Initial Study/Mitigated Negative Declaration

Peninsula Heights

PA-2020-012

Prepared by

CITY OF SAN MATEO CALIFORNIA

In Consultation with

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

November 2020

CITY OF SAN MATEO

Mitigated Negative Declaration

Pursuant to Section 21000 et seq of the Public Resources Code and the City of San Mateo Environmental Review Guidelines and Procedures, a Negative Declaration is hereby granted for the following project:

1. Project Title and Number:	Peninsula Heights, PA-2020-012
2. Lead Agency Name and Address:	City of San Mateo, Planning Division 330 W. 20th Avenue, San Mateo, CA 94403
3. Contact Person and Phone Number:	Rendell Bustos, Acting Senior Planner rbustos@cityofsanmateo.org (650) 522-7211
4. Project Location and APNs:	2655, 2755, 2800, and 2988 Campus Drive, San Mateo. APNs 041-521-010, -020; 041-522-010, -020.
5. Project Sponsor's Name & Address:	Preston O'Connell, Harvest Properties 180 Grand Avenue, Suite 1400 Oakland, CA 94610 poconnell@harvestproperties.com (510) 466-1485
6. General Plan Designation:	Executive Office
7. Zoning:	Executive Park (E1-1)

8. Description of Project:

The project proposes to demolish four existing office buildings totaling approximately 224,844 square feet, and construct 290 residential units comprised of a mix of three- to four-story townhomes, stacked flats, and detached single-family residences on two sites totaling 15.45-acres.

FINDING

The Planning Manager finds the project described above will not have a significant effect on the environment in that the attached Initial Study identifies one or more potentially significant effects on the environment for which the project applicant, before public release of this draft Mitigated Negative Declaration (MND), has made or agrees to make project revisions that clearly mitigate the effects to a less than significant level.

MITIGATION MEASURES INCLUDED IN THE PROJECT TO REDUCE POTENTIALLY SIGNIFICANT EFFECTS TO A LESS THAN SIGNIFICANT LEVEL

A. **AESTHETICS**- The project will not have a significant impact on this resource; therefore, no mitigation is required.

B. **AGRICULTURE AND FORESTRY RESOURCES** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

C. **AIR QUALITY -** The project will not have a significant impact on this resource; therefore, no mitigation is required.

D. **BIOLOGICAL RESOURCES**

Impact BIO-1: Disturbance of raptor or other migratory bird nests present in any on-site or adjacent trees during construction activities could result in the loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes abandonment and/or loss of reproductive effort is considered a taking by the CDFW.

MM BIO-1.1: Construction activities (or at least the commencement of such activities) shall be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside of the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1st through August 30th.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31 then preconstruction surveys for nesting birds 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. During this survey, the ornithologist shall inspect all trees and other potential nesting

habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and immediately adjacent to the impact areas for nests).

MM BIO-1.3: 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 to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that nests of species protected by the MBTA and California Fish and Game Code shall not be disturbed during project implementation. However, if the ornithologist has confirmed that the hatchlings have left the nest, construction may commence within the buffer zone.

MM BIO-1.4: If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1st).

E. CULTURAL RESOURCES

Impact CUL-2: While archaeological resources are not anticipated to be discovered during project construction, the possibility remains that as-yet undiscovered resources could be unearthed during grading, excavation, or other site disturbances.

MM CUL-2: If any unanticipated prehistoric or significant historic period cultural materials are exposed during construction grading and/or excavation, operations shall stop within 50 feet of the find and a qualified professional archaeologist contacted for evaluation and further recommendations consistent with CEQA and City of San Mateo requirements. Potential recommendations could include evaluation, collection, recordation, analysis, etc. of any significant cultural materials followed by a professional report.

Impact CUL-3: The project site has been identified as having a low sensitivity for cultural materials associated with Native Americans, including human remains. Nonetheless, there is the potential for discovery of human remains during grading, excavation, and other site disturbing activities.

MM CUL-3: In the event that human remains are discovered during excavation and/or grading of the site or public right-of-way, all activity within a 50-foot radius of the find shall be stopped. The San Mateo County

Coroner shall be notified and make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

F. **ENERGY -** The project will not have a significant impact on this resource; therefore, no mitigation is required.

G. **GEOLOGY AND SOILS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

H. **GREENHOUSE GAS EMISSIONS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

I. HAZARDS AND HAZARDOUS MATERIALS

Impact HAZ-2: Release of hazardous materials, specifically asbestos-containing materials, lead-based paint, and polychlorinated biphenyls present on site could pose a risk to construction workers and nearby sensitive receptors during building demolition.

MM HAZ-2: To reduce the potential for construction worker and nearby sensitive receptor exposure to hazardous materials (ACMs and lead-based paint), the following measures shall be incorporated at all times during the construction of 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.

- As required under the Toxic Substances Control Act (TSCA), all building materials containing PCBs at levels greater than 50 parts per million (ppm) must be removed upon discovery. If demolition is likely to impact such materials, they must be properly characterized and removed in accordance with TSCA regulations. The project shall be required to submit a PCB Screening Assessment form prior to building permit issuance.

J. HYDROLOGY AND WATER QUALITY - The project will not have a significant impact on this resource; therefore, no mitigation is required.

K. LAND USE AND PLANNING - The project will not have a significant impact on this resource; therefore, no mitigation is required.

L. MINERAL RESOURCES - The project will not have a significant impact on this resource; therefore, no mitigation is required.

M. NOISE AND VIBRATION

Impact NOI-1: Sensitive receptors in the project area could be exposed to noise levels exceeding the limits specified in the City's Municipal Code during project construction activities. In addition, noise from HVAC equipment could exceed the daytime and nighttime hourly thresholds at adjacent uses.

MM NOI-1: Modification, placement, and operation of construction equipment are possible means for minimizing the impact of construction noise on existing sensitive receptors. Construction equipment should be well-maintained and used judiciously to be as quiet as possible. Additionally, construction activities for the project should include the following best management practices to reduce noise at sensitive land uses:

- Construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, Saturdays between 9:00 a.m. and 5:00 p.m., and Sundays and holidays between 12:00 p.m. and 4:00 p.m., in accordance with the City's Municipal Code, unless permission is granted with a development permit or other planning approval. Work in the public right-of-way shall be restricted to the weekdays. No work shall be allowed to take place within the public right-of-way after 5:00 p.m. Earth haul and materials delivery to and from the site, including truck arrivals and departures to and from the site, will be prohibited between the weekday hours of 4:00 p.m. to 5:30 p.m. Signs outlining these restrictions shall be posted at conspicuous locations on-site.
- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Use of exceptionally loud equipment such as jackhammers and concrete saws within 35 feet of shared property lines shall be limited, as feasible.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors and property lines. If they must be located within 35 feet of receptors and property lines, adequate muffling (with barriers or enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers' radios to a point where they are not audile at existing residences bordering the project site.
- The contract 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 residential land uses so that construction activities can be scheduled to minimize noise disturbance.

- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise and vibration during demolition and construction activities. The disturbance coordinator will determine the cause of the noise and vibration complaints (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 it in the notice sent to neighbors regarding the construction schedule.

Impact NOI-1.2: Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's Noise Ordinance. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine the specific noise reduction measures necessary, if any, to reduce noise to comply with the City's Noise Ordinance. Noise reduction measures shall include, but are not limited to, selection of equipment that emits low noise levels and the installation of noise barriers, such as enclosures or parapet walls to block the line-of-sight between the noise source and the nearest receptors. Verification of review by an acoustical consultant, and any noise reduction measures to be implemented, shall be provided to the Planning Division prior to issuance of building permits for the superstructure.

N. **POPULATION AND HOUSING** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

O. **PUBLIC SERVICES** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

P. **RECREATION -** The project will not have a significant impact on this resource; therefore, no mitigation is required.

Q. **TRANSPORTATION** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

R. **TRIBAL CULTURAL RESOURCES -** The project will not have a significant impact on this resource; therefore, no mitigation is required.

S. **UTILITIES AND SERVICE SYSTEMS** - The project will not have a significant impact on this resource; therefore, no mitigation is required.

T. **WILDFIRE -** The project will not have a significant impact on this resource; therefore, no mitigation is required.

U. **MANDATORY FINDINGS OF SIGNIFICANCE** – With the implementation of the mitigation measures identified above, and the conditions of approval identified in the Initial Study, the project would not degrade the quality of the environment, substantially affect the biological resources, or eliminate important examples of California history or prehistory. The mitigation measures and standard permit conditions would also ensure that the project's contribution to cumulative impacts would not be cumulatively considerable, and the project would not cause substantial adverse effects on human beings, either directly or indirectly.

PUBLIC REVIEW PERIOD

Before 5:00 p.m. on **Wednesday, December 2, 2020** any person may:

1. Review the Draft MND as an informational document only; or
2. Submit written comments regarding the information and analysis in the Draft MND. Before the MND is adopted, Planning staff will prepare written responses to any comments, and revise the Draft MND, if necessary, to reflect any concerns raised during the public review period. All written comments will be included as part of the Final MND.

Rendell Bustos, Acting Senior Planner Date

Aaron Aknin, Interim Planning Manager Date

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SECTION 1.0 INTRODUCTION AND PURPOSE

1.1 PURPOSE OF THE INITIAL STUDY

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

The project proposes to demolish four existing office buildings and construct a maximum of 290 townhomes and single-family detached units on a 15.45-acre site. 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 20-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 20-day public review period should be sent to:

Rendell Bustos, Senior Planner
City of San Mateo
Planning Division
330 W. 20th Avenue
San Mateo, CA 94403
(650) 522-7211
rbustos@cityofsanmateo.org

1.3 CONSIDERATION OF THE INITIAL STUDY AND PROJECT

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

1.4 NOTICE OF DETERMINATION

If the project is approved, the City of San Mateo 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

Peninsula Heights

2.2 LEAD AGENCY CONTACT

Rendell Bustos, Acting Senior Planner
City of San Mateo
Planning Division
330 W. 20th Avenue
San Mateo, CA 94403
(650) 522-7211
rbustos@cityofsanmateo.org

2.3 PROJECT APPLICANT

Harvest Properties, Inc.
180 Grand Avenue, Suite 1400
Oakland, CA 94610
(510) 466-1485

2.4 PROJECT LOCATION

The project site is located at 2655, 2755, 2800, and 2988 Campus Drive, adjacent to State Route (SR) 92, in the City of San Mateo. Regional and vicinity maps of the site are shown on Figures 2.4-1 and 2.4-2, respectively. An aerial photograph of the site and surrounding land uses is shown on Figure 2.4-3.

2.5 ASSESSOR'S PARCEL NUMBER

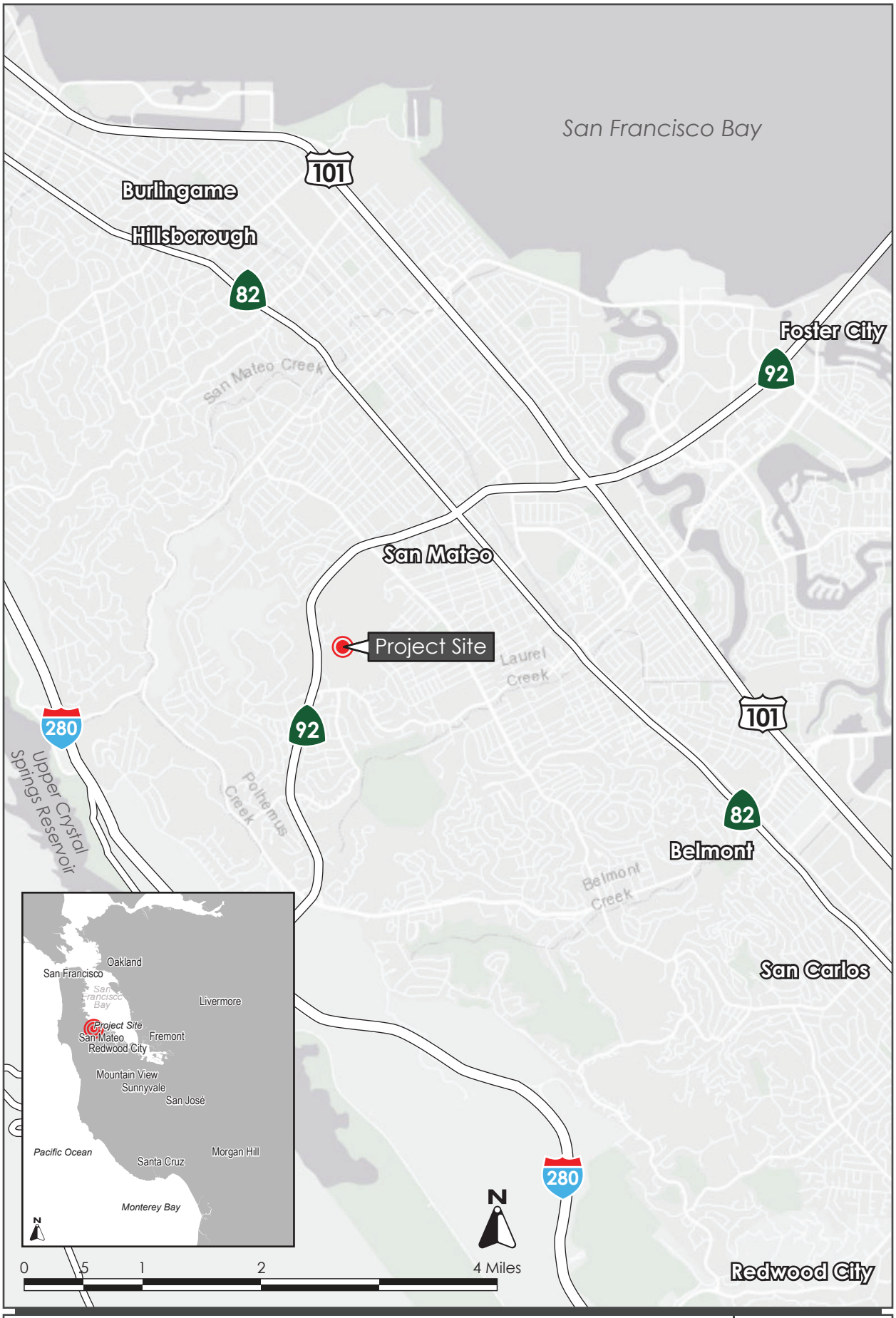
APNs 041-521-010, -020; 041-522-010, -020

