). The C-RO land use designation is intended for retail and office uses both regional and citywide in scope. The project site is bordered by the Bay Club South San Francisco building and Cow Palace parking lot to the north, the Cow Palace to the east, open space to the south, and Carter Street and residential condos to the west. The transmission line alignments run through residential neighborhoods primarily consisting of single-family homes. The PG&E Martin Substation has a General Plan land use designation of Public Facility (PF) and is zoned Industrial (M). It is bordered by Geneva Avenue and single-family homes to the north, Bayshore Boulevard and industrial uses to the east, apartments and single-family homes to the south, and Schwerin Street, single-family homes, and Bayshore Elementary School to the west.

4.11.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Physically divide an established community?	☐	☐	☒	☐
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

a) Would the project physically divide an established community?

Examples of projects that have the potential to physically divide an established community include new freeways and highways, major arterial streets, and railroad lines. The project would construct a BESS and substation on a lot that is surrounded by existing commercial and residential development. Development of the project site would be consistent with the surrounding area. In addition, the proposed transmission line would be within the existing public ROW and would be underground within the residential areas. Modifications to the PG&E Martin Substation to accommodate the project would not result in any changes to land use in the area. Thus, the project would not result in the construction of any infrastructure that would divide the community. For these reasons, the proposed project would not physically divide an established community. **(Less than Significant Impact)**

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

General Plan and Zoning

The project site has a General Plan land use designation of Commercial Retail and Office (C-RO) and is zoned Light Commercial (C1). In order to develop the proposed project, the project proposes to amend the General Plan land use designation to Industrial (I) and rezone the site to Heavy Commercial (C2). The Industrial designation allows for light manufacturing, storage of merchandise produced on the site, administrative offices, and research facilities that are subordinate to the primary business and the C2 zoning allows public utilities equipment with a use permit. The transmission line and modifications to the PG&E Martin Substation would not result in any changes to land use or zoning. The project, therefore, would be consistent with the Industrial land use designation and C2 zoning and would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

SFO Airport Land Use Compatibility Plan

The project site is located approximately five miles north of the SFO and is not within the SFO CLUP Airport Influence Area B; therefore, the project is not subject to the SFO ALUCP. **(No Impact)**

4.12 Mineral Resources

4.12.1 Environmental Setting

4.12.1.1 *Regulatory Framework*

State

Surface Mining and Reclamation Act

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

4.12.1.2 *Existing Conditions*

The San Mateo County General Plan identifies 13 mineral resources found in San Mateo County. Seven of these minerals: chromite, clay, expansible shale, mercury, sand and gravel, sands (specialty), and stone (dimension), are not likely to be used primarily because of limited quantities, urbanization or economic infeasibility. Daly City does not contain any mineral resources within its limits.

4.12.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state?

Due to the fact that the project site is located on urban land in the City of Daly City, there are no significant mineral resources on or in the vicinity of the project site. **(No Impact)**

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Please see the discussion under checklist question a) above. **(No Impact)**

4.13 Noise

The following discussion is based in part on a Noise and Vibration Assessment prepared by Illingworth & Rodkin, Inc. in September 2024. This document is included as Appendix F to this Initial Study.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

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

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[61] These descriptors are used to measure a location's overall noise exposure, given that there are times when noise levels are higher (e.g., when a jet is taking off from an airport or when a leaf blower is operating) and times when noise levels are lower (e.g., during lulls in traffic flows on freeways or in the middle of the night). L_{max} is the maximum A-weighted noise level during a measurement period.

Vibration

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

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

4.13.1.2 *Regulatory Framework*

State

California Green Building Standards Code

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

Local

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy NE-1	Use the future noise contour map to identify existing and potential noise impact areas.
Policy NE-3	Maintain a CNEL level of not more than 70 dBA L_{eq} in residential areas.
Task NE-2.1	Use the Noise Control Guidelines to assess the suitability of a site for new development in combination with the noise contours to accurately identify areas that may need additional noise study and mitigation. Noise mitigations include additional insulation, double glazing of windows and increasing building setbacks from the noise source. Mitigations should also be creative and attractive whenever possible and appropriate. Creative noise mitigation measures can include incorporation of fountains using water to mask freeway noise and noise walls of an appropriate scale painted with decorative murals.
Task NE-3.1	Continue to enforce the environmental noise requirements of the State Building Code (Title 24).
Task NE-5.1	Additional noise studies should be conducted in “Conditionally Acceptable” noise environments to ensure adequate mitigation features are employed. Usually conventional construction with closed windows and fresh air supply systems will maintain a healthy noise environment.
Task NE-9.1	Depending upon the hours of operation, intensity of use, and the location of sensitive receptors in the area, the expansion or change of use could cause noise impacts. Acoustical studies should be performed, at the applicant's expense, during the discretionary and environmental review processes and conditions should be placed on the project accordingly

Policy/Task	Description
Task NE-11.3	Require all future development within the Airport Influence Area B boundary for San Francisco International Airport to conform to the relevant height/airspace protection, aircraft noise, and safety policies and land use compatibility criteria contained within the most recent adopted version of the ALUCP for the environs of San Francisco International Airport.

Daly City Municipal Code

Title 9 – Public Peace, Morals and Welfare

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

Title 17 – Zoning

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

4.13.1.3 *Existing Conditions*

The project site is bordered by the Bay Club South San Francisco building and Cow Palace parking lot to the north, the Cow Palace to the east, open space to the south, and Carter Street and residential condos to the west. The noise environment on the project site primarily results from vehicular traffic along Geneva Avenue and the surrounding roadway network and aircraft departures from SFO. A noise monitoring survey was conducted between April 19, 2023 and April 21, 2023. The noise monitoring survey included two long-term noise measurements (LT-1 and LT-2) and three short-term measurements (ST-1 through ST-3). Noise measurement locations are shown on Figure 4.13-1.

The closest sensitive receptors are the residences along Rio Verde Street, Ottilia Street, Schwerin Street, and Oriente Street where the future transmission line would be placed underground, and existing residences located approximately 700 feet to the west and 800 feet to the southwest, as measured from the center of the BESS and substation site.

Long-term measurement LT-1 was made along Geneva Avenue, approximately 65 feet north of the centerline. Hourly average noise levels at LT-1 typically ranged from 65 to 72 dBA L_{eq} during daytime hours (between 7:00 a.m. and 10:00 p.m.) and from 59 to 68 dBA L_{eq} during nighttime hours (between 10:00 p.m. and 7:00 a.m.). The CNEL for the 24-hour period on Thursday April 20, 2023, was 72 dBA CNEL.

Long-term measurement LT-2 was made along Carter Street, approximately 25 feet east of the centerline. Hourly average noise levels at LT-2 typically ranged from 64 to 70 dBA L_{eq} during daytime and from 54 to 66 dBA L_{eq} during nighttime. The CNEL for the 24-hour period on Thursday April 20, 2023, was 70 dBA CNEL.

