Initial Study

JUHSD District Office & Adult Education Project

Prepared by

JEFFERSON UNION HIGH SCHOOL DISTRICT
EDUCATING OUR YOUTH AND ADULTS
ESTABLISHED 1922

In Consultation with

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

July 2021

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☒ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☒ Geology /Soils	☐ Greenhouse Gas Emissions	☒ Hazards & Hazardous Materials
☐ Hydrology / Water Quality	☐ Land Use / Planning	☐ Mineral Resources
☒ Noise	☐ Population / Housing	☐ Public Services
☐ Recreation	☐ Transportation/~~Traffic~~	☒ Tribal Cultural Resources
☐ Utilities / Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

6-30-21
Date

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SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

The Jefferson Union High School District (JUHSD), as the Lead Agency, has prepared this Initial Study for the District Office and Adult Education Facilities 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 JUHSD, California.

The project proposes to construct a new district office and adult education building at 123 Edgemont Drive in Daly City, CA. The District Office will house administrative offices, as well as conference rooms and board meeting room. The adult education building will have classroom space for adult education programs and adult transition/special education programs. These buildings would replace the existing district office and adult education building at 699 Serramonte Boulevard. 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:

Jefferson Union High School District
Attn: Stefanie Phillips
Director of Bond Projects/Construction
699 Serramonte Boulevard, Suite 100
Daly City, CA 94015
Telephone: (650) 500-7931
Fax: (650) 550-7888

Comments may also be sent by email to: sphillips@juhsd.net

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

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

1.4 NOTICE OF DETERMINATION

If the project is approved, the JUHSD 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

Jefferson Union High School District Office and Adult Education Facilities Project

2.2 LEAD AGENCY CONTACT

Stefanie Phillips
Director of Bond Projects/Construction
699 Serramonte Boulevard, Suite 100
Daly City, CA 94015
Telephone: (650) 500-7931
sphillips@juhsd.net

2.3 PROJECT APPLICANT

Jefferson Union High School District
699 Serramonte Boulevard, Suite 100
Daly City, CA 94015
Telephone: (650) 500-7900
Fax: (650) 550-7888

2.4 PROJECT LOCATION

The project site is located at 123 Edgemont Drive, Daly City, CA 94015. Regional and vicinity maps of the site are shown on Figure 2.7-1 and Figure 2.7-2, respectively. An aerial photograph of the site and surrounding land uses is shown on Figure 2.7-3.

2.5 ASSESSOR'S PARCEL NUMBER

The Assessor's Parcel Number (APN) for the project site parcel is 008-072-290.

2.6 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

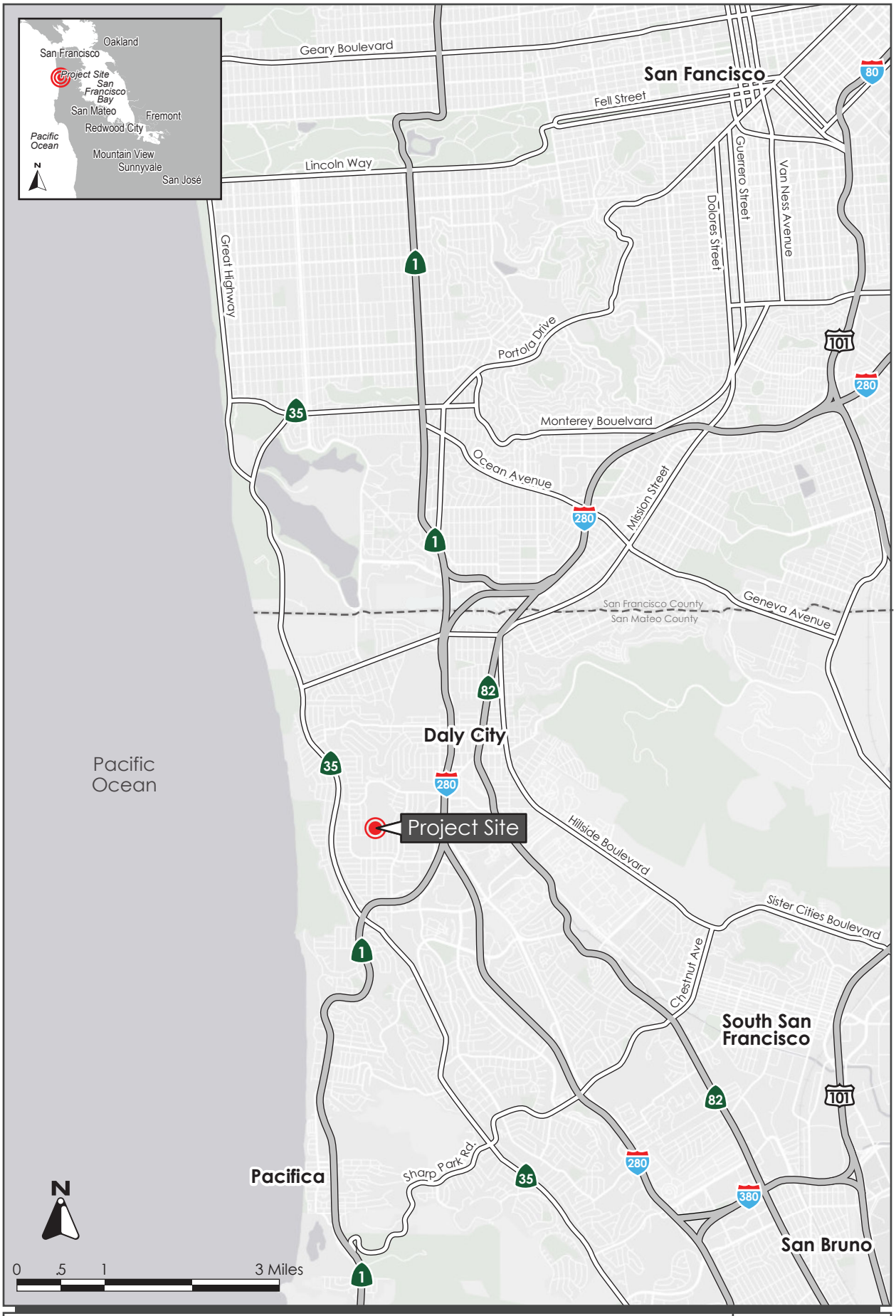
General Plan: The General Plan designates the property as *Public Park* (*PP*) which applies to all developed public open space including all state, regional and local parks and city maintained tot lots which provide recreational opportunities to the community.

Zoning: U – Unzoned District, which is exempt from the City of Daly City's Zoning Ordinance

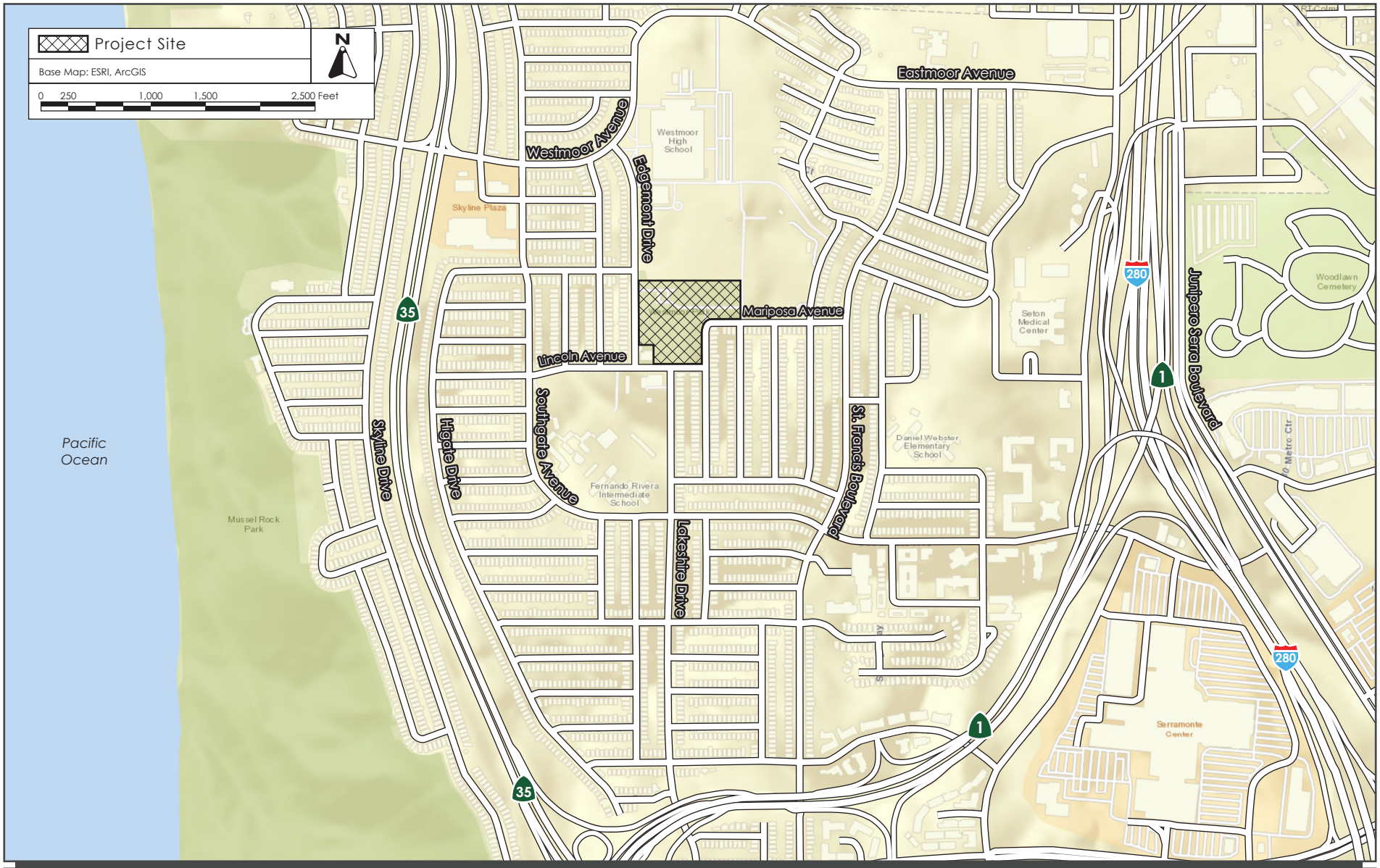
2.7 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

- Project Approval by the City[1] (Design Review and any off-site utility work)
- Project Approval by the Jefferson Union High School District Board (Board)
- California Division of the State Architect Approval

[1] Project approval by the City of Daly City is limited to those components of the proposed project that affect City property.



REGIONAL MAP | FIGURE 2.7-1



VICINITY MAP

FIGURE 2.7-2

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.7-3

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROPOSED DEVELOPMENT

The project proponent, Jefferson Union High School District (JUHSD), proposes to develop a new district office and adult education building on an approximately 7.6-acre site located at 123 Edgemont Drive. The district office building would be located in the southwest corner of the project site and the adult education building would be located on the eastern portion of the project site (see Figure 3.1-1). A surface parking lot would be located in the northwest portion of the project site and serve both the district office and adult education building. The project would provide a total of 295 parking spaces.

The new district office and adult education building would replace the existing Serramonte Del Rey campus facilities located at 699 Serramonte Boulevard in Daly City, approximately 1.7 miles south of the Edgemont Drive site. The JUHSD has filed an application for a Precise Plan with the City of Daly City to redevelop the site at 699 Serramonte Boulevard with up to 1,235 residential units and up to 10,000 square feet of retail space, and that project will be the subject of an EIR to be prepared by the City of Daly City as lead agency. While the JUHSD decision to relocate the district office and education building to the Edgemont Drive site is related to the JUHSD's proposed housing development on the Serramonte Del Rey campus, they are two separate projects, with the City of Daly City acting as lead agency for the housing project.

The approximately 27,000 square-foot proposed district office building would be two-stories tall. Ground-floor uses would include office space, large event/conference space, and the district board room. Second-floor uses would consist of additional office space and smaller conference rooms.

The approximately 37,700 square-foot proposed adult education building would also be two-stories tall. The building would provide administrative office space, approximately 15 adult education classrooms, four adult transition classrooms, and multi-purpose rooms.[2]

3.1.1 Site Access and Circulation

Vehicular access to the project site would be provided from driveways off of Edgemont Drive and Mariposa Avenue. The Edgemont Drive driveway would be located on the northwest corner of the project site and the Mariposa Avenue driveway would be located on the eastern side of the project site. Both driveways would provide access to the shared surface parking lot between the district office building and the adult education building. Walkways would be constructed along the perimeter of the buildings, between the buildings on site, and in the middle of the parking lot.

3.1.2 Open Space and Landscaping

The project site is currently developed with a parking lot, sports clubhouse, tennis courts, and grass sports fields. All of these facilities are not in use and have been closed to the public for the past two years. The project site has numerous mature trees on-site. The project proposes to remove approximately nine trees and plant approximately 62 trees around the site perimeter and parking area

[2] Adult transition classrooms are for special education students and provide programs to help students transition from high school to adult life.

(refer to Figure 3.1-1). The proposed development would include outdoor seating areas along the southern portions of the district office and adult education buildings. A basketball court and raised garden beds would also be constructed next to the adult education building. No lighting would be provided for evening use of the basketball court.

3.1.3 Construction Schedule

Construction for the project is expected to last approximately 15 months and begin in January 2022. The project would export approximately 500 cubic yards (CY) of soil as part of the grading process. A typical haul truck carries about 12 CY, and so approximately 42 trips would be required. The grading and soil off-haul process is expected to take approximately one week.

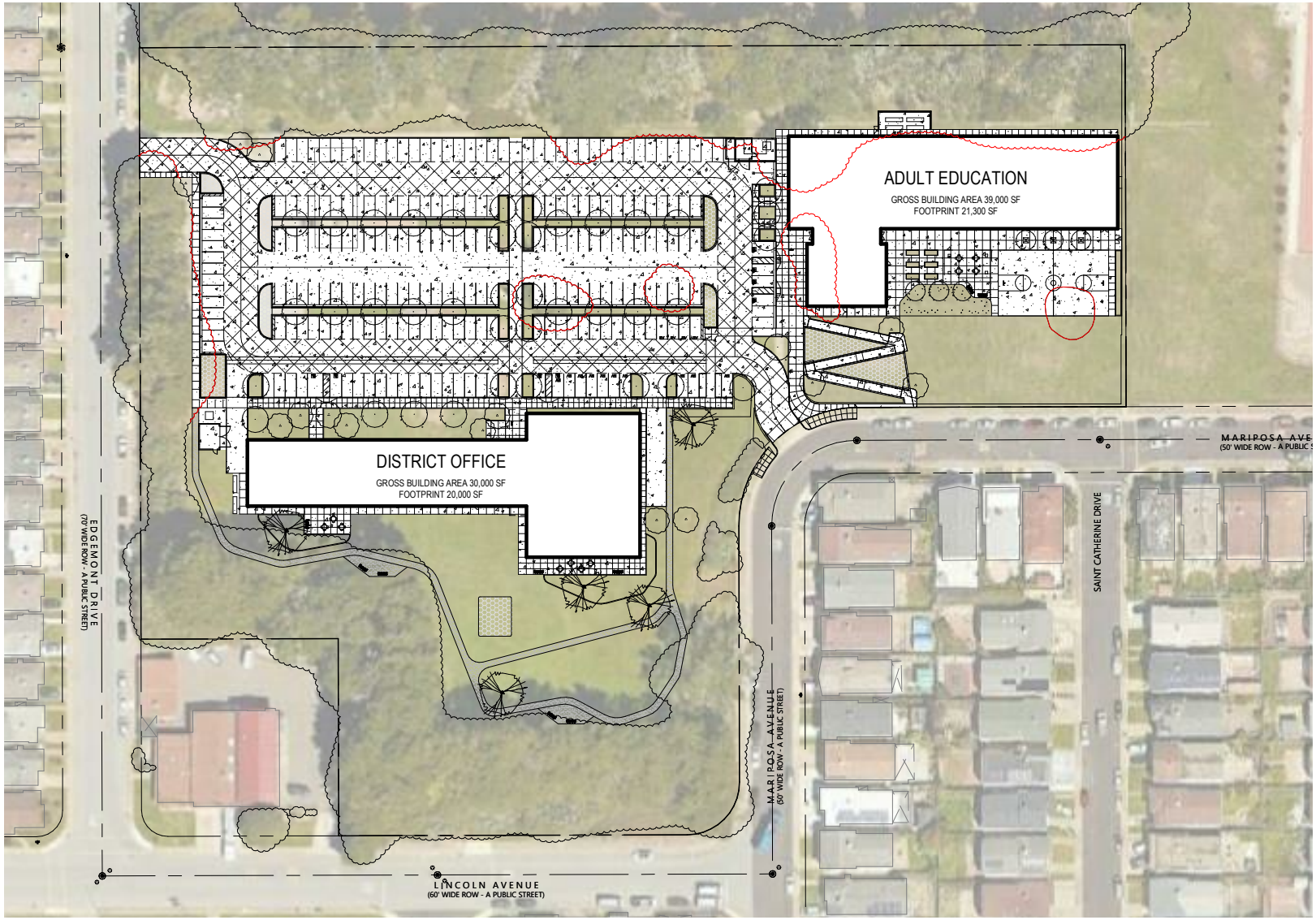
3.1.4 Utility, Drainage, and Off-Site Improvements

The project would connect to existing utilities located in Edgemont Drive and Mariposa Avenue. The project does not propose to improve any of the other existing utilities serving the site. The proposed drainage system will consist of area drains, drop inlets, manholes, stormwater treatment areas with an overflow structure, and below-grade pipes.

3.1.5 Green Building Measures

The project would be built to meet the 2016 California Green Building Standards Code (Title 24) and include additional green building measures that may include, but are not limited to the following:

- Water efficient landscaping
- High-efficiency LED lighting
- High-efficiency heating, ventilation, and air conditioning (HVAC) system
- Electrical vehicle parking and charging
- 50 percent diversion rate for all disposable materials
- Pre-wired for photovoltaic (solar) system
- High-efficiency water conservation measures



Source: HKIT Architects, March 4, 2021.

CONCEPTUAL SITE PLAN

FIGURE 3.1-1

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-1.3 refers to the third 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

Streets and Highway Code Sections 260 through 263

The California Scenic Highway Program (Streets and Highway Code, Sections 260 through 263) 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.

4.1.1.2 *Existing Conditions*

The approximately 7.6-acre site is in an urbanized area and is developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. The clubhouse is a rectangular, single-story building painted beige, yellow and red, with a sloping triangular roof. A number of mature trees, including Monterey cypress and Monterey pine are present on-site. Views of the project site from the surrounding area are limited by the topography, trees, and landscaping as well as surrounding developments.

The project site itself slopes downhill in a southern direction, and is bordered by Westmoor High School to the north and residential development to the west and east. Residential development and educational facilities (Martin Luther King Jr. Education Center, Thomas Edison Elementary School, Fernando Rivera Middle School), as well as Daly City Fire Station 95, are present south of the project site. Surrounding developments consist generally of single-story rectangular buildings that feature broad window facades and flat, hip, gable, shed, or butterfly roofs.

Due to the orientation of the project site and rising slopes to the north, west, and south, views towards these directions are limited to the surrounding residential and public facilities described above. San Bruno Mountain is visible to the east of the project site. Views of the coastline are not visible from the project site. There are three eligible State scenic highways within the City of Daly City, although none are officially designated; Skyline Boulevard (State Route [SR] 35), Cabrillo Highway (SR 1), and Junipero Serra (Interstate 280 [I-280]). The project site is not visible from any state or County designated scenic highways or roadways.

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:				
1) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

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

Impact AES-1: The project would not have a substantial adverse effect on a scenic vista. **(Less than Significant Impact)**

There are three eligible State scenic highways within the City of Daly City, though none are officially designated. These highways include Skyline Boulevard (SR 35), Cabrillo Highway (SR 1), and Junipero Serra (I-280). Scenic potential along these corridors is related to the views of the coast and San Bruno Mountain. The project site is not visible from I-280, approximately 3,000 feet to the east, or from SR 1, approximately one mile to the south. SR 35 is approximately 1,700 feet west of the project site. Views of the project site from SR 35 are obscured by trees, landscaping, and development surrounding the project site. The project, which would construct a new two-story district office and two-story adult education buildings, would not obscure views from SR 35 of San Bruno Mountain, which reaches approximately 1,000 feet in elevation.

Likewise, due to the topography of the project vicinity and the relative heights of the proposed project, surrounding development, and San Bruno Mountain, the project would not substantially obscure views of San Bruno Mountain from surrounding residences and streets. **(Less than Significant Impact)**

Impact AES-2: The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway. **(Less than Significant Impact)**

As discussed under Impact AES-2, the project site is not visible from any of the three eligible State scenic highways within the City of Daly City (SR 35, SR 1, I-280), nor could the project obscure

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

scenic resources (views of the coast, San Bruno Mountain) visible from these scenic corridors. **(Less than Significant Impact)**

Impact AES-3:	The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. The project would not conflict with applicable zoning and other regulations governing scenic quality. **(Less than Significant Impact)**

The project site is located in an urbanized, highly developed area consisting of residential developments as well as education and public facilities. The project proposes to construct a two-story rectangular district office and a two-story rectangular adult education building, both of which will feature large exterior windows and flat and shed roofing. This design, shown in Figure 4.1-1, is consistent with the design of the nearby education and public facilities and the larger aesthetic environment described under 4.1.1.2 Existing Conditions. The height of the proposed development would be relatively consistent with surrounding heights, and as discussed under Impact AES-1, would not have a substantial adverse effect on a scenic vista. Therefore, the project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Lastly, the proposed project is a public facility subject to the jurisdiction of the Jefferson Union High School District, and therefore is not subject to Daly City zoning and other regulations governing scenic quality within Daly City. **(Less than Significant Impact)**

Impact AES-4:	The project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. **(Less than Significant Impact)**

Outdoor lighting associated with the proposed project would include security lighting on and around the proposed structures. No other outdoor lighting is proposed by the project. The security lighting on and around the proposed structures would be similar to the existing security lighting on the Westmoor High School campus directly north of the project site and the Jefferson Elementary School District Office south of the project site across Lincoln Avenue. Security lighting would be angled towards the ground, away from adjacent residences, and fully shielded to reduce spill light. The project would, therefore, not create a new source of substantial light or glare which would significantly affect day or nighttime views in the area. **(Less Than Significant Impact)**

Source: FORGE Architecture.