2.6 GENERAL PLAN DESIGNATION AND ZONING DISTRICT

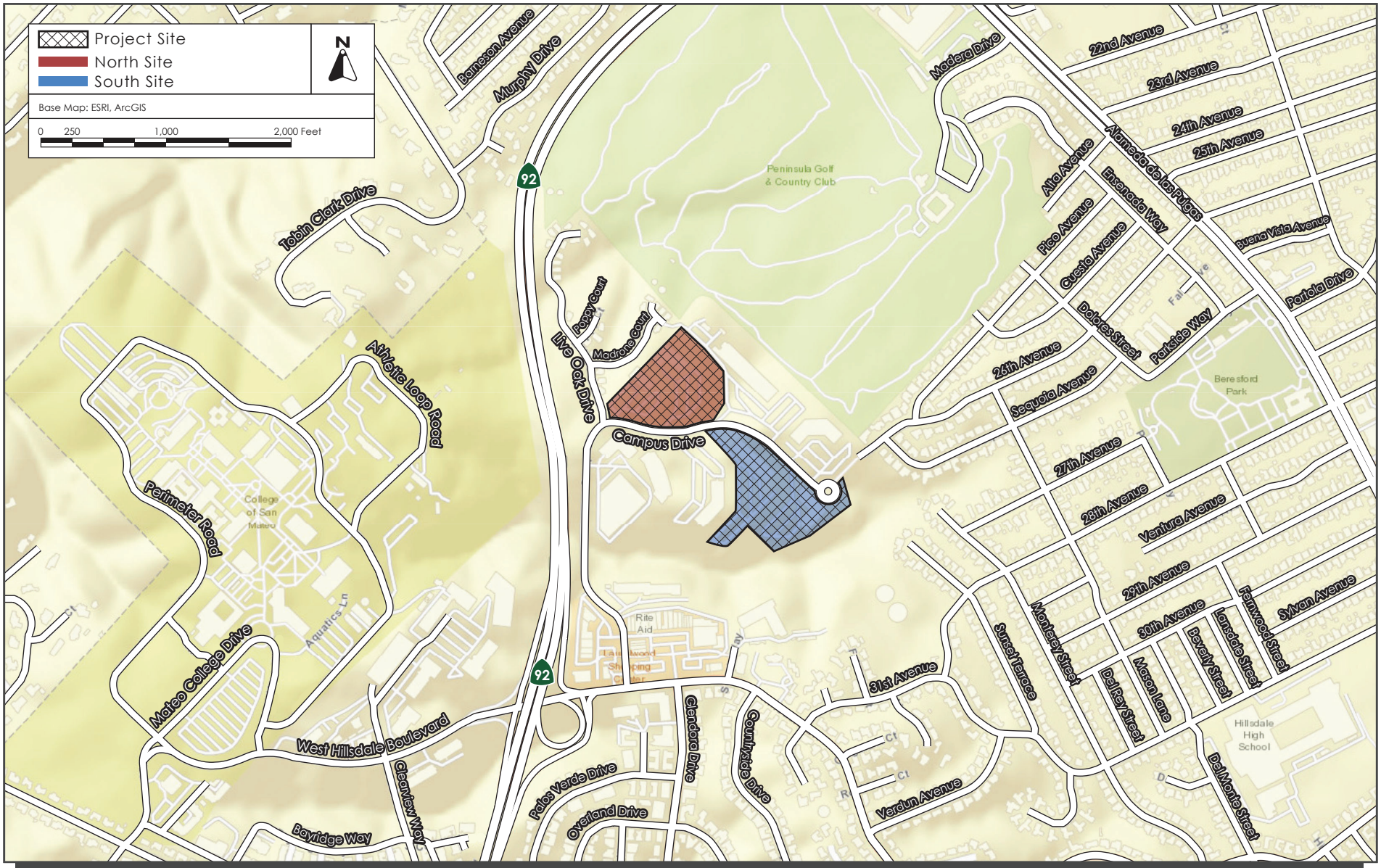
General Plan Designation: Executive Office
Zoning District: Executive Park (E1-1)

2.7 HABITAT PLAN DESIGNATION

There is no applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP), or other approved local, regional, or state habitat conservation plan for the City of San Mateo.



REGIONAL MAP | FIGURE 2.4-1



VICINITY MAP | FIGURE 2.4-2

AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.4-3

2.8 PROJECT-RELATED APPROVALS, AGREEMENTS, AND PERMITS

- Site Plan and Architectural Review (SPAR)
- Special Use Permit
- Vesting Tentative Subdivision Map
- Site Development Planning Application (SDPA)
- Density Bonus Application
- Demolition and Grading Permits

SECTION 3.0 PROJECT DESCRIPTION

3.1 PROJECT OVERVIEW

The project proposes to demolish four existing office buildings totaling approximately 224,844 square feet, and construct 290 residential units comprised of a mix of three- to four-story townhomes, stacked flats, and detached single-family residences on a 15.45-acre site.

3.1.1 Existing Setting

The project site is a part of a larger 26-acre office campus located in western San Mateo, on the southeast side of California State Route 92. The campus is developed with six office buildings, between two to four stories in height, with individual surface parking lots. The project site is composed of a 3.38 acre parcel (2655 Campus Drive, APN: 041-522-010), a 5.03 acre parcel (2755 Campus Drive, APN: 041-522-020), a 4.25 acre parcel (2800 Campus Drive, APN: 041-521-020), and a 2.79 acre parcel (2988 Campus Drive, APN: 041-521-010).

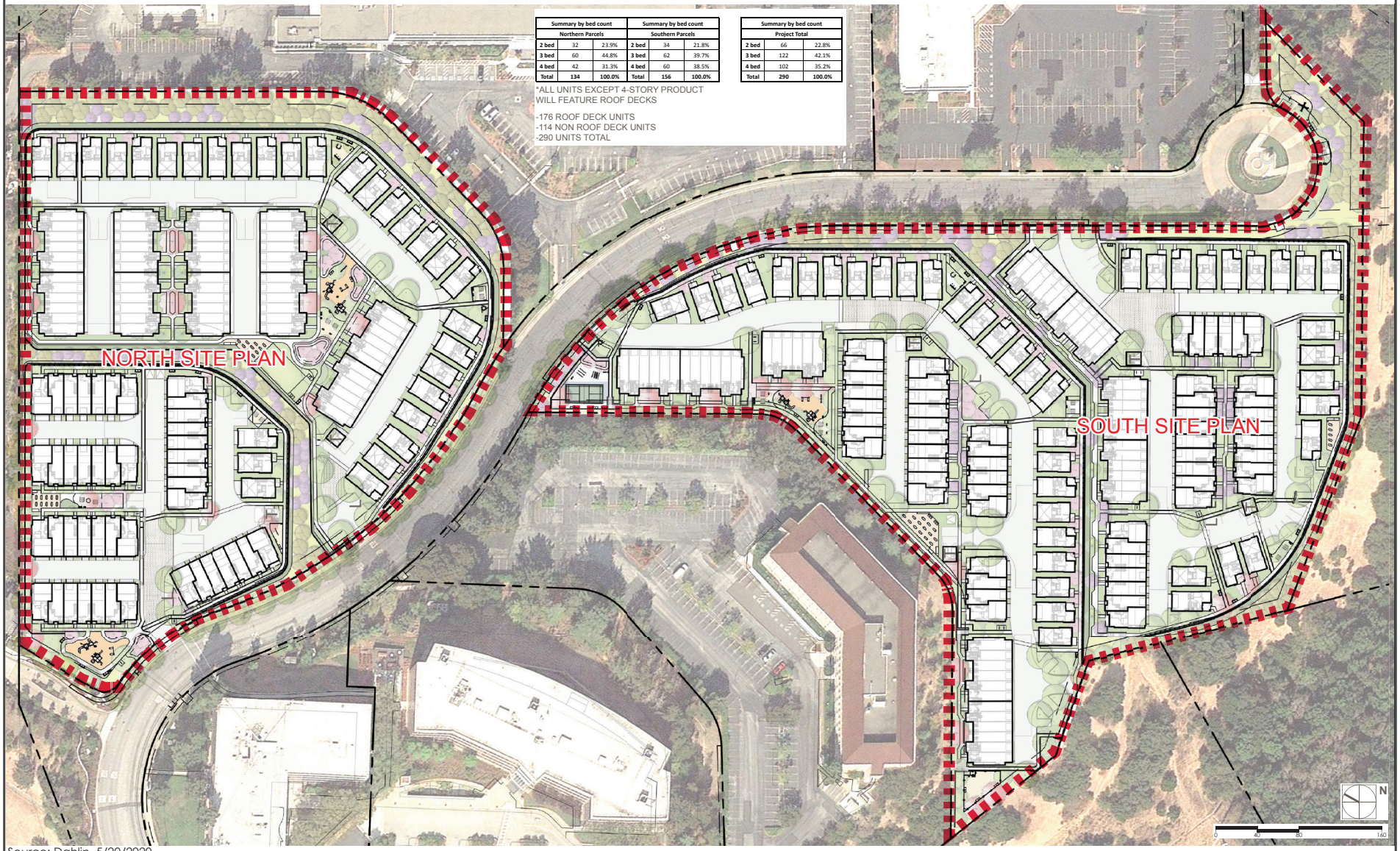
The site is located on a hillside which slopes downward in a southeasterly direction. Access to the site is provided via four driveways on Campus Drive - two two-way driveways on the north side and two two-way driveways on the south side of Campus Drive. Surrounding land uses include residential, office, commercial, institutional, and recreational uses. The site is located just south of the Peninsula Golf and Country Club and east of the College of San Mateo. Single-family residential neighborhoods are located to the north, south and east of the site. The project site is bordered to the south and southeast by an approximately 20-acre undeveloped canyon, which features the Beresford Creek riparian corridor and is populated by coastal oak woodland and valley oak woodland habitat.

3.2 PROPOSED DEVELOPMENT

The proposed residences would be organized into two areas: a northern parcel (approximately 7.04 acres) containing 134 units and a southern parcel (approximately 8.41 acres) containing 156 units. The two areas would be bisected by Campus Drive. The northern parcel would provide 60 four-story townhomes over flats, 44 three-story townhomes, and 30 single-family dwellings. The southern parcel would provide 54 four-story townhomes over flats, 58 three-story townhomes, and 44 single-family dwellings.

The proposed residential buildings would reach a maximum height of 46 feet and would be designed with contemporary and traditional architectural forms and materials. Unit sizes would range from approximately 1,400 to 2,200 square feet. All units would have two-car parking garages with ground level entries and a combination of useable private open space in the form of balconies and roof decks. The project also includes publicly accessible mini-parks, picnic areas, open spaces, terraces, and landscaped paths and trails which would connect the residences to surrounding roadways and on-site amenities.

The proposed site plan is shown on Figure 3.2-1. Building elevations are shown on Figures 3.2-2 through 3.2-4. The proposed landscape plan is shown on Figures 3.2-5 through 3.2-7.



Summary by bed count		
Northern Parcels		
2 bed	32	23.9%
3 bed	60	44.8%
4 bed	42	31.3%
Total	134	100.0%

Summary by bed count		
Southern Parcels		
2 bed	34	21.8%
3 bed	62	39.7%
4 bed	60	38.5%
Total	156	100.0%

Summary by bed count		
Project Total		
2 bed	66	22.8%
3 bed	122	42.1%
4 bed	102	35.2%
Total	290	100.0%

*ALL UNITS EXCEPT 4-STORY PRODUCT WILL FEATURE ROOF DECKS

-176 ROOF DECK UNITS
-114 NON ROOF DECK UNITS
-290 UNITS TOTAL

Source: Dahlin, 5/20/2020.

