

California Department of Transportation

DIVISION OF AERONAUTICS - M.S. #40
1120 N STREET
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
PHONE (916) 654-4959
FAX (916) 653-9531
TTY 711
www.dot.ca.gov



October 4, 2024

Michael Smith
Senior Planner
Community Development Dept. City of San Bruno
567 El Camino Real Community Development Department
San Bruno, CA, 94110

Electronically Sent <msmith@sanbruno.ca.gov>

Re: SCH 2022120217: Addendum to the adopted IS/MND for the San Bruno 2023-2031 Housing Element Update

Dear Mr. Smith:

The California Department of Transportation (Caltrans), Division of Aeronautics (Division), has reviewed the Addendum to the adopted Initial Study/Mitigated Negative Declaration (IS/MND) for the San Bruno 2023-2031 Housing Element Update (Project). The Division of Aeronautics collaborates with cities, counties, and Airport Land Use Commissions (ALUC) to ensure compliance with the State Aeronautics Act (California Public Utilities Code Section 21001 et seq.).

The proposed Project aims to update the City of San Bruno's (City) General Plan Housing Element. The new 2023-2031 Housing Element will replace the current 2015-2023 version and guide the City in addressing future housing needs across all income levels. This Project serves as an addendum to the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the City of San Bruno's 2023-2031 Housing Element Update (6th Cycle) of the General Plan. The original project was adopted by the City Council on January 24, 2023, under Resolution No. 2023-08.

Sites affected by the Project may lie within an airport safety zone or noise contours of the San Francisco International Airport. The Comprehensive Airport Land Use Compatibility Plan for the Environs of the San Francisco International Airport (ALUCP), adopted by the ALUC pursuant to the PUC, Section 21674, is crucial for minimizing noise nuisance and safety hazards around airports while promoting orderly development.

Noise Sensitive Land Uses and Considerations

The project may encompass noise-sensitive land uses as defined by the Public Utilities Code Section 21669.5(3). This includes residential developments such as single-family and multi-family dwellings. Additionally, Section 21669.5(4) defines a "noise-sensitive project" as new construction or reconstruction for planned noise-sensitive land use within an airport's Community Noise Equivalent Level (CNEL) of 65 decibels (dB) or higher.

While California Code of Regulations (CCR: Title 21 CCR, §5006) defines 65 dB CNEL as the "acceptable level" for residents near airports, the Caltrans Aeronautics California Land Use Planning Handbook (Handbook) advises against using this standard for new noise-sensitive development. To mitigate the impact of aircraft noise, any new residential development within the airport's 65 dB CNEL contour should be designed and constructed to ensure that interior noise levels in all habitable rooms do not exceed 45 dB CNEL. It is recommended that aviation easements be required for all new residential or noise-sensitive developments within an Airport Influence Area (AIA) to ensure long-term compatibility with airport operations and provide transparency regarding potential noise impacts. However, while these construction measures and the easement address interior noise, they will not reduce exterior aircraft noise levels, and future residents may still experience annoyance from aircraft noise in the surrounding area.

By implementing these recommendations as mitigation measures, the project can minimize noise impacts on future residents and ensure responsible development near the airport.

Other Airport Hazards

California Public Utilities Code Section 21659 prohibits structural hazards near airports. Structures should not be at a height that will result in penetration of the airport imaginary surfaces. In accordance with Federal Aviation Regulation, Part 77 "Objects Affecting Navigable Airspace" a Notice of Proposed Construction or Alteration (Form 7460-1) may be required by the Federal Aviation Administration (FAA). For further information or a copy of Form 7460-1, please refer to the FAA website <https://oeaaa.faa.gov/oeaaa/external/portal.jsp>.

We recommend further review of potential compatibility concerns related to airport obstructions and hazards to flight, such as:

- **Wildlife attractants:** Project elements (e.g., open waste disposal areas) that could attract wildlife, posing a hazard to aircraft.
- **Lighting:** Improper lighting design or excessive light intensity could interfere with night-time airport operations and can cause safety hazards to pilots.

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- **Glare:** Reflective surfaces (e.g., extensive use of solar panels) could create glare that disrupts pilots' visibility.

The Division encourages collaboration among the Lead Agency, the Airport Land Use Commission, and airport representatives to prioritize the safety and well-being of current and future residents in the City of San Bruno.

Thank you for the opportunity to review and comment. If you have any questions, please contact me by email at tiffany.martinez@dot.ca.gov.

Sincerely,



Tiffany Martinez
Associate Transportation Planner
Division of Aeronautics

c: State Clearing House <state.clearinghouse@opr.ca.gov>,
Matthew Friedman, Chief Office of Aviation Planning, <matthew.friedman@dot.ca.gov>,
Nirupama Stalin, Senior Transportation Planner <nirupama.stalin@dot.ca.gov>

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