PROJECT CONCEPTUAL DESIGN

FIGURE 4.1-1

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 called 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]

4.2.1.2 *Existing Conditions*

The approximately 7.6-acre site is in an urbanized area and is developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. The *San Mateo County Important Farmlands 2018 Map* designates the project site as "Urban and Built-Up Land", defined as land with at least six structures per 10 acres. Common examples of "Urban and Built-Up Land" are residential,

[4] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed September 22, 2020. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[5] California Department of Conservation. "Williamson Act." 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 to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[7] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed September 22, 2020. http://frap.fire.ca.gov/.

institutional, industrial, commercial, landfill, golf course, airports, and other utility uses. The site is not under a Williamson Act contract and there are no existing agricultural or forestry resources on or in the vicinity of the site.

4.2.2 Impact Discussion

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

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

According to the *San Mateo County Important Farmland 2018* map, the project site is designated as *Urban and Built-Up Land*, meaning that the land contains a building density of at least six units per 10-acre parcel or is used for industrial or commercial purposes, golf courses, landfills, airports, or other utilities.[8] Therefore, the proposed project would not convert farmland to a non-agricultural use. **(No Impact)**

[8] California Department of Conservation, Division of Land Resource Protection. "California Important Farmland Finder". Accessed September 22, 2020. https://maps.conservation.ca.gov/DLRP/CIFF/

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

The project site is not designated as farmland or zoned for agricultural use and is not the subject of a Williamson Act contract. The surrounding area is urbanized and not zoned for agricultural use or considered farmland. Accordingly, there is no conflict with existing zoning for agricultural use or a Williamson Act contract. **(No Impact)**

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

"Forest land" is defined as land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. "Timberland" means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees.

The project site and surrounding area is not used or zoned for timberland or forest land. Therefore, the project would not impact timberland or forest land. **(No Impact)**

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

As covered in the Impact AG-3 discussion, the project site and surrounding area is not used or zoned for timberland or forest land. Since the site is urban and built-up land surrounded by urbanized areas it could not support forest land or timberland. As the site is absent of forestry resources, the proposed development would not result in the loss of forest land or conversion of forest land to non-forest use. **(No Impact)**

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

Both the project site and surrounding area are urbanized with no presence of designated farmland, forest land, or used or zoned for agriculture. As a result, the implementation of the proposed project would not result in the conversion of farmland to non-agricultural use or forest land to non-forest uses. **(No Impact)**

4.3 AIR QUALITY

The following discussion is based, in part, on an Air Quality Assessment prepared for the project by Illingworth & Rodkin, Inc. The report, dated March 2021, is attached to this Initial Study as Appendix A.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

Criteria Pollutants

Air quality in the Bay Area is assessed related to six common air pollutants (referred to as criteria pollutants), including ground-level ozone (O_3), nitrogen oxides (NO_x), particulate matter (PM), carbon monoxide (CO), sulfur oxides (SO_x), and lead.[9] Criteria pollutants are regulated because they result in health effects. An overview of the sources of criteria pollutants and their associated health are summarized in Table 4.3-1. The most commonly regulated criteria pollutants in the Bay Area are discussed further below.

Table 4.3-1: Health Effects of Air Pollutants

Pollutants	Sources	Primary Effects
Ozone (O_3)	Atmospheric reaction of organic gases with nitrogen oxides in sunlight	• Aggravation of respiratory and cardiovascular diseases • Irritation of eyes • Cardiopulmonary function impairment
Nitrogen Dioxide (NO_2)	Motor vehicle exhaust, high temperature stationary combustion, atmospheric reactions	• Aggravation of respiratory illness • Reduced visibility
Fine Particulate Matter ($PM_{2.5}$) and Coarse Particulate Matter (PM_{10})	Stationary combustion of solid fuels, construction activities, industrial processes, atmospheric chemical reactions	• Reduced lung function, especially in children • Aggravation of respiratory and cardiorespiratory diseases • Increased cough and chest discomfort • Reduced visibility
Toxic Air Contaminants (TACs)	Cars and trucks, especially diesel-fueled; industrial sources, such as chrome platers; dry cleaners and service stations; building materials and products	• Cancer • Chronic eye, lung, or skin irritation • Neurological and reproductive disorders

High O_3 levels are caused by the cumulative emissions of reactive organic gases (ROG) and NO_x. These precursor pollutants react under certain meteorological conditions to form high O_3 levels. Controlling the emissions of these precursor pollutants is the focus of the Bay Area's attempts to

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

reduce O_3 levels. The highest O_3 levels in the Bay Area occur in the eastern and southern inland valleys that are downwind of air pollutant sources.

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

Toxic Air Contaminants

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

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

Sensitive Receptors

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

4.3.1.2 *Regulatory Framework*

Federal and State

Clean Air Act

At the federal level, the United States Environmental Protection Agency (EPA) is responsible for overseeing implementation of the Clean Air Act and its subsequent amendments. The federal Clean Air Act requires the EPA to set national ambient air quality standards for the six common criteria pollutants (discussed previously), including PM, O_3, CO, SO_x, NO_x, and lead.

[10] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed October 20, 2020. https://www.arb.ca.gov/research/diesel/diesel-health.htm.

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

Risk Reduction Plan

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

Regional

2017 Clean Air Plan

The Bay Area Air Quality Management District (BAAQMD) is the agency primarily responsible for assuring that the federal and state ambient air quality standards are maintained in the San Francisco Bay Area. Regional air quality management districts, such as BAAQMD, must prepare air quality plans specifying how state and federal air quality standards will be met. BAAQMD's most recently adopted plan is the Bay Area 2017 Clean Air Plan (2017 CAP). The 2017 CAP focuses on two related BAAQMD goals: protecting public health and protecting the climate. To protect public health, the 2017 CAP describes how BAAQMD will continue its progress toward attaining state and federal air quality standards and eliminating health risk disparities from exposure to air pollution among Bay Area communities. To protect the climate, the 2017 CAP includes control measures designed to reduce emissions of methane and other super-greenhouse gases (GHGs) that are potent climate pollutants in the near-term, and to decrease emissions of carbon dioxide by reducing fossil fuel combustion.[11]

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.

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

4.3.1.3 *Existing Conditions*

The Bay Area is considered a non-attainment 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 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.

Sensitive receptors in the vicinity of the project site include the single-family residences located to the west, south, and southeast, and educational facilities located to the south and north.

4.3.2 Impact Discussion

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

4.3.2.1 *Thresholds of Significance*

Impacts from the Project

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. JUHSD has considered the air quality thresholds updated by BAAQMD in May 2017 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 4.3-2 below.

Table 4.3-2: BAAQMD Air Quality Significance Thresholds			
Pollutant	**Construction Thresholds**	**Operation Thresholds**	
	Average Daily Emissions (pounds/day)	**Average Daily Emissions (pounds/day)**	**Annual Average Emissions (tons/year)**
Criteria Air Pollutants			
ROG, NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	**Single Source**	**Combined Cumulative Sources**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual $PM_{2.5}$	0.3 µg/m^3	0.8 µg/m^3 (average)	

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

Consistency with the 2017 CAP

The BAAQMD's 2017 Clean Air Plan (2017 CAP) prepared for the Bay Area air basin defines an integrated, multi-pollutant control strategy to reduce emissions of particulate matter, TACs, ozone precursors, and GHGs. The proposed control strategy is designed to complement efforts to improve air quality and protect the climate that are being implemented by partner agencies at the state, regional, and local scale. The control strategy encompasses 85 individual control measures. The control measures describe specific actions to reduce emissions of air and climate pollutants from the full range of emission sources and is based on the following four key priorities:

- Reduce emissions of criteria air pollutants and TACs from all key sources.
- Reduce emissions of "super-GHGs" such as methane, black carbon, and fluorinated gases.
- Decrease demand for fossil fuels (gasoline, diesel, and natural gas).
- Decarbonize our energy system.

The proposed project supports the primary goals of the 2017 CAP in that it does not exceed the BAAQMD thresholds for construction and operational air pollutant emissions. In addition, the proposed project is considered urban infill. The project, therefore, would not result in a significant impact related to consistency with the 2017 CAP. **(Less Than Significant Impact)**

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

As stated in the BAAQMD CEQA Air Quality Guidelines, air pollution by its nature is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions.

The Bay Area is considered a non-attainment area for ground-level O^3 and $PM_{2.5}$ under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM_{10} under the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone 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.

Construction Period Emissions – Criteria Pollutants

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate annual emissions from construction activities. The project land use types and size, and anticipated construction schedule were input to CalEEMod, which included the 27,266 square foot district office building as "Government Office Building", the 37,700 square foot adult education building as "Junior College (2 year)", and the 295-space surface parking lot as "Parking Lot". The CARB Emission FACtors 2017 (EMFAC2017) model was used to predict emissions from construction traffic, which includes worker travel, vendor trucks and haul trucks. The construction analysis assumed a construction start date of January 2022 and a construction period of approximately 15 months or 303 workdays. The earliest year of full operation was assumed to be 2024. Table 4.3-3 shows the estimated average daily air emissions from construction of the proposed project.

Table 4.3-3: Summary of Construction Period Emissions

Year	ROG	NOx	PM_{10}	$PM_{2.5}$
Construction Emissions Per Year (Tons)				
2022	0.23	1.84	0.10	0.08
2023	0.30	0.14	0.01	0.01
Average Daily Construction Emissions Per Year (lbs./day)				

2022 (259 construction workdays)	1.77	14.22	0.74	0.64
2023 (44 construction workdays)	13.83	6.36	0.37	0.29
BAAQMD Thresholds *(lbs./day)*	54	54	82	54
Exceed Threshold?	No	No	No	No

As shown in Table 4.3-3, the project's construction criteria pollutant emissions would not exceed BAAQMD thresholds. These emissions would be further reduced by adherence to the BAAQMD best management practices for construction dust control, as described below under Impact AIR-3. Therefore, construction criteria air pollutant emissions would be less than significant. **(Less than Significant Impact)**

Operational Period Emissions – Criteria Air Pollutants

Operational air emissions from the project would be generated primarily from automobiles driven by employees and adult students, and to a lesser extent by architectural coatings and maintenance products. CalEEMod was used to estimate the emissions from operation of the project. This analysis assumed that the project would be fully built-out and operating in the year 2024. The assumptions and results are described further in Appendix A of this document. Table 4.3-4 shows average daily operational emissions of ROG, NOX, total PM10, and total PM2.5 during operation of the project.

Table 4.3-4: Summary of Operational Period Emissions

Scenario	**ROG**	**NOx**	**PM_{10}**	**$PM_{2.5}$**
2024 Project Operational Emissions *(tons/year)*	0.7	0.54	0.93	0.26
BAAQMD Threshold *(tons/year)*	10	10	15	10
Exceed Threshold?	No	No	No	No
2024 Project Operational Emissions *(lbs./day)*[1]	3.85	2.95	5.11	1.42
BAAQMD Threshold *(lbs./day)*	54	54	82	54
Exceed Threshold?	No	No	No	No
1 Assumes 365-day operation				

As shown in Table 4.3-4, the project's operational emissions would not exceed BAAQMD significance thresholds. Therefore, operational criteria air pollutant emissions would be less than significant. **(Less than Significant Impact)**

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

Fugitive Dust

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 are implemented to reduce these emissions.

Mitigation Measures: The project proposes to implement the following best management practices identified by the BAAQMD to reduce fugitive dust emissions impacts to a less than significant level:

MM AIR-3.1: The following standard measures reflect BAAQMD best management practices and would be implemented by the project to reduce potential impacts from fugitive dust.

- 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 possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's

phone number shall also be visible to ensure compliance with applicable regulations.

The measures above are consistent with BAAQMD-recommended basic control measures for reducing fugitive particulate matter, as set forth in the BAAQMD CEQA Air Quality Guidelines. With implementation of MM AIR-3.1 as described above, fugitive dust and other particulate matter during construction would have a less than significant air quality impact. **(Less than Significant Impact with Mitigation Incorporated)**

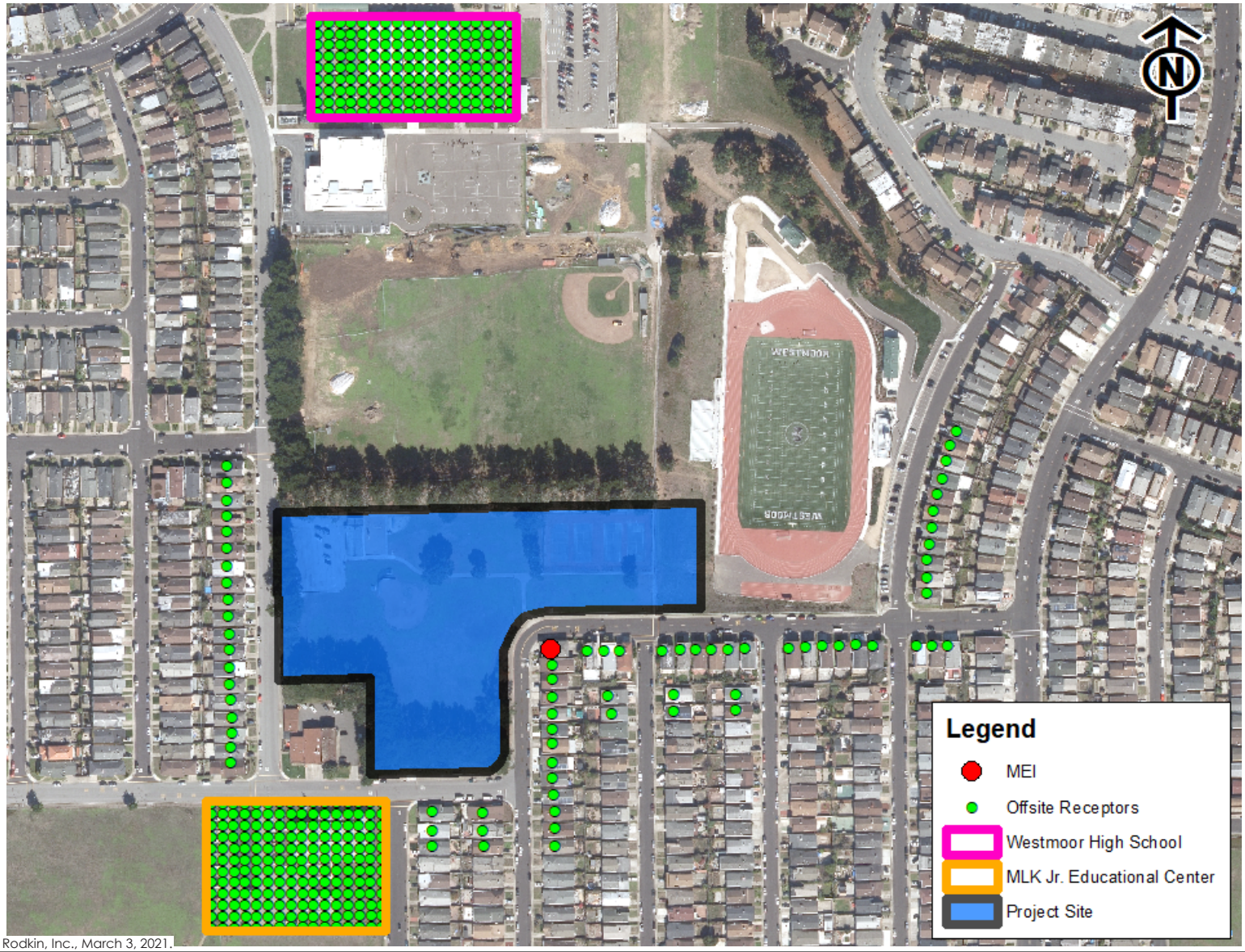
Community Health Risk from Project Implementation

Project Construction

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. Although construction exhaust air pollutant emissions would not contribute substantially to existing or projected air quality violations (see Impact AIR-1), construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to $PM_{2.5}$. Diesel exhaust particulate matter (DPM) poses both a potential health and nuisance impact to nearby receptors. A quantitative health risk assessment of the project construction activities was conducted to evaluate the potential health effects to nearby sensitive receptors from construction emissions of DPM and $PM_{2.5}$.

The CalEEMod and EMFAC2017 models provided total annual PM_{10} exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. Total DPM emissions from the construction site was estimated to be 0.079 tons (160 pounds). The on-road emissions are a result of haul truck travel during grading activities, worker travel, and vendor deliveries during construction. Due to the small size of the project site, a trip length of a half-mile was used to represent construction vehicle travel while at or near the construction site, which is where the construction emissions that nearby sensitive receptors would be exposed to would be generated. Fugitive PM2.5 dust emissions were estimated to be 0.019 tons (38 pounds) using the same methods and assumptions used to estimate site DPM emissions.

The U.S. EPA AERMOD dispersion model was used to predict DPM and $PM_{2.5}$ concentrations at sensitive receptors (i.e., nearby residents) in the vicinity of the project construction area. Figure 4.3-1 shows the locations of sensitive receptors near the project site and the maximally exposed individual (MEI). The maximum cancer risk would occur on the first floor (5 feet above ground) of the single-family residence to the southeast of the project site opposite Mariposa Avenue. Table 4.3-5 below displays the maximum cancer risks, PM2.5 concentrations, and hazard indexes (HIs) for project construction and operation activities affecting the off-site residential MEI.



Source: Illingworth & Rodkin, Inc., March 3, 2021.

PROJECT CONSTRUCTION TAC IMPACTS | FIGURE 4.3-1

Table 4.3-5: Construction Risk Impacts at Off-Site MEI				
Source		**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Project Construction	Unmitigated	**24.6 (infant)**	0.18	0.03
	Mitigated*	6.4 (infant)	0.06	<0.01
	BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold?	Unmitigated	***Yes***	*No*	*No*
	Mitigated*	*No*	*No*	*No*
Most Affected Nearby School – Martin Luther King Jr. Educational Center				
Project Construction	Unmitigated	1.5 (child)	0.03	<0.01
	BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold?	Unmitigated	No	No	No
Numbers in excess of BAAQMD single-source thresholds identified in **bold.**				
***** Construction equipment with Tier 4 engines as mitigation measures.				

As shown in Table 4.3-5, the unmitigated maximum cancer risks from construction activities at the project MEI location would exceed BAAQMD single-source thresholds of greater than 10.0 per million for cancer risk.

Mitigation Measure: Selection of equipment during construction to minimize emissions. Such equipment selection would include the following:

MM AIR-3.2: 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. EPA Tier 4 emission standards for PM (PM_{10} and $PM_{2.5}$), if feasible, otherwise:

- If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 60 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).
- Use of electrical or non-diesel fueled equipment.