PROPOSED SITE PLAN

FIGURE 3.2-1

RIGHT ELEVATION

REAR ELEVATION

LEFT ELEVATION

FRONT ELEVATION

SINGLE-FAMILY DWELLING ELEVATIONS

FIGURE 3.2-2

LEFT ELEVATION

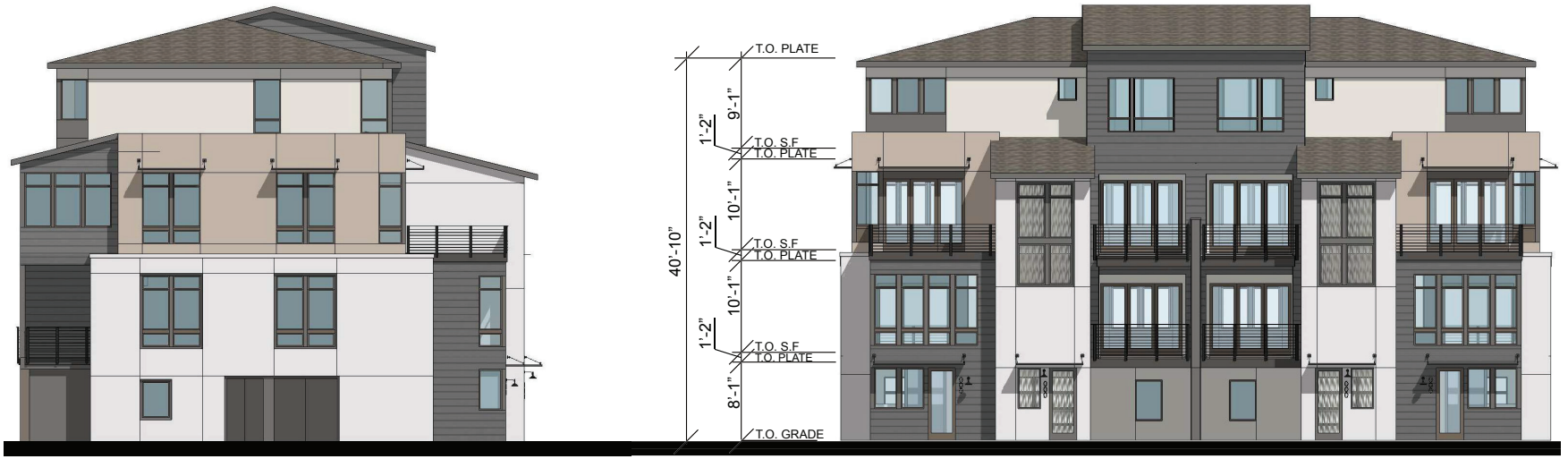
FRONT ELEVATION

REAR ELEVATION

RIGHT ELEVATION

TOWNHOME ELEVATIONS

FIGURE 3.2-3



LEFT ELEVATION

FRONT ELEVATION

REAR ELEVATION

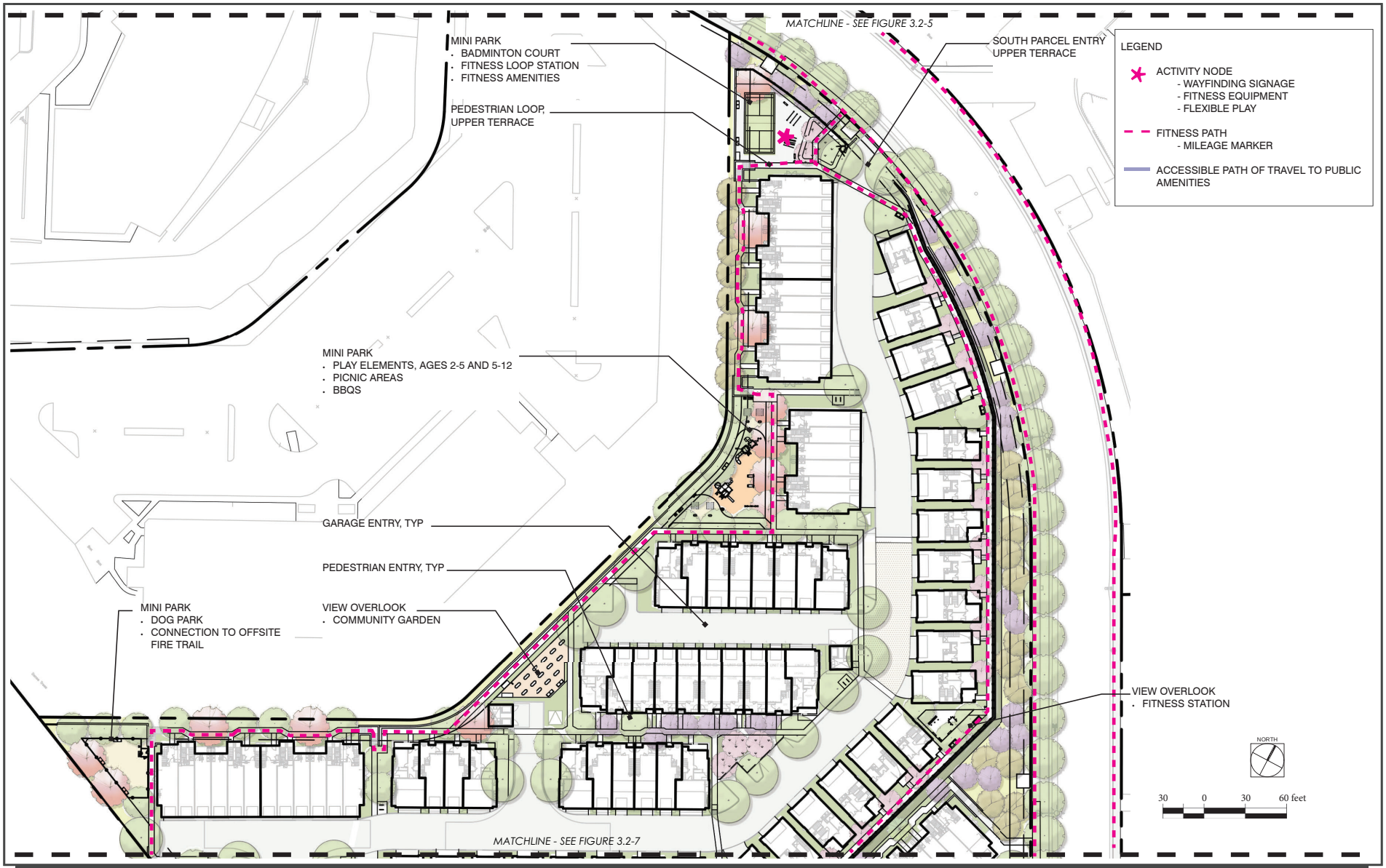
RIGHT ELEVATION

TOWNHOMES OVER FLATS ELEVATIONS

FIGURE 3.2-4

LANDSCAPE PLAN - NORTH PARCEL

FIGURE 3.2-5



LANDSCAPE PLAN - SOUTH PARCEL (1) | FIGURE 3.2-6

LANDSCAPE PLAN - SOUTH PARCEL (2) | FIGURE 3.2-7

3.2.1 Site Access and Parking

Vehicular access would be provided via four driveways on Campus Drive. Local access to Campus Drive is provided via West Hillsdale Boulevard and regional access is provided via SR 92. The project includes improvements to the existing Emergency Vehicle Access (EVA) road, east of the roundabout on the south end of the project site. This road, which is currently a single-lane extension of 26th Avenue connecting to the Campus Drive roundabout, will be improved with a rolled curb and gutter replacing the existing curb and gutter on the north side to provide a drivable sidewalk for emergency vehicles. In addition, the existing gate will be removed, and gates with Knox boxes or removable bollards will be installed at the east and west ends of the roadway.

The project would also upgrade the bicycle facilities on Campus Drive from a Class III bicycle boulevard to a Class II bike lane by reducing the number of vehicle travel lanes on Campus Drive from four lanes to two. Bike lane buffers would be accommodated on the southerly roadway segment. Further, the sidewalk would be widened to a 12-foot width and would include planting strips.

The project would provide a total of 624 on-site parking spaces, including 580 resident parking spaces in attached two-car garages and 44 guest surface parking spaces distributed across the northern and southern parcels. The project would also provide 432 long-term bicycle parking spaces and 33 short-term bicycle spaces.

3.2.2 Open Space and Landscaping

The proposed project would provide publicly accessible open space areas and new landscaping throughout the site. The project includes seven mini- parks which would provide amenities such as a dog parks, playgrounds, community gardens, fitness stations, badminton and tennis courts, BBQs and picnic areas. The project also provides a fitness path with fitness stations and viewpoint overlooks, and flexible green spaces. Pedestrian pathways would link the proposed development to the surrounding neighborhood. Additionally, private open space areas would be provided in the form of balconies and roof decks in individual residences. Approximately 2.2 acres of the site would be dedicated to open space and 1.2 miles of paths and trails would be provided.

The project would provide landscaping throughout the open space areas and pedestrian pathways, in addition to planting screening vegetation along the site perimeter and shade trees in the surface parking areas. The project would remove a total of 327 trees from the site, including 145 heritage trees. All trees removed would be replaced in accordance with Municipal Code Section 13.52.050. The project would integrate stormwater treatment areas into the site design, in accordance with Provision C.3 of the Municipal Regional Permit.

3.2.3 Green Building Measures

The project would be designed for energy efficiency and water conservation in accordance with the 2019 California Green Building Standards Code (CALGreen). This includes mandatory installation of electric vehicle charging stations, low-flow plumbing fixtures, and low-water use landscaping. In addition, photovoltaic panels will be installed on the roof decks, and Energy Star appliances will be provided in the units. The project would conform to the City's Reach Code (Municipal Code Chapter

23.24), which requires new single-family residential buildings to be all-electric or mixed-fuel with a higher energy efficiency than CALGreen standards.

3.2.4 General Plan and Zoning

The project site's General Plan land use designation is *Executive Office*, which is intended to provide, create, preserve, and enhance areas devoted primarily to conference, research, professional, and administrative activities. Appendix B of the General Plan allows residential uses ranging from low to high densities in all non-residential land uses except service commercial, manufacturing/industrial and parks/open space, and where otherwise excluded by specific area policies.[1]

The project site is zoned *E1-1 (Executive Park).* The purpose of the E1-1 zoning is to encourage commercial uses which support administrative, executive, and professional office uses, and various accessory uses. Residential uses within this zoning are permitted with a Special Use Permit, subject to the Minimum Development Standards for R-3 zoning districts (Section 27.22.040 of the Zoning Code) and affordable housing requirements as adopted by City Council resolution.

3.2.5 Density Bonus

The proposed project would reserve 10 percent of units as below market rate (BMR) units, for a total of 29 affordable units, and would qualify for benefits under the State Density Bonus law (California Government Code 65915).

3.2.6 Utility Improvements

Primary utility services to the proposed project would be provided by the City of San Mateo (storm drain, sanitary sewer), the California Water Service (Cal Water) Mid-Peninsula District, and Pacific Gas & Electric (PG&E) (natural gas/electrical). Utility laterals from the project would tie into existing mains located in Campus Drive, including a 24-inch storm drain main, eight-inch gravity sewer main, 12-inch water main, and four-inch natural gas main.

3.2.7 Transportation Demand Management

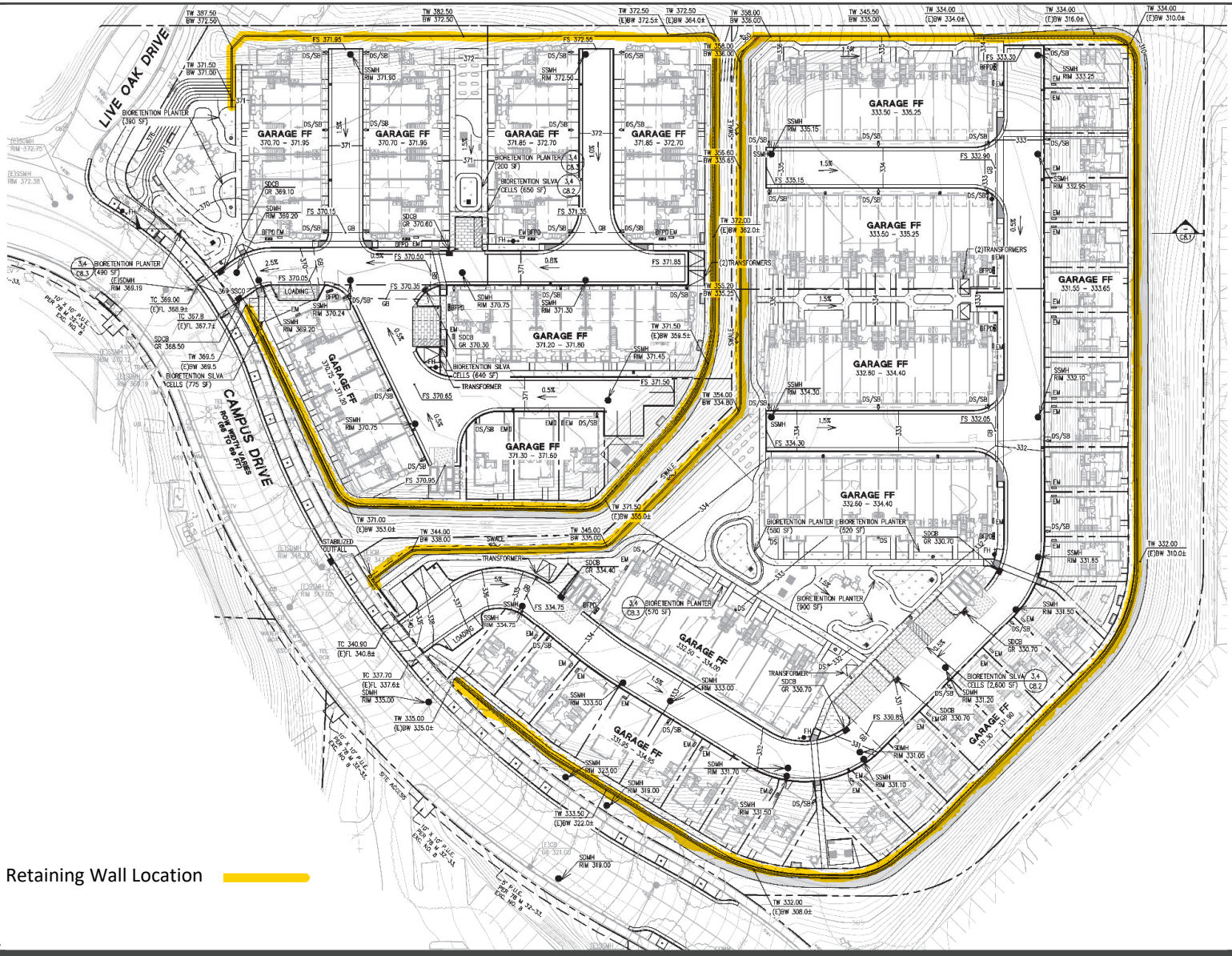
A Transportation Demand Management (TDM) Plan to encourage automobile-alternative modes of transportation and reduce vehicle trips to and from the site will be prepared for the project, as required by the City of San Mateo. The plan will include specific measures to be implemented by the project, and will be provided as part of the entitlement process for the project.