The results of the three short-term noise measurements and their locations are summarized in Table 4.13-1, below.

Table 4.13-1: Summary of Short-Term Measurements (dBA)

Noise Measurement Location	L_{max}	$L_{(1)}$	$L_{(10)}$	$L_{(50)}$	$L_{(90)}$	$L_{eq(10)}$
ST-1: 90 feet from Carter Street Centerline	75	67	61	51	44	57
ST-2: 25 feet from Martin Trail Centerline	65	61	51	46	43	49
ST-3: 40 feet from Martin Street Centerline	65	62	57	48	44	53

The project site is not within the 65 CNEL noise contour for SFO.

NOISE MONITORING LOCATIONS | FIGURE 4.13-1

4.13.2 Impact Discussion

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

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

- A significant noise impact would be identified if the project would generate a substantial temporary or permanent noise level increase over ambient noise levels at existing noise-sensitive receptors surrounding the project site and that would exceed applicable noise standards presented in the General Plan or Municipal Code at existing noise-sensitive receptors surrounding the project site.
    - A potentially significant impact would occur if the project generated noise levels would result in a substantial temporary or periodic increase in ambient noise levels above current levels.
    - A temporary construction noise impact would be considered significant if project construction activities produced noise levels exceeding 80 dBA L_{eq} at residential land uses, 85 dBA L_{eq} at commercial land uses, and 90 dBA L_{eq} at industrial land uses surrounding the site.[62]
    - A significant permanent noise level increase would occur if project-generated traffic generated by the project or project improvements/operations would substantially increase noise levels at sensitive receivers in the vicinity. A substantial increase would occur if: a) the noise level increase is five dBA CNEL or greater, with a future noise level of less than the "normally acceptable" standard, or b) the noise level

[62] Federal Transit Administration. *Transit Noise and Vibration Impact Assessment Manual*. 2018.

increase is three dBA CNEL or greater, with a future noise level equal to or greater than the "normally acceptable" standard.

- A significant noise impact would be identified if the project would expose persons to or generate noise levels that would exceed applicable noise standards presented in the General Plan or Municipal Code.

- A significant impact would be identified if the construction of the project would generate excessive vibration levels surrounding receptors. Ground-borne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in cosmetic damage to normal buildings.
- A significant noise impact would be identified if the project would expose people residing or working in the project area to excessive aircraft noise levels.

a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise

Construction Work Hours

Construction activities for the proposed project would include: 1) BESS and substation construction at the project site; 2) transmission line construction from the proposed substation to the Martin Substation. Construction is expected to occur during weekdays between 8:00 a.m. to 5:00 p.m., with ROW work restricted to the hours of 9:00 am to 3:00 pm Monday through Friday. Construction would last approximately 20 months. The following condition of approval would be required to ensure the project complies with the City's standard construction hours unless otherwise allowed.

Condition of Approval:

- **Construction Hours.** The City's allowed construction hours are Monday through Friday between the hours of 8:00 am to 5:00 pm. Construction is prohibited on weekends and holidays[63] unless approved by the City Council and the City Manager.
- **Noise.** During the permitted construction hours, the Contractor shall ensure noise generated by construction equipment shall not exceed 85 dBA when measured at a distance of 75 feet from the construction site boundary. Additionally, no deliveries of materials or equipment are permitted outside these hours. The Contractor is permitted to stage and prepare the worksite up to one hour before the permitted hours of construction provided that no construction equipment is in use. The use of any construction equipment outside the permitted construction hours is strictly prohibited.
- **Posted Sign**. A project sign with the construction hours shall be posted five feet above ground level and shall be visible to the street at all entrances to the construction site.

[63] The City observes the following holidays: New Year's Day, Martin Luther King, Jr, President's Day, Memorial Day, Juneteenth, Independence Day, Labor Day, Veteran's Day, Thanksgiving, Christmas, and New Year's Eve.

- **Special Requests**. If the General Contractor wishes to work after hours (i.e., outside of 8:00 am to 5:00 pm on weekdays and/or on weekends or City Holidays) on a regular basis, this shall be approved in advance by the City Council and the City Manager. For special requests on a limited basis, the Building Official can approve alternate construction hours for projects not within or impacting the ROW. All special circumstances construction hour requests must be received no later than 10 business days before the special circumstances construction. A copy of the approval must be kept on-site and made available to any member of the public, police, and City staff.

Construction Noise Analysis

Table 4.13-2 shows the construction noise levels to the nearest surrounding receptors during the construction of the BESS and substation.

Table 4.13-2: BESS and Substation Construction Noise Levels

Phase of Construction	Calculated Hourly Average L_{eq}, dBA			
	North Tennis & Pickleball (310 feet)[1]	West Residences (610 feet)[1]	East Cow Palace (540 feet)[1]	South Residences (695 feet)[1]
BESS Site Preparation	72	66	67	65
Collector Substation Site Preparation	69	63	64	62
BESS Grading	73	67	68	66
Collector Substation Grading	70	64	65	63
Battery/Container Installation/Construction	74	68	69	67
Collector Substation Installation/Construction	74	68	69	67

Notes: [1] Distances shown are measured from the center of the project site to the receiving property lines.

As shown in Table 4.13-2, construction of the BESS and substation would result in noise levels ranging from 62 to 68 dBA L_{eq} at existing residential uses and 64 to 74 dBA L_{eq} at existing commercial and light industrial uses. These noise levels would not exceed the exterior noise threshold of 80 dBA L_{eq} at existing residential land uses, the 85 dBA L_{eq} threshold at commercial uses, or the 90 dBA L_{eq} threshold at light industrial uses.

Existing residential and commercial receptors would be exposed to construction noise levels of 68 to 90 dBA L_{eq} during installation of the underground transmission line along Alignment 1, 71 to 90 dBA L_{eq} during installation of the underground transmission line along Alignments 2 and 3, and 61 to 86 dBA L_{eq} during installation of the transmission line within the Martin Substation. This would exceed the 80 dBA L_{eq} threshold at residential property lines.

Impact NOI-1: Construction of the transmission line would exceed the construction noise threshold of 80 dBA L_{eq} threshold at residential property lines. **(Significant Impact)**

Mitigation Measures: The project shall implement the following mitigation measures to reduce construction noise to a less than significant level:

MM NOI-1.1: The applicant shall implement the following best management practices:

- Limit construction hours, including deliveries of materials and equipment, to between 8:00 a.m. and 5:00 p.m., Monday through Friday, and prohibited on weekends and holidays in accordance with the City's General Plan, unless permission is granted by the City of Daly City's Planning Manager or the Planning Manager's designee to conduct construction outside the allowable hours with a development permit or other planning approval.
- Construct temporary noise barriers, where feasible, to screen stationary noise-generating equipment. Temporary noise barrier fences would provide a five dBA noise reduction if the noise barrier interrupts the line-of-sight between the noise source and receptor and if the barrier is constructed in a manner that eliminates any cracks or gaps.
- At a minimum, the construction contractor shall implement the following control measures: improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds.
- Equipment used for project construction shall be hydraulically or electrically powered impact tools (e.g., jack hammers) wherever possible to avoid noise associated with compressed air exhaust from pneumatically powered tools. Where use of pneumatically powered tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used. A muffler could lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves shall be used where feasible; this could achieve a reduction of five dBA. Quieter procedures shall be used (such as drilling rather than impact equipment) wherever feasible.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- The construction contractor shall not allow any construction equipment, trucks, or vehicles to idle.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors as feasible. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used to reduce noise

levels at the adjacent sensitive receptors. Any enclosure openings or venting shall face away from sensitive receptors.

- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers' radios to a point where they are not audible at existing residences bordering the project site.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Locate material stockpiles, as well as maintenance/equipment staging and parking areas, as far as feasible from residential receptors.
- Route construction-related traffic along major roadways and as far as feasible from sensitive receptors.
- The contractor shall prepare a detailed construction schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- If complaints are received or excessive noise levels cannot be reduced using the measures above, erect a temporary noise control blanket barrier along surrounding building facades that face the construction sites.
- Designate a "disturbance coordinator" who shall be responsible for responding to any complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Implementation of MM NOI-1.1 would reduce construction noise levels emanating from the project site and along the transmission line route, limit construction hours, and minimize disruption and annoyance. For residences located along Rio Verde Street, Ottilia Street, Carter Street, Martin Street, Schwerin Street, or Oriente Street, however, noise levels may still exceed 80 dBA L_{eq} even with implementation of MM NOI-1.1. Assuming an installation rate of 100 feet per day, any single residence along these streets would be exposed to noise levels exceeding 80 dBA L_{eq} for no more than five days. Due to the limited number of days that construction noise would exceed the 80 dBA L_{eq} threshold at any single receptor and implementation of mitigation measure MM NOI-1.1, the project would result in a less than significant construction noise impact. **(Less than Significant Impact with Mitigation Incorporated)**

Operational Noise

A significant impact would occur if the permanent noise level increase due to project-generated operations was three dBA CNEL or greater for future ambient noise levels exceeding 60 dBA CNEL or was five dBA CNEL or greater for future ambient noise levels at or below 60 dBA CNEL. With existing ambient noise levels exceeding 60 dBA CNEL, it is assumed future noise levels would remain over 60 dBA CNEL. Therefore, a significant impact would occur if project-generated operations increased levels by three dBA CNEL or more.

Project Traffic

The proposed project would be monitored remotely, with maintenance staff visiting the facility periodically throughout the year. No permanent full-time or part-time employees would occupy the building. At most, only one or two vehicle roundtrips to and from the project site would be generated per week. An increase of three dBA DNL is considered substantial in noise sensitive areas along roadways. A three dBA DNL noise increase would occur if the project doubled existing traffic volumes along a roadway. One to two trips would not result in a measurable noise level increase and would not double the existing traffic volumes along the surrounding roadways; therefore, the proposed project would not result in a permanent noise level increase due to project-generated traffic. **(Less than Significant Impact)**

Mechanical Equipment

The main noise sources generated by the proposed project would be from the power inverters within the BESS and the power transformers at the substation. Noise levels information for the specific equipment selected for the project is not available at this time; however, power inverters for the batteries typically generate noise levels of 80 dBA at a distance of one meter. The project proposes a minimum of 150 battery units, which would result in a noise level of approximately 93 dBA at one meter. Typical noise levels for substation power transformers are approximately 72 dBA at a distance of six feet during full load.

Table 4.13-3 summarizes the estimated noise levels generated by the project at nearby receptors. Existing ambient noise levels in the project area are 70 to 72 dBA CNEL. As shown in Table 4.13-3, operational noise would not exceed existing ambient noise levels and would not result in a significant operational noise impact. **(Less than Significant Impact)**

Table 4.13-3: Estimated Noise Levels of Proposed BESS Facility and Substation

Receptor	Inverters		Main Power Transformer		Combined CNEL, dBA
	Distance from Center, feet	L_{eq}, dBA	Distance from Center, feet	L_{eq}, dBA	
North Tennis & Pickleball Club	230	56[1]	540	33	62
West Residences	640	47[1]	855	29	53

Receptor	Inverters		Main Power Transformer		Combined CNEL, dBA
	Distance from Center, feet	L_{eq}, dBA	Distance from Center, feet	L_{eq}, dBA	
East Cow Palace	380	51[1]	180	43	58
South Residences, Fire Station & Community Center	635	47[1]	770	30	54

Notes: [1] Conservative 10 dBA attenuation assumed for all enclosures

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

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

The City does not define quantitative vibration thresholds; therefore, a conservative vibration limit of 0.3 in/sec PPV has been used, consistent with California Department of Transportation guidelines. Table 4.13-4 below shows the typical vibration levels that could be expected from construction equipment at 25 feet and the distance required to meet 0.3 in/sec PPV.

Table 4.13-4: Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 ft. (in/sec)	Minimum Distance to Meet 0.3 in/sec PPV (feet)
Clam shovel drop		0.202	18
Hydromill (slurry wall)	in soil	0.008	1
	in rock	0.017	2
Vibratory Roller		0.210	19
Hoe Ram		0.089	9
Large bulldozer		0.089	9
Caisson drilling		0.089	9
Loaded trucks		0.076	8

Equipment	PPV at 25 ft. (in/sec)	Minimum Distance to Meet 0.3 in/sec PPV (feet)
Jackhammer	0.035	4
Small bulldozer	0.003	<1

Source: Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, September 2018, as modified by Illingworth & Rodkin, Inc., June 2023.

The nearest structures that would be affected by project construction are existing residences along Ottilia Street and the Cow Palace, located approximately 25 feet from the underground transmission line work along Alignment 1. The vibration analysis determined neither cosmetic, minor, or major damage would occur at buildings located 20 feet or more from the project construction. All structures along the three potential alignments would be equal to or farther away than the residences along Ottilia Street. As shown in Table 4.13-4, vibration levels would not exceed 0.3 in/sec PPV threshold at distances of 25 feet; therefore, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. **(Less than Significant Impact)**

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project site is located approximately five miles north of SFO and is not within the SFO CLUP Airport Influence Area B. The project is not located within the 65 CNEL noise contour for SFO; therefore, the project would not expose workers to excessive aircraft noise. **(No Impact)**

4.14 Population and Housing

4.14.1 Environmental Setting

4.14.1.1 *Regulatory Framework*

State

Housing Element Law

State requirements mandating that housing be included as an element of each jurisdiction's general plan is known as housing-element law. The Regional Housing Need Allocation (RHNA) is the state-mandated process to identify the total number of housing units (by affordability level) that each jurisdiction must accommodate in its housing element. California housing-element law requires cities to: 1) zone adequate lands to accommodate its RHNA; 2) produce an inventory of sites that can accommodate its share of the RHNA; 3) identify governmental and non-governmental constraints to residential development; 4) develop strategies and a work plan to mitigate or eliminate those constraints; and 5) adopt a housing element and update it on a regular basis.[64] The City of Daly City Housing Element and related land use policies were last updated in 2015.