Emissions reductions associated with this mitigation measure were modeled using CalEEMod. As shown above in Table 4.3-5, implementation of MM AIR-3.2 would substantially reduce the project cancer risk levels to a level below the BAAQMD single-source significance threshold. Construction-related community health risks would be further reduced with implementation of MM AIR-3.1 (discussed above under Fugitive Dust). With implementation of MM AIR-3.1 and MM AIR-3.2, the

computed maximum increased cancer risk to nearby residential areas from construction, assuming infant exposure, would be 6.4 in one million or less. Therefore, with implementation of MM AIR-3.2, community health risks due to construction would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

Community Health Risk from Project Operation

Operation of the project would have long-term emissions from mobile sources (i.e., traffic). No stationary equipment that could emit substantial TACs (e.g., stand-by generators) is proposed. Per BAAQMD recommended risks and methodology, a road with less than 10,000 total vehicles per day is considered a low-impact source of TACs. As discussed under Section 4.17 Transportation, this project would generate 1,426 net daily trips dispersed on the roadway system with a majority of the trips being from light-duty vehicles (i.e., passenger automobiles), which is a fraction of 10,000 daily vehicles. The roadways surrounding the project site are local streets with volumes less than 10,000 vehicles per day. Therefore, emissions from project traffic are considered negligible and not included within this analysis. **(Less than Significant Impact)**

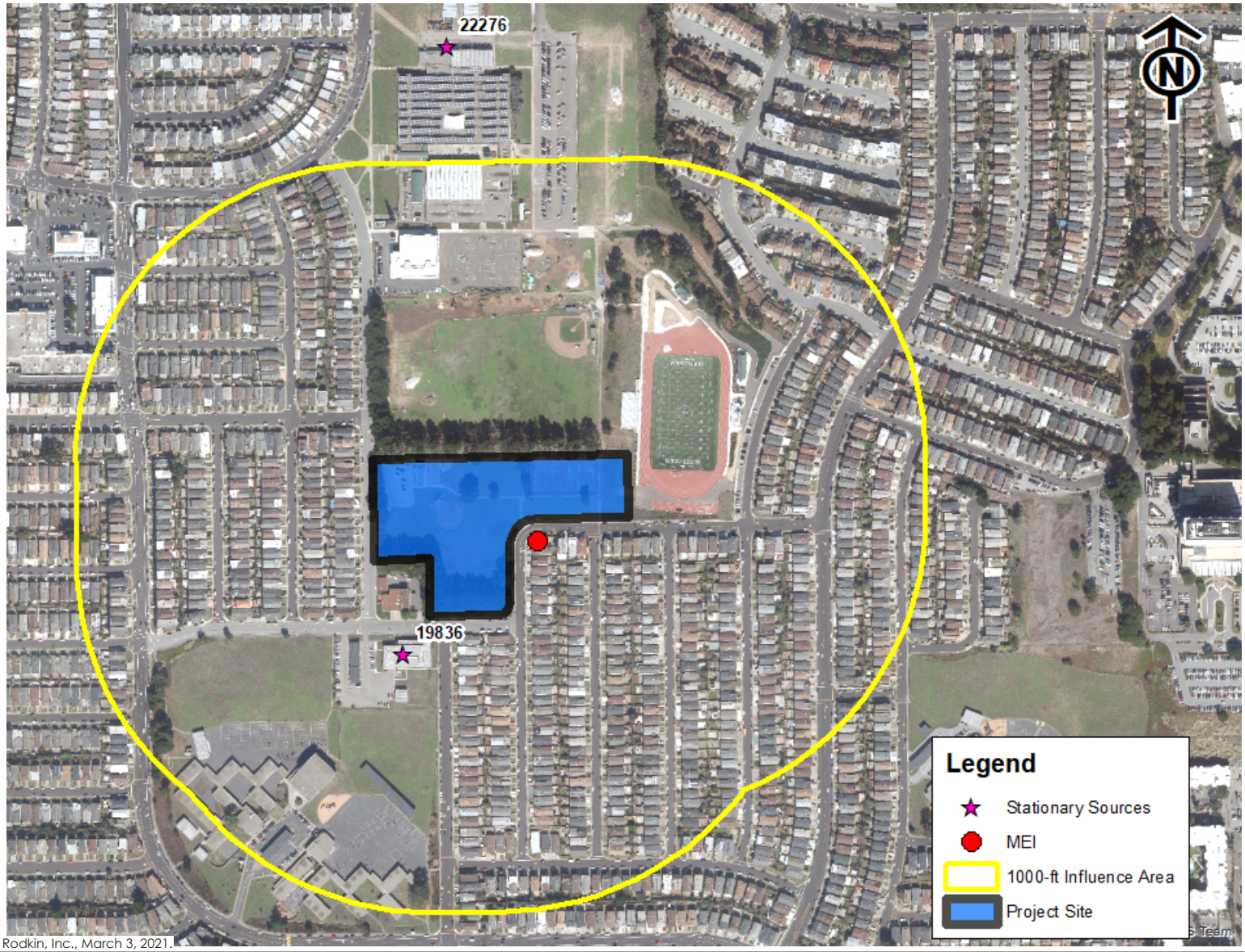
Combined Impact of All TAC Sources on the Off-Site MEI

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of the project site. These sources include railroads, freeways or highways, busy surface streets, and existing stationary sources identified by BAAQMD. Figure 4.3-2 shows the existing TAC sources with the potential to affect the off-site MEI. Table 4.3-6 reports both the project and cumulative community risk impacts at the sensitive receptors most affected by project construction and operation (i.e., the MEI). For the combined effect of cumulative sources, BAAMQD considers a cancer risk greater than 100 cases per million to be significant, or ten times higher than the single source threshold of ten.

Table 4.3-6: Impacts from Combined Sources at Off-Site MEI

Sources		Cancer Risk (per million)	Annual PM2.5 (µg/m3)	Hazard Index
Project (Construction & Operation)	Unmitigated	24.6 (infant)	0.18	0.03
	Mitigated	6.4 (infant)	0.06	<0.01
JUHSD Westmoor High School (Facility ID #22276, Generator), MEI +1,000 feet		<0.01	0.00	0.00
City of Daly City (Facility ID #19836, Generator), MEI 580 feet		0.28	0.00	0.00
Cumulative Total	Unmitigated	24.88 (infant)	0.18	0.03
	Mitigated	6.68 (infant)	0.06	<0.01
BAAQMD Cumulative Source Threshold		***>100***	***>0.8***	***>10.0***
Exceed Threshold?	Unmitigated	No	No	No
	Mitigated	No	No	No

As shown in Table 4.3-6, the project would not exceed the BAAQMD cumulative source thresholds cancer risk, $PM_{2.5}$ concentration, or Hazard Index values. Therefore, the combined impact of all TAC sources on the off-site MEI would be less than significant. **(Less than Significant Impact)**



Source: Illingworth & Rodkin, Inc., March 3, 2021.

PROJECT SITE AND NEARBY TAC AND $PM_{2.5}$ SOURCES | FIGURE 4.3-2

Health Effects from Criteria Pollutants

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

As described previously under Impact AIR-1, the proposed project would not exceed BAAQMD thresholds for operational and construction criteria air pollutants. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. **(Less than Significant Impact)**

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

Construction activities for the proposed project would generate localized emissions of diesel exhaust during construction equipment operation and truck activity. These emissions may be noticeable from time to time by adjacent receptors; however, the odors would be localized and temporary and are not likely to affect people off-site. Odors associated with the application of paints and coatings may also be noticeable on occasion by adjacent receptors. Painting and coating of the district office building and adult education facilities would occur during daytime hours only, would be localized, and would be generally confined to the project site. These odors would also be temporary.

Odors are generally considered an annoyance rather than a health hazard. Land uses that have the potential to be sources of odors that generate complaints include, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities. Educational facilities, such as the proposed project, do not typically generate objectionable odors. **(Less than Significant Impact)**

4.4 BIOLOGICAL RESOURCES

The following discussion is based in part on an Arborist Report prepared by HortScience | Bartlett Consulting (HSBC) in January 2021. A copy of this report is attached to this Initial Study as Appendix B.

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. The taking and killing of birds resulting from an activity is not prohibited by the MBTA when the underlying purpose of that activity is not to take birds.[12] Nesting birds are considered special-status species and are protected by the USFWS. The CDFW also protects migratory and nesting birds under California Fish and Game Code Sections 3503, 3503.5, and 3800. The CDFW defines taking as causing abandonment and/or loss of reproductive efforts through disturbance.

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

[12] United States Department of the Interior. "Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take." Accessed February 8, 2021. https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf.

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.

Local

City of Daly City 2030 General Plan

The Lead Agency for the project is the Jefferson Union High School District. The project would not be subject to the regulations of the City of Daly City (e.g., 2030 General Plan and Municipal Code) regarding biological resources except when analyzing off-site impacts within the jurisdiction of the City. The following policies are specific to biological resources and are applicable to the proposed project.

Policies	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

This chapter 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*

Natural Communities/Sensitive-Status Species

The only areas within Daly City that provide suitable habitat for sensitive status species are portions of San Bruno Mountain and the California Coastal Zone within the City boundaries. The project site, which is outside of the San Bruno Mountain Habitat Conservation Plan area and the California Coastal Zone, is mapped as "Urban" land cover/habitat in the Daly City 2030 General Plan EIR. Urban areas are those which consist of ornamental vegetation and minimal cover, and only provide

habitat for species of birds and mammals that have adapted to human habitation and activities. The project site is currently developed with a parking lot, sports clubhouse, tennis courts, and grass sports-fields. The only biological resources on-site consist of the trees discussed below.

Trees

A total of 63 trees representing four species were identified within the project site and surrounding area, as summarized below in Table 4.4-1. With the exception of one Monterey cypress that has a moderate suitability for preservation, all of the trees identified in the tree survey have a low suitability for preservation.

Table 4.4-1: Tree Survey Summary

Common Name	Condition				Total
	Dead	Poor	Fair	Good	
Griselinia	-	2	-	-	2
Monterey cypress	-	28	5	-	33
Monterey pine	4	22	1	-	27
Mexican fan palm	-	1	-	-	1
Total	4	53	6	-	63

4.4.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	☐	☒	☐	☐
2) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?	☐	☐	☒	☐

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
3) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
4) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
5) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
6) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Impact BIO-1:	The project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the CDFW or USFWS. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed under Existing Conditions, the project site does not contain any suitable habitat for special-status plant or wildlife species. Therefore, the project would not result in impacts to special-status species.

The proposed development does encompass trees which could be used by nesting birds. Nesting birds are protected under the MBTA and the California Fish and Game Code 3503, 3503.5, and 2800. Construction disturbance during the breeding season could result in the loss of fertile eggs, nesting raptors, or nest abandonment and would constitute a significant impact.

Furthermore, tree removal during the nesting season (February 1st through August 31st) could potentially impact protected raptors and/or other protected migratory birds. Any loss of fertile bird eggs, or individual nesting eggs, or any activities resulting in nest abandonment during construction would constitute a significant impact.

Mitigation Measures: The project will be required to implement the following mitigation measures to reduce impacts to raptors, migratory birds, and nesting birds to a less than significant level.

MM BIO-1.1: To the extent feasible, initial grading and vegetation removal activities (or at least the commencement of such activities) should be scheduled to occur during the non-nesting season (September 1 to January 31). If construction activities are scheduled to take place outside of the nesting season, all impacts on nesting birds protected under the MBTA and CDFW will be avoided.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31, then pre-construction surveys shall be conducted by a qualified ornithologist to ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than 14 days prior to the initiation of construction activities or tree relocation or removal. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats within 250 feet of the limits of construction activities. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 50 feet for other species), to ensure that nests of species protected by the MBTA and CDFW shall not be disturbed during project implementation. These buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest.

MM BIO-1.3: If construction activities will be scheduled during the nesting season (February 1 to August 31), all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are planned to be removed by the project must be removed prior to February 1st, the start of the nesting season.

With implementation of the above measures, potential impacts from the project on nesting birds and protected raptors would be reduced to a less than significant level. **(Less than Significant with Mitigation Incorporated)**

Impact BIO-2: The project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the CDFW or USFWS. **(Less than Significant Impact)**

The project site is located in a developed, urban area of Daly City and is mapped as Urban land cover/habitat. There are no habitats on-site suitable for special-status species or riparian habitats present on-site. The project site does contain habitat suitable for nesting birds and protected raptors; however, these species would be protected by the mitigation measures outlined under Impact BIO-1. Accordingly, the project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community. **(Less than Significant Impact)**

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

The project site is mapped as Urban land cover/habitat and is devoid of any wetlands, marshes, or vernal pools that would meet the definition of wetlands under the CDFW, USEPA, or USACE. Therefore, the project would not impact any state or federally protected wetlands under the Clean Water Act. **(No Impact)**

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

As the project site and surrounding area is heavily urbanized and not identified as an essential connectivity area, core reserve or corridor, landscape block, or general wildlife corridor, there is limited potential to serve as a corridor or nursery for resident or migratory wildlife outside of the birds discussed in Impact BIO-1. The absence of any waterways on-site precludes the potential to impact any resident or migratory fish species. **(Less than Significant Impact)**

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

The proposed project would involve the demolition and removal of the existing sports clubhouse, parking lot, tennis courts, and grass sports fields, which would require the removal of nine trees, one of which is dead. There are an additional three dead trees on-site recommended for removal in the Arborist Report. Of the remaining 51 trees, there is one Monterey cypress with moderate suitability for preservation, and 50 trees in poor to fair condition that can be preserved with implementation of the following tree preservation measures. As discussed under Section 4.4.1.1 Regulatory Framework, the project site is not within the jurisdiction of Daly City, and therefore the trees present on-site are not subject to Daly City policies concerning biological resources, such as protected trees. **(Less Than Significant Impact with Mitigation)**

Construction activity, including grading, trenching, and equipment storage, could damage the 51 trees on-site.

Mitigation Measures: The following mitigation measures would ensure that the 51 trees on-site would be preserved during construction of the project.

MM BIO-5.1:

Tree Protection Zone

- A Tree Protection Zone shall be identified for each tree to be preserved.

- Fence all trees to be retained to completely enclose the Tree Protection Zone prior to demolition, grubbing, or grading.
- Tree protection fences shall be six-foot high chain link fencing mounted on eight-foot tall, two-inch diameter galvanized posts, driven 24-inches into the ground, or equivalent as required by the City.
- No grading, excavation, construction or storage or dumping of materials shall occur within the Tree Protection Zone.
- No underground services including utilities, sub-drains, water or sewer shall be placed in the Tree Protection Zone.

Design Recommendations

- Accurately locate all trees, on-site and off-site, and include tree locations and Tree Protection Zones on all plans.
- Any changes to the plans affecting the trees should be reviewed by the Consulting Arborist with regard to tree impacts. These include, but are not limited to, site plans, improvement plans, utility and drainage plans, grading plans, landscape and irrigation plans, and demolition plans.
- Plot accurate locations of all trees to be preserved on all project plans. Identify the Tree Protection Zone for each tree. A collective Tree Protection Zone could be established around Trees #29-43 and Trees #44-56.
- Plan for tree preservation by designing adequate space around trees to be preserved. This is the Tree Protection Zone. No grading, excavation, construction or storage of materials should occur within that zone. Route underground services including utilities, sub-drains, water or sewer around the Tree Protection Zone. For design purposes, the Tree Protection Zone is the trees dripline.
- Consider the vertical clearance requirements near trees during design. Avoid designs that would require pruning more than 20% of a tree's canopy.
- Irrigation systems must be designed so that no trenching severs roots larger than 1 inch in diameter will occur within the Tree Protection Zone.
- Tree Preservation Guidelines prepared by the Consulting Arborist, which include specifications for tree protection during demolition and construction, should be included on all plans.
- Any herbicides placed under paving materials must be safe for use around trees and labeled for that use.
- Do not lime the subsoil within 50 feet of any tree. Lime is toxic to tree roots.
- Ensure adequate but not excessive water is supplied to trees; in most cases occasional irrigation will be required. Avoid directing runoff toward trees.

Pre-Demolition/Construction Measures

- The demolition and construction superintendents shall meet with the Project Arborist before beginning work to review all work procedures, access routes, storage areas, and tree protection measures.
- Raise tree canopies as needed for construction activities, in accordance with the following requirements:
    - All pruning shall be done by a State of CA Licensed Tree Contractor (C61/D49). All pruning shall be done by Certified Arborist or Certified Tree Worker in accordance with the Best Management Practices for Pruning (International Society of Arboriculture, 2002) and adhere to the most recent editions of the American National Standard for Tree Care Operations (Z133.1) and Pruning (A300).
    - While in the tree the arborist shall perform an aerial inspection to identify any defects, weak branch and trunk attachments, and decay not visible from the ground. Any additional work needed to mitigate defects shall be reported to the property owner.
- Tree(s) to be removed that have branches extending into the canopy of tree(s) or located within the Tree Protection Zone of tree(s) to remain shall be removed by a Certified Arborist or Certified Tree Worker and not by the demolition contractor. The Certified Arborist or Certified Tree Worker shall remove the trees in a manner that causes no damage to the tree(s) and understory to remain.
- Trees to be removed shall be felled so as to fall away from Tree Protection Zone and avoid pulling and breaking of roots of trees to remain. If roots are entwined, the Consulting Arborist may require first severing the major woody root mass before extracting the trees, or grinding the stump below ground.
- All down brush and trees shall be removed from the Tree Protection Zone either by hand, or with equipment sitting outside the Tree Protection Zone. Extraction shall occur by lifting the material out, not by skidding across the ground.
- All tree work shall comply with the Migratory Bird Treaty Act as well as CA Fish and Wildlife code 3503-3513 to not disturb nesting birds. To the extent feasible tree pruning and removal should be scheduled outside of the breeding season. Breeding bird surveys should be conducted prior to tree work, as detailed in MM BIO-1.1 through 1.3. Qualified biologists should be involved in establishing work buffers for active nests.

Construction Measures

- Any approved grading, construction, demolition or other work within the Tree Protection Zone should be monitored by the Consulting Arborist.
- All contractors shall conduct operations in a manner that will prevent damage to trees to be preserved.
- Tree protection devices are to remain until all site work has been completed within the work area. Fences or other protection devices may not be relocated or removed without permission of the Consulting Arborist.

- Construction trailers, traffic and storage areas must remain outside Tree Protection Zone at all times.
- Any root pruning required for construction purposes shall receive the prior approval of and be supervised by the Project Arborist. Roots should be cut with a saw to provide a flat and smooth cut. Removal of roots larger than 2 inches in diameter should be avoided.
- If roots 2 inches and greater in diameter are encountered during site work and must be cut to complete the construction, the Project Arborist must be consulted to evaluate effects on the health and stability of the tree and recommend treatment.
- Prior to grading or trenching, trees may require root pruning outside the Tree Protection Zone. Any root pruning required for construction purposes shall receive the prior approval of, and be supervised by, the Project Arborist.
- Spoil from trench, footing, utility or other excavation shall not be placed within the Tree Protection Zone, neither temporarily nor permanently.
- All grading within the dripline of trees shall be done using the smallest equipment possible. The equipment shall operate perpendicular to the tree and operate from outside the Tree Protection Zone. Any modifications must be approved and monitored by the Consulting Arborist.
- If injury should occur to any tree during construction, it should be evaluated as soon as possible by the Consulting Arborist so that appropriate treatments can be applied.
- No excess soil, chemicals, debris, equipment or other materials shall be dumped or stored within the Tree Protection Zone.
- Any additional tree pruning needed for clearance during construction must be performed by a Certified Arborist and not by construction personnel.

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

The project site is approximately two miles southwest of the San Bruno Mountain Habitat Conservation Plan area boundary. Therefore, the project would not conflict with the provisions of an adopted local, regional, or state habitat conservation plan. **(No Impact)**

4.5 CULTURAL RESOURCES

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.[13]

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

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

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.

[13] 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.

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.

4.5.1.2 *Existing Conditions*

Archaeological Resources

The Ohlone Indian Tribe inhabited a large area along the California Coast, running from the San Francisco Bay Area to Monterey Bay. The tribelet which inhabited the Daly City area lived primarily in two main inland villages located on the Colma and San Bruno Creeks and a seasonal village along the coast at Mussel Rock. According to the Northwest Information Center (NWIC), Native American resources in the northern part of San Mateo County have been found in close proximity to sources of water (including perennial and intermittent streams and springs), near the bay margin and its associated wetlands, along the coastal terraces and sheltered valleys, and near ecotones and other productive environments.

The project site is in an urbanized area and is developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. The project site is not on or adjacent to waterways, bay margins, associated wetlands, coastal terraces, sheltered valleys, or ecotones or other productive environments.

Historic Resources

Based on the National Park Service's National Register of Historic Places and the California Office of Historic Preservation's California Register of Historical Resources and Historical Landmarks, there are no historical resources under CEQA Guidelines Section 15064.5 on or within the vicinity of the subject site. Based on historic aerials of the project site, the sports clubhouse on-site was constructed between 1956 and 1968.[14] The sports clubhouse is not listed as a property with potential historic value in the Daly City General Plan.

[14] Nationwide Environmental Title Research, LLC. "Historic Aerials Viewer". Accessed September 22, 2020. https://www.historicaerials.com/viewer

4.5.2 Impact Discussion

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

Impact CUL-1: The project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. **(No Impact)**

The existing sports club house on the project site is not listed in the National Register of Historic Places or the California Register of Historical Resources, or the local registry of historic resources reflected in the Daly City General Plan. While the sports club house is over 50 years old, it is not an example of unique architecture and not associated with any significant person or local event in the area. For these reasons, demolition of the sports club house as part of the project would not result in significant impacts to historic resources. **(No Impact)**

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

The project site has been previously disturbed and developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. The project site is not on or adjacent to areas in northern San Mateo County with a heightened sensitivity for archaeological resources, such as waterways, bay margins, associated wetlands, coastal terraces, sheltered valleys, or ecotones or other productive environments. Additionally, the site was graded extensively as part of the hillside terracing to create the current level site.

As such, there is a low possibility for uncovering buried archaeological resources. Project-related grading and excavation during construction could however result in significant impacts, if any unknown culturally significant archaeological resources were discovered.

Mitigation Measure: Implementation of the following mitigation measures would ensure that potential impacts to buried archaeological remain at a less than significant level.

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

MM CUL-2.2: *Worker Awareness Training.* Prior to the initiation of any site preparation and/or the start of construction, the JUHSD shall ensure that all construction workers receive training overseen by a qualified professional archaeologist who is experienced in teaching non-specialists, to ensure that contractors can recognize archaeological resources in the event that any are discovered during construction.

With the implementation of this mitigation measure, impacts to buried archaeological resources would be less than significant. **(Less Than Significant Impact with Mitigation Incorporated)**

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

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

Mitigation Measure: Implementation of the following mitigation measures would ensure that potential impacts to undiscovered human remains is at a less than significant level.

MM CUL-3.1: *Human Remains.* If human remains are discovered at any project construction site during any phase of construction, all ground-disturbing activity within 100 feet of the resources shall be halted and the Director of Bond Projects/Construction 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. JUHSD 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 JUHSD, before the resumption of ground-disturbing activities within 100 feet of where the remains were discovered.

By applying this measure, potentially significant impacts related to the destruction of human remains would be mitigated to a less than significant level. **(Less Than Significant with Mitigation Incorporated)**

4.6 ENERGY

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]

[15] California Building Standards Commission. "California Building Standards Code." Accessed May 10, 2021. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[16] California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed May 10, 2021. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

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. CALGreen requires that construction projects recycle or salvage 65 percent of non-hazardous construction and demolition waste.