3.2.8 Construction Details

Construction of the project is estimated to last approximately 18 to 24 months. Demolition is anticipated to begin in 2021. Horizontal and vertical construction is anticipated to start in late 2021. Construction activities associated with the proposed project include site clearing and demolition, utility connections, building construction, frontage improvements, and landscaping on the site. The project would construct retaining walls ranging from 18 to 25 feet in height around the site to accommodate grade changes between the existing terrain and the proposed development. The

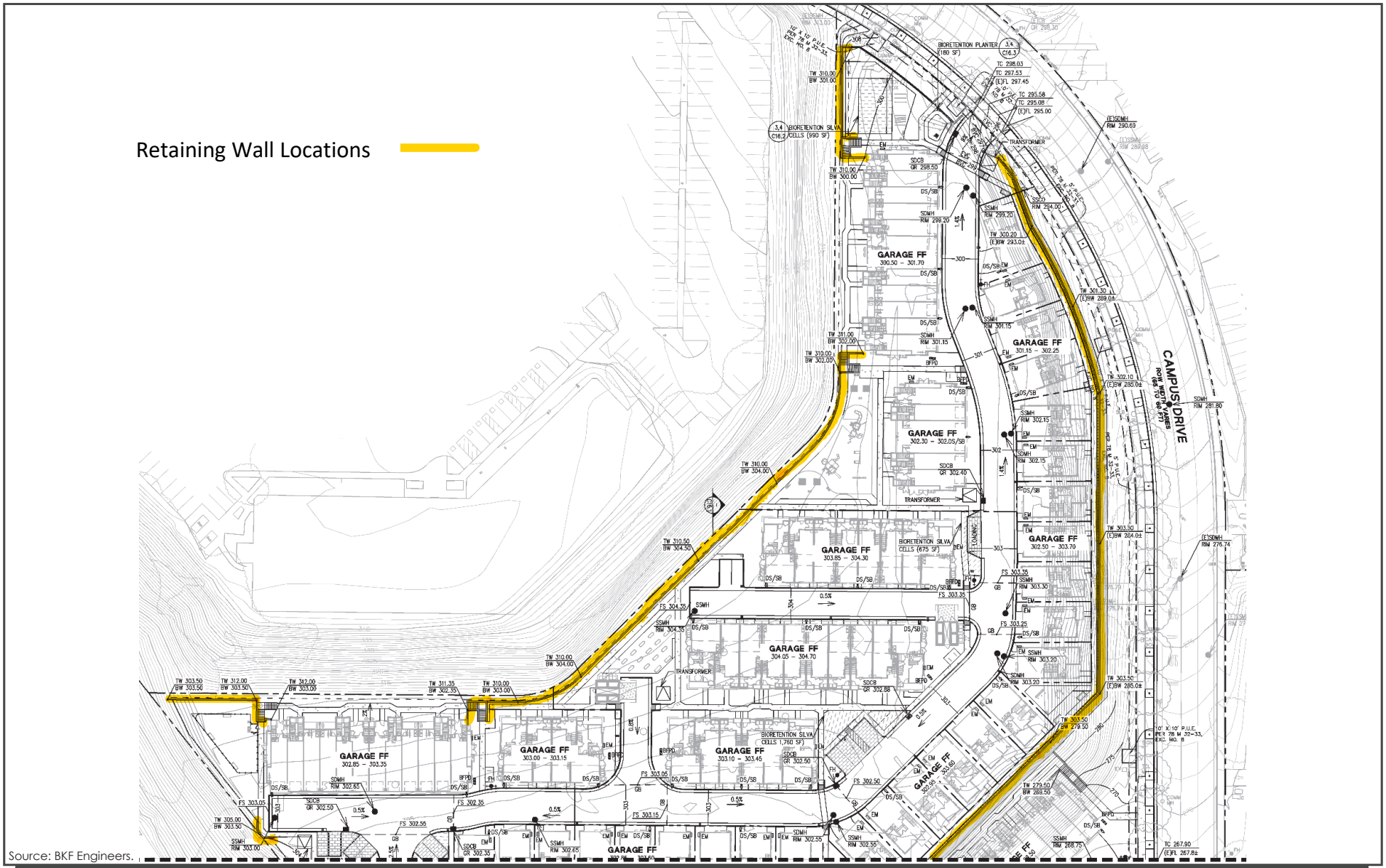
[1] San Mateo Planning Commission Study Session. *Agenda Report*. October 22, 2019.

retaining wall locations are shown on Figures 3.2-8 through 3.2-10. The project would require a total of approximately 56,500 cubic yards of cut and 42,500 cubic yards of fill. Approximately 14,000 cubic yards of material would be required to be exported from the site. During construction, all staging activities (e.g., equipment and material storage) would occur on the project site. The construction workers would park on the project site, or be bused in.



Source: BKF Engineers.

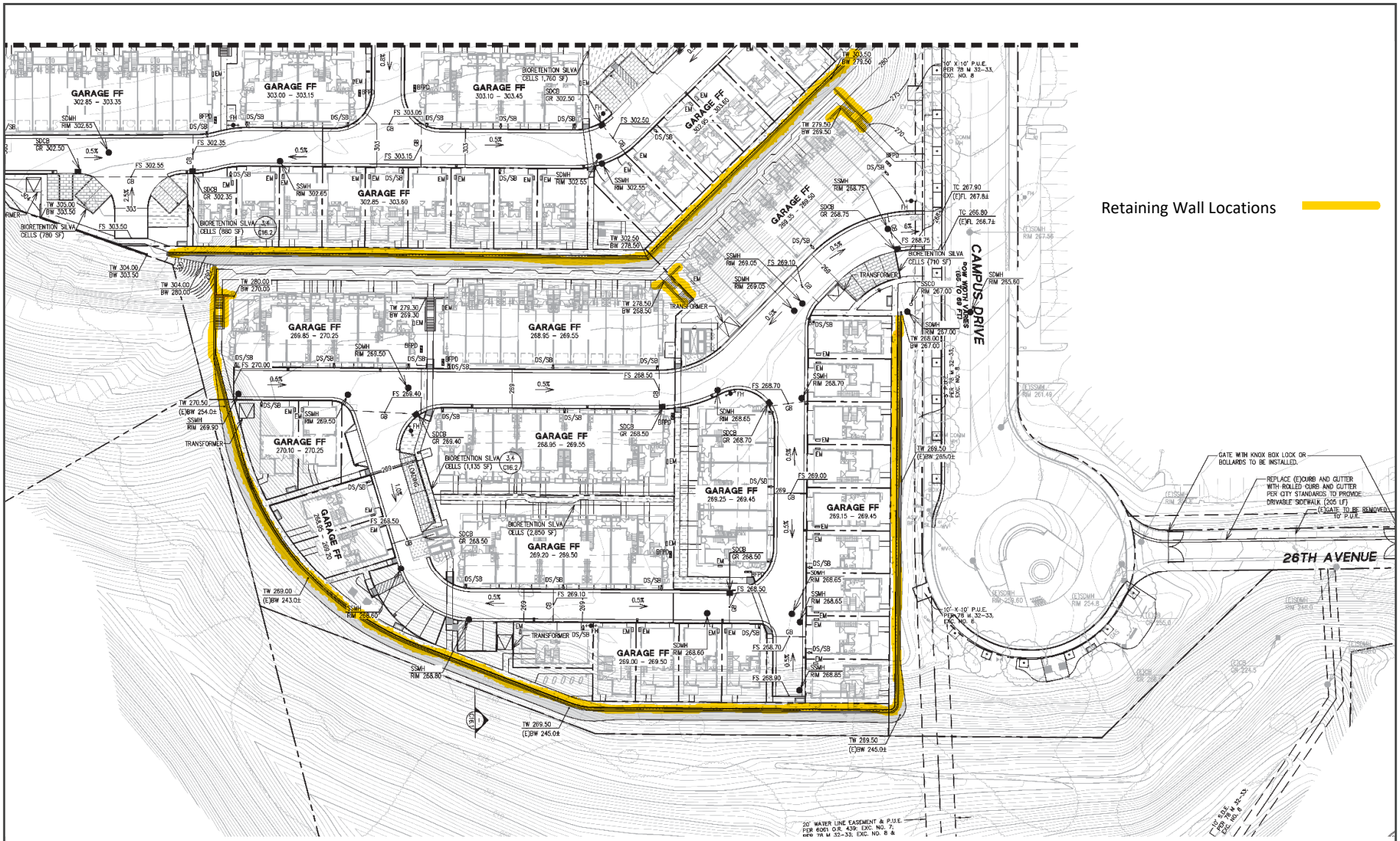
NORTH SITE RETAINING WALL LOCATIONS | FIGURE 3.2-8



Source: BKF Engineers.

SOUTH SITE RETAINING WALL LOCATIONS (1)

FIGURE 3.2-9



Source: BKF Engineers.

SOUTH SITE RETAINING WALL LOCATIONS (2) | FIGURE 3.2-10

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. In San Mateo County, there are three state-designated scenic highways, including the SR 1 segment between south of Half Moon Bay to the Santa Cruz County line (approximately 8.3 miles west of the project site), Interstate 280 (I-280) segment near the City of San Bruno to Santa Clara County line (approximately two miles west of the project site), and the SR 35 segment between the SR 92 intersection to the Santa Cruz County Line (approximately 3.8 miles west of the project site). There are no state-designated scenic highways in the City of San Mateo.[2]

Local

County of San Mateo General Plan

The County of San Mateo General Plan states that Alameda de las Pulgas, Crystal Springs Road, Polhemus Road, and State Route 92 are County-designated scenic roads.[3]

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted to avoid or mitigate impacts to aesthetic resources resulting from planned development within the City, including the following:

Policies	Description
UD-1.1	Emphasize and improve established focal points identified as the Downtown, Hillsdale Cal Train Station, Hillsdale Shopping Center, Bridgepointe, Hayward Park Cal Train Station, and adjacent office development areas, the intersections of U.S. 101 and SR 92 and SR 92 and El Camino Real (SR 82), and the SR 92 corridor. Encourage focal points by emphasizing a particular use, or feature, or through entry of landscape treatments. Focal points should be discouraged at inappropriate locations.
UD 2.16	Encourage applicants to incorporate solar energy systems into their projects. Building owners can minimize non-renewable heating and cooling methods and maximize solar heat gain by using solar panels and innovative building design features such as the use of overhangs, having south-facing windows and planting trees that provide shade. Important considerations in the design and placement of solar panels include: a. Building placement and adjacencies should be considered such that they do not unreasonably affect the solar access of neighboring residential properties. b. Solar panels and other roof-mounted equipment should be integrated into building design so as to not detract from the appearance of a home and reduce obtrusiveness.

[2] California Department of Transportation. *California Scenic Highway Mapping System*. Accessed April 22, 2020. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
[3] San Mateo County. *General Plan*. January 2013.