Regional and Local

Plan Bay Area 2050

Plan Bay Area 2050 is a long-range plan for the nine-county San Francisco Bay Area that provides strategies that increase the availability of affordable housing, support a more equitable and efficient economy, improve the transportation network, and enhance the region's environmental resilience. Plan Bay Area 2050 promotes the development of a variety of housing types and densities within identified Priority Development Areas (PDAs). PDAs are areas generally near existing job centers or frequent transit that are locally identified for housing and job growth.[65]

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

[64] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements." Accessed December 8, 2020. http://hcd.ca.gov/community-development/housing-element/index.shtml.

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

4.14.1.2 *Existing Conditions*

According to a May 2022 estimate by the California Department of Finance, Daly City has a total population of 102,875persons.[66] There are estimated to be 33,934 housing units in the City, with the largest categories of housing consisting of 15,907 single-detached units and 8,354 structures containing five or greater units.[67] There is no housing located on the BESS site or within the three potential transmission line alignments.

4.14.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The project site is designated in the general plan and zoned for commercial uses and is located in an urban area. The project includes construction of a BESS, substation, and transmission line. The BESS would be monitored remotely with maintenance staff visiting the facility periodically throughout the year. No permanent employees would occupy the site. For these reasons, the project would not induce unplanned population growth. **(No Impact)**

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site is currently vacant and contains no housing; therefore, the project would not displace existing people or housing. **(No Impact)**

[66] California Department of Finance. *E-5 Population and Housing Estimates for Cities, Counties, and the State 2011-2022 with 2020 Census Benchmark.* Accessed on May 3, 2023. http://dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.
[67] Ibid.

4.15 Public Services

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Government Code Section 66477

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

Government Code Section 65995 through 65998

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

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

Local

City of Daly City Capital Plan

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

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy SE-3.1	Support and maintain the City's Insurance Service Office rating of a Class 2, which establishes the fire insurance rates for the City.
Policy SE-3.2	Provide for a seven-minute total reflex time for arrival of a first due company to 90 percent of all emergency incidents.
Policy SE-3.3	Provide for an eleven-minute total reflex time for arrival of multiple fire companies to 90 percent of all structure fires.
Policy SE-3.4	Maintain fire company reliability, whereby 90 percent of all incidents are handled by the district fire company.

4.15.1.2 *Existing Conditions*

Fire Protection

The City of Daly City is served by the North County Fire Authority (NCFA), a Joint Powers Authority which currently serves the communities of Brisbane, Daly City, and Pacifica.[68] The NCFA responds to all fires, hazardous materials spills, and medical emergencies in the City. The closest station to the project site is Station No. 93, located at 464 Martin Street, approximately 0.3-mile southeast of the project site.

Police Protection

Police protection services for the project site are provided by the Daly City Police Department (DCPD), which is headquartered at 333 90th Street, approximately three miles southwest of the project site. The Daly City Police Department employs 111 sworn personnel.[69]

Schools

The project site is located within the Bayshore Elementary School District and the Jefferson Union High School District. The nearest elementary/middle school is Bayshore Elementary, approximately 0.4-mile east of the project site, located at 155 Oriente Street. The nearest high school is Jefferson High School, approximately 2.5 miles west of the project site, located at 6996 Mission Street.

[68] City of Daly City. "Fire Department". Accessed May 3, 2023. https://www.dalycity.org/461/Fire-Department.
[69] City of Daly City. "Police Officer". Accessed May 3, 2023. https://www.dalycity.org/389/Police-Officer.

Parks

According to the General Plan, 13 municipal parks and 12 tot lots are located in Daly City, resulting in a total of 82.95 acres of developed public recreational open space. The nearest park is Bayshore Heights Park, approximately 0.3-mile southeast of the project site, located at 450 Martin Street.

Libraries, Community Centers, and Other Facilities

The Daly City Library provides library services to the residents of Daly City. The nearest library is the Bayshore Branch, approximately 0.3-mile southeast of the project site, located at 450 Martin Street.

There are two community centers, one art center, and one public clubhouse in Daly City. The nearest of these centers is the Bayshore Community Center, approximately 0.3-mile southeast of the project site, located at 450 Martin Street.

4.15.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a) Fire Protection?	☐	☐	☒	☐
b) Police Protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other Public Facilities?	☐	☐	☐	☒

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services?

As part of the permitting process, the North County Fire Authority would review project plans before permits are issued to ensure compliance with all applicable fire and building code standards

and to ensure that adequate fire and life safety measures are incorporated into the project in compliance with all applicable state and city fire safety regulations. The project would use battery systems that are National Fire Protection Agency (NFPA) 855 Code compliant and would include built-in failsafe and cooling systems designed to prevent thermal runaway and the spread of fire. The fire protection system would automatically shut down any affected battery storage components and prevent the spread of the fire to the other battery storage modules. The proposed project would result in an incremental increase in the demand for fire protection services. The service area of the NCFA includes the cities of Daly City, Brisbane, and Pacifica. The nearest fire station to the project site is located approximately 0.3-mile southeast of the project site. As a result, the proposed project's incremental increase in fire service demand would be insignificant compared to the total demand within the NCFA service area and the NCFA would maintain adequate response times to the project site. For this reason, the proposed project would not individually require new or altered fire protection facilities, and as a result, would have a less than significant impact on the environment. **(Less than Significant Impact)**

b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services?

The proposed project would result in an incremental increase in the demand for police protection services within the DCPD service area. However, the project site is already served by DCPD and the proposed project would be an unmanned facility; therefore, the increase in police service demand generated by the project would be minimal and would be served by existing police facilities. As a result, the proposed project would have a less than significant impact on the provision of police protection services and would not require the construction or alteration of existing facilities. **(Less than Significant Impact)**

c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools?

The project proposes a BESS and substation and would not generate students; therefore, the proposed project will not impact schools. **(No Impact)**

d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?

The proposed project would not generate substantial population growth in the project area or result in the use of public facilities in the City by new residents. No permanent employees would occupy the proposed BESS or substation and it would, therefore, not generate park users. For these reasons, the proposed project would not impact park facilities. **(No Impact)**

e) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities?

The project proposes a BESS and substation with no permanent employees. The proposed project does not include residential development and, therefore, would not increase demand upon public facilities, such as libraries and community centers, in the project area. Thus, there would be no impact. **(No Impact)**

4.16 Recreation

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Government Code Section 66477

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

Local

Daly City General Plan

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

General Plan Policies

Policy/Task	Description
Policy RME-11	Areas designated as open space recreation-public shall continue to be maintained and upgraded by the Public Works Department.
Policy RME-12	Encourage a diverse, equitable, and integrated system of park facilities throughout Daly City that are accessible to all age, social, and economic groups and all geographic areas of the City.
Policy RME-13	Require the dedication of parkland or the payment of an in-lieu fee in accordance with Subdivision Map Act.
Policy RME-14	Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas.