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]

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 7,875 trillion British thermal units (Btu) in the year 2018, 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 46th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,440 trillion Btu) for residential uses, 19 percent (1,510 trillion Btu) for commercial uses, 23 percent (1,847 trillion Btu) for industrial uses, and 39 percent (3,078 trillion Btu) for transportation.[19] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power. The project site is currently developed with a vacant sports clubhouse and sports fields. For the purposes of this analysis, it is assumed the project site in its current form does not use any energy.

Electricity

Electricity in San Mateo County in 2019 was consumed primarily by the commercial sector (64 percent), with the residential sector consuming 36 percent. In 2019, a total of approximately 4,325 GWh of electricity was consumed in San Mateo County.[20]

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

[17] California Air Resources Board. "The Advanced Clean Cars Program." Accessed May 10, 2021. https://www.arb.ca.gov/msprog/acc/acc.htm.
[18] United States Energy Information Administration. "State Profile and Energy Estimates, 2018." Accessed January 28, 2021. https://www.eia.gov/state/?sid=CA#tabs-2.
[19] United States Energy Information Administration. "State Profile and Energy Estimates, 2018." Accessed January 28, 2021. https://www.eia.gov/state/?sid=CA#tabs-2.
[20] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed January 28, 2021. http://ecdms.energy.ca.gov/elecbycounty.aspx.

from 85 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. [21]

Natural Gas

PG&E provides natural gas services within Daly City. In 2018, approximately one percent of California's natural gas supply came from in-state production, while the remaining supply was imported from other western states and Canada.[22] In 2018, residential and commercial customers in California used 34 percent of the state's natural gas, power plants used 35 percent, the industrial sector used 21 percent, and other uses used 10 percent. Transportation accounted for one percent of natural gas use in California. In 2018, San Mateo County used approximately 1.7 percent of the state's total consumption of natural gas.[23]

Fuel for Motor Vehicles

In 2019, 15.4 billion gallons of gasoline were sold in California.[24] 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 24.9 mpg in 2019.[25] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in March 2020 to require all cars and light duty trucks achieve an overall industry average fuel economy of 40.4 mpg by model year 2026. [26,27]

[21] Sources: 1) Peninsula Clean Energy. "Frequently Asked Questions." Accessed August 31, 2020. https://www.peninsulacleanenergy.com/faq/. 2) Peninsula Clean Energy. "Energy Choices." Accessed August 31, 2020. https://www.peninsulacleanenergy.com/faq/.

[22] California Gas and Electric Utilities. 2019 *California Gas Report.* Accessed August 31, 2020. https://www.socalgas.com/regulatory/documents/cgr/2019_CGR_Supplement_7-1-19.pdf.

[23] California Energy Commission. "Natural Gas Consumption by County." Accessed August 31, 2020. http://ecdms.energy.ca.gov/gasbycounty.aspx.

[24] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed February 3, 2021. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

[25] United States Environmental Protection Agency. "The 2020 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." January 2021. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P1010U68.pdf

[26] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed August 31, 2020. http://www.afdc.energy.gov/laws/eisa.

[27] Public Law 110–140—December 19, 2007. *Energy Independence & Security Act of 2007.* Accessed August 31, 2020. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.

4.6.2 Impact Discussion

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

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

The project proposes to develop an approximately 27,000 square-foot district office building and an approximately 37,700 square-foot adult education building.

Energy would be consumed during both the construction and operational phases of the proposed project. Energy requirements throughout the construction phase include energy for the manufacturing and transportation of building materials, preparation of the site, and operation of construction equipment. The operation of the project would consume both electricity and natural gas for building heating and cooling, lighting, cooking, appliances, and water heating. Fuel would also be consumed during vehicle trips to and from the project site.

The proposed project is estimated to use approximately 0.85 GWh of electricity and 1,824,916 kBtu of natural gas per year. It is estimated that project-generated vehicle trips would use approximately 100,119 gallons of gasoline per year.[28] The project proposes to be constructed in compliance with the 2016 California Green Building Standards Code (Title 24), which requires features that reduce water and energy consumption, and may include additional green buildings measures such as high-efficiency HVAC systems, electric car charging, and pre-wiring for photovoltaic systems.

Given the infill location of the project site, the existing pedestrian, bicycle, and transit services in the project area, and the project's compliance with the 2016 California Green Building Code, the proposed project would not result in a wasteful, inefficient, and unnecessary consumption of energy. **(Less Than Significant Impact)**

[28] The project's estimated energy use was derived from the air quality and greenhouse gas emissions modeling completed for the project and included in Appendix A of this Initial Study.

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

According to the 2019 Integrated Energy Policy Report, the state is working towards decarbonizing the energy system and moving towards a 100 percent carbon-free system by 2045.[29] The project would obtain energy from the PCE which provides 50 to 100 percent carbon free electricity to the project site. The project would result in an increase in demand on existing energy resources; however, the project is required to comply with applicable regulations and the 2016 California Green Building Code that would conserve energy and water, and reduce fuel consumption and waste generation. For these reasons, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less Than Significant Impact)**

[29] California Energy Commission. *2019 Integrated Energy Policy Report*. 2019.

4.7 GEOLOGY AND SOILS

The following discussion is based, in part, on a Geotechnical Feasibility Study prepared for the project by Cornerstone Earth Group, Inc. The report, dated May 20, 2020, is included in this Initial Study as Appendix C.

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.

4.7.1.2 *Existing Conditions*

Regional Geology

The project site and surrounding area is located within the Coast Ranges Geomorphic Province, a relatively geologically young and seismically-active region on the western margin of the North American plate. The ranges and valleys trend northwest, sub-parallel to the San Andreas Fault. The Coast Ranges are composed of thick Mesozoic and Cenozoic sedimentary strata. The northern and southern ranges are separated by a depression containing the San Francisco Bay. West of the San Andreas is the Salinian Block, a granitic core extending from the southern extremity of the Coast Ranges to the north of the Farallon Islands.

On-site Geological Conditions

Topography

The project site is located on a modified ridge top in an area of otherwise undulating terrain. The actual site exists on a flat, partially graded terrace with low to moderately steeply inclined downslopes bordering on the east, south, and west. A southerly facing downslope exists on the north. The site is relatively level, with elevations on the order of 422 feet to 426 feet, except in the southwest corner where elevations drop to about 415 to 418 feet and along the southwest, south and southeast perimeters of the site where elevations drop toward the adjacent streets and properties to about 400 to 418 feet.

Seismicity and Seismic Hazards

The entire Bay Area is located within the San Andreas Fault Zone, a complex of active faults where moderate to strong earthquakes have been generated. The overall probability of a magnitude 6.7 or greater earthquake on a fault in the greater Bay Area in the next 30 years is estimated at 63 percent. The San Andreas Fault runs directly through the southwestern portion of Daly City.

The project site is not within an Alquist-Priolo Earthquake Fault Zone.[30] The nearest fault, the San Andreas, is approximately 4,500 feet southwest of the site. Since no known active faults intersect the property, fault rupture is not anticipated to occur at the site. Based on hazard maps prepared for the

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

Daly City General Plan, the project site is projected to experience violent shaking during a seismic event, has a moderate risk of land sliding, and is at very low risk of liquefaction.

Soils

Field exploration of the project site by Cornerstone Earth Group consisted of three borings drilled on May 1, 2020. The borings were drilled to depths ranging from about 5½ to 29½ feet. Borings encountered undocumented fill consisting of medium dense silty sand to depths of approximately 2½ to 5 feet. Beneath the fills, our borings generally encountered medium dense to very dense poorly graded sand with silt of the Merced Formation to the maximum depth explored of about 29½ feet. The Plasticity Index (PI) of surficial soils on-site is 15 or less.[31]

Groundwater

Groundwater was not encountered in any of the field exploration borings completed by Cornerstone Earth Group. Groundwater in the project area slopes towards the south. Groundwater levels at nearby wells range between 24 feet below ground surface (bgs) to 94 feet bgs, and groundwater levels at the project site are estimated to be at a depth of greater than 50 feet bgs. Based on USGS 7.5-minute topographic maps, groundwater flow is estimated to be generally to the south and east towards the San Francisco Bay. Fluctuations in groundwater levels occur due to many factors including seasonal fluctuation, underground drainage patterns, regional fluctuations, and other factors.

Paleontological Resources

The project site is within the Merced Formation (QTm) of the Franciscan complex, which was formed during the early to late Pliocene age of the Neogene period, and has a high sensitivity for paleontological resources. At a regional level, the project site is within the Pilarcitos stratigraphic area, which has approximately nine historic fossil collection sites, the closest of which is Mussel Rock, approximately 1.25 miles southwest of the project site. Fossils have been discovered elsewhere in Daly City along the coastline and on the shores of Lake Merced, but have not been discovered inland within Daly City.

4.7.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				

[31] Plasticity Index is correlated to expansion potential and shrink-swell of soils.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
– Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42)?	☐	☐	☒	☐
– Strong seismic ground shaking?	☐	☐	☒	☐
– Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
– Landslides?	☐	☐	☒	☐
2) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
3) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
4) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
5) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
6) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	☐	☒	☐	☐

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

Fault Rupture

The project site is not located within an Alquist-Priolo Earthquake Fault Zone, making fault rupture at the site unlikely. While existing faults are located in the region, the proposed project is outside of

the fault zone for any regional fault systems, and significant impacts from fault ruptures are not anticipated to occur. **(Less than Significant Impact)**

Seismic Ground Shaking

The potential for strong ground shaking at the project site exists due to the likelihood of seismic activity generated by faults in proximity to the site; however, adherence to the 2019 California Building Code (CBC) and the recommendations of a design-level geotechnical report as required by law would ensure that the proposed district office and adult education buildings would resist minor earthquakes without damage and major earthquakes without collapse. Conformity with the aforementioned regulations would ensure less than significant impacts from seismically-induced ground shaking. **(Less than Significant Impact)**

Ground Failure

Landslides

Slope and earthquake stability of the Merced Formation is generally characterized as fair to good and good, respectively. Additionally, a review of various published geologic maps showed no landslides at or immediately adjacent to the project site.

Sloping portions of the site occur around the perimeter (north, east, and west sides) of the northwest area, along the north and east sides of the east area, and around the perimeter of the baseball field terrace. The southerly facing slopes along the north perimeter are likely compound slopes (cut into Merced Formation within the basal portion, and fill in the upper portion). The slopes around the west, east, and south sides of the baseball field are considered to be fill slopes and the southerly-facing slopes in the eastern portion of the site are thought to be fill slopes. The fills at and adjacent to the site are considered to be underlain by the Merced Formation. These slopes are generally moderately inclined.

Based on the topography and soils present on-site, and no previous history of land sliding within the project vicinity, the risk of land sliding is considered moderate. Additionally, as required under the CBC, a design-level geotechnical report would be prepared for the project site that will provide recommendations for structural designs and/or engineering techniques to be implemented to reduce landslide risks. Adhering to the recommendations of the design-level geotechnical report would ensure that any landslide hazards on the project site are adequately addressed. **(Less than Significant Impact)**

Liquefaction and Lateral Spreading

As discussed in Section 4.7.1.2 Existing Conditions, the proposed project site is at very low risk for liquefaction. Soils most susceptible to liquefaction are loose, non-cohesive soils that are saturated and are bedded with poor drainage, such as sand and silt layers bedded with a cohesive cap. Subsurface boring encountered medium dense to very dense granular soils. In addition, the groundwater level is anticipated to be below a depth of 50 feet. Based on the above, Cornerstone's screening of the site has a low potential for liquefaction. Conformance with the 2019 CBC and the recommendations of a site-specific geotechnical report would further reduce the risk of liquefaction at the project site.

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

There are no adjacent bodies of water, channels, or excavations in the vicinity of the site that would increase the potential of lateral spread occurrence. Since groundwater is anticipated to be 50 feet or greater below the ground surface and the potential for liquefaction is low, it is not anticipated that lateral spread or other seismic-induced hazards would occur at the project site. **(Less than Significant Impact)**

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

Ground disturbance related to demolition, excavation, grading, and construction activities from the proposed project is expected, potentially resulting in an increased exposure of soil to wind and water erosion. Development on the project site could result in significant amounts of soil erosion if managed improperly.

By implementing standard grading and best management practices, and adhering to the measures set forth in Section 4.10 Hydrology and Water Quality for the management of surface runoff and construction-related erosion, the proposed project would have a less than significant impact on soil erosion at the site. The following erosion measures are C.3 requirements under the Municipal Regional Stormwater Permit and would reduce possible construction-related erosion impacts:

- All excavation and grading work would be scheduled in dry weather months or construction sites would be weatherized to withstand or avoid erosion.[32]
- Stockpiles and excavated soils would be covered with secured tarps or plastic sheeting.
- Vegetation in disturbed areas would be replanted as quickly as possible.

Implementation of the identified erosion control measures would ensure that erosion and sedimentation impacts are less than significant. **(Less than Significant Impact)**

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

As discussed under Section 4.7.1.2 Existing Conditions and Impact GEO-1, while the project site is located on a geologic unit that is mapped within a moderate landslide risk area, the geologic foundation of the project site is not inherently unstable or likely to become unstable as a result of the project. Furthermore, by conforming with the applicable regulations and the recommendations of the

[32] Weatherized refers to measures that would protect exposed soils from rain and stormwater runoff.

design-level geotechnical report, the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

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

Pursuant to the 2019 CBC, soils with a PI of 15 or less are not considered expansive, therefore the project would not be located on expansive soil. Additionally, as discussed under Impact GEO-1, the geologic foundation of the project site is at a less than substantial risk of landslides, lateral spreading, or liquefaction. By conforming with the applicable regulations and the recommendations of the soils and engineering geology report, the project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. **(Less than Significant Impact)**

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

The project proposes to construct a new district office and adult education building that would connect to the existing wastewater utilities in the project vicinity. No septic systems would be constructed or used; therefore, no impacts related to septic systems would occur. **(No Impact)**

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

The project site has been previously disturbed and developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. The project site is not on or adjacent to the Pacific coastline or the shores of Lake Merced where fossils have been previously encountered in Daly City.

As such, there is a low possibility for uncovering unique paleontological resources or geological features. Project-related grading and excavation during construction could, however, result in significant impacts, if any unknown unique geology and soil resources were discovered.

Mitigation Measure: Implementation of the following mitigation measures would ensure that potential impacts to buried paleontological resources or geological features remain at a less than significant level.

MM GEO-6.1: *Unique Paleontological and/or Geologic Features and Reporting*. Should a unique paleontological resource or site or unique geological feature be identified at the project site during any phase of construction, all ground disturbing activities within 25 feet shall cease and the Director of Bond Projects/Construction notified immediately. A qualified paleontologist shall evaluate the find and prescribe mitigation measures to reduce impacts to a less

than significant level. Work may proceed on other parts of the project site while mitigation for paleontological resources or geologic features is implemented. Upon completion of the paleontological assessment, a report shall be submitted to the JUHSD and, if paleontological materials are recovered, a paleontological repository, such as the University of California Museum of Paleontology shall also be submitted to the JUHSD.

With the implementation of the above mitigation measure, impacts to unknown unique paleontological resources or geological features would be less than significant. **(Less Than Significant Impact with Mitigation Incorporated)**

4.8 GREENHOUSE GAS EMISSIONS

The following discussion is based, in part, on a Greenhouse Gas Assessment prepared for the project by Illingworth & Rodkin, Inc. The report, dated March 2021, is attached to this Initial Study as Appendix A.

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

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

In 2016, SB 32 was signed into law, amending the California Global Warming Solution Act. SB 32, and accompanying Executive Order B-30-15, require CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. CARB updated its Climate Change Scoping Plan in December of 2017 to express the 2030 statewide target in terms of million metric tons of CO_2E ($MMTCO_2e$). Based on the emissions reductions directed by SB 32, the annual 2030 statewide target emissions level for California is 260 $MMTCO_2e$.

Senate Bill 375

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

Consistent with the requirements of SB 375, the Metropolitan Transportation Commission (MTC) partnered with the Association of Bay Area Governments (ABAG), BAAQMD, and the Bay Conservation and Development Commission to prepare the region's Sustainable Communities Strategy (SCS) as part of the Regional Transportation Plan process. The SCS is referred to as Plan Bay Area 2040. Plan Bay Area 2040 establishes a course for reducing per-capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).

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. CALGreen requires that construction projects recycle or salvage 65 percent of non-hazardous construction and demolition waste.

Regional and Local

2017 Clean Air Plan

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

CEQA Air Quality Guidelines

The BAAQMD 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. The jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

BAAQMD Significance Thresholds

For quantified emissions, the guidelines recommended a GHG threshold of 1,100 metric tons or 4.6 metric tons (MT) per capita. These thresholds were developed based on meeting the 2020 GHG targets set in the scoping plan that addressed AB 32. Development of the project would occur beyond 2020, so a threshold that addresses a future target is appropriate. Although BAAQMD has not published a quantified threshold for 2030 yet, this Initial Study utilizes an efficiency metric of 2.8 MT CO2e/year/service population and a bright-line threshold of 660 MT CO_2e /year based on the GHG reduction goals of EO B-30-15. The service population metric of 2.8 is calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MT CO_2e /year threshold.

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. There are no GHG emissions associated with the project site as it is currently vacant.

4.8.2 Impact Discussion

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

Impact GHG-1:	The project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. **(Less than Significant Impact)**

Construction Emissions

Short-term GHG emissions from the construction phase of the project would consist primarily of heavy equipment exhaust, worker travel, materials delivery, and solid waste disposal. Neither the JUHSD nor BAAQMD have an adopted threshold of significance for construction-related GHG emissions; however, BAAQMD recommends disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable. Because construction would be temporary (approximately 15 months) and would not result in a permanent increase in emissions, the project would not interfere with the implementation of AB 32 or SB 32. **(Less than Significant Impact)**

Operational Emissions

Daily emissions associated with operation of the proposed district office and adult education facilities were modeled using CalEEMod based on the project's estimated service population (744 adult students and full-time employees) and the project's daily trip generation rate (1,426 trips/day; refer to Section 4.17 Transportation). Net annual emissions resulting from construction and operation of the proposed project in 2024 (first year of operation) and 2030 (SB 32 target year) are shown below in Table 4.8-1.

Table 4.8-1: Annual Project GHG Emissions

Source Category	Project-Generated GHG Emissions (metric tons)	
	2024	**2030**
Area	0.01	0.01
Energy Consumption	151	151
Mobile	823	751
Solid Waste Generation	37	37
Water Usage	14	14
Total Annualized Emissions	1,026 MT CO_2e /year	954 MT CO_2e /year
Bright-Line Significance Threshold[1]	-	660 MT CO_2e /year
Total Emissions per Service Population	1.4	1.3
Service Population Significance Threshold	-	2.8
Exceeds Thresholds?	-	No

[1] MT CO_2e/year/service population

The project would need to exceed both the bright-line and service population thresholds for GHG emissions generated by the project to be considered a significant impact. As shown above in Table 4.8-1, the net annual emissions resulting from operation of the proposed project are predicted to be 1,026 MT of CO_2e in 2025 and 954 MT of CO_2e in 2030, which would exceed the bright-line threshold of 660 MT CO_2e. The project, however, would not exceed the service population

significance threshold of 2.8; therefore, the project would not directly or indirectly generate GHG emissions that would have a significant effect on the environment. **(Less than Significant Impact)**

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

The proposed project would not conflict or otherwise interfere with the statewide GHG reduction measures identified in CARB's Scoping Plan. For example, the proposed building would be constructed in conformance with CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures and water-efficient irrigation systems. And as discussed in Impact GHG-1, the proposed project would not generate GHG emissions that would have a significant effect on the environment, and therefore would not conflict with the BAAQMD Air Quality Guidelines. **(Less than Significant Impact)**

4.9 HAZARDS AND HAZARDOUS MATERIALS

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

Federal Aviation Regulations Part 77

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

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. Over five years, $1.6 billion was collected and the tax went to a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA accomplished the following objectives:

- Established prohibitions and requirements concerning closed and abandoned hazardous waste sites;

- Provided for liability of persons responsible for releases of hazardous waste at these sites; and
- Established a trust fund to provide for cleanup when no responsible party could be identified.

The law authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response; and
- Long-term remedial response actions that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life-threatening. These actions can be completed only at sites listed on the EPA's National Priorities List.

CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.[33]

Resource Conservation and Recovery Act

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

The Federal Hazardous and Solid Waste Amendments (HSWA) are the 1984 amendments to RCRA that focused on waste minimization, phasing out land disposal of hazardous waste, and corrective action for releases. Some of the other mandates of this law include increased enforcement authority for the EPA, more stringent hazardous waste management standards, and a comprehensive underground storage tank program.[34]

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).[35]

[33] United States Environmental Protection Agency. "Superfund: CERCLA Overview." Accessed May 11, 2020. https://www.epa.gov/superfund/superfund-cercla-overview.
[34] United States Environmental Protection Agency. "Summary of the Resource Conservation and Recovery Act." Accessed May 11, 2020. https://www.epa.gov/laws-regulations/summary-resource-conservation-and-recovery-act.
[35] California Environmental Protection Agency. "Cortese List Data Resources." Accessed May 28, 2020. https://calepa.ca.gov/sitecleanup/corteselist/.

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 Department of Environmental Health reviews CalARP risk management plans as the CUPA.

Asbestos-Containing Materials

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

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.