Policies	Description
	c. Roof-mounted solar energy equipment and panels should be located below ridgelines and on sides of roof and away from street view wherever possible. Non-glare and non-reflective type panels should be utilized. d. The design and placement of roof-mounted solar panels should account for the heights of existing trees and future growth. This applies to both trees on-site and neighboring properties, including Heritage trees and street trees.
C/OS 6.1	Preserve heritage trees in accordance with the City's Heritage Tree Ordinance.
C/OS 6.2	Require significant replacement planting when the removal of heritage trees is permitted.
C/OS 6.4	Retain the maximum feasible number of trees and preserve the character of stands or groves of trees in the design of new or modified projects.
C/OS 6.6	Require street tree planting as a condition of all new developments in accordance with the adopted Street Tree Master Plan.
C/OS 10.1	Review planning applications for opportunities to promote exceptional design and use of public open spaces in new developments.
C/OS 14.10	When master planning or significantly redeveloping existing facilities, develop an image plan that includes the effective use of signage, color schemes, lighting and plant material which meets both aesthetic and maintenance needs.

The City of San Mateo General Plan does not designate any scenic roadways in the City as locally scenic. The General Plan does, however, recognize significant natural resources throughout the City which provide scenic value, including approximately seven acres of undeveloped oak and shrub land northwest of Campus Drive and approximately 20 acres of steep canyon with oak and shrub habitat south of Campus Drive. In addition, heritage trees are recognized in the General Plan as contributing to the City's scenic beauty and their preservation and reforestation is necessary for the health and welfare of the citizens of San Mateo.

City of San Mateo Zoning Ordinance

The City's Zoning Ordinance, Title 27 in the Municipal Code, provides standards for the physical development of the City. The City's Site Plan and Architectural Review (SPAR) process applies to new building construction, and projects involving historic buildings within the Downtown Specific Plan area. SPAR establishes the following specific findings that must be made to allow approval of new building construction:

- The structures, site plan, and landscaping are in scale and harmonious with the character of the neighborhood;
- The development will not be detrimental to the harmonious and orderly growth of the City;
- The development will not impair the desirability of investment or occupation in the vicinity, and otherwise is in the best interests of the public health, safety, or welfare;
- The development meets all applicable standards as adopted by the Planning Commission and City Council, conforms with the General Plan, and will correct any violations of the Zoning Ordinance, Building Code, or other Municipal Codes that exist on the site; and
- The development will not adversely affect matters regarding police protection, crime prevention, and security.

Single-Family, Duplex and Multi Family Design Guidelines

The San Mateo City Council adopted Single-Family Design Guidelines in 2001, Duplex Design Guidelines in 2004, and Multi Family Design Guidelines in 1994. The Single-Family Design Guidelines require new development proposals for new single-family dwellings to consider the character of the existing neighborhood, the relationship of the dwellings to the neighborhood, and specific elements of design. The Duplex Design Guidelines address how a building's size, architectural character, and relationship to the street and nearby structures contribute to successful neighborhoods; many of the issues and guidelines are similar to those contained in the Single-Family Dwelling Design Guidelines. The Multi Family Design Guidelines address the construction of new multi-family buildings and how building size, quality, style, and relationship to the street contribute to successful neighborhoods.

City of San Mateo Heritage Tree Ordinance

The City of San Mateo tree regulations protect all trees designated as "Heritage Trees" (Municipal Code Chapter 13.52). Under this ordinance, a Heritage Tree is defined as any one of the following:

- Any bay, buckeye, oak, cedar or redwood (sequoia) tree that has a diameter of 10 inches or more measured at 48 inches above natural grade;
- Any tree or stand of trees designated by resolution of the City Council to be of special historical value or of significant community benefit;
- A stand of trees, the nature of which makes each dependent on the others for survival;
- Any other tree with a trunk diameter of 16 inches or more, measured at forty-eight (48) inches above natural grade.

4.1.1.2 *Existing Conditions*

The approximately 15.45-acre project site is part of a larger 26-acre office campus bordered by open space and retail to the south, SR 92 and the College of San Mateo to the west, single-family residences and the Peninsula Golf and Country Club to the north, and single-family residences to the east. The project site is currently occupied by four existing office buildings between two to three stories in height adjacent to surface parking lots, landscaping, and natural vegetation including trees and shrubs. The existing buildings on-site are either rectangular or L-shaped, constructed of brick and concrete with broad glass facades, and range from 27 feet to 52 feet in height. Densely vegetated sloped areas differentiate each parcel. The project site contains 412 trees, including 182 heritage trees. While the project site is in an elevated area, views of the site from surrounding roadways are generally obstructed by intervening structures and vegetation. The site is predominantly visible from the immediately surrounding parcels and roadways. Views of the site are shown on Photos 1 through 10 on the following pages.

Notable views from the project site include the San Francisco Bay Area, the Peninsula Golf & Country Club, and an undeveloped canyon with oak and shrub habitat to the south of the site. The adjacent canyon is recognized as a significant feature in the City's General Plan EIR.[4] Additionally, two County-designated scenic roads, California State Route 92 and Alameda de la Pulgas, are within

[4] City of San Mateo. *General Plan Update – Draft Environmental Impact Report.* July 2009. Page 4.12-1.

a mile of the project site, although the site is not visible from either roadway. The nearest state-designated scenic highway is the segment of I-280 from San Bruno to the Santa Clara County line, approximately two miles west of the site.

Photo 1: View of the office building at 2655 Campus Drive, looking southeast.

Photo 2: View of the parking lot at 2655 Campus Drive, the adjacent undeveloped canyon, and residential uses beyond.

PHOTOS 1 & 2

Photo 3: View of the office building at 2755 Campus Drive, looking southeast.

Photo 4: View of the office building at 2755 Campus Drive (right) and adjacent office development (left), looking north.

PHOTOS 3 & 4

Photo 5: View of 2655 Campus Drive and the adjacent canyon from 2755 Campus Drive, looking east.

Photo 6: View of the office building at 2800 Campus Drive, looking north.

PHOTOS 5 & 6

Photo 7: View of the office building at 2988 Campus Drive, looking north.

Photo 8: View of the emergency access road leading to 26th Avenue at the southern end of the site.

PHOTOS 7 & 8

Photo 9: View of adjacent office development along Campus Drive in the southern portion of the site.

Photo 10: View of adjacent office development along Campus Drive in the northern portion of the site.

PHOTOS 9 & 10

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

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

The project site is located adjacent to SR 92 and in the vicinity of Alameda de la Pulgas, both of which are County-designated scenic corridors. The project site is not visible from SR 92 because views are obstructed by existing buildings along SR 92, trees, and hillsides. The San Francisco Bay and the airspace over 2655 Campus Drive is visible from the SR 92-West Hillside Boulevard interchange area. Due to the sharply eastward sloping nature of the hillside and the aforementioned obstructions along SR 92, the proposed development would not be visible from this interchange and would not obstruct views of the San Francisco Bay. Thus, no scenic vistas throughout the SR 92 corridor would be affected by the project.

Views of the project site from Alameda de la Pulgas are obstructed by residential buildings, trees, and the Peninsula Golf and Country Club. Alameda de la Pulgas is east and downhill from the project site; therefore, the project would not obstruct any scenic vistas present within this corridor. As the project site is not visible from any scenic vistas and would not obstruct views of the San Francisco Bay, the project would have a less than significant impact on scenic vistas. **(Less than Significant Impact)**

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

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)**

The site is in a well-developed area that does not contain any rock outcroppings or historic buildings. The site is not located within a state scenic highway; the nearest state scenic highway is located approximately two miles west of the site and is not visible from the project area. As mentioned in Section 4.1.1.2 Existing Conditions, the site is located adjacent to a canyon which is recognized as a significant feature in the General Plan. The proposed project would not develop this canyon or detract from its scenic value. The project proposes to remove 327 trees from the site, including 145 Heritage Trees. Heritage trees are recognized as scenic resources in the City's General Plan; however, the project would plant replacement trees in accordance with Municipal Code Section 13.52.050. Furthermore, the publicly accessible mini-parks, picnic areas, open spaces, terraces, and landscaped paths and trails proposed by the project would enhance the aesthetic and pedestrian environment of the site and surrounding area. For these reasons, the project would have a less than significant impact on scenic resources. **(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)**

As identified above, all four parcels have an *Executive Office* land use designation and are zoned *E1-1 (Executive Park)*. The purpose of the E1-1 zoning is to encourage commercial uses which support administrative, executive, and professional office uses, and various accessory uses. Residential uses with this zoning are permitted with a Special Use Permit. During the SPAR process, the project would be reviewed for conformance with zoning standards, such as landscape buffers and setbacks, and modifications to project design can be made to ensure visual impacts on surrounding land uses are minimized. Therefore, there would be no conflict with applicable zoning regulations unless otherwise permitted as a waiver, incentive, or concession in accordance with State Density Bonus law.

The proposed project would substantially change the project site's existing visual character, as it would convert the project site from an office development to a residential development. The increase in mass and scale of the proposed development in comparison with the existing development is the most notable change, as the combined floor area would increase from 224,844 square feet to 664,941 square feet. Building heights however would not change substantially. An increase in building height of approximately 10 to 15 feet would occur at 2655 Campus Drive and 2800 Campus Drive, while building heights at 2988 Campus Drive would decrease by approximately 12 to 15 feet. Building heights at 2755 Campus Drive would be generally consistent with the existing office building. These building heights would be consistent with the permitted building heights under the site's *E1-1 (Executive Park)* zoning, and with existing buildings to the west and south of the site. Visual cohesiveness would be further enhanced by the mini-parks, picnic areas, open spaces, terraces, and landscaped paths and trails connecting the proposed development with the surrounding commercial and residential developments. As previously mentioned, the project would require fairly extensive

grading and includes the construction of retaining walls up to 25 feet in height. The site, however, is visually segregated at a horizontal level by virtue of SR 92, the sharply eastward sloping hillside, and the extensive open space and trees. As a result, the proposed increases in mass and scale of development at the site would not be noticeable from most nearby roadways. The mature trees and hillsides of the adjacent canyon open space area would help to screen views of the site from the existing lower-elevation residential neighborhoods to the south. The project would include 15-foot setbacks from property lines that would be landscaped and aesthetically consistent with the surrounding open space. Accordingly, the visual character or public views of the site would not be significantly degraded by the increase in mass, scale, and height of site development.

Architecturally, the proposed development would blend contemporary and traditional architectural forms and materials that would be aesthetically consistent with the surrounding developments. The appearance of the site would be further enhanced by the previously described mini-parks, picnic areas, open spaces, terraces, and landscaped paths and trails. The final building designs would be subject to the City's SPAR process, during which design modifications can be made to the project in order to preserve the visual character and quality of the surrounding area and reduce aesthetic impacts. While the proposed project would change the visual character of the site and the surrounding area, the building design and exterior materials would be selected in a manner that ensures congruency with adjacent buildings and neighborhoods. Therefore, implementation of the proposed project would not result in significant impacts to visual character and quality, nor conflict with zoning and other regulations governing scenic quality. (**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)**

The project would create new sources of light and glare from exterior building materials, glass windows and lighting of the proposed three- to four-story buildings. In contrast with the existing development however, which has broad glass facades and sightlines extending to the surrounding areas, much of the light and glare generated by the proposed development would be directed inwards as opposed to outwards. Additionally, the existing buildings are surrounded by light poles designed to illuminate surface parking lots at nighttime, whereas the proposed uncovered parking spaces would be located on the interior of the proposed development, thus decreasing the exposure of surrounding areas from nighttime illumination of parking areas. Exposure of surrounding areas to light and glare would be further limited by the previously described 15-foot setbacks and exterior landscaping.

The project would also be subject to the SPAR process prior to submittal of construction drawings for a building permit, and new lighting sources would be installed on the site in conformance with City's design guidelines. At the time of final design review, a lighting plan will be reviewed by the City, to ensure that lighting is directed downward and will not spill over onto adjacent properties or otherwise be highly visible and lead to glare. **(Less than Significant Impact)**

4.2 AGRICULTURE AND FORESTRY RESOURCES

4.2.1 Environmental Setting

4.2.1.1 *Regulatory Framework*

State

Farmland Mapping and Monitoring Program

The California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) assesses the location, quality, and quantity of agricultural land and conversion of these lands over time. Agricultural land is rated according to soil quality and irrigation status. The best quality land is 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.[6]

California Land Conservation Act

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

Fire and Resource Assessment Program

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

4.2.1.2 *Existing Conditions*

The proposed project site is fully developed with office buildings and surface parking lots, and within an urbanized area of western San Mateo on the southeast side of California State Route 92. All four parcels have an *Executive Office* land use designation and are zoned *E1-1 (Executive Park)*. The *San Mateo County Important Farmlands 2018 Map* designates the project site as "Urban and

[6] California Department of Conservation. "Farmland Mapping and Monitoring Program." Accessed April 22, 2020. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.
[7] California Department of Conservation. "Williamson Act." http://www.conservation.ca.gov/dlrp/lca.
[8] Forest Land is land that can support 10 percent native tree cover and allows for management of forest resources (California Public Resources Code Section 12220(g)); Timberland is land not owned by the federal government or designated as experimental forest land that is available for, and capable of, growing trees to produce lumber and other products, including Christmas trees (California Public Resources Code Section 4526); and Timberland Production is land used for growing and harvesting timber and compatible uses (Government Code Section 51104(g)).
[9] California Department of Forestry and Fire Protection. "Fire and Resource Assessment Program." Accessed April 22, 2020. http://frap.fire.ca.gov/.