Parkland Dedication

The City of Daly City Municipal Code currently has parkland dedication standards within Title 16 – Subdivisions. Section 16.30 of the Municipal Code has a standard for parks of three acres per 1,000 people. This requirement may be satisfied through either on-site park construction, land dedication, or an in-lieu fee equal to the land value plus ten percent towards costs of off-site improvements.[70]

[70] City of Daly City. *Municipal Code 16.30.050.* Accessed December 8, 2020.

4.16.1.2 *Existing Conditions*

Public recreational open space within Daly City consists of City parks and facilities, and State and County Parks. Daly City has 31 city parks and open spaces as well as access to nearby regional and state parks and open spaces such as San Bruno Mountain.[71] According to the Parks and Open Space Master Plan, the City contains 65.4 acres of developed parkland and 68.6 acres of open space. In addition to City parks, San Bruno Mountain State and County Park provides 2,063 acres of public park space comprising state and San Mateo County managed land. The nearest park is Bayshore Heights Park, approximately 0.3-mile southeast of the project site, located at 450 Martin Street.

4.16.2 Impact Discussion

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a)	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility will occur or be accelerated?	☐	☐	☐	☒
b)	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

The proposed project would not generate substantial population growth in the project area or result in the use of public facilities in the City by new residents. No permanent employees would occupy the proposed BESS or substation and it would, therefore, not generate park users. For these reasons, the proposed project would not impact park facilities. **(No Impact)**

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Please see discussion under checklist question a) above. **(No Impact)**

[71] City of Daly City. *Daly City Parks & Open Space Master Plan*. March 2020.

4.17 Transportation

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Regional Transportation Plan

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

Senate Bill 743

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

SB 743 did not authorize OPR to set specific VMT impact thresholds, but it did direct OPR to develop guidelines for jurisdictions to utilize. CEQA Guidelines Section 15064.3(b)(1) describes factors that might indicate whether a development project's VMT may be significant. Notably, projects located within 0.50 mile of transit should be considered to have a less than significant transportation impact based on OPR guidance.

Regional and Local

San Mateo County Congestion Management Program

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

Daly City General Plan

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

General Plan Policies and Tasks

Policy/Task	Description
Policy CE-6	Support regional efforts to improve traffic while accommodating future development.
Policy CE-7	Ensure an effective transit system by supporting the work of other agencies in their efforts to expand public transit in and around Daly City.
Task CE-13.3	Consider impacts to the existing and future bicycle and pedestrian network when completing environmental review for private development projects, and require mitigation measures where necessary and reasonable to ensure that these systems are not impacted.

4.17.1.2 *Existing Conditions*

Roadway Network

Regional access to the project site is provided by U.S. 101 and Interstate 280 (I-280). Local access to the project site is provided via Carter Street, Martin Street, Geneva Avenue, and Bayshore Boulevard. These roadways are described below:

U.S. 101 is an eight-lane, north-south freeway that runs along the western side of San Francisco Bay. The Bayshore Boulevard off-ramp provides access to the project site from U.S. 101 North. The Third Street/Cow Palace off-ramp provides access to the project site from U.S. 101 South.

I-280 is an eight- to 12-lane, north-south freeway that runs through the middle of Daly City. The Geneva Avenue/Ocean Avenue off-ramp provides access to the project site from I-280 in both directions.

Geneva Avenue is a four-lane, east-west arterial street that provides access to Carter Street and I-280.

Bayshore Boulevard is a four-lane, north-south arterial street that provides access to Geneva Avenue and U.S. 101.

Carter Street is a two-lane, north-south neighborhood street that runs along the west side of the project site. It provides direct access to the project site.

Martin Street is a two-lane, east-west neighborhood street that runs along the south side of the project site and along the proposed transmission line.

Bicycle and Pedestrian Facilities

There are no sidewalks providing direct access to the project site; however, there are sidewalks along the west side of Carter Street directly across from the project driveway. Sidewalks are also provided on the south side of Martin Street and both sides of Geneva Avenue. There are Class III designated bike lanes on Martin Street and Carter Street along the project frontage and Class II bike lanes along Geneva Avenue.[72]

Transit Services

SamTrans

SamTrans provides the principal bus service in San Mateo County. It operates local and school buses, as well as express routes to San Francisco. It is also a service provider for paratransit. All scheduled buses are equipped with front-loading racks that can hold up to two bicycles. In the project vicinity, bus stops exist along Geneva Avenue and Carter Street. The closest bus stop is located at the intersection of Carter Street and Saddleback Drive, approximately 300 feet south of the project driveway.

BART

The nearest BART station is the Balboa Park BART station, located approximately 1.5 miles northwest of the project site. From the Balboa Park BART station, riders can access Fremont, Pleasanton/Dublin, Richmond and Pittsburg as well as numerous points in between. Trains run on approximately 15-minute headways during commute hours. There are also a number of bus routes and shuttles operated by SamTrans that stop at the Balboa Park BART station.

4.17.1.3 *Methodology*

VMT Analysis

At the time of this report, the City of Daly City is undertaking a process of updating its significance thresholds to be consistent with SB 743, and the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b). The City has not released draft significance thresholds to determine project VMT impacts. In September 2021, C/CAG published the SB 743 Implementation Decisions document with guidelines for VMT analysis. In the absence of a City policy or draft numeric thresholds, this analysis uses C/CAG's guidelines.

[72] Class II bike lanes are on-road, separated (striped) bike lanes. Class III bike lanes, or bike routes (with sharrows), designate a preferred route for bicyclists on streets shared with motor traffic not served by dedicated bikeways to provide continuity to the bikeway network.

4.17.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

a) Would the project conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?

Roadways

The City of Daly City does not currently have an adopted VMT policy. Per SB 743, the City's LOS standards cannot be used in CEQA analysis for transportation impacts. The CMP requires traffic impact analyses when a project generates greater than a 100 average daily trips. The project would not generate more than 100 average daily trips as it would be monitored remotely and not have any permanent employees; therefore, a County CMP analysis is not required. The project's VMT impact is discussed in Impact TRN-2, below.

Bicycle and Pedestrian Facilities

The project would not generate a large volume of pedestrian or bicycle trips, as it would be monitored remotely and not have any permanent employees and, therefore, would not exceed the capacity of existing facilities. The project would also not conflict with the City's Bicycle and Pedestrian Master Plan.