4.9.1.2 *Existing Conditions*

Historical Uses

Based on historic aerials, the project site was dedicated to agricultural uses prior to 1956. The sports clubhouse and recreational field that currently occupy the project site were constructed between 1956 and 1968. [36]

[36] Nationwide Environmental Title Research, LLC. "Historic Aerials Viewer". Accessed September 22, 2020. https://www.historicaerials.com/viewer

Potential Sources of Contamination

A review of readily available regulatory databases did not identify any active or closed hazardous materials cleanup cases on or within a quarter-mile of the project site.[37]

4.9.2 Impact Discussion

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

[37] California State Water Resources Control Board. "Geotracker" Accessed September 28, 2020. https://geotracker.waterboards.ca.gov/

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

The proposed project does not involve the routine transport, use, or disposal of reportable quantities of hazardous materials besides gas and diesel fuel used by construction vehicles.

Small quantities of cleaning supplies, maintenance chemicals, and herbicides and pesticides for landscape maintenance would be stored and used in operation of the proposed project. No other hazardous materials would be used or stored on-site. These materials would be managed in accordance with existing laws and regulations that ensure that the routine transport, storage, use, and disposal of these materials would not result in a significant hazard to the public or environment. **(Less than Significant Impact)**

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

Demolition

Based on the estimated age of the existing on-site building, ACM and lead-based paint may be present in some building materials. Building demolition could result in the release of these materials to the environment, if appropriate control measures are not implemented.

Mitigation Measures: The following mitigation measures would reduce impacts to construction workers from ACM and lead-based paint to less than significant level.

MM HAZ-2.1: To reduce the potential for construction workers and nearby sensitive receptors to encounter hazardous materials contamination from ACMs and lead-based paint, the following measures are included in the project.

- In conformance with local, state, and federal laws, an asbestos building survey and a lead-based paint survey shall be completed by a qualified professional to determine the presence of ACMs and/or lead-based paint on the structures proposed for demolition prior to issuance of a demolition permit for any site structure.

- A registered asbestos abatement contractor shall be retained to remove and dispose of all potentially friable asbestos-containing materials, in accordance with the NESHAP guidelines, prior to building demolition that may disturb the materials. All construction activities shall be undertaken in accordance with Cal/OSHA standards, contained in Title 8 of the California Code of Regulations (CCR), Section 1529, to protect workers from exposure to asbestos. Materials containing more than one percent asbestos are also subject to BAAQMD regulations.

- During demolition activities, all building materials containing lead-based paint shall be removed in accordance with Cal/OSHA Lead in Construction Standard, Title 8, CCR 1532.1, including employee training, employee air monitoring and dust control. Any debris or soil containing lead-based paint or coatings shall be disposed of at landfills that meet acceptance criteria for the waste being disposed.

Implementation of the above mitigation measure would reduce the impact of released hazardous materials during demolition to a less than significant level. **(Less than Significant Impact with Mitigation Incorporated)**

Construction

As described under Section 4.9.1.0 Existing Conditions, the site was previously used for agricultural purposes prior to development of the existing uses. Because of the past agricultural uses, it is reasonable to assume that pesticides and other agricultural chemicals were used as part of the normal agricultural operations.

Construction of the proposed project would require soil grading. If pesticides and chemicals from historic agricultural operations have persisted on-site, soil disturbing activities during construction could expose workers and the environment to these hazardous materials. The project would implement the following mitigation measures to reduce and/or avoid hazards related to the potential upset of hazardous materials during project construction activities.

Mitigation Measures: The following mitigation measures would reduce impacts to workers and nearby sensitive receptors to a less than significant level.

MM HAZ-2.2: To reduce the potential for workers and nearby sensitive receptors to encounter hazardous materials in the form of agricultural chemicals and pesticides, the following measures have been included in the project.

- Prior to grading of the project site, shallow soil samples shall be taken on the project site to determine if contaminated soil is located on-site with concentrations above established construction/trench worker thresholds.

- Once soil sampling is complete, a report of findings shall be provided to the SMCDEH (or other appropriate agency) for review. If no contaminants are found above established thresholds, no further action is required.

- If contaminated soils are found in concentrations above established thresholds, a Site Management Plan (SMP) shall be prepared and implemented to manage the cleanup of potential contamination. The SMP shall be prepared prior to construction to reduce or eliminate exposure risk to human health and the environment, specifically, potential risks associated with the presence of contaminated soils. Contaminated soil

removed from the site shall be hauled off-site and disposed at a licensed hazardous materials disposal site in accordance with applicable regulations.

- The SMP shall be submitted to the SMCDEH (or equivalent agency) for review and acceptance. A copy of the accepted SMP shall be submitted to the Director of Bond Projects/Construction, and shall be implemented prior to the commencement of grading activities on the site.

With implementation of mitigation measure MM HAZ-2.2, construction of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. **(Less than Significant Impact with Mitigation Incorporated)**

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

There are four existing schools within approximately one-quarter mile of the proposed development:

- Martin Luther King Jr. Education Center (approximately 275 feet south of the project site)
- Thomas Edison Elementary School (approximately 500 feet south of the project site)
- Fernando Rivera Middle School (approximately 600 feet southwest of the project site)
- Westmoor High School (approximately 1,000 feet north of the project site)

As discussed under Impact HAZ-1, there is no significant hazard related to the transport, use, or disposal of hazardous materials. The release of asbestos-containing materials and lead-based paint particles from building demolition would be controlled by the mitigation measures prescribed in MM HAZ-2.1. The potential release of agricultural chemicals and pesticides would be controlled by the mitigation measures prescribed in MM HAZ-2.2. Accordingly, the handling of hazardous materials and hazardous emissions associated with the proposed development would not impact nearby schools. **(Less than Significant Impact)**

Impact HAZ-4:	The project would not be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard to the public or the environment. **(Less than Significant Impact)**

The project site is not included on the Cortese List, or any relevant list of hazardous material sites. Therefore, the proposed project would not create a significant hazard to the public or the environment due to its location. **(Less than Significant Impact)**

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

The project site is located approximately 6.9 miles northwest of San Francisco International Airport (SFO). However, the proposed project would be located within the SFO Airport Influence Area (AIA). As a result, it would be required to comply with applicable policies of the SFO Airport Land Use Compatibility Plan (ALUCP). The project site is not located inside the CNEL noise contours identified in the SFO ALUCP indicating airport related noise levels below 65 dB at the project site, a level compatible with residential uses.

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 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 ground level. For the project site, any proposed structure of a height greater than 200 feet above ground level is required under FAR Part 77 to be submitted to the FAA for review.

The proposed project will be two-stories tall (no more than 50 feet in height at the top of the roof); therefore, the total height of the structure would not exceed 200 feet above ground level. For these reasons, although the project site is located within the jurisdiction of the SFO ALUCP, there are no safety hazards or excessive noise levels which would result in a significant impact. **(Less than Significant Impact)**

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

The proposed project would not impair or physically interfere with any adopted emergency response or evacuation plan. The proposed project would be constructed to comply with all applicable building and fire codes. During construction and operation of any future project, 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)**

Impact HAZ-7:	The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. **(No Impact)**

The proposed project area is entirely urbanized and does not contain wildlands, nor is it adjacent to wildlands. Therefore, no discussion of wildland fires is included, and wildland hazards are not a concern.[38] **(No Impact)**

[38] California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Date accessed September 28, 2020. https://egis.fire.ca.gov/FHSZ/

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 EPA and the 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.

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

Regional 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 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[39] Under Provision C.3 of the MRP, new and redevelopment projects that create or replace 10,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. LID-based treatment controls are intended to maintain or restore the site's natural hydrologic functions, maximizing opportunities for infiltration and evapotranspiration, and using stormwater as a resource (e.g., rainwater harvesting for non-potable uses). The MRP also requires that stormwater treatment measures are properly installed, operated, and maintained.

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

4.10.1.2 *Existing Conditions*

Surface Water

The project site is located within the Colma Creek Watershed which is roughly bounded by San Bruno Mountain to the north, Skyline Boulevard to the west, Interstate 380 to the south, and the San Francisco Bay to the east. Colma Creek runs to the southeast of Daly City and ultimately discharges into San Francisco Bay. The project site is currently developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. Numerous mature trees are present on-site, located around the perimeter of the project site.

Groundwater

The aquifer that underlies most of Daly City is within the Westside Groundwater Basin (Westside Basin). The Westside Basin underlies parts of San Francisco and northern San Mateo counties. The basin extends from Golden Gate Park in the north and past the San Francisco International Airport in the south. The basin extends to the west beneath the Pacific Ocean at least as far as the San Andreas Fault and to the east an unknown distance beneath San Francisco Bay. The Westside Basin is a buried valley, where the walls and floor of the valley are formed by rock with a mixture of course- and fine-grained sediments as much as 3,700 feet thick in parts of the basin fill. The coarse-grained

[39] MRP Number CAS612008

sediments consist of sand and gravel and the fine-grained sediments consist of silt and clay. Sand and gravel can transmit substantial quantities of water to wells, whereas silt and clay impede the movement of groundwater. Where silt and clay deposits form semi-continuous beds, they can effectively isolate the water table from underlying aquifer. Groundwater in the shallow water table aquifer is referred to as "unconfined" and the underlying aquifer separated from the water table by continuous and semi-continuous fine-grained silt and clay strata are referred to as "confined." Both unconfined and confined conditions occur in the Westside Basin. The project site is not located within a natural or facility groundwater recharge area.[40]

Flooding Hazards

The Federal Emergency Management Agency (FEMA) has developed a Flood Hazard Boundary Map (FHBM) and has designated Daly City as a Non-Special Flood Hazard Area (NSFHA). The project site is not located in a 100-year floodplain.

Dam Inundation, Seiches, Tsunamis, and Mudflow Hazards

No areas in the city are subject to dam inundation. There are no water bodies in Daly City so there is no threat of seiches. A tsunami inundation map prepared by the California Department of Conservation shows a portion of the coast in Daly City as a tsunami inundation area.[41] However, the project site is outside of the tsunami inundation area.

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 roads is collected by storm drains and discharged into Colma Creek. The 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.

Under existing conditions, the project site consists of an unpaved open space and a paved surface parking lot, tennis courts, and a sports club building. The existing ground coverage is approximately 273,551 square-feet pervious surfaces (83 percent pervious) and 57,505 square-feet impervious surfaces (17 percent impervious). Stormwater on the sports club building and surface parking lot is directed to gutters that run east towards Edgemont Drive and then discharged into the street gutter. Stormwater on Edgemont Drive is collected by storm drains and discharged into Colma Creek and eventually flows into San Francisco Bay.

[40] City of Daly City. *General Plan Environmental Impact Report, Hydrology.* 2012.
[41] California Department of Conservation. "San Mateo County Tsunami Hazard Area Maps". Accessed May 13, 2021. https://www.conservation.ca.gov/cgs/tsunami/maps/san-mateo.

4.10.2 Impact Discussion

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
1) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
2) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
3) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
– result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
– substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
– create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
– impede or redirect flood flows?	☐	☐	☒	☐
4) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
5) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

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

Construction Water Quality Impacts

Construction activities (e.g., grading and excavation) on the project site may result in temporary impacts to surface water quality. When disturbance to underlying soils occurs, the surface runoff that flows across the site may contain sediments that are ultimately discharged into the storm drainage system. Construction of the project would disturb approximately 7.6 acres of the site, as stated above.

Because the project would disturb more than one acre of ground surface, it is subject to compliance with the Construction General Permit, and is required to develop and implement a SWPPP. The SWPPP would contain erosion and sediment controls designed to minimize stormwater pollution by reducing sediment loads in runoff form the construction site. A Notice of Intent (NOI) would also be filed with the RWQCB in conformance with NPDES Permit requirements. The SWPPP would contain a list of measures and BMPs that have been included in the project to reduce potential construction-related water quality impacts:

Standard Measures

- Burlap bags filled with drain rock shall be installed around storm drains to route sediment and other debris away from the drains. Silt sacks shall also be installed at all catch basins.
- Earthmoving or other dust-producing activities would be suspended during periods of high winds.
- All exposed or disturbed soil surfaces would be watered at least twice daily to control dust as necessary.
- Stockpiles of soil or other materials that can be blown by the wind would be watered or covered.
- All trucks hauling soil, sand, and other loose materials would be covered and all trucks would be required to maintain at least two feet of freeboard.
- All paved access roads, parking areas, staging areas and residential streets adjacent to the construction sites would be swept daily (with water sweepers).
- Vegetation in disturbed areas would be replanted as quickly as possible.
- A construction entrance shall be installed and maintained at all times to prevent sediment tracking.

With implementation of the identified construction measures and compliance with the NPDES General Construction Permit, construction of the proposed project would have a less than significant impact on water quality. **(Less than Significant Impact)**

Post-Construction Water Quality Impacts

The project's proposed ground coverage consists of approximately 151,000 square feet (46 percent) of impervious surfaces and 180,056 square feet (54 percent) of pervious surfaces. This would result in a net increase of 93,495 square feet (29 percent) of impervious surfaces compared to existing conditions. Since the project would add or replace more than 10,000 square feet of impervious surface area, the project would be subject to conformance with Provision C.3 of the MRP. A Stormwater Control Plan would be prepared for the project and would include appropriate source control and treatment control measures to meet LID requirements for reducing impervious surface area and removing pollutants from runoff entering the storm drainage system. In addition, the project would be required to maintain all post-construction treatment control measures, as outlined below, throughout the life of the project.

Standard Measures

The following standard measures, based on the RWQCB Best Management Practices (BMPs), are included in the proposed project as a condition of approval to ensure compliance with NPDES permit requirements to reduce post-construction water quality impacts.

- When the construction phase is complete, a Notice of Termination (NOT) for the General Permit for Construction will be filed with the RWQCB. The NOT shall document that all elements of the SWPPP have been executed, construction materials and waste have been properly disposed of, and a post-construction stormwater management plan is in place as described in the SWPPP for the project site.
- All post-construction treatment control measures shall be installed, operated, and maintained by qualified personnel. On-site inlets will be cleaned out at a minimum of once per year, prior to the wet season.
- The property owner/site manager shall keep a maintenance and inspection schedule and record to ensure the Treatment Control Measures continue to operate effectively for the life of the project.

JUHSD would implement and monitor the project's Stormwater Control Plan to ensure that the project would not exceed the capacity of the local drainage system and ensure compliance with the MRP requirements to reduce post-construction water quality impacts. Therefore, installation and maintenance of the proposed stormwater treatment systems would result in a less than significant impact on water quality. **(Less than Significant Impact)**

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

Daly City receives a large portion of its water supply from the San Francisco Public Utilities Commission (SFPUC) and supplements the SFPUC supply with groundwater pumped from six local wells. During dry periods, groundwater makes up a larger proportion (up to 45 percent) of the City's supply. The proposed project would replace the existing district office and adult education building and result in similar water demand; thus, the project would not be expected to result in the need for excessive groundwater pumping from the local wells, and would therefore not substantially decrease groundwater supplies. (see water supply discussion in Section 4.19 Utilities and Service Systems)

There are no designated groundwater recharge areas within the Westside Groundwater Basin. The principal sources of recharge are direct infiltration of rainfall, infiltration of irrigation water, and leakage from water and sewer pipes.[42] As discussed in Impact HYD-1, the proposed project would significantly reduce the pervious area on-site, resulting in a corresponding decrease in infiltration capacity. However, the project's Stormwater Control Plan 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)**

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

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

The project site is located in a fully developed area of Daly City and no surface water bodies are present on or adjacent to the project site. The nearest waterway to the project site is Colma Creek approximately two miles southeast of the project site. The City of Daly City owns and maintains the municipal storm drainage system which serves the project site. Runoff from the project site enters the storm drain line and flows to Colma Creek and eventually, San Francisco Bay.

The project would not substantially alter the existing drainage pattern of the site. Currently, surface water runoff on-site is conveyed to the existing storm drain system. Under existing conditions, the majority of the project site is covered with pervious surfaces. Under project conditions, the impervious surfaces would increase by approximately 29 percent, which would result in an increase in stormwater runoff. Although the project would increase impervious surfaces on-site, implementation of the proposed project would not substantially alter the existing drainage pattern of the site or area through the alteration of any waterway and would implement a Stormwater Control Plan (see Impact HYD-1) to reduce surface runoff. As a result, the project would not substantially increase erosion or siltation or exceed the capacity of the existing stormwater system. **(Less Than Significant Impact)**

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

As described in Existing Conditions, the project site is not located in a 100-year floodplain and, therefore, would not place new buildings within a 100-year flood hazard area or impede or redirect flood flows within a 100-year flood hazard area. The project site, due to its topography, is not subject to seiche, tsunami, or mudslide hazards. **(No Impact)**

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

As previously described, the project site is located within the Westside Groundwater Basin. There are existing groundwater management plans for the northwestern portion (North Westside Groundwater Basin Management Plan) and the southern portion (South Westside Basin Groundwater Management Plan) of the Basin. The project site is within the City of Daly City, which would be the water service provider for the project and is a participant in the South Westside Basin Groundwater Management Plan. The City would implement the groundwater protection and management goals and objectives of the Plan. The project, which proposes to construct a school district office and adult education building, would not conflict with or obstruct the implementation of the Plan. **(Less Than Significant Impact)**

4.11 LAND USE AND PLANNING

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

The Lead Agency for the project is Jefferson Union High School District. The project would not be subject to the land use regulations of the City of Daly City (e.g., 2030 General Plan and Municipal Code) except when analyzing off-site impacts within the jurisdiction of the City. The project site is not part of an approved habitat conservation plan or natural community conservation plan.

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

Furthermore, 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 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 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.

4.11.1.2 *Existing Conditions*

The project site, located at 123 Edgemont Drive in Daly City, is adjacent to the existing Westmoor High School located at 131 Westmoor Avenue, which serves grades nine through 12 as part of the Jefferson Union High School District. The project site has historically been used as a public park with recreational facilities since the 1960s.

The Daly City 2030 General Plan shows the general distribution, location, and intensity of land uses throughout the City. The project site has a Daly City 2030 General Plan *Public Parks (PP)* land use designation. This land use designation applies to all developed public open space including all state, regional and local parks and city maintained tot lots which provide recreational opportunities to the community.

The project site is located in a predominantly single-family residential neighborhood. Educational facilities (Martin Luther King Jr. Education Center, Thomas Edison Elementary School, Fernando Rivera Middle School), as well as Daly City Fire Station 95, are present south of the project site. Two major transportation corridors, SR 35 and I-280, are located in the project vicinity.

4.11.2 Impact Discussion

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

Impact LU-1: The project would not physically divide an established community. **(Less than Significant Impact)**

The project proposes to demolish and replace the existing sports clubhouse and recreational fields with a district office and an adult education building. The project does not propose dividing infrastructure such as highways, freeways, or major arterials that could inhibit the access of residents to the surrounding areas. The project would not physically divide an established community within the City because it would not interfere with or modify the movement of residents throughout nearby neighborhoods. **(Less Than Significant Impact)**

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

The Jefferson Union High School District is the Lead Agency for the proposed project, and the proposed project does not conflict with district policies. As discussed above, the project is not subject to the land use plans, policies, or regulations of the City of Daly City, aside from project effects which would occur off-site in the City's jurisdiction.

The project is within the AIA of SFO and subject to the ALUCP and FAR Part 77 regulations. As discussed in Section 4.9.2 Hazards and Hazardous Materials the project would be two-stories tall and not exceed the 200 feet above mean ground level threshold established by FAR Part 77. In addition, the project site is not located within SFO's 70 dB CNEL aircraft noise contour. Thus, the project would not result in a substantial safety hazard for people residing or working in the project area.

As previously noted, the project would demolish and replace the existing sports clubhouse and recreational fields with a district office and an adult education building. The proposed use of the project site is consistent with the educational uses present in the project vicinity, and therefore would not substantially conflict with surrounding land uses. In addition, the proposed project is subject to mitigation measures and standard conditions of approval to minimize environmental impacts and would be consistent with state and local policies adopted to avoid or mitigate environmental effects as described in the individual resource sections of this Initial Study. For these reasons, the proposed project would not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. **(Less than Significant Impact)**

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*

According to the Mineral Lands Classification Map of the SMGB, the City of Daly City does not include any mineral extraction areas of statewide importance.[43]

4.12.2 Impact Discussion

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

[43] California Department of Conservation. *Designated Areas Update San Francisco South Quadrangle.* Map. 1996.

Impact MIN-1:	The project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. **(No Impact)**

The project site, located at 123 Edgemont Drive in Daly City, has historically been used for agricultural and recreational purposes. The project site is currently developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. As discussed under Section 4.12.1.2 Existing Conditions, the project site does not contain any known mineral resources. There would be no impact on the availability of known, valuable mineral resources. **(No Impact)**

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

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

4.13 NOISE

4.13.1 Environmental Setting

Noise

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

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[44] 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.

4.13.1.1 *Regulatory Framework*

Federal

Federal Transit Administration Vibration Limits

The Federal Transit Administration (FTA) has developed vibration impact assessment criteria for evaluating vibration impacts associated with transit projects. The FTA has proposed vibration impact criteria based on maximum overall levels for a single event. The impact criteria for groundborne vibration are shown in Table 4.13-1 below. These criteria can be applied to development projects in jurisdictions that lack vibration impact standards.

[44] 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}.

Table 4.13-1: Groundborne Vibration Impact Criteria			
Land Use Category	**Groundborne Vibration Impact Levels (VdB inch/sec)**		
	Frequent Event	**Occasional Events**	**Infrequent Events**
Category 1: Buildings where vibration would interfere with interior operations	65	65	65
Category 2: Residences and buildings where people normally sleep	72	75	80
Category 3: Institutional land uses with primarily daytime use	75	78	83
Source: Federal Transit Administration. *Transit Noise and Vibration Assessment Manual.* September 2018.			