Built-Up Land", defined as land with at least six structures per 10 acres. Common examples of "Urban and Built-Up Land" are residential, institutional, industrial, commercial, landfill, golf course, airports, and other utility uses.[10] 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. [11]

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)**

The proposed project would redevelop two parcels that are designated as "Urban and Built-Up Land" on maps prepared by the California Resources Agency for San Mateo County. Therefore, no

[10] California Natural Resources Agency. *San Mateo County Important Farmland 2018.* September 2019. Accessed May 15, 2020. https://www.conservation.ca.gov/dlrp/fmmp/Pages/SanMateo.aspx

[11] California Department of Conservation, Division of Land Resource Protection. *San Mateo County Williamson Act FY 2006/2007.* 2012.

farmland would be converted to non-agricultural use as a result of project implementation. **(No Impact)**

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 zoned *E1-1 (Executive Park)*, which does not permit agricultural use. The project site is not under a Williamson Act contract. Therefore, the project will not conflict with existing zoning for an 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)**

The project site is not zoned, or adjacent to land zoned, for forest land, timberland, or Timberland Production. Therefore, the project would not conflict with existing zoning or require rezoning of forest land or timberland uses. **(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)**

The project site is located in an urbanized area of the City and does not contain any forest lands. Therefore, no forest land would be lost as a result of the project. **(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)**

The project site is located in an urbanized area of the City. The project would not result in impacts to agricultural lands or forest lands in the surrounding region. **(No Impact)**

4.3 AIR QUALITY

The following discussion is based, in part, on an Air Quality Assessment prepared by *Ramboll* in August 2020. A copy of this report is attached as Appendix A to this Initial Study.

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.[12] 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 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

[12] 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).[13] 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.

[13] California Air Resources Board. "Overview: Diesel Exhaust and Health." Accessed April 22, 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.[14]

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.

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

Local

City of San Mateo 2030 General Plan

Various policies and actions of the City of San Mateo General Plan have been adopted for the purpose of avoiding or mitigating air quality impacts resulting from planned development within the City, including the following, which are applicable to the subject project:

Policies	Description
LU 8.9	The City shall mitigate air quality impacts generated during construction activities by the following measures: • Use of appropriate dust control measures, based on project size and latest BAAQMD guidance, shall be applied to all construction activities within San Mateo. • Applicants seeking demolition permits shall demonstrate compliance with applicable BAAQMD requirements involving lead paint and asbestos containing materials (ACM's) designed to mitigate exposure to lead paint and asbestos. • Utilization of construction emission control measures recommended by BAAQMD as appropriate for the specifics of the project (e.g., length of time construction and distance from sensitive receptors). This may include the utilization of low emission construction equipment, restrictions on the length of time of use of certain heavy-duty construction equipment, and utilization of methods to reduce emissions from construction equipment (alternative fuels, particulate matter traps and diesel particulate filters).
LU 8.11	The City shall require that when new development that would be a source of TAC's is proposed near residences or sensitive receptors, either adequate buffer distances shall be provided (based on recommendations and requirements of CARB and BAAQMD), or filters or other equipment/solutions shall be provided to reduce the potential exposure to acceptable levels. When new residential or other sensitive receptors are proposed near existing sources of TAC's, either adequate buffer distances shall be provided (based on recommendations and requirements of the California Air Resources Control Board and BAAQMD), or filters or other equipment/solutions shall be provided to the source to reduce the potential exposure to acceptable levels.

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.

The closest sensitive receptors to the project site are the residential dwellings adjacent to the site boundary along Live Oak Drive, to the west of the northern parcel.

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?	☐	☐	☒	☐

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

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. The City of San Mateo 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 $\mu g/m^3$	0.8 $\mu g/m^3$ (average)	

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

A project is considered consistent with the 2017 CAP if, a) the plan supports the primary goals of the 2017 CAP; b) includes relevant control measures; and c) does not interfere with implementation of 2017 CAP control measures.[15]

The project would support the primary goals of the CAP, which are to attain air quality standards, reduce population exposure and protect public health, and reduce greenhouse gas emissions and protect the climate. As discussed below under checklist questions b) and c), project construction and operational emissions would not exceed the BAAQMD thresholds for ozone precursor pollutant (ROG, NO_x) and exhaust (PM_{10}, $PM_{2.5}$) emissions. Additionally, the project will meet California Green Building Standards Code (CALGreen) requirements and incorporate energy efficient fixtures and photovoltaic panels into the project design. Further, the proposed project would reduce GHG emissions relative to the existing office uses on-site, as is discussed in Section 4.8 Greenhouse Gas Emissions, and would not result in substantial GHG emissions.

[15] Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines.* May 2017. Pages 9-2 and 9-3.

As shown in Table 4.3-3 below, the proposed project would generally be consistent with the 2017 CAP measures intended to reduce vehicle trips, increase energy efficiency and water conservation, and reduce waste.

Table 4.3-3: Bay Area 2017 Clean Air Plan Applicable Control Measures

Control Measures	Description	Project Consistency
Transportation Measures		
Trip Reduction Programs	Encourage trip reduction policies and programs in local plans, e.g., general and specific plans. Encourage local governments to require mitigation of vehicle travel as part of new development approval, to develop innovative ways to encourage rideshare, transit, cycling, and walking for work trips.	The proposed development would be located in immediate proximity to transit services, such as the Campus Drive Caltrain shuttle, which has a stop on Campus Drive adjacent to the site. In addition, the project would include bicycle parking consistent with City standards. The proposed project would be required to implement a TDM Program, consistent with City policy. Therefore, the project is consistent with this measure.
Bicycle and Pedestrian Access and Facilities	Encourage planning for bicycle and pedestrian facilities in local plans, e.g., general and specific plans, fund bike lanes, routes, paths and bicycle parking facilities.	The project would include bicycle parking consistent with City standards and a network of interconnected pedestrian paths. The project would improve bicycle and pedestrian facilities in the area by implementing Class II bike lanes on Campus Drive, widening the sidewalk to a 12-foot width, and including planter strips. In addition, the project area is well equipped with pedestrian facilities including sidewalks and crosswalks. Therefore, the project is consistent with this measure.
Land Use Strategies	Support implementation of Plan Bay Area, maintain and disseminate information on current climate action plans and other local best practices.	The project is an infill development in proximity to transit services and amenities; therefore, the project is consistent with this measure.
Building Measures		
Green Buildings	Identify barriers to effective local implementation of CALGreen (Title 24) statewide building energy code; develop solutions to improve implementation/ enforcement. Engage with	The project would comply with Building Energy Efficiency Standards (Title 24) and the most recent CALGreen requirements. Thus, the project is consistent with this measure.

Table 4.3-3: Bay Area 2017 Clean Air Plan Applicable Control Measures		
Control Measures	**Description**	**Project Consistency**
	additional partners to target reducing emissions from specific types of buildings.	
Urban Heat Island Mitigation	Develop and urge adoption of a model ordinance for "cool parking" that promotes the use of cool surface treatments for new parking facilities, as well existing surface lots undergoing resurfacing. Develop and promote adoption of model building code requirements for new construction or reroofing/ roofing upgrades for commercial and residential multifamily housing.	The project would be required to comply with the most recent CALGreen requirements which would increase building efficiency over standard construction. In addition, parking for residents would be located within two-car garages in each residential unit. The project would redevelop large surface parking areas with energy-efficient buildings, landscaping, and open space areas; thus, the project would minimize the heat island effect of the site. Therefore, the project is consistent with this control measure.
Decrease Electricity Demands	Work with local governments to adopt additional energy efficiency policies and programs. Support local government energy efficiency program via best practices, model ordinances, and technical support. Work with partners to develop messaging to decrease electricity demand during peak times.	The proposed building would be constructed in compliance with the California Green Building Standards Code (Part 11 of Title 24, California Code of Regulations). Additionally, photovoltaic panels would be provided on the building roofs, which would reduce the electricity demand of the project. Therefore, the project is consistent with this measure.
Natural and Working Lands Measures		
Urban Tree Planting	Develop or identify an existing model municipal tree planting ordinance and encourage local governments to adopt such an ordinance. Include tree planting recommendations, the Air District's technical guidance, best management practices for local plans, and CEQA review.	The project would be required to adhere to the City's tree replacement policy (Municipal Code Section 13.52.050). Therefore, the project is consistent with this control measure.
Waste Management Measures		
Recycling and Waste Reduction	Develop or identify and promote model ordinances on community-wide zero waste goals and recycling of construction and demolition materials in commercial and public construction projects.	The project shall provide recycling services to project residents as mandated by Assembly Bill 341. The project, therefore, is consistent with this measure.

Table 4.3-3: Bay Area 2017 Clean Air Plan Applicable Control Measures		
Control Measures	**Description**	**Project Consistency**
Water Conservation Measures		
Support Water Conservation	Develop a list of best practices that reduce water consumption and increase on-site water recycling in new and existing buildings; incorporate into local planning guidance.	The project would comply with CALGreen and Chapter 27.71 of the Municipal Code to reduce potable indoor water consumption and outdoor water use by including water efficient fixtures and planting drought tolerant non-invasive landscaping. The project, therefore, would be consistent with this measure.

The project is consistent with applicable transportation, building, natural and working lands, waste management, and water conservation control measures identified in the table above and is consistent with the City's General Plan. As discussed under checklist question b) and c) below, the project construction and operational emissions would not exceed relevant BAAQMD thresholds. Furthermore, the proposed project would reduce GHG emissions compared to the existing use of the site and would not result in a significant GHG impact (refer to Section 4.8 Greenhouse Gases). For these reasons, the project 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)**

The Bay Area is considered a non-attainment area for ground-level ozone 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}, the BAAQMD has established thresholds of significance for these air pollutants and their precursors. These thresholds are for ozone 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

Construction period emissions were modeled using the California Emission Estimator Model version 2016.3.2 (CalEEMod). Construction emissions from the project include both on-site, off-road heavy equipment as well as off-site, on-road vehicle travel. Where specific construction information was not available, CalEEMod defaults were used. The project land uses input into CalEEMod included: 290 Condo/Townhouse units on 8.56 acres; 6.49 acres of open space; and 44 uncovered parking spaces on 0.40 acres. It was assumed that the project construction would begin in July of 2021 and continue through January of 2023. A total of 400 construction workdays were assumed. The

demolition of 221,385 square feet of existing office uses was factored into the model. The results of the construction modeling are shown below in Table 4.3-4.

Table 4.3-4: Construction Period Emissions				
Scenario	**ROG**	**NOx**	**PM_{10} Exhaust**	**$PM_{2.5}$ Exhaust**
Total construction emissions (tons)	2.42 tons	3.70 tons	0.11 tons	0.11 tons
Average daily emissions (pounds)	12 lbs./day	18 lbs./day	1 lbs./day	1. lbs./day
BAAQMD Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	No	No	No	No

As seen in Table 4.3-4, the project construction period emissions would not exceed BAAQMD construction criteria air pollutant thresholds. Therefore, the impact would be less than significant. **(Less than Significant Impact)**

Operational Emissions

The BAAQMD CEQA Air Quality Guidelines contains screening level sizes for various land use types and development (Table 3-1 in the Guidelines). The screening levels were developed to provide a conservative indication of whether a proposed project could result in potentially significant air quality impacts. If a project is below the screening criteria, a detailed air quality assessment of a project's air pollutant emissions is not required, and the project's air quality impacts are considered less than significant. The BAAQMD screening criteria is 451 dwelling units for "Condos/Townhouses" and 325 dwelling units for "Single-Family" uses. The project proposes to develop a mix of townhouses, flats, and single-family dwellings, for a total of 290 units. Additionally, the site includes existing office buildings, and emissions from the occupancy of those buildings are present as part of the baseline, which serve to reduce the net amount of new pollution generated by the project. Thus, the proposed project would be below the BAAQMD screening criteria and would have a less than significant operational criteria air pollutant impact. **(Less than Significant Impact)**

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

Construction Dust

The project involves the demolition of existing buildings, grading, trenching, and building construction. Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. The amount of dust generated would be highly variable, depending on the activity occurring, the duration of the activity, and meteorological conditions. Adjacent land uses could be adversely affected by dust generated during project construction activities. Accordingly, Best Management Practices (BMPs) would be implemented as required by BAAQMD to reduce potential air quality impacts from dust to a less

than significant level. The standard dust control measures to be implemented by the proposed project are listed below.