Transit

The project could generate new transit users but is not anticipated to exceed the capacity of bus service near the project site. The project would not conflict with any SamTrans policies related to the transit system. **(Less than Significant Impact)**

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

The VMT thresholds used for this project are based on the Governor's Office of Planning and Research (OPR)'s recommendations. Per OPR guidelines, projects that generate or attract fewer than 110 trips per day may be assumed to cause a less than significant transportation impact. The project would be monitored remotely with no permanent employees on-site. Only periodic maintenance trips would be needed throughout the year; thus, the project would generate less than 110 trips per day. Given that the project would generate less than 110 trips, the project would have a less than significant VMT impact. **(Less than Significant Impact)**

c) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Vehicle access to the project site would be provided via a 26-foot-wide driveway along Carter Street. The driveway would lead to an eight-foot-tall security gate providing access to the BESS and substation, as well as a public access road that runs along the western side of the site. Internal roadways (26 feet wide), inside the security gate, would surround the BESS and provide access to the substation. No pedestrian facilities are proposed within the project site. Landscaping would be planted in a manner that would ensure no conflicts with a driver's ability to locate a gap in traffic and see oncoming bicycles and vehicles. Trees planted at the project driveway on Carter Street would be set back from the roadway and located to provide adequate sight lines for vehicles. No other objects exist or are proposed along the project frontages that would reduce vehicle sight distance. For these reasons, the proposed project would not create an operational safety hazard. **(Less than Significant Impact)**

d) Would the project result in inadequate emergency access?

The project driveway would lead to internal roadways that loop around the BESS and provide direct access to the substation, ensuring adequate circulation for emergency vehicles. In addition, the project would be reviewed by City staff and NCFA to ensure adequate emergency access. For these reasons, the project would not result in inadequate emergency access. **(Less than Significant Impact)**

4.18 Tribal Cultural Resources

The following discussion is based in part upon an archaeological sensitivity analysis prepared by Archaeological/Historical Consultants in May 2024. A copy of the archaeological sensitivity analysis, which is a confidential report, is on file at the City of Daly City Planning Division and is available upon request with appropriate credentials.

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

Senate Bill 18

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

Assembly Bill 52

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

Under AB 52, TCRs are defined as follows:

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

4.18.1.2 *Existing Conditions*

As discussed in Section 4.5 Cultural Resources, there are no known archaeological sites on the project site, PG&E Martin Substation, or along the proposed transmission line route within 0.25-mile of the site. The NAHC was contacted on February 18, 2023, to conduct a Sacred Lands File search. The NAHC responded that no tribal cultural resources were identified during the SLF review. The NAHC provided a contact list of eight Native American individuals/organizations who may know of cultural resources in this area or have specific concerns about the project. Per SB 18, the City of Daly City requested a tribal consultation list from the NAHC of tribes affiliated with the project area. The City received a list from the NAHC on December 27, 2022, and sent an email and physical letter to each of the identified individuals/organizations on January 5, 2023, inquiring whether they had any concerns about the proposed project. No responses were received within the 90-day response period and the City concluded consultation on April 4, 2023.

4.18.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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)?	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?

As discussed above, there are no known TCRs on or adjacent to the project site. As discussed in Section 4.5 Cultural Resources, the project site has a low potential to encounter subsurface tribal cultural resources; however, construction-related ground disturbing activities could result in a significant impact to such resources if encountered. In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-1.1, MM CUL-1.2, and MM CUL-2.1 would be implemented. Implementation of these mitigation measures would ensure that any subsurface tribal cultural resources encountered during construction are appropriately treated and protected. **(Less than Significant Impact with Mitigation Incorporated)**

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

See response to Impact TCR-1 above. **(Less than Significant Impact with Mitigation Incorporated)**

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

4.19.1.1 *Regulatory Framework*

State

State Water Code

Pursuant to the State Water Code, water suppliers providing water for municipal purposes to more than 3,000 customers or supplying more than 3,000 acre-feet (approximately 980 million gallons) of water annually must prepare and adopt an urban water management plan (UWMP) and update it every five years. As part of a UWMP, water agencies are required to evaluate and describe their water resource supplies and projected needs over a 20-year planning horizon, water conservation, water service reliability, water recycling, opportunities for water transfers, and contingency plans for drought events. The City of Daly City adopted its most recent UWMP in June 2021.

Senate Bill 610

SB 610 amended state law, effective January 1, 2002, to improve the link between information on water supply availability and certain land use decisions made by cities and counties. SB 610 requires preparation of a WSA containing detailed information regarding water availability to be provided to the decision-makers prior to approval of specified large development projects that also require a General Plan Amendment. This WSA must be included in the administrative record that serves as the evidentiary basis for an approval action by the city or county on such projects. Under SB 610, WSAs must be furnished to local governments for inclusion in any environmental documentation for certain projects subject to CEQA. Pursuant to the California Water Code (Section 10912[a]), projects that require a WSA include a proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area. WSAs are also required for projects that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

Assembly Bill 939

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

Assembly Bill 341

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

Senate Bill 1383

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

California Green Building Standards Code

The California Green Building Standards Code (CALGreen) establishes mandatory green building standards for all buildings in California. The code is updated every three years and was most recently updated in 2022. The CALGreen code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and indoor environmental quality. These standards include mandatory measures, as well as more rigorous voluntary guidelines, to reduce water and wastewater use, provide recycling facilities, and ensure that construction projects recycle or salvage 65 percent of non-hazardous construction and demolition waste.

Local

City of Daly City General Plan

The General Plan includes policies and tasks for the purpose of avoiding or mitigating impacts resulting from planned development projects with the City. The following policies and tasks are specific to utilities and service systems and are applicable to the proposed project.

General Plan Policies and Tasks

Policy/Task	Description
Policy RME-1	Reduce average per capita demand by implementing cost effective water conservation programs that address all applicable methods of water conservation.
Policy RME-2	Require drought resistant landscaping and water conserving irrigation methods in new development, and encourage the replacement of existing water-intensive landscaping.
Task RME-2.1	Enforce the provisions of the Water Conservation in Landscaping Ordinance and conduct a public education effort to ensure that residents, businesses, and contractors are aware of the Ordinance provisions.

Policy/Task	Description
Policy RME-3	Continue to use recycled wastewater for irrigating and explore opportunities to expand capacity to accommodate its use in development projects, landscaped medians, golf courses, cemeteries, parks, and school playgrounds.
Task RME-4.1	Develop a water supply questionnaire for inclusion with any application involving 50 or more residential units, 50,000 square feet or commercial or industrial development, or other pre-defined development intensity that constitutes a significance threshold under CEQA.
Policy RME-8	Through the development of a Stormwater Management Program, ensure that all new development complies with applicable municipal stormwater Municipal Regional Stormwater NPDES Permit by incorporating controls that reduce water quality impacts over the life of the project in way that is both technically and economically feasible, and reduces pollutants in stormwater discharges to the maximum extent practicable.
Task RME-8.2	Evaluate acceptable development standards for stormwater treatment mechanisms and publish such standards for distribution to developers. Such standards shall be based on a thorough evaluation of modern stormwater control mechanisms and shall, to the extent feasible, consider soil conditions in various parts of Daly City.
Task RME-8.4	Assess projected stormwater impacts from new development in conformance with the San Mateo County Water Pollution Prevention Program, CEQA Guidelines and relative to state and federal standards.