State

California Green Building Standards Code

The State of California established exterior sound transmission control standards for new non-residential buildings as set forth in the 2016 California Green Building Standards Code (Section 5.507.4.1 and 5.507.4.2). The sections that pertain to this project are as follows:

5.507.4.1 Exterior noise transmission, prescriptive method. Wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall meet a composite STC rating of at least 50 or a composite OITC rating of no less than 40, with exterior windows of a minimum STC of 40 or OITC of 30 when the building falls within the 65 dBA DNL noise contour of a freeway or expressway, railroad, industrial source or fixed-guideway noise source, as determined by the local general plan noise element.

5.507.4.2 Performance method. For buildings located, as defined by Section 5.507.4.1, wall and roof-ceiling assemblies exposed to the noise source making up the building envelope shall be constructed to provide an interior noise environment attributable to exterior sources that does not exceed an hourly equivalent noise level ($L_{eq\ (1\text{-}hr)}$) of 50 dBA in occupied areas during any hour of operation.

The performance method, which establishes the acceptable interior noise level, is the method typically used when applying these standards.

The California Collaborative for High-Performance Schools Best Practices Manual, 2014 Edition, establishes standards for background noise levels due to exterior noise sources. Sections EQ14.0 and EQ 14.1 of the CA-CHPS Manual state that the A-weighted background noise levels produced by exterior sound sources shall be no more than 45 dBA L_{eq}. A maximum level of 35 dBA L_{eq} is recommended for enhanced learning environments.

Local

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

The project site is located within the Airport Influence Area (AIA) of the San Francisco International Airport (SFO). Properties within the AIA may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (e.g., noise, vibration, and odors). The airport/land use compatibility of a proposed development or land use policy action shall be determined by comparing the proposed development or land use policy action with the safety compatibility criteria, noise compatibility criteria, and airspace protection/height limitation criteria in the ALUCP. The site is located outside of the SFO 70 dB CNEL noise contour.

Daly City General Plan

Various policies in the City's General Plan have been adopted for the purpose of avoiding or mitigating noise and vibration impacts resulting from planned development within the City. The following policies cover State Government Code requirements and the State Office of Noise Control Guidelines and are used as thresholds to determine if there would be a significant environmental impact.

Policy/Task	Description
Policy NE-3	Maintain a CNEL level of not more than 70 dBA L_{eq} in residential areas.
Task NE-3.1	Continue to enforce the environmental noise requirements of the State Building Code (Title 24).
Policy NE-1	Use the future noise contour map to identify existing and potential noise impact areas.
Policy NE-5	Maintain the City's current standard of 75 dBA CNEL for office, commercial and professional areas.
Task NE-11.3	Require all future development within the Airport Influence Area B boundary for San Francisco International Airport to conform to the relevant height/airspace protection, aircraft noise, and safety policies and land use compatibility criteria contained within the most recent adopted version of the comprehensive airport/land use compatibility plan (ALUCP) for the environs of San Francisco International Airport.

4.13.1.2 *Existing Conditions*

The project site is located in a predominantly single-family residential neighborhood. Educational facilities (Martin Luther King Jr. Education Center, Thomas Edison Elementary School, Fernando Rivera Middle School), as well as Daly City Fire Station 95, are present south of the project site. Two major transportation corridors are present in the project vicinity, including SR 35 which is approximately 1,700 feet west of the project site, and I-280, which is approximately 3,000 feet to the east of the project site.

The primary noise sources within the project vicinity include noise generated by outdoor activities at the nearby educational facilities and operation of Fire Station 95, as well as traffic noise from local roadways and SR 35 and I-280. According to the Daly City 2030 General Plan, the project site is

within a 60-65 dB CNEL future noise area. The site is currently not in operation and is not generating any substantial noise.

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

4.13.2.1 *Significance Criteria*

The following criteria were used to evaluate the significance of environmental noise resulting from the project:

- 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.
    - Hourly average noise levels during construction that would exceed 60 dBA L_{eq} at residential land uses or exceed 70 dBA L_{eq} at commercial land uses and exceed the ambient noise environment by at least 5 dBA L_{eq} for a period of more than one year would constitute a significant temporary noise increase in the project vicinity.
    - 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 5 dBA CNEL or greater, with a future noise level of less than the "normally acceptable" standard, or b) the noise level increase is 3 dBA CNEL or greater, with a future noise level equal to or greater than the "normally acceptable" standard. For reference, a 3 dBA CNEL noise increase

would be expected if the project would double existing traffic volumes along a roadway.

  - 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. Groundborne 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.

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

Construction Noise

The construction schedule assumes that the project would be built out over a period of approximately 15 months beginning in 2022. The project would be constructed in six different phases: paving and building demolition, site preparation, grading, building construction, paving, architectural coating. Pile driving, which would have the potential to exceed permitted noise levels, is not proposed as a method of construction.

Project implementation would result in intermittent short-term noise impacts resulting from construction-related activities. However, construction activities would be completed in accordance with the provision of the City's General Plan and Municipal Code, and would incorporate the following best management practices (BMPs) to further reduce potential noise impacts:

Best Management Practices:

1) Construction activities shall be limited to the hours between 8:00 am and 5:00 pm, Monday through Friday, and prohibited on weekends and holidays in accordance with the City's General Plan.
2) Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
3) Unnecessary idling of internal combustion engines should be strictly prohibited.
4) Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from nearby receptors. If they must be located near receptors, adequate muffling (with enclosures where feasible and appropriate) shall be used reduce noise levels at nearby receptors. Any enclosure openings or venting shall face away from receptors.
5) Utilize "quiet" air compressors and other stationary noise sources where technology exists.
6) A temporary noise control blanket barrier could be erected, if necessary, along building facades facing construction sites. This mitigation would only be necessary if conflicts

occurred which were irresolvable by proper scheduling. Noise control blanket barriers can be rented and quickly erected.

7) Control noise from construction workers' radios to a point where they are not audible at existing structures bordering the project site.
8) The contractor shall prepare a detailed construction plan identifying the schedule for major noise-generating construction activities. The construction plan shall identify a procedure for coordination with adjacent land uses so that construction activities can be scheduled to minimize noise disturbance.
9) Neighbors located adjacent to the construction site shall be notified of the construction schedule in writing.
10) Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., bad muffler, etc.) and will require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include in it the notice sent to neighbors regarding the construction schedule.

With the implementation of the identified BMPs above, the proposed project would reduce noise impacts to a less than significant level. **(Less Than Significant Impact)**

Operational Noise

Project Traffic

The proposed project would add a total of approximately 1,426 total average daily trips (ADT) on to surrounding roadways, including Edgemont Drive and Mariposa Avenue. This would not double the existing volumes of traffic on Edgemont Drive (2,860 ADT) or Mariposa Avenue (4,020 ADT); therefore, the project would not result in a permanent increase in ambient noise levels in the vicinity of the project area.[45] **(Less Than Significant Impact)**

Mechanical Equipment

The proposed project would include mechanical equipment, such as heating, ventilation, and air conditioning (HVAC) systems. The location of these systems is currently unknown, but they are typically located on rooftops or on the ground surrounding the buildings. The nearest sensitive receptors are single-family homes located across Edgemont Drive and Mariposa Avenue, approximately 120 feet away from the edge of the proposed buildings. Given the close proximity of noise-sensitive uses to the project site and lack of sufficient details about the mechanical equipment, mechanical enclosures, and rooftop/ground locations, there is the potential for noise from mechanical equipment to exceed five dBA above existing noise levels at noise-sensitive land uses in the immediate project vicinity. The final design plans shall be reviewed by a qualified acoustical consultant to address any potential conflicts. This is a potentially significant impact.

[45] A significant permanent noise level increase would occur if project-generated traffic generated by the project or project improvements/operations would substantially increase noise levels at sensitive receivers in the vicinity. A substantial increase would occur if: a) the noise level increase is five dBA CNEL or greater, with a future noise level of less than the "normally acceptable" standard, or b) the noise level increase is three dBA CNEL or greater, with a future noise level equal to or greater than the "normally acceptable" standard. For reference, a three dBA CNEL noise increase would be expected if the project would double existing traffic volumes along a roadway.

Mitigation Measure: Implementation of the following measures would ensure that noise levels generated do not create significant impacts on the residential uses in the vicinity of the project site:

MM NOI-1: Prior to the issuance of building permits, mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City of Daly City requirement of 70 dBA CNEL at residential land uses. A qualified acoustical consultant shall be retained by Jefferson Union High School District to review mechanical noise as the equipment systems are selected in order to determine specific noise reduction measures necessary to reduce noise to comply with the noise limit at the shared property line. Noise reduction measures could include, but are not limited to, selection of equipment that emits low noise levels and/or installation of noise barriers such as enclosures and parapet walls to block the line of sight between the noise source and the nearest receptors.

With implementation of these measures, operational noise would not result in a substantial increase in noise levels. **(Less Than Significant Impact with Mitigation Incorporated)**

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

The construction of the project may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used. Construction activities would include demolition, site preparation work, grading and excavation, trenching, paving, and new building framing and finishing. This analysis assumes the proposed project would not require pile driving, which can cause excessive vibration.

Groundborne vibration levels exceeding 0.3 in/sec PPV would have the potential to result in cosmetic damage to buildings in the proximity of the construction areas. Table 4.13-2 presents typical vibration levels that could be expected from construction equipment at a distance of 25 feet. Vibration levels would vary depending on soil conditions, construction methods, and equipment used.

Table 4.13-2: Vibration Source Levels for Construction Equipment

Equipment		PPV at 25 ft. (in/sec)
Clam shovel drop		0.202
Hydromill (slurry wall)	in soil	0.008
	in rock	0.017
Vibratory Roller		0.210
Hoe Ram		0.089
Large bulldozer		0.089
Caisson drilling		0.089
Loaded trucks		0.076
Jackhammer		0.035
Small bulldozer		0.003

Table 4.13-2: Vibration Source Levels for Construction Equipment	
Equipment	**PPV at 25 ft. (in/sec)**
Source: Transit Noise and Vibration Impact Assessment Manual, Federal Transit Administration, Office of Planning and Environment, U.S. Department of Transportation, September 2018.	

The nearest sensitive receptors would be residences located across Edgemont Drive and Mariposa Avenue, more than 25 feet away. As shown in Table 4.13-2 above, vibration levels more than 25 feet away would be less than 0.3 in/sec PPV; therefore, the project would not result in the generation of excessive groundborne vibration. **(Less Than Significant Impact)**

Impact NOI-3:	The project would not be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport. The project would not expose people residing or working in the project area to excessive noise levels. **(No Impact)**

SFO is a public-use airport located approximately 6.9 miles southeast of the project site. According to the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, the project site lies outside the 65 dBA CNEL 2020 noise contour of the airport. This means that future exterior noise levels due to aircraft from SFO would be compatible with the City's exterior noise standards for 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.[46] The City of Daly City Housing Element and related land use policies were last updated in 2014.

Regional

Plan Bay Area 2040

Plan Bay Area 2040 is a long-range transportation, land-use, and housing plan intended support a growing economy, provide more housing and transportation choices, and reduce transportation-related pollution and GHG emissions in the Bay Area. Plan Bay Area 2040 promotes compact, mixed-use residential and commercial neighborhoods near transit, particularly within identified Priority Development Areas (PDAs).[47]

ABAG allocates regional housing needs to each city and county within the nine-county San Francisco Bay Area, based on statewide goals. ABAG also develops forecasts for population, households, and economic activity in the Bay Area. ABAG, MTC, and local jurisdiction planning staff created the Regional Forecast of Jobs, Population, and Housing, which is an integrated land use and transportation plan through the year 2040 (upon which Plan Bay Area 2040 is based).

[46] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed October 20, 2020. http://hcd.ca.gov/community-development/housing-element/index.shtml.
[47] Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." http://projectmapper.planbayarea.org/. Accessed October 20, 2020.

4.14.1.2 *Existing Conditions*

According to California Department of Finance 2020 Census data, Daly City's population for 2020 was 109,142 persons.[48] In 2020, there were 33,428 households with an average of 3.37 persons per household.[49]

The jobs/housing balance is the relationship between the number of housing units required as a result of local jobs and the number of residential units available in the City. This relationship is quantified by the jobs/employed resident ratio. When the ratio reaches 1.0, a balance is struck between the supply of local housing and local jobs. The jobs/employed resident ratio is determined by dividing the number of local jobs by the number of employed residents that can be housed in local housing. The jobs/employed residents' ratio for Daly City in 2010 was 0.41, which means that there were 0.41 jobs for every employed resident in the City.

4.14.2 Impact Discussion

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

Impact POP-1: The project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure). **(Less than Significant Impact)**

A project can induce substantial population growth by proposing new housing beyond projected or planned development levels, generating demand for housing as a result of new businesses, extending roads or other infrastructure to previously undeveloped areas, or removing obstacles to population growth (e.g., expanding capacity of a wastewater treatment plant beyond that necessary to serve planned growth).

[48] State of California, Department of Finance. E-1 Population Estimates for Cities, Counties, and the State—January 1, 2019 and 2020. May 2020. Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/e-1/
[49] State of California, Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State—2011-2020 with 2010 Census Benchmark. May 2020. Available at: http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/

The project proposes to construct an approximately 27,266 square foot district office and a 37,690 square foot adult education building. Currently, district employees and adult education student use the existing district facilities located at 699 Serramonte Boulevard in Daly City, approximately 1.7 miles south of the project site. If the proposed project is constructed, the facilities at 699 Serramonte Boulevard would be closed, and all district employees and adult education students would use the proposed facilities at 123 Edgemont Drive. Accordingly, the project, which does not include construction of housing or infrastructure, would not directly or indirectly result in substantial unplanned population growth. **(Less than Significant Impact)**

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

There are no housing units or residences on-site, therefore, the project would not displace existing housing or people. **(No Impact)**

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 the proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Regional and 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 with the 2013 General Plan. The study also projected the extent of capital improvements for public facilities which would be needed in the City over the same time period. The City identified the capital improvements which would be needed to provide City services to all areas over the next 20 years. The relationship between the additional projected commercial and residential development and the need for improvements in public facilities were analyzed. The City formulated impact fees that are based on the extent to which any need for new public facilities is attributed to new development.

City of Daly City 2030 General Plan

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

Policies	Description
SE-3.1	Support and maintain the City's Insurance Service Office (ISO) rating of a Class 2, which establishes the fire insurance rates for the City.
SE-3.2	Provide for a seven (7) minute total reflex time for arrival of a first due company to 90 percent of all emergency incidents.
SE-3.3	Provide for an eleven (11) minute total reflex time for arrival of multiple fire companies to 90 percent of all structure fires.
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 Services

Fire protection services in Daly City are provided by a joint powers authority, the North County Fire Authority (NCFA). The NFCA consists of fire and emergency medical response services for the cities of Brisbane, Daly City, and Pacifica.[50] The NCFA responds to all fires, hazardous material spills, and medical emergencies within the constituent cities. The nearest fire station to the project site is Daly City Fire Department Station 95, located at 191 Edgemont Drive, which is adjacent to the southern border of the project site.

Police Protection Services

Police protection services are provided to the project site by the Daly City Police Department (DCPD). The DCPD is headquartered at 333 90th Street, approximately 1.7 miles northeast of the project site, and employs 111 sworn and 43 non-sworn personnel.

Schools

The City of Daly City is served by five public school districts that provide educational services to the community. It is comprised of 15 elementary schools, four middle schools, and six high schools. The Bayshore Elementary, Jefferson Elementary and Brisbane Elementary School Districts serve K-8 students. The Jefferson Union High School District serves grades 9-12, and the South San Francisco Unified School District serves K-12 students. The Jefferson School District is the second highest employer in the city, with a total of 1,418 employees in the Elementary and High school districts combined. There are also several private and parochial schools accessible and convenient to Daly City residents.

[50] North County Fire Authority. "Frequently Asked Questions". Accessed on February 25, 2020. Available at: https://northcountyfire.org/ncfa-overview/frequently-asked-questions/

Parks and Recreational Facilities

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

There are 13 municipal parks and 12 tot lots within Daly City, totaling 82.95 acres of developed recreational area. The City offers approximately 0.26 acres of parkland per 100 dwelling units, well below the State Recreation Commission standard of 2.6 acres of parkland per 100 dwelling units. In addition to City-provided parkland, San Bruno Mountain State and County Park provides an additional 2,063 acres of public park space comprising state and San Mateo county managed land.

The nearest parks to the project site are the Alta Loma Tot Lot, approximately 0.25 miles northeast of the project site, and Gellert Park, located approximately two miles south of the project site. The Alta Loma Tot Lot consists of 0.11 acres and features a play structure. Gellert Park consists of 19.53 acres and features a playground, clubhouse, tennis courts and a multiuse sports field. Additionally, the project site itself is a park and has historically provided recreational facilities; however, the project site has been closed to the public and no longer serves as a park or provide recreational opportunities.

Other Public Services

In addition to the aforementioned public services, Daly City also has four public libraries: the Serramonte Main Branch, John Daly, Westlake, and Bayshore. The nearest library to the project site is the Westlake Branch, located approximately 1.7 miles to the north.

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, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
1) Fire Protection?	☐	☐	☐	☒
2) Police Protection?	☐	☐	☐	☒
3) Schools?	☐	☐	☒	☐
4) Parks?	☐	☐	☒	☐
5) Other Public Facilities?	☐	☐	☐	☒

Impact PS-1:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. **(No Impact)**

As discussed under Impact POP-1, the proposed project would not result in an increase in population either directly or indirectly, or in the number of employees and students. Additionally, the proposed use is consistent with the use of the facilities located at 699 Serramonte Boulevard. Therefore, the proposed project would not increase demand for public services, including fire protection services. Service ratios and response times of the NCFA and mutual aid fire departments would not be affected. Thus, the proposed project would have no impact on the environment due to the provision of new or altered fire protection facilities. **(No Impact)**

Impact PS-2:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection services. **(No Impact)**

As stated above in Impact PS-1, the proposed project would not increase demand on public services. Police protection service ratios or response times would not increase as a result of the proposed project, and the proposed project would not necessitate additional or altered police protection facilities. Therefore, the proposed project would have no impact on the environment due to effects on police protection services. **(No Impact)**

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

The project itself is a school facility; the environmental effects of the proposed school facility are analyzed throughout this Initial Study. As discussed under Impact POP-1, the project would not result in a population increase, and the number of employees and students associated with the proposed facilities is consistent with the service population at the existing facilities located at 699 Serramonte Boulevard. Therefore, the proposed project would not indirectly cause environmental impacts by requiring the construction or expansion of school facilities. **(Less than Significant Impact)**

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

The proposed project does not include residential development and would replace existing administrative offices and adult education facilities. It is reasonable to anticipate the future school staff and students may use nearby recreational facilities, such as parks and community centers, for after-school activities; however, the increase in use at these facilities would be marginal. Additionally, the project includes a basketball court and landscaping which would largely meet the outdoor and recreational needs of the project's service population.

The project would replace the existing parkland and recreational facilities present on-site; however, as discussed under Section 4.15.1.2 Existing Conditions, the project site is closed to the public and is not in operation. The City's current standard is a ratio of three acres per 1,000 residents. The proposed project does not include any housing and would not change the parkland ratio. Employees and students of the proposed project may frequent the adjacent high school outdoor areas or local parks, such as Alta Loma Tot Lot and Gellert Park, during breaks or after work; however, the use would be minimal and would not result in a significant impact on recreational facilities. **(Less than Significant Impact)**

Impact PS-5:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. **(No Impact)**

Service ratios, response times, and other performance objectives of public services in the City of Daly City would not be affected by the proposed project. The proposed project would not necessitate the alteration of existing public service facilities, or the construction of additional facilities. For these reasons, the project would not result in substantial adverse impacts due to the provision of new or altered public facilities. **(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

City of Daly City 2030 General Plan

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

Policies	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.

4.16.1.2 *Existing Conditions*

There are 13 municipal parks and 12 tot lots within Daly City, totaling 82.95 acres of developed recreational area. The City offers approximately 0.26 acres of parkland per 100 dwelling units, below the State Recreation Commission standard of 2.6 acres of parkland per 100 dwelling units. In addition to City-provided parkland, San Bruno Mountain State and County Park provides an additional 2,063 acres of public park space comprising state and San Mateo county managed land.

The nearest parks to the project site are the Alta Loma Tot Lot, approximately 0.25 miles northeast of the project site, and Gellert Park, located approximately two miles south of the project site. The Alta Loma Tot Lot consists of 0.11 acres and features a play structure. Gellert Park consists of 19.53 acres and features a playground, clubhouse, tennis courts and a multiuse sports field. Additionally, the project site itself is a park and has historically provided recreational facilities; however, the project site is closed to the public and no longer serves as a park or provide recreational opportunities.

4.16.2 Impact Discussion

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

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

The proposed project does not include residential development and would replace existing administrative offices and adult education facilities. It is reasonable to anticipate the future school staff and students may use nearby recreational facilities, such as parks and community centers, for after-school activities; however, the increase in use at these facilities would be marginal. Additionally, the project includes a basketball court and landscaping which would largely meet the outdoor and recreational needs of the project's service population.