Conditions of Approval: The contractor shall implement the following measures to reduce fugitive dust-related impacts associated with grading and new construction:

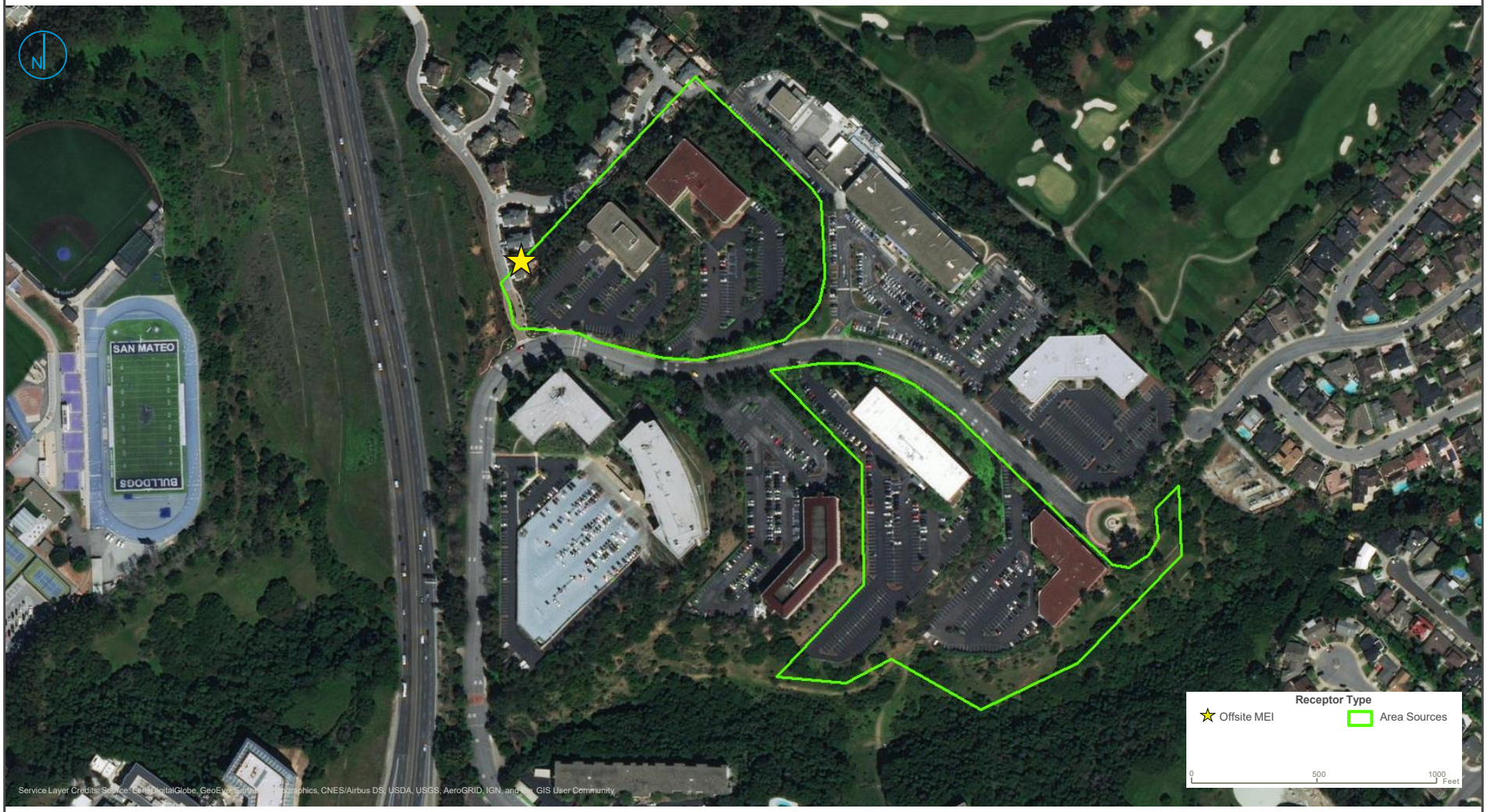
- Water active construction areas at least twice daily or as often as needed to control dust emissions.
- Cover trucks transporting soil, sand, or other loose materials and/or ensure that all trucks hauling such materials maintain at least two feet of freeboard.
- Remove visible mud or dirt track-out onto adjacent public roads by using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- Enclose, cover, water twice daily or apply non-toxic soil binders to exposed stockpiles (dirt, sand, etc.).
- Pave new or improved roadways, driveways, and sidewalks as soon as possible.
- Lay building pads as soon as possible after grading unless seeding or soil binders are used.
- Replant vegetation in disturbed areas as quickly as possible.
- Install sandbags or other erosion control measures to prevent silt runoff to public roadways.
- Minimize idling times either by shutting off equipment when not in use, or reducing the maximum idling time to five minutes (as required by the California Airborne Toxics Control Measure Title 13, Section 2485 of California Code of Regulations). Provide clear signage for construction workers at all access points.
- Maintain and properly tune construction equipment in accordance with manufacturer's specifications.
- Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints.

Implementation of the conditions of approval listed above would reduce potential impacts from construction dust to a less than significant level. **(Less than Significant Impact)**

Construction Health Risk Assessment

Project Construction

The total DPM and $PM_{2.5}$ emissions from construction were modeled using AERMOD, a tool developed by the EPA for regulatory applications. AERMOD requires emission source locations and release parameters, receptor locations, and processed meteorological data. The assessment used five years of meteorological data from the San Francisco International Airport, which was the nearest dataset available to the project. Health risks were assessed based on the maximally exposed individual (MEI), which for this project was a residence located adjacent to the western property line of the northern parcel on Live Oak Drive. All emissions from construction were summed by year and modeled on an annual basis for off-site receptors. The health risk assessment conservatively assumed infant exposure to construction emissions, in line with the Office of Environmental Health Hazard Assessment (OEHHA) guidance. Emission exposure was calculated at the MEI and compared to BAAQMD health risk thresholds for excess lifetime cancer risk, $PM_{2.5}$, and non-cancer hazard indices. The location of the MEI is shown on the following page on Figure 4.3-1. The results of the construction health risk assessment are shown below in Table 4.3-5.



PROJECT SITE AND LOCATION OF MEI

FIGURE 4.3-1

Table 4.3-5: Construction Health Risk Impacts at Off-Site MEI			
Source	**Cancer Risk* (per million)**	**Annual $PM_{2.5}$* ($\mu g/m^3$)**	**Hazard Index**
Project Construction	4.9 (infant)	0.029	0.0062
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold? Unmitigated	*No*	*No*	*No*

As seen in the table above, project construction would not exceed any BAAMQD health risk thresholds. Therefore, the project would result in a less than significant construction health risk impact. **(Less than Significant Impact)**

Cumulative Health Risk Assessment

In addition to analyzing the health risk impacts of project construction alone on the MEI, the health risk assessment included an analysis of cumulative health risk impacts. Per BAAQMD guidance, this analysis included the effects of permitted stationary sources within 1,000 feet of the MEI, roadways with over 10,000 vehicle trips, and other major emissions sources such as railways. The emissions of these existing sources, in combination with project construction emissions, were calculated and compared to BAAQMD cumulative health risk thresholds. The results of the assessment are shown below in Table 4.3-6.

Table 4.3-6: Cumulative Health Risk Impacts at Off-Site MEI			
Source[1]	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index[3]**
Project Construction	4.9 (infant)	0.029	0.0062
Stationary Sources[2] - Hudson Peninsula Office Park LLC	0.032	--	--
Roadways – Major Streets[4]	0.29	0.0074	--
Roadways – Highway[5]	10	0.26	--
Railways – Caltrain[5]	1.1	0.0022	--
Total	*17*	*0.30*	*0.006*
BAAQMD Cumulative-Source Threshold	***>100***	***>0.8***	***>10***
Exceed Threshold? Unmitigated	*No*	*No*	*No*

Notes:
[1] Off-site construction impacts were determined from project-specific modeling. Health impacts from existing stationary and mobile sources are estimated using Screening Tools provided by BAAQMD.
[2] Consistent with BAAQMD guidance, all facilities within 1,000 feet of the proposed project are included per the BAAQMD Stationary Source Screening Analysis tool. Facility information was obtained from the Permitted Stationary Source Risks and Hazard Screening Tool. Values have been adjusted using BAAQMD's Diesel Internal Combustion Engine Distance Multiplier Tool.
[3] The BAAQMD's screening tools do not estimate chronic hazards since the screening levels were found to be extremely low; thus, there are no chronic hazard values associated with highways, railways, or major streets.
[4] Per BAAQMD guidance, Ramboll searched for additional nearby roads with 10,000 to 30,000 average daily trips. However, there were no roadways with average daily traffic between 10,000 and 30,000 trips per day within 1,000 feet of the MEI.

[5] Cancer risk and $PM_{2.5}$ concentration values were determined using BAAQMD screening tools and are based on the maximum impact of a raster cell located on the MEI.

As shown in Table 4.3-6 above, project construction in combination with cumulative emission sources in the area would not result in an exceedance of BAAQMD cumulative-source thresholds. Therefore, the project would not result in a cumulative health risk impact. **(Less than Significant Impact)**

Operational Emissions

The project does not include any operational sources of TACs, such as back-up diesel generators, which could have adverse health risk impacts at nearby receptors. BAAQMD recommends analyzing TAC emissions from roadways with over 10,000 vehicles per day. The traffic assessment (refer to Appendix G) found that the project would generate a net increase of 268 daily vehicle trips, after deducting trips from the existing office development on the property. Therefore, the project would not generate 10,000 vehicles per day and would not create a substantial mobile source of TACs. For these reasons, the project would not result in an operational health risk impact. **(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)**

The proposed project would not include any land uses that are likely to generate a substantial odor that would cause complaints from surrounding uses. The proposed project would use cleaning supplies, but their use would be contained indoors. Localized odors, mainly resulting from diesel exhaust and construction equipment on-site, would be created during the construction phase of the project. These odors would be temporary and not likely be noticed beyond the project site's boundaries. The proposed project would, therefore, result in less than significant odor impacts. **(Less than Significant Impact)**

4.3.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of San Mateo has policies that address existing air quality conditions affecting a proposed project. The City of San Mateo's General Plan Policy LU 8.11 requires such additional analysis to determine if a project will exposure future residents to harmful levels of TACs. The City relies on the BAAQMD threshold established for cumulative sources when determining a site's acceptable exposure to TACs.

Per BAAQMD guidance, all TAC sources within 1,000 feet of a proposed sensitive receptor need to be identified and analyzed. Sources evaluated in the cumulative health risk assessment included any BAAQMD permitted stationary source, roadways with over 10,000 vehicles per day, and any other major source of emissions within the zone of influence such as railways. The health risk impacts of cumulative emissions sources on future on-site sensitive receptors are shown below in Table 4.3-7.

Table 4.3-7: Cumulative Health Risk Impacts at On-Site MEI			
Source[1]	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index[3]**
Stationary Sources[2] - Hudson Peninsula Office Park LLC	0.048	--	--
Roadways[4] – Major Streets	0.28	0.0071	--
Roadways – Highway[5]	16	0.41	--
Railways – Caltrain[5]	1.0	0.0020	--
Total	*17*	*0.42*	*0*
BAAQMD Cumulative-Source Threshold	***>100***	***>0.8***	***>10***
Exceed Threshold? Unmitigated	*No*	*No*	*No*

Notes:
[1] Health impacts from existing stationary and mobile sources are estimated using Screening Tools provided by BAAQMD. The on-site MEI was determined at the location of the maximum total off-site sources risk.
[2] Consistent with BAAQMD guidance, all facilities within 1,000 feet of the proposed project are included per the BAAQMD Stationary Source Screening Analysis tool. Facility information was obtained from the Permitted Stationary Source Risks and Hazard Screening Tool. Values have been adjusted using BAAQMD's Diesel Internal Combustion Engine Distance Multiplier Tool.
[3] The BAAQMD's screening tools do not estimate chronic hazards since the screening levels were found to be extremely low; thus, there are no chronic hazard values associated with highways, railways, or major streets.
[4] Per BAAQMD guidance, Ramboll searched for additional nearby roads with 10,000 to 30,000 average daily trips. However, there were no roadways with average daily traffic between 10,000 and 30,000 trips per day within 1,000 feet of the MEI.
[5] Cancer risk and $PM_{2.5}$ concentration values were determined using BAAQMD screening tools and are based on the maximum impact of a raster cell located on the MEI.

As shown in the table above, existing cumulative sources of emissions would not generate emissions exceeding BAAQMD cumulative source thresholds at the on-site MEI. Therefore, future sensitive receptors would not be exposed to substantial health risks and the project would not conflict with General Plan Policy LU 8.11.

4.4 BIOLOGICAL RESOURCES

The following discussion is based, in part, on a Tree Preservation Report prepared for the project by *Traverso Tree Service.* A copy of this report, dated February 6, 2020 (revised May 21, 2020) is attached as Appendix B to this Initial Study.

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.[16] 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

[16] United States Department of the Interior. "Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take." Accessed April 22, 2020. 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.

Regional and Local

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted for the purpose of avoiding or mitigating biological resource impacts resulting from planned development within the City, including the following:

Policies	Description
C/OS 6.1	Preserve heritage trees in accordance with the City's Heritage Tree Ordinance.
C/OS 6.2	Require significant replacement planting when the removal of heritage tree is permitted.
C/OS 6.3	Require the protection of heritage trees during construction activity; require that landscaping, buildings, and other improvements located adjacent to heritage trees be designed and maintained to be consistent with the continued health of the tree.
C/OS 6.4	Retain the maximum feasible number of trees and preserve the character of stands or groves of trees in the design of new or modified projects.
C/OS 6.6	Require street tree planting as a condition of all new developments in accordance with the adopted Street Tree Master Plan, El Camino Real Master Plan, or Hillsdale Station Area Plan, as applicable.
C/OS 6.7	Encourage the planting of new street trees throughout the City and especially in gateway areas such as Third Avenue, Fourth Avenue, El Camino Real (SR 82), Hillsdale Boulevard, and 42nd Avenue; encourage neighborhood participation in tree planting programs; explore non-City funded tree planting programs.