Daly City 2020 Urban Water Management Plan

The Urban Water Management Plan (UWMP) is a long-range plan that assesses the city's water supply over a 25-year planning horizon (2045) to ensure adequate water supplies to meet existing and future demands for water. The UWMP presents forecasted supplies and demands, describes conservation programs, and includes a water shortage contingency analysis.

Daly City Municipal Code

Chapter 15.64, Recycling and Diversion of Construction and Demolition Debris, requires that all projects meet the minimum diversion percentage required under the latest locally adopted CALGreen standard for waste tonnage from construction, demolition, and alteration projects. This may be accomplished by delivering mixed debris to a recycling facility approved by the city, separating recyclables at the job site and delivering them to reuse and recycling facilities approved by the city, and/or reusing concrete or other waste materials at the jobsite.

Chapter 17.41, Water Conservation in Landscaping, establishes regulations to implement water conservation practices on existing and new landscapes. For projects containing more than 1,000 square feet of irrigated landscape, a landscape permit is required which requires irrigation design review. Further, this Chapter mandates that any owner of landscape of over one (1) acre in size shall comply with local agency programs that may be instituted relating to irrigation audits, surveys and water use analysis, and shall maintain landscape irrigation facilities to prevent water waste and runoff.

4.19.1.2 *Existing Conditions*

Water Service and Supply

Water service to the project site is provided by the Daly City Department of Water and Wastewater Resources (DWWR). The City relies on local groundwater pumping from five municipal wells, which extracts groundwater from the Westside Groundwater Basin, and water supply purchases from the San Francisco Public Utilities Commission (SFPUC).[73] The City also uses tertiary recycled water from the North San Mateo County Sanitation District wastewater treatment plant, to offset potable/ aquifer water demands. Currently recycled water is used to water five golf courses, two city parks, and road median strips. Recycled water is not a source of water proposed for the project site.

The project site is currently served by a 12-inch water main in Carter Street near the entrance driveway. The project site is currently vacant and does not use any water.

Sanitary Sewer/Wastewater Treatment

Sanitary sewer lines in the project area are inspected and maintained by the Bayshore Sanitary District. Wastewater produced within the District is pumped via the Carlyle Pump Station to the San Francisco Public Utility Commission's (SFPUC) Southeast Treatment Plant (STP), which is located approximately three miles northeast of the project site. The Bayshore Sanitary District has a current agreement with the STP through July 2025.[74]

The project site is vacant and does not generate any wastewater.

Storm Drainage

As discussed in Section 4.10 Hydrology and Water Quality, Sunnydale watershed which drains to the San Francisco Bay via Brisbane.

The project site is gently sloping from west to east and situated at an elevation of approximately 140 feet msl. Surface runoff on-site is collected in drains or inlets and conveyed via below grade pipes to three storm drain outfalls located along the western property line. The outfall discharges to an existing 10-inch storm drain line that connects to the larger storm drain system within the Cow Palace property. This system flows towards Bayshore Boulevard and discharges into a 60-inch storm drain line through Brisbane and ultimately into San Francisco Bay, approximately 1.6 miles east of the project site.

The project site is approximately 92 percent impervious surfaces and eight percent pervious surfaces.

[73] Brown and Caldwell. *Daly City 2020 Urban Water Management Plan*. June 2021. Page 6-8.
[74] Bayshore Sanitary District. "About Bayshore Sanitary District". Accessed June 24, 2024. http://www.bayshoresanitary.com/about-bayshore-sanitary-district/.

Solid Waste

Solid waste is collected from Daly City homes and businesses and is processed by Republic Services of Daly City and transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. In 2001, Browning-Ferris Industries, owner of the Ox Mountain Landfill, obtained a revised solid waste facility permit for Ox Mountain to increase the permitted disposal acreage from 173 acres to 191 acres. According to CalRecycle, the landfill has a remaining capacity of 22,180,000 cubic yards and an estimated closure date of 2034.[75]

Electric, Telecommunication, and Natural Gas Facilities

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. PG&E supplies natural gas services to the project area. Telecommunication services are also provided through underground infrastructure by various service providers.

4.19.2 Impact Discussion

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

[75] CalRecyle. SWIS Facility Detail. Cordina Los Trancos (Ox Mtn) (41-AA-0002). Accessed on August 9, 2023. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
e) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Water Facilities

The proposed project would be monitored remotely, with maintenance staff visiting the facility periodically throughout the year. The project would connect to the existing 12-inch water main in Carter Street near the project site driveway. Currently the project site uses no water and no bathroom facilities are proposed as part of the project. Water would only be used for fire suppression during emergencies and for landscaping. Thus, the project would not necessitate expansion of existing water facilities or construction of new water facilities and would have a less than significant impact. **(Less than Significant Impact)**

Wastewater Facilities

As discussed above, the project would be monitored remotely, with maintenance staff visiting the facility periodically throughout the year. No restrooms are proposed on-site; therefore, the project would not generate any wastewater and would not require the expansion of existing wastewater facilities or construction of new wastewater facilities. **(No Impact)**

Stormwater Drainage

As discussed in Section 4.10 Hydrology and Water Quality, the proposed project would result in a net increase of 10,000 square feet of impervious surface area compared to existing conditions; however, the project includes a dry detention pond designed to retain stormwater on-site during a 25-year storm event. Stormwater from the detention pond would then discharge to an existing 10-inch storm drain line along the eastern property line, connecting to the larger storm drain system within the Cow Palace property. Pervious surface area provided by the project would include landscaping and bioretention areas. Thus, the proposed project, in conformance with applicable regulations, would not result in significant impacts to the storm drain system. **(Less than Significant Impact)**

Electric Power, Natural Gas, and Telecommunication Utilities

The project site is currently served by electric power and telecommunication utilities and would not require the use of natural gas. The proposed redevelopment of the site would not require the expansion of natural gas and telecommunication utilities. The proposed project would develop additional electric power facilities on the site, including a BESS facility, substation and electric transmission line. The impacts from construction of the proposed facilities are described throughout this Initial Study. No additional electrical power lines or facilities, than those proposed by the project, would be required to serve the proposed development. **(Less than Significant Impact)**

b) Would the project have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

As discussed above, the project would be monitored remotely and maintenance staff would visit the facility periodically throughout the year. No restrooms are proposed as part of the project and water would only be used during fire emergencies and for landscaping. Thus, the project would have little impact on the City's water supplies and the impact would be less than significant. **(Less than Significant Impact)**

c) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

As discussed previously, the proposed project does not include any restroom facilities and would not generate any wastewater. Thus, the project would not result in a determination by the wastewater treatment provider that it does not have adequate capacity. **(No Impact)**

d) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

As discussed above, the proposed project would be monitored remotely and maintenance staff would visit the facility periodically throughout the year. Solid waste generated by the project would be negligible and any waste generated by the project would be sent to Ox Mountain Landfill, which has a remaining capacity of 22,180,000 cubic yards.[76] Thus, the project would not generate solid waste in excess of local standards or capacity and would not impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

[76] CalRecyle. SWIS Facility Detail. Cordina Los Trancos (Ox Mtn) (41-AA-0002). Accessed on August 9, 2023. https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223.

e) Would the project be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste?