The project would replace the existing parkland and recreational facilities present on-site; however, as discussed under Section 4.15.1.2 Existing Conditions, the project site is closed to the public and is not in operation. The City's current standard is a ratio of three acres per 1,000 residents. The proposed project does not include any housing and would not change the parkland ratio. Employees and students of the proposed project may frequent the adjacent high school outdoor areas or local parks, such as Alta Loma Tot Lot and Gellert Park, during breaks or after work; however, the use would be minimal and would not result in a significant impact on recreational facilities. **(Less than Significant Impact)**

Impact REC-2:	The project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. **(Less than Significant Impact)**

As part of the proposed project, the existing recreational facilities on-site would be removed and replaced with a district office and adult education building. As discussed under Impact PS-3 and Impact REC-1, the loss of these recreational facilities is less than significant as these facilities are already closed to the public and recreational facilities in the project vicinity adequately serve residential development in the area. Therefore, no construction or expansion of recreational facilities that might have an adverse physical effect on the environment would be constructed.

The project also includes the construction of a basketball court on the southside of the adult education building. The impact of this recreational facility is analyzed throughout this Initial Study in the context of the overall development proposed by the project. Therefore, the recreational facilities proposed by the project would not have an adverse physical effect on the environment. **(Less than Significant Impact)**

4.17 TRANSPORTATION

The following is based upon a Transportation Analysis prepared for the project by Hexagon Transportation Consultants, Inc. in May 2021. A copy of the report is included in Appendix D of this Initial Study.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Regional Transportation Plan

The Metropolitan Transportation Commission (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 2040 in July 2017, which includes the region's Sustainable Communities Strategy (integrating transportation, land use, and housing to meet GHG reduction targets set by CARB) and Regional Transportation Plan (including a regional transportation investment strategy for revenues from federal, state, regional and local sources over the next 24 years).

Senate Bill 743

Senate Bill 743 (SB 743), which became effective September 2013, initiated reforms to the CEQA Guidelines to establish new criteria for determining the significance of transportation impacts that "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses." Specifically, SB 743 directs the Governor's Office of Planning and Research (OPR) to update the CEQA Guidelines to replace automobile delay—as described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion—with vehicle miles traveled (VMT) as the recommended metric for determining the significance of transportation impacts. OPR has approved the CEQA Guidelines implementing SB 743. Beginning on July 1, 2020, the provisions of SB 743 will apply statewide.

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, or not.

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, acceptable level of service at signalized intersections is LOS E.

4.17.1.2 *Existing Conditions*

Roadway Network

Regional access to the project site is provided by Interstate 280 (I-280), State Route 1 (SR 1), and State Route 35 (SR 35). Local access to the project site is provided via St. Francis Boulevard, Sullivan Avenue, Westmoor Avenue, Southgate Avenue, Edgemont Drive, Mariposa Avenue, and Eastmoor Avenue.

Regional Access

Interstate 280 (I-280) is an eight- to twelve-lane freeway with a posted speed limit of 65 miles per hour. The north-south freeway connects Daly City with nearby cities, such as San Francisco and San Bruno, and regional destinations, such as San José. Additionally, it provides access to the greater freeway network with direct connections to Interstates 680 and 880, U.S. Highway 101, and State Routes 1, 35, 92, and 85. The project site is served by interchanges at Sullivan Avenue and Junipero Serra Boulevard. The Sullivan Avenue interchange provides access from I-280 north of the site. The Junipero Serra Boulevard interchange provides access from I-280 south of the site, via San Pedro Road.

State Route 1 (*SR 1*) is a four- to eight-lane freeway in the vicinity of the project with a posted speed limit of 65 miles per hour. It provides regional access to the project site from San Francisco to the north via its interchange with I-280. The project is served by a hook-ramp interchange on SR 1. The northbound SR 1 off- and on-ramps at Serramonte Boulevard provide site access via St. Francis Boulevard. Access to and from southbound SR 1 is provided via St. Francis Boulevard by the southbound SR 1 on- and off-ramps at Clarinada Avenue.

State Route 35 (SR 35) a four-lane north-south freeway in the vicinity of the site. SR 35 extends northward through San Francisco and southward through San Bruno where it merges with I-280. Access to and from the project study area is provided via an interchange at Westmoor Avenue and SR 35.

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. The nearest bus stop is Route 121 located 1,000 feet east of the project site at the intersection of St. Francis Boulevard and Mariposa Avenue.

BART

The nearest BART station is the Colma BART station, located approximately 1.3 miles east of the

project site. From the Colma 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 (including Route 121) and shuttles operated by SamTrans that stop at the Colma BART station.

Pedestrian and Bicycle Facilities

Pedestrian access to the site is provided via sidewalks along the Edgemont Drive and Mariposa Avenue frontage of the project site, and along other vicinity streets including Westmoor Avenue, Eastmoor Avenue, San Pedro Road, St. Francis Boulevard, and Southgate Avenue. All intersections near the project site have pedestrian crosswalks and curb ramps on at least one leg of the intersection.

There are bicycle facilities in the project area that are classified as both bike lanes (Class II) and bike routes (Class III).

- Westmoor Avenue between Southgate Avenue and Baldwin Avenue
- Southgate Avenue between St. Francis Boulevard and Glenbrook Avenue
- Southgate Avenue between Westmoor Avenue and Crestwood Drive
- St. Francis Boulevard between Campana Avenue and Serramonte Boulevard

Class III bike routes are located along the street segments listed below:

- Skyline Drive south of Westridge Avenue
- Westmoor Avenue between Southgate Avenue and Skyline Drive
- Southgate Avenue between St. Francis Boulevard and Junipero Serra Boulevard
- Southgate Avenue between Glenbrook Avenue and Westmoor Avenue
- St. Francis Boulevard between Southgate Avenue and Campana Avenue

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. The JUHSD has also not adopted VMT thresholds. In the absence of a City policy or draft numeric thresholds, this study utilized the OPR guidelines in analyzing VMT.

4.17.2 Impact Discussion

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

Impact TRN-1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities. **(Less than Significant Impact)**

Pedestrian Facilities

Overall, the project is not expected to generate a large volume of pedestrian trips (six to seven new trips during the AM and PM peak hours), and would not exceed the capacity of project area pedestrian facilities. The project would also not result in a conflict with the Daly City Bicycle and Pedestrian Master Plan, which proposes pedestrian improvements along the I-280 overcrossings at 87th Street, Junipero Serra Boulevard crossing north of Washington Street, and San Pedro Road to improve pedestrian connectivity on both sides of the freeway as well as intersection improvement at the intersections of Skyline Boulevard/Westridge Avenue, Skyline Boulevard/Westmoor Avenue, Sullivan Avenue/Eastmoor Avenue, and Junipero Serra Boulevard/San Pedro Road. **(No Impact)**

Bicycle Facilities

The proposed project is expected to generate approximately one new bicycle trip during AM and PM peak hours. This would not result in exceedance of the carrying capacity of area bicycle facilities, and would not require the construction of new off-site facilities. The project would not conflict with planned projects to construct Class II bicycle lanes along the entire street of Eastmoor Avenue, as proposed in the recently adopted the Walk Bike Daly City plan. **(No Impact)**

Transit System

The project site is served by SamTrans bus service Route 120 and 121, the same bus service that serves the existing JUHSD district office and adult education buildings. While the project is estimated to generate approximately 71 transit riders in the AM peak hour and 56 transit riders in the PM peak hour, the proposed project is a relocation of the existing district office and adult education

buildings; therefore, it is assumed there would be no net increase in transit ridership compared to existing conditions and the proposed project would not exceed the capacity of bus service near the project site, and would not conflict with any SamTrans policies related to the transit system. **(No Impact)**

Impact TRN-2:	The project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b). **(Less than Significant Impact)**

The City of Daly City does not currently have an adopted vehicle miles traveled (VMT) policy, nor does the JUHSD. Therefore, the following discussion of VMT is provided as it pertains to consistency with the OPR guidelines. The project is an infill project and would relocate the existing JUHSD district office and adult education buildings. The project would not result in an increase in the number of employees or students and, therefore, no new vehicle trips would be generated within Daly City by the project, although the location of existing trips would change with the change in site from Serramonte Boulevard to the Edgemont Drive site. The proposed project would add a total of approximately 1,426 total average daily trips on to surrounding roadways, including Edgemont Drive and Mariposa Avenue. The proposed project site is approximately 1.7 miles northwest of the existing JUHSD district office and adult education buildings; thus, it is expected that the project would not increase the VMT of the existing trips. For these reasons, the proposed project would be presumed to cause a less than significant VMT impact. **(Less than Significant Impact)**

Impact TRN-3:	The project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). **(Less than Significant Impact)**

Vehicle access to the district office, adult education building, and parking lot would be provided via an existing driveway along Edgemont Drive and a new driveway along Mariposa Avenue. The Mariposa Venue driveway would be located at the curve of the street. Because of the sharp curve, northbound traffic approaching the curve is stop controlled, just south of the driveway. The project access points would be clear of any obstructions, thereby ensuring the exiting vehicles can see pedestrians on the sidewalk, and bicyclists and other vehicles traveling on the adjacent roadway. 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 pedestrians, bicyclists, and 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)**

Impact TRN-4:	The project would not result in inadequate emergency access. **(Less than Significant Impact)**

The proposed project's alignments of drive aisles, and the radii of the corners and curbs are adequate to accommodate circulation of emergency vehicles. The project proposes internal drive aisles of 26 feet wide and no dead-end aisles, consistent with Daly City Municipal Code guidelines. Therefore, the project would not result in inadequate emergency access. **(Less than Significant Impact)**

4.17.3 Non-CEQA Effects

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

Level of Service

As described previously, SB 743 establishes the thresholds for transportation impacts under CEQA based on VMT instead of LOS. An inconsistency with an established LOS policy would not be an impact on the environment under CEQA. Therefore, the following discussion from the Transportation Analysis is included for informational purposes only, consistent with City policies pertaining to LOS.

The traffic analysis evaluated the impacts of the proposed project at three signalized intersections and four unsignalized intersections during the weekday AM and PM peak hour periods of traffic. The AM peak hour is between 7:00 AM and 9:00 AM and the PM peak hour period is between 4:00 PM and 6:00 PM.

Traffic conditions at the study locations were evaluated using level of service (LOS), a qualitative description of intersection operation. LOS ranges from LOS A (conditions with little or no delay) to LOS F (conditions with excessive delays). One of the project's study intersections is maintained by Caltrans and is a State highway facility, however, because CEQA no longer allows consideration of LOS for purposes of disclosing environmental impacts, this discussion is focused on conformance with the policies of Daly City, therefore, the LOS standards and impact criteria used in this report were based on Daly City standards. The analysis methods for signalized and unsignalized intersections are described below.

Signalized Intersections

The intersection analysis for signalized intersections is based on the *2010 Highway Capacity Manual* LOS methodology. This method evaluates signalized intersection operations on the basis of average control delay time for all vehicles at the intersection. The City's General Plan has established that if the addition of project traffic degrades an intersection LOS to below LOS D during weekday morning or evening peak traffic periods, the project would have a significant impact on traffic. For intersections operating at LOS E or F, any increase in delay is considered a significant impact. The correlation between the levels of service and average control delay for signalized intersections is shown in Table 4.17-1 below.

Table 4.17-1: Signalized Intersection Level of Service Standards

Level of Service	Description	Average Control Delay Per Vehicle (seconds)
A	Signal progression is extremely favorable. Most vehicles arrive during the green phase and do not stop at all. Short cycle lengths may also contribute to the very low vehicle delay	10.0 or less

Table 4.17-1: Signalized Intersection Level of Service Standards		
Level of Service	**Description**	**Average Control Delay Per Vehicle (seconds)**
B	Operations characterized by good signal progression and/or short cycle lengths. More vehicles stop compared to LOS A, causing high levels of average vehicle delay.	10.1 to 20.0
C	Higher delays may result from fair signal progression and/or longer cycle lengths. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant, though may still pass through the intersection without stopping.	20.1 to 35.0
D	The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable signal progression, long cycle lengths, or high volume-to-capacity (V/C) ratios. Many vehicles stop and individual cycle failures are noticeable.	35.1 to 55.0
E	This is considered to be the limit of acceptable delay. These high delay values generally indicate poor signal progression, long cycle lengths, and high V/C ratios. Individual cycle failures occur frequently.	55.1 to 80.0
F	This level of delay is considered unacceptable by most drivers. This condition often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. Poor progression and long cycle lengths may also be major contributing causes of such delay levels	Greater than 80.0

Unsignalized Intersections

The City of Daly City does not assess unsignalized intersections with a level of service standard. For the traffic report, unsignalized intersections were assessed based on the approach delay for intersection approaches. This approach delay is correlated to a LOS grade. In addition to this analysis, an assessment for the need for signalization is made based on the operating conditions at each intersection and the peak hour volume signal warrant. The correlation between the levels of service and average control delay for unsignalized intersections is provided in Table 4.17-2 below.

Table 4.17-2: Unsignalized Intersection Level of Service Based on Control Delay		
Level of Service	**Description**	**Average Control Delay Per Vehicle** (seconds)
A	Little or no traffic delay	10.0 or less
B	Short traffic delays	10.1 to 15.0
C	Average traffic delays	15.1 to 25.0
D	Long traffic delays	25.1 to 35.0
E	Very long traffic delays	35.1 to 50.0
F	Extreme traffic delays	Greater than 50.0

Trip Generation

Project trip estimates for the proposed project are based on trip generation rates obtained from the *Institute of Transportation Engineers' (ITE's) Trip Generation Manual, Tenth Edition,* and data provided by the JUHSD for the district office and adult education.

JUHSD currently has 54 employees working for the district office and 23 employees working for the adult education program, for a total of 77 employees that are expected to work during regular office hours. The adult education program also has 14 faculty members teaching the classes. The peak-hour trips generated by the faculty members were estimated based on the class schedule for the 2020 fall semester. During the AM peak hour, there are eight classes starting at 8:45 or 9:00 AM on a typical weekday. It was assumed there would be eight AM inbound trips generated by the instructors of these classes. During the PM peak hour, there are no daytime classes ending after 3:30 PM, but there are 10 classes starting at 5:30 or 6:00 PM on a typical weekday. Based on the schedule, the instructors of these classes also have daytime classes. Therefore, it was assumed that a half of the instructors would leave and return to the site for the evening classes during the PM peak hour. Table 4.17-3 below summarizes the proposed project's trip generation during the AM and PM peak hours. Total daily trips are expected to be approximately 1,426.

Table 4.17-3: Project Trip Generation Estimates

Land Use	AM Peak Hour			PM Peak Hour		
	In	Out	Total	In	Out	Total
District Employees[1]	49	15	64	9	46	55
Adult Education Program Faculty[2]	8	0	8	5	5	10
Adult Education Program Students[3]	283	0	283	216	0	216
Total Project Trips	***340***	***15***	***355***	***230***	***51***	***281***

Notes:

[1] Trip rates (trips per employee) based on the ITE Trip Generation Manual, 10th Edition, for School District Office (Land Use 538)

[2] It was assumed each class would generate one AM peak hour inbound trip by instructors, and a half of the instructors would leave and return to the site for the evening classes during the PM peak hour

[3] The trip rate is calculated based on 90 percent of students attending the classes and about 15 percent of students carpooling or using transportation modes other than driving to access the site

Study Intersections

The study intersections are listed below.

1. Sullivan Avenue and Eastmoor Avenue
2. St. Francis Boulevard and Eastmoor Avenue
3. Edgemont Drive and Westmoor Avenue
4. St. Francis Boulevard and Mariposa Avenue
5. St. Francis Boulevard and Southgate Avenue

6. Southgate Avenue and Westmoor Avenue
7. Skyline Boulevard and Westmoor Avenue

Existing plus project and cumulative plus project conditions are summarized in Table 4.17-4 below. For the analysis completed in the traffic report, full buildout of the City's General Plan was assumed for assessing cumulative conditions. Under existing plus project conditions, all signalized intersections would continue to operate at an acceptable LOS D or better, except for Skyline Boulevard and Westmoor Avenue, which would continue to operate at LOS E. Of the four unsignalized intersections, operations at St. Francis Boulevard and Eastmoor Avenue, and Southgate Avenue and Westmoor Avenue would degrade from LOS D to LOS E under existing plus project conditions.

Under cumulative plus project conditions, two of the three signalized intersections would operate at an acceptable LOS D. The Skyline Boulevard and Westmoor Avenue intersection would operate at LOS F and LOS E during the AM and PM peak hours, respectively, with and without project conditions, which is deficient per the City of Daly City guidelines. There is no feasible way to widen or increase capacity at this intersection due to intersection orientation and space restrictions.

Of the four unsignalized intersections, operations at St. Francis Boulevard and Eastmoor Avenue, and Southgate Avenue and Westmoor Avenue would degrade from LOS D and LOS E, respectively, to LOS F during the AM peak hour under cumulative plus project conditions. The City does not have a LOS standard for unsignalized intersections; therefore, a signal warrant analysis for the intersections was prepared. The Southgate Avenue and Westmoor Avenue intersection would warrant signalization during the AM peak hour under exiting and cumulative conditions.

Recommendation: The need for intersection improvement or modification of traffic control at the intersection should be evaluated further with field observations in the future when volumes return to pre-Covid levels. It is recommended that the City evaluate the need for signalization or improvement at the intersection prior to issuance of the occupancy permit for the project. If the City determines an improvement or signalization is warranted, it would be appropriate for the project applicant to pay a fair share contribution towards the improvement. In addition, the improvement would occur within the existing roadways and all construction-related standard permit conditions, conditions of approval, and mitigation measures identified in this Initial Study would be adhered to. Thus, construction of the improvements would have a less than significant impact on the environment.

Queuing Analysis

St. Francis Boulevard and Eastmoor Avenue

Vehicle trips generated by the project would add 9 vehicles during the AM and 2 vehicles during the PM peak hour to the westbound Eastmoor Avenue and St. Francis Boulevard intersection, which would exceed the existing storage capacity. During the AM peak hour, the vehicle queue would reach the intersection of Mirada Drive and Eastmoor Avenue. The St. Francis Boulevard and Eastmoor Avenue intersection, however, is stop controlled and any queueing delay is expected to be brief.

Skyline Boulevard and Westmoor Avenue

The westbound left-turn movement at Skyline Boulevard and Westmoor Avenue currently exceeds the queuing capacity under existing conditions. Vehicle trips generated by the project would add 12 vehicles during the AM and 11 vehicles during the PM peak hour to the westbound Skyline Boulevard and Westmoor Avenue intersection; however, since the queuing capacity is already exceeded, the project trips are not expected to result in a noticeable increase in vehicle queue length. Vehicles not within the storage capacity of the westbound left-turn lane would back up to the Mayfair Avenue and Westmoor Avenue intersection; however, there are existing "Keep Clear" markings at the intersection to ensure vehicles do not block the intersection while waiting to turn.

Table 4.17-4: Peak Hour Intersection LOS Summary												
Intersection		**Peak Hour[1]**	**Existing**		**Existing Plus Project**			**Cumulative**		**Cumulative Plus Project**		
			Avg. Delay[2] (sec)	**LOS**	**Avg. Delay[2] (sec)**	**LOS**	**Incr. In Crit.[2] Del. (sec)**	**Avg. Delay[2] (sec)**	**LOS**	**Avg. Delay[2] (sec)**	**LOS**	**Incr. In Crit. Del.[2](sec)**
1.	Sullivan Avenue and Eastmoor Avenue	AM	31.6	C	32.3	C	0.7	32.9	C	33.1	C	0.2
		PM	23.8	C	24.4	C	0.6	25.0	C	25.7	C	0.7
2.	St. Francis Boulevard and Eastmoor Avenue	AM	27.0	D	**48.8**	**E**	21.8	34.0	D	**61.0**	**F**	27.0
		PM	15.8	C	22.5	C	6.7	17.5	C	25.5	D	8.0
3.	Edgemont Drive and Westmoor Avenue	AM	9.2	A	9.8	A	0.6	9.4	A	10.0	A	0.6
		PM	9.1	A	9.5	A	0.4	9.0	A	9.4	A	0.4
4.	St. Francis Boulevard and Mariposa Avenue	AM	13.0	B	22.0	C	9.0	13.3	B	23.5	C	10.2
		PM	10.7	B	13.8	B	3.1	10.9	B	14.4	B	3.5
5.	St. Francis Boulevard and Southgate Avenue	AM	15.0	B	15.1	B	0.1	14.8	B	15.7	B	0.9
		PM	14.4	B	14.5	B	0.1	14.4	B	14.8	B	0.4
6.	Southgate Avenue and Westmoor Avenue	AM	28.4	D	**39.3**	**E**	10.9	**41.5**	**E**	**54.2**	**F**	12.7
		PM	17.6	C	21.1	C	3.5	19.3	C	24.0	C	4.7
7.	Skyline Boulevard and Westmoor Avenue[3]	AM	74.3	E	**78.0**	**E**	3.7	**93.1**	**F**	**96.2**	**F**	3.1
		PM	57.8	E	**61.3**	**E**	3.5	**68.1**	**E**	**74.3**	**E**	6.2

1 Peak Hour Definitions: AM = AM Peak Hour; Peak Hour; PM = PM Peak Hour.

2 Intersection level of service for TWSC intersection is represented by the delay for the worse stop-controlled approach. Intersection level of service for all other control types is represented by average delay for all movements.

Table 4.17-4: Peak Hour Intersection LOS Summary											
Intersection	**Peak Hour[1]**	**Existing**		**Existing Plus Project**			**Cumulative**		**Cumulative Plus Project**		
		Avg. Delay[2] (sec)	**LOS**	**Avg. Delay[2] (sec)**	**LOS**	**Incr. In Crit.[2] Del. (sec)**	**Avg. Delay[2] (sec)**	**LOS**	**Avg. Delay[2] (sec)**	**LOS**	**Incr. In Crit. Del.[2](sec)**
3 This intersection is a Caltrans facility. Since Daly City is the lead agency for this project, the LOS standards and impact criteria used in this report are based on Daly City standards.											
Bold indicates LOS E or F operations.											
Indicates Adverse effect due to the project											

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

State

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*

The Ohlone Indian Tribe inhabited a large area along the California Coast, running from the San Francisco Bay Area to Monterey Bay. The tribelet which inhabited the Daly City area lived primarily in two main inland villages located on the Colma and San Bruno Creeks and a seasonal village along the coast at Mussel Rock. According to the Northwest Information Center (NWIC), Native American resources in the northern part of San Mateo County have been found in close proximity to sources of water (including perennial and intermittent streams and springs), near the bay margin and its associated wetlands, along the coastal terraces and sheltered valleys, and near ecotones and other productive environments.

The project site is in an urbanized area and is developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot. The project site is not on or adjacent to waterways, bay margins, associated wetlands, coastal terraces, sheltered valleys, or ecotones or other productive environments.

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:				
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	☐	☒	☐	☐
2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Impact TCR-1: The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). **(Less than Significant Impact with Mitigation Incorporated)**

No Native American tribes have formally requested to be put on the City's or JUHSD's notification list for projects undergoing review pursuant to AB 52, and no known tribal cultural resources are associated with the project site at this time. Ohlone Indians have however historically inhabited the Daly City area, primarily in two main inland villages located on the Colma and San Bruno Creeks and a seasonal village along the coast at Mussel Rock. According to the Northwest Information Center (NWIC), Native American resources in the northern part of San Mateo County have been found in close proximity to sources of water (including perennial and intermittent streams and springs), near the bay margin and its associated wetlands, along the coastal terraces and sheltered valleys, and near ecotones and other productive environments.

Accordingly, the potential exists for identifying Native American cultural resources within the city. Since the project site has been previously disturbed with grading to create the large terrace and developed with a sports clubhouse, tennis courts, grass sports fields, and parking lot, there is a low possibility for uncovering buried objects with tribal cultural value. Project-related grading and

excavation during construction could however result in significant impacts, if any unknown buried resources were discovered. In the event that an inadvertent discovery of a tribal cultural resource is made, mitigation measures MM CUL-2.1 and MM CUL-3.1 will be implemented, as stated in Section 4.5 Cultural Resources of this Initial Study. **(Less than Significant Impact with Mitigation Incorporated)**

Impact TCR-2:	The project would not cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. **(Less than Significant Impact with Mitigation Incorporated)**

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

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 2016.[51]

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.

[51] City of Daly City. *2015 Urban Water Management Plan.* June 20, 2016. http://www.dalycity.org/Assets/Departments/Water+and+Wastewater/pdf/City+of+Daly+City+2015+UWMP_Public+Review+Draft_Full+Report.pdf

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. CALGreen requires that construction projects recycle or salvage 65 percent of non-hazardous construction and demolition waste.

4.19.1.2 *Existing Conditions*

Water Service

Potable water is provided for the city by the Daly City Department of Water and Wastewater Resources (DWWR). According to the UWMP, the City relies on local groundwater pumping from six municipal wells and water purchased from the San Francisco Public Utilities Commission (SFPUC).

The City has 11 storage tanks and there are 16 associated pump and booster stations throughout the city which deliver water to the distribution system. The City produces an average of about 45 percent of its water from local wells. With the scheduled replacement of Well 10 with the new Junipero Serra Well, groundwater is expected to supply an average of 50 percent of the water needs. Since 1999, groundwater supplies have provided as much as 44 percent in drought years and as little as eight percent in wet years when participating with a pilot conjunctive use program with SFPUC. During dry periods, groundwater makes up a larger proportion of the City's supply. The City also uses tertiary recycled water from the North San Mateo County Sanitation District wastewater treatment plant, to offset potable/aquifer water demands.

Water demand in Daly City amounted to approximately 10,102 acre feet per year (AFY) in 2010. According to the 2015 UWMP, water demand is projected to increase to 15,133 AFY by 2030 with buildout of the City's General Plan and Bayshore Development.[52] The City's current use is at 48 gallons per capita per day (gpcd) for residential uses and 62 gpcd for gross use. Water consumption by institutions, such as educational facilities, is projected to be approximately 567 AFY in 2030. The City's water conservation programs are designed to save 0.82 million gallons per day (mgd) by 2035.

For the purposes of this analysis, it is assumed the project site currently does not generate water demand.

Wastewater

Wastewater collection and treatment for Daly City is managed by the North San Mateo County Sanitation District (NSMCSD), which is a subsidiary of the City of Daly City. Wastewater produced within the District is treated at the NSMCSD Wastewater Treatment Plant (WWTP), which is located at the corner of John Daly Boulevard and Lake Merced Boulevard. Also, a portion of the District in

[52] One acre-foot is 325,851 gallons of water.

Daly City (Crocker and Southern Hills) flows and is treated by the City and County of San Francisco via contract.

The WWTP has an average dry weather flow design capacity of 10.3 million gallons per day (mgd); however, the NSMCSD discharges and operates the WWTP at or below the permitted average dry weather flow rate of eight mgd (averaged over 3 consecutive dry months) and does not anticipate a need to increase the permitted flow rate in the next five years. Dry weather flow to the WWTP averaged 6.3 mgd in 2009. Daly City generates approximately 6.3 mgd of wastewater per day, which is projected to increase to 7.6 mgd with buildout of the Daly City 2030 General Plan.

For the purposes of this analysis, it is assumed the project site currently does not generate any wastewater.

Storm Drainage

As discussed in Section 4.10 Hydrology and Water Quality, the project site is located within the Colma Creek Watershed which extends from Guadalupe Canyon at the foot of San Bruno Mountain to the northeast and Junipero Serra Boulevard and into South San Francisco to the west and south. Storm drain lines in the project area are provided and maintained by the City of Daly City Department of Water and Wastewater Resources. The City's storm drain system is designed to retain runoff flows during a two-hour storm event with a ten-year frequency, e.g. a storm event with an intensity expected every ten or so years.

Solid Waste

Solid waste is collected from Daly City homes and businesses and is processed by Allied Waste Services of Daly City at its Mussel Rock Transfer Station. Materials that cannot be recycled or composted are transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. The Ox Mountain landfill is permitted by the California Integrated Waste Management Board to receive 3,598 tons per day or 1.3 million tons per year. The landfill's maximum capacity is 60.5 million cubic yards, with an estimated closure year of 2034.[53] The remaining capacity at this facility is 22,180,000 cubic yards.[54] In 2010, Daly City deposited 52,350 tons of solid waste, approximately 26 percent less than what was deposited in 2006.

For the purposes of this analysis, it is assumed the project site currently does not generate any solid waste.

[53] CalRecycle. Solid Waste Facility Permit – Corinda Los Trancos Landfill (Ox Mountain). April 12, 2017. https://www2.calrecycle.ca.gov/PublicNotices/Details/2078

[54] California's Department of Resources Recycling and Recovery (CalRecycle). SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Date accessed February 24, 2020. https://www2.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/Detail/

4.19.2 Impact Discussion

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

Impact UTL-1: The project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. **(Less than Significant Impact)**

Water Facilities

The proposed project would use approximately 18,213 gallons per day (gpd) of water.[55] While this would increase water usage at the project site, the proposed project would replace the existing district office and adult education building in the City of Daly City. The new district office and adult education buildings would have similar capacities and functions as the previous buildings; thus, water usage is expected to remain the same and the project's water demand has been accounted for in

[55] CalEEMod. *Appendix D Default Data Tables: Table 9.1 Water Use Rates*. October 2017. Water use rates were calculated based on the land use type of General Office (District Office) and Junior College (Adult Education).

the City's UWMP. For this reason, the project would not exceed the available water supply or require the relocation or construction of water facilities. **(Less than Significant Impact)**

Wastewater Treatment Facilities

Pursuant to the Federal Clean Water Act and California's Porter-Cologne Water Quality Control Act, the RWQCB regulates wastewater discharges to surface waters, such as San Francisco Bay, through the NPDES program. Wastewater permits contain specific requirements that limit the pollutants it discharges. As required by the RWQCB, the WWTP monitors its wastewater to ensure that it meets all requirements. The RWQCB routinely inspects treatment facilities to ensure permit requirements are met.

Sewage from development on the project site would be treated at the WWTP in accordance with the existing NPDES permit. The project would generate approximately 15,481 gpd of wastewater.[56] As discussed above, the project would replace the existing district office and adult education buildings with new buildings of similar capacity and functionality; therefore, wastewater generation is not expected to increase across the wastewater system. Since the WWTP has adequate treatment capacity under existing conditions, the proposed project would not require the relocation or construction of wastewater facilities. **(Less than Significant Impact)**

Stormwater Drainage Facilities

As discussed under Impact HYD-1 in Section 4.10 Hydrology and Water Quality, the project's proposed ground coverage consists of approximately 151,000 square feet (46 percent) of impervious surfaces and 180,056 square feet (54 percent) of pervious surfaces. This would result in a net increase of 93,495 square feet (29 percent) of impervious surfaces compared to existing conditions. Since the project would add or replace more than 10,000 square feet of impervious surface area, the proposed project would be required to comply with Provision C.3 of the Municipal Regional Permit (MRP), as discussed in Section 4.10 Hydrology and Water Quality, which would reduce the rate and volume of stormwater runoff from the project site. Furthermore, the project would incorporate measures to reduce stormwater runoff from the site, including disconnected downspouts and vegetated swales. It is anticipated that the existing storm drain system can accommodate the runoff that would be generated from the proposed development. The proposed project would not require the expansion or construction of storm drainage facilities. **(Less than Significant Impact)**

Electric Power, Natural Gas, & Telecommunication Facilities

The project would utilize existing utility connections to connect to the City's electric, natural gas, and telecommunications systems. Although the project would increase the demand on existing facilities in the City, relocation of existing or construction of new facilities would not be needed to serve the proposed project. As a result, the proposed project would have a less than significant impact on these facilities. **(Less than Significant Impact)**

[56] Wastewater is conservatively estimated to be 85 percent of water usage.

Impact UTL-2:	The project would not have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years. **(Less than Significant Impact)**

As discussed under Impact UTL-1, the proposed project's water demand would not exceed the City's projected supply as identified in the City's UWMP. **(Less than Significant Impact)**

Impact UTL-3:	The project would not result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. **(Less than Significant Impact)**

The WWTP has an average dry weather flow design capacity of 10.3 million gallons per day (mgd). The General Plan FEIR determined that full buildout of the General would generate approximately 6.66 mgd. This is below the permitted flow rate of eight mgd, leaving 1.34 mgd of unused capacity at buildout. The project would generate approximately 0.02 mgd of wastewater to be treated at the WWTP; however, the project would replace the existing district office and adult education buildings so the increase in wastewater generation would be incremental at most. In addition, as discussed under Impact UTL-1, the WWTP monitors its wastewater to ensure that it meets all requirements and the RWQCB routinely inspects treatment facilities to ensure permit requirements are met. For these reasons, there would be adequate capacity at the WWTP. **(Less than Significant Impact)**

Impact UTL-4:	The project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **(Less than Significant Impact)**

Waste generation and disposal data for Daly City is maintained by CalRecycle. According to the CalRecycle, the total amount of solid waste landfilled in 2019 was 52,899 tons.[57] The proposed project would generate approximately 406 pounds of solid waste per day.[58] As discussed previously the project would replace the existing district office and adult education buildings so the increase in solid waste would be incremental at most. The project would increase solid waste generation in the City by substantially less than one percent and therefore would not significantly impact landfill capacity. **(Less than Significant Impact)**

[57] CalRecycle. "Disposal Rate Calculator". Accessed October 27, 2020. https://www2.calrecycle.ca.gov/LGCentral/AnnualReporting/DisposalRateCalculator.

[58] CalEEMod. *Appendix D Default Data Tables: Table 10.1 Solid Waste Disposal Rates*. October 2017. Solid waste rates were calculated based on the land use type of General Office (District Office) and Junior College (Adult Education).

Impact UTL-5:	The project would not be noncompliant with federal, state, or local management and reduction statutes and regulations related to solid waste. **(Less than Significant Impact)**

In addition to the solid waste generated by the project occupants, large amounts of construction waste would be generated during construction and demolition activities. At least 65 percent of this construction waste will be recycled, in compliance with the CALGreen. Implementation of recycling measures during the construction and post-construction phases of the project would contribute to the City's compliance with the waste diversion requirements under state law. **(Less than Significant Impact)**

4.20 WILDFIRE

4.20.1 Environmental Setting

4.20.1.1 *Regulatory Framework*

State

Fire Hazard Severity Zones

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 (FHSZs), these maps influence how people construct buildings and protect property to reduce risk associated with wildland fires. FHSZs are divided into areas where the state has financial responsibility for wildland fire protection, known as state responsibility areas (SRAs), and areas where local governments have financial responsibility for wildland fire protection, known as local responsibility areas (LRAs). Homeowners living in an SRA are responsible for ensuring that their property is in compliance with California's building and fire codes. Only lands zoned for very high fire hazard are identified within LRAs.

4.20.1.2 *Existing Conditions*

The proposed project is located in an urban, developed area of Daly City. The project site is not within or near state responsibility areas or a very high severity wildfire hazard zone.[59]

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:				
1) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
2) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
3) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

[59] California Department of Forestry and Fire Protection. *Fire Hazard Severity Zone Viewer*. Date accessed September 30, 2020. https://egis.fire.ca.gov/FHSZ/

	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:				
4) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

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

4.21 MANDATORY FINDINGS OF SIGNIFICANCE

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
1)	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?	☐	☒	☐	☐
2)	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.)	☐	☒	☐	☐
3)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact MFS-1: The project does not 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. **(Less than Significant Impact with Mitigation Incorporated)**

As discussed in the individual sections, the proposed project would not degrade the quality of the environment with the implementation of identified mitigation measures. As discussed in Section 4.4 Biological Resources, the project would not impact sensitive habitat or species but requires the implementation of appropriate mitigation measures for nesting preconstruction bird surveys, as well as tree protection measures during construction to preserve existing trees intended to remain on the property. There are no historic buildings on-site or in the immediate project vicinity as discussed in Section 4.5 Cultural Resources. The potential for subsurface geological, paleontological, or cultural resources is low on-site due to the composition of underlying soil, and implementation of appropriate mitigation measures would ensure the proper treatment of any resources discovered inadvertently during construction. **(Less Than Significant Impact with Mitigation Incorporated)**

Impact MFS-2:	The project does not have impacts that are individually limited, but cumulatively considerable. **(Less than Significant Impact with Mitigation Incorporated)**

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 evaluated the proposed project against the full buildout of the Daly City General Plan.

Because criteria air pollutant and GHG emissions would contribute to regional and global emissions of such pollutants, the identified thresholds developed by BAAQMD were developed such that a project-level impact would also be a cumulatively considerable impact. The project would not result in a significant emissions of criteria air pollutants or GHG emissions and, therefore, would not make a substantial contribution to cumulative air quality or GHG emissions impacts. The discussion in Section 4.3 Air Quality provides analysis of the cumulative health risk effects of the project's TACs emissions during construction, and concluded those effects would be less than significant.

With implementation of mitigation measures and compliance with federal, state, and local regulations, development on the site would not result in significant cultural resources, geology and soils or hydrology and water quality impacts and would not contribute to cumulative impacts to these resources. Also, the project would not impact agricultural and forest resources, aesthetics, public services, or mineral resources and, therefore, the project would not contribute to a significant cumulative impact on these resources.

Biological Resources

No sensitive habitat areas are located within 2,000 feet of the project site. Any nearby projects would require pre-construction nesting bird surveys as mitigation. Therefore, the project and other cumulative projects would have a less than significant impact on nesting birds given that the pre-construction nesting surveys ensure nesting activity is not disrupted. The project would provide replacement tree planting of approximately 62 trees to offset the nine trees proposed for removal. **(Less than Significant Impact with Mitigation Incorporated)**

Noise

Typically, a three (3) dBA noise increase would be perceivable by sensitive receptors. In order for traffic noise to increase by 3 dBA, traffic volumes would need to double along a local roadway. Under the cumulative condition reflecting General Plan buildout roadway volumes, the proposed project and future development under the General Plan would not double existing daily traffic volumes along the surrounding roadways such that sensitive receptors would be affected by significant traffic related noise from cumulative projects.[60] **(Less than Significant Impact)**

[60] City of Daly City. *City of Daly City General Plan Update EIR*. October 2012.

Traffic

As discussed in Section 4.17 Transportation, vehicle miles traveled (VMT) for the proposed project would be less than significant. The proposed project would replace the existing district office and adult education buildings, approximately 1.7 miles away; thus, there would not be a substantial net change in VMT. Regional VMT is expected to decrease as cities continue with infill development, mixed-use developments, and increased building density along transit corridors. Thus, the project would have a less than significant cumulative impact. **(Less than Significant Impact)**

Utilities

As discussed in Section 4.19 Utilities and Service Systems, the proposed project would replace the existing district office and adult education buildings. As a result, utility usage is expected to remain the same or at most incrementally increase compared to existing conditions and the project would not contribute to cumulative impacts to water facilities, storm drain facilities, or solid waste facilities. In addition, since the project would replace the existing district office and adult education building, it was accounted for in the most recent UWMP and there are sufficient water supplies. **(Less than Significant Impact)**

Impact MFS-3:	The project does not have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly. **(Less than Significant Impact with Mitigation Incorporated)**

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. Under 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 hazardous materials potentially present in building materials and site soils, construction TACs and noise. However, implementation of mitigation measures would reduce these impacts to a less than significant level. No other direct or indirect adverse effects on human beings have been identified. **(Less Than Significant Impact with Mitigation Incorporated)**

SECTION 5.0 REFERENCES

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SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

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6.2 CONSULTANTS

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Arborist Consultant

SECTION 7.0 ACRONYMS AND ABBREVIATIONS

2017 CAP	Bay Area 2017 Clean Air Plan
AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	Asbestos Containing Materials
ADA	Americans with Disabilities Act
AFY	Acre-Feet Yearly
AICP	American Institute of Certified Planners
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
Basin Plan	Water Quality Control Plan for the San Francisco Bay Basin
Bgs	Below ground surface
BIA	California Building Industry Association
BMPs	Best Management Practices
Btu	British thermal units
CA	California
CalARP	California Accidental Release Prevention
Cal Fire	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
Caltrans	California Department of Transportation
Cal/OSHA	California Occupational Safety and Health Administration
CARB	California Air Resources Board
CBC	California Building Standards Code
C/CAG	San Mateo City and County Association of Governments
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act

CFCs	Chlorofluorocarbons
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 equivalent
CRECs	Controlled Recognized Environmental Conditions
CRHR	California Register of Historical Resources
dBA	A-weighted decibel
DNL	Day-Night Level
DPM	Diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
EZRI	Earthquake Zones of Required Investigation
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FEMA	Federal Emergency Management Agency
FHSZs	Fire Hazard Severity Zones
FIRM	Flood Insurance Rate Maps
FMMP	Farmland Mapping and Monitoring Program
FTA	United States Department of Transportation's Federal Transit Administration
GHGs	Greenhouse gases
GPD	Gallons per day
GWh	Gigawatt hours
HCP	Habitat Conservation Plan
HFCs	Hydrofluorocarbons
HRECs	Historically Recognized Environmental Conditions
IS	Initial Study

JUHSD	Jefferson Union High School District
LBPs	Lead-Based Paints
LED	Light-Emitting Diode
LEED	Leadership in Energy and Environmental Design
L_{eq}	Equivalent noise level
LID	Low-Impact Development
L_{max}	Maximum A-weighted
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
Mgd	Million gallons per day
MM	Mitigation Measure
MND	Mitigated Negative Declaration
Mpg	Miles per gallon
Mph	Miles per hour
MRP	NPDES Permit
MRZs	Mineral Resource Zones
MTC	Metropolitan Transportation Commission
MT CO_2e	Metric tons of carbon dioxide equivalent
NAHC	Native American Heritage Commission
NESHAP	National Emission Standards for Hazardous Air Pollutants
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NOD	Notice of Determination
NOI	Notice of Intent
NO_x	Nitrogen oxides
NO_2	Nitrogen dioxide
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
O_3	Ground-level ozone
OITC	Outdoor/Indoor Transmission Class
OPR	Office of Planning and Research

PCB	Polychlorinated biphenyls
PCE	Peninsula Clean Energy
PG&E	Pacific Gas & Electricity
PM	Particulate matter
$PM_{2.5}$	Fine particulate matter
PM_{10}	Coarse particulate matter
PPC	Public Protection Classification
PPV	Peak Particle Velocity
REC	Recognized environmental condition
RHNA	Regional Housing Need Allocation
ROG	Reactive organic gases
RPS	Renewable Portfolio Standards
RWQCB	Regional Water Quality Control Board
SamTrans	San Mateo County Transit District
SSOs	Sanitary Sewer Overflows
SB	Senate Bill
SFHA	Special Flood Hazard Areas
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SMBG	State Mining and Geology Board
SO_x	Sulfur oxides
SR	State Route
SRA	State Responsibility Area
STC	Sound Transmission Class
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TACs	Toxic air contaminants
TCR	Tribal Cultural Resources
TDM	Transportation Demand Management
TIA	Transportation Impact Analysis

USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
UST	Underground storage tank
VHFHSZs	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled
VOCs	Volatile Organic Compounds