The project would comply with solid waste management and reductions statutes and regulations including CALGreen requirements and Chapter 15.64 of the Daly City Municipal Code for recycling and salvaging of construction and demolition waste. **(Less than Significant Impact)**

4.20 Wildfire

4.20.1 Environmental Setting

4.20.1.1 *Existing Conditions*

The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors. Referred to as Fire Hazard Severity Zones (FHSZ), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. The project site is not located in a FHSZ.[77] San Bruno Mountain is identified as a Moderate Fire Hazard Severity Zone in a State Responsibility Area (SRA).[78]

4.20.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

The project site is located in an urbanized area of Daly City and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones; therefore, the project would not result in wildfire impacts. **(No Impact)**

[77] CAL FIRE. "Fire Hazard Severity Zones in State Responsibility Area." Accessed August 9, 2023. https://calfire-forestry.maps.arcgis.com/apps/webappviewer/index.html?id=988d431a42b242b29d89597ab693d008.
[78] Ibid.

4.21 Mandatory Findings of Significance

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

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

As discussed throughout this Initial Study, the proposed project would not substantially degrade the quality of the environment with implementation of identified mitigation measures. As discussed in Section 4.4 Biological Resources, with implementation of mitigation measures MM BIO-1.1 and MM BIO-2.1, the project would not significantly impact nesting birds or roosting bats. No sensitive species or habitats would be significantly impacted by the project. As discussed in Section 4.5 Cultural Resources and Section 4.18 Tribal Cultural Resources, with implementation of mitigation measures MM CUL-1.1, MM CUL-1.2, and MM CUL-2.1, the project would result in a less than significant impact on archaeological resources and TCRs. In addition, as discussed in Section 4.9 Hazards and Hazardous Materials, the project would implement MM HAZ-1.1 to prevent exposure to existing soil contaminants. The project would have no impact on historic resources. **(Less than Significant Impact with Mitigation Incorporated)**

b) Does the project have impacts that are individually limited, but cumulatively considerable?

Under Section 15065(a)(3) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects "that are individually limited, but cumulatively considerable." As defined in Section 15065(a)(3) of the CEQA Guidelines, cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." This Initial Study evaluates the environmental impacts of the proposed BESS, substation, and transmission line and takes into account other past, pending, and probably future projects whose impacts could combine to produce cumulative impacts.

The proposed development would result in temporary air quality, hazards and hazardous materials, and noise impacts during construction. With implementation of the identified mitigation measures and consistency with adopted City policies, the construction impacts would be mitigated to a less than significant level. As the identified impacts are temporary and would be mitigated, the project would not have cumulatively considerable impacts on air quality, hazards and hazardous materials and noise in the project area. The impacts of the project on biological resources, cultural resources, and tribal cultural resources would be avoided and minimized through the use of mitigation measures to ensure the project would not substantially contribute to a cumulative impact on those resources.

The project would have a less than significant impact on aesthetics, energy, geology and soils, greenhouse gas emissions, hydrology and water quality, land use and planning, public services, transportation, and utilities, and would not contribute to cumulative impacts to these resources given the limited scope of the project. The project would not impact agricultural and forest resources, mineral resources, population and housing, recreational facilities, or wildfire hazards. Therefore, the project would not contribute to a significant cumulative impact on these resources. **(Less than Significant Impact with Mitigation Incorporated)**

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Consistent with Section 15065(a)(4) of the CEQA Guidelines, a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to cause substantial adverse effects on human beings, either directly or indirectly. Pursuant to this standard, a change to the physical environment that might otherwise be minor must be treated as significant if people would be significantly affected. This factor relates to adverse changes to the environment of human beings generally, and not to effects on particular individuals. While changes to the environment that could indirectly affect human beings would be represented by all of the designated CEQA issue areas, those that could directly affect human beings include air quality pollutants, geological hazards, hazardous materials, and noise. As discussed in Section 4.3 Air Quality, 4.7 Geology and Soils, 4.9 Hazards and Hazardous Materials,

and 4.13 Noise, with the implementation of mitigation measures and adherence to existing laws and regulations, the project would avoid significant impacts. No other direct or indirect adverse effects on human beings have been identified. **(Less than Significant Impact with Mitigation Incorporated)**

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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Section 6.0 Lead Agency and Consultants

6.1 Lead Agency

City of Daly City
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Sam Fielding, *Associate Planner*

6.2 Consultants

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Eric Fraske, *Senior Engineer*
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WRA, Inc.
Biological Consultants

Justin Semion, *Principal and Technical Services Director*
Scott Batiuk, *Plant Biologist*

Section 7.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos-Containing Material
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
ATCM	Asbestos Airborne Toxic Control Measure
BAAQMD	Bay Area Air Quality Management District
Bay Area	San Francisco Bay Area
BESS	Batter Energy Storage System
Btu	British Thermal Unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	Methane
CLUP	Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	Carbon Monoxide

CO_2	Carbon Dioxide
CO_2e	Carbon Dioxide Equivalents
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	Diesel Particulate Matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
GHG	Greenhouse Gases
GHGRS	Greenhouse Gas Reduction Strategy
GWh	Gigawatt Hour
GWP	Global Warming Potential
Habitat Plan	Santa Clara Valley Habitat Plan
HSWA	Hazardous and Solid Waste Amendments
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
L_{max}	Maximum A-weighted noise level during a measurement period
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
$MMTCO_2e$	Million Metric Tons of Carbon Dioxide Equivalent
MND	Mitigated Negative Declaration
mpg	Miles per Gallon
MSL	Mean Sea Level

MTC	Metropolitan Transportation Commission
N_2O	Nitrous Oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	Nitrogen Dioxide
NOA	Naturally Occurring Asbestos
NOD	Notice of Determination
NO_x	Nitrogen Oxides
NRHP	National Register of Historic Places
O_3	Ozone
PCB	Polychlorinated Biphenyls
PCF	Perfluorocarbon
PDA	Priority Development Areas
PG&E	Pacific Gas and Electric Company
PM	Particulate Matter
PM_{10}	Particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	Particulate matter with a diameter of 2.5 microns or less
PPV	Peak Particle Velocity
R&D	Research and Development
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
ROG	Reactive Organic Gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCS	Sustainable Communities Strategy
SF_6	Sulfur Hexafluoride
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act

SMGB	State Mining and Geology Board
SMP	Site Management Plan
SO_x	Sulfur Oxides
SR	State Route
SRA	State Responsibility Area
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
Title 24	Title 24, Part 6 of the California Code of Regulations
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VMT	Vehicle Miles Traveled
Williamson Act	California Land Conservation Act
WUI	Wildland-Urban Interface
ZNE	Zero Net Carbon Emission