City of San Mateo Heritage Tree Ordinance

The City of San Mateo tree regulations protect all trees designated as "Heritage Trees" (Municipal Code Chapter 13.52). Under this ordinance, a Heritage Tree is defined as any one of the following:

- Any bay, buckeye, oak, cedar or redwood (sequoia) tree that has a diameter of 10 inches or more measured at 48 inches above natural grade;
- Any tree or stand of trees designated by resolution of the City Council to be of special historical value or of significant community benefit;
- A stand of trees, the nature of which makes each dependent on the others for survival;
- Any other tree with a trunk diameter of 16 inches or more, measured at forty-eight (48) inches above natural grade.

City of San Mateo Site Development Code

The City's Site Development Code (Chapter 23.40 of the Municipal Code) establishes administrative procedures, regulations, required approvals, and performance standards for site grading, construction on slopes, and removal of major vegetation. The regulations apply to site development occurring within any of the following provisions:

- Grading will exceed an area of 5,000 square feet and 5,000 cubic feet (185 cubic yards);
- Grading will exceed a volume of 550 cubic yards;
- Grading, regardless of quantity, where, in the opinion of the Building Official and/or City Engineer, includes special physical conditions which necessitate the application of this chapter to protect public health and safety;
- Construction is proposed on a slope of 15 percent or greater; and/or within slope setbacks as defined in Municipal Code Section 23.40.030; and/or
- Removal of major vegetation (trees over six inches in diameter) is proposed.

The intent of the ordinance is to protect public and private lands from erosion and earth movement, minimize the risk of injury to persons and damage to property, and ensure that each development relates to adjacent lands to minimize physical problems.

Chapter 27.71 Landscape for Planning Applications

Chapter 27.71 of the Municipal Code establishes requirements and guidelines for the appropriate design of landscaping and the preservation of existing trees in proposed developments. The intent of this chapter is to provision the use of landscaping to develop and maintain neighborhood character, soften architecture by use of plant materials where appropriate, buffer conflicting uses, screen parking areas, create comfortable outdoor living and walking spaces, mitigate air pollution and ensure that future developments are made water efficient. The landscaping plan for the proposed project would be required to meet the minimum standards set forth by Chapter 27.71.

4.4.1.2 *Existing Conditions*

Habitat

The project site is developed with an office campus with associated buildings, paved surface parking lots and landscaping. The site is bordered to the south and southeast by an undeveloped canyon, which features the Beresford Creek riparian corridor and contains riparian and oak woodland habitat. Beresford Creek is identified in the USFWS National Wetlands Inventory as a potential wetlands area, designated as "riverine."[17] Future development activities or disturbance in this area could be subject to permitting by the USACE or other regulatory agencies. There are no natural habitat areas contained within the project site boundaries.

[17] Targus Environmental, *Report of Phase I Environmental Site Assessment and Additional Environmental Services,* May 22, 2018.

Special Status Species

Based on information obtained from the USFWS' Information for Planning and Conservation (IPaC) website, there are several endangered or threatened animal and plant species that are known to occur near the project site. Of the animal species listed, final critical habitat has been established for five species (marbled murrelet, western snowy plover, California red-legged frog, delta smelt, and Bay checkerspot butterfly); however, the critical habitat is outside the limits of the project area. Critical habitat has been proposed for two of the listed species (Mission blue butterfly, San Bruno elfin butterfly), but the locations are not available. No critical habitats have been designated for any of the listed plant species.

Trees

The project site contains 412 trees including 27 different species. The majority of the trees on-site are located in restricted planters near buildings or hardscape, or on hillside areas along the property lines. The trees range in health and structural condition from good to very poor, with the majority rated as fair in the tree survey. The species included Monterey pine, coast live oak, coast redwood, blue gum, London plane tree, California bay and Monterey cypress. In addition, several non-native ornamental species including ornamental pear, pepper, acacia, various pine species, elm, holly, camphor, and sweet gum were surveyed. Of the trees on-site, 182 trees meet the City of San Mateo's definition of "Heritage Tree."

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?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 with Mitigation Incorporated)**

Special-Status Species

As described in Section 4.4.1.2 Existing Conditions, the project site is in an urbanized area and is developed with office buildings and surface parking lots. Due to the lack of suitable habitat and history of development on the site and in the surrounding areas, special-status species are unlikely to occur on the site. The canyon area adjacent to the site is undeveloped, however, any special status species occurring there would likely be less impacted by the proposed residential development than by the existing office uses, due the reduced levels of activity (traffic, noise, light and glare) and increase open space resulting from the residential development. Potential impacts associated with construction activities would be temporary in nature, and not likely to adversely affect special status species in this area in the long-term. Therefore, development of the proposed project would not significantly impact special-status species. **(Less than Significant Impact)**

Nesting Raptors and Migratory Birds

Although the presence of protected birds is unlikely, urban-adapted raptors or other protected birds could use the mature trees on or near the site for nesting and foraging habitat. Raptors and nesting birds are protected by the MBTA and CDFW Code. As previously mentioned, the project proposes to remove a total of 327 trees from the site. Removal of the trees on-site could potentially lead to nest abandonment and/or loss of reproductive effort. This is considered a "taking" by the CDFW. Any loss of fertile eggs, nesting raptors, or any activities resulting in nest abandonment would be considered a significant impact. The following measures are included in the project to minimize impacts to nesting raptors and migratory birds.

Mitigation Measures: In compliance with the MBTA, California Fish and Game Code and General Plan Policies ER-5.1 and ER-5.2, the following mitigation measures shall be implemented during construction to reduce impacts to nesting birds to a less than significant level.

MM BIO-1.1: Construction activities (or at least the commencement of such activities) shall be scheduled to avoid the nesting season. If construction activities are scheduled to take place outside of the nesting season, all impacts on nesting birds protected under the MBTA and California Fish and Game Code will be avoided. The nesting season for most birds in San Mateo County extends from February 1st through August 30th.

MM BIO-1.2: If it is not possible to schedule construction activities between September 1 and January 31 then preconstruction surveys for nesting birds 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. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats (e.g., trees, shrubs, ruderal grasslands, buildings) in and immediately adjacent to the impact areas for nests)

MM BIO-1.3: 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 to be established around the nest (typically 300 feet for raptors and 100 feet for other species), to ensure that nests of species protected by the MBTA and California Fish and Game Code shall not be disturbed during project implementation. However, if the ornithologist has confirmed that the hatchlings have left the nest, construction may commence within the buffer zone.

MM BIO-1.4: If construction activities will not be initiated until after the start of the nesting season, all potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are scheduled to be removed by the project may be removed prior to the start of the nesting season (e.g., prior to February 1st).

The proposed project, with implementation of the above mitigation measures, would reduce impacts to nesting birds (if present) 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 fully developed and does not contain riparian habitat or any other sensitive natural community. The Conservation and Open Space Element of the City's General Plan identifies an approximately 20-acre area of undeveloped land on the south side of Campus Drive as sensitive; this

area contains a steep canyon with oak and shrub acreage and the Beresford Creek riparian corridor. This area lies adjacent to and topographically below Campus Drive, near the southern border of the project site, and does not extend onto the project site. The project proposes to develop the adjacent area with landscaped retaining walls and landscape areas located between the edge of the new development and South Campus Drive that would buffer the development from the open space areas on the opposite side of the street. Therefore, the project would not impact any of the existing habitat areas, including the Beresford Creek riparian corridor. **(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)**

There are no federally protected wetlands within or adjacent to the project site. As previously stated, Beresford Creek is identified in the USFWS National Wetlands Inventory as a potential wetlands area; however, the creek is not located within the immediate vicinity of the project site and would not be affected by the proposed development. For this reason, the proposed project would not adversely affect protected wetlands through demolition, excavation, grading, or construction activities. **(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)**

Migratory movements of animal species are most often associated with riparian corridors. The nearest riparian corridor is contained within Beresford Creek, which is located at the bottom of the steep canyon adjacent to the South Parcel portion of the site. Construction and operational activities associated with the proposed development would not have any direct effects on this riparian corridor, as the project is immediately upslope of, but physically disconnected from the corridor. The proposed project would be required to conform to the City's Site Development Code, which contains performance standards for hillside development to regulate grading, drainage, and sediment and erosion control, unless otherwise approved as a waiver under State Density Bonus Law. These provisions are intended to preserve existing topographical forms, open spaces, habitat areas and visual resources from encroachment by new hillside development.

There are no native wildlife nursery sites on or adjacent to the project site. [18] Development of the proposed project would not result in impacts to any native wildlife nursery sites. **(Less than Significant Impact)**

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

[18] A wildlife nursery site is defined as a site where wildlife concentrate for hatching and/or raising young, such as rookeries, spawning areas and bat colonies.

There are approximately 412 trees on the project site, including 182 Heritage Trees. The project proposes to remove 327 trees from the site, including 145 Heritage Trees. The project would obtain tree removal permits and replace all removed trees in conformance with the City's Tree Preservation Ordinance. The Ordinance specifies that removal of one or more Heritage Trees requires the application for a removal permit from the Director of Parks and Recreation. Permits for Heritage Tree removal require replanting in accordance with the following guidelines:

- Trees removed under jurisdiction of a planning approval pursuant to Chapter 27.71 shall conform to the replacement conditions specified in the planning approval.

- Trees removed with a valid tree removal permit shall be replaced in accordance with the direction of the Director. Replacement direction shall include direction on the location and species of the replacement tree. Tree replacement shall be one 24" box size tree approved by the Director, for each tree removed.

- Trees removed without a valid tree removal permit shall be replaced by a 48" box size tree for each tree removed. Enhanced replant conditions may be imposed if it is determined by the Director that the value of the removed tree was significantly greater than that of a 48" box tree. In such cases, the determination of the level of replacement shall be within the discretion of the Director, but shall not exceed the actual tree loss as determined by the Replacement Value. In addition to the requirements of this subsection, penalties under Section 13.52.055 or other sanctions allowed by law may be imposed for removal of heritage trees without a permit.

- Where the Director determines that replanting is not feasible and/or appropriate, e.g., sufficient trees exist on site, the Director (1) may require that a payment of equal value to the cost of the purchase and installation of the replacement tree(s) be made to the City tree planting fund or (2) may place other conditions on the permit which are of equal value to the cost of the purchase and installation of the replacement tree(s).

In addition, the project would remove numerous trees which, although not qualifying as Heritage Trees, would still be covered under the City of San Mateo Site Development Code. The City's Site Development Code sets forth requirements to be met when the removal of existing trees with diameters of six inches or larger is proposed.

Condition of Approval: The following condition of approval shall be applied to the proposed project due to the removal of existing trees with diameters of greater than six inches.

- The applicant shall obtain a tree removal permit from the Planning Division for removal of existing trees with a diameter of six inches or larger, prior to the issuance of a Site Development Permit or demolition building permit, whichever is issued first. The applicant shall plant trees on the project site equivalent to the Landscape Unit (LU) value of trees to be removed or pay a fee in lieu of planting trees at the rate established in the annual Comprehensive Fee Schedule.

Adherence to the Condition of Approval described above would ensure that the project complies with the City's Site Development Code as it pertains to tree removal.

Additionally, the project would retain 85 trees on-site. Project construction could damage the roots and soil compaction within the driplines of existing mature trees on the site and could result in substantial damage to the trees' health and/or eventual failure of the trees. The City of San Mateo prescribes conditions of approval to protect Heritage Trees from construction impacts during site development.

Condition of Approval: The following condition of approval shall be applied to the proposed project due to the retention of Heritage Trees on-site.

- The applicant shall protect all Heritage Trees designated to remain from damage during construction. Tree protection shall comply with all provisions of the Heritage Tree Ordinance, approved Tree Protection Plan contained in the approved project arborist's report, and any requirements imposed by the City. The following tree protection measures shall be shown on grading and building permit drawings:
    - All recommendations for tree protection contained in the approved Tree Protection Plan contained in the approved project arborist's report, and/or additional requirements imposed by the City.
    - Protective fencing shall be located at the drip line of existing major vegetation to remain. This protective fencing shall be constructed of solid wood, chain link, or other solid materials subject to approval of the Zoning Administrator.
    - Oil, gas, chemicals, or construction materials shall not be stored within the drip line of trees that are designated to be preserved.
    - Signs, wires, or other types of obstructions shall not be attached to trees.
    - Trenching under the drip line of trees is to be avoided. If trenching is necessary, trenches are to be hand dug and major roots retained.
- All tree protection measures shall be constructed prior to issuance of a grading permit, demolition permit, or building permit. The Project Arborist shall submit a letter and photos to the Project Planner verifying that all tree protection measures are properly implemented prior to the issuance of the first grading or building permit.
- All approved and installed Heritage Tree protection measures shall be maintained throughout the period of construction. The Project Arborist shall complete inspections on an as-need basis during the construction period and shall submit a monthly report of his/her findings in a letter sent by fax or email to the City Planner assigned to this project.

Implementation of the conditions of approval discussed above would ensure that the proposed project does not conflict with City of San Mateo policies regarding tree removal or tree preservation. **(Less than Significant Impact)**

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

There is no applicable habitat conservation plan (HCP) or natural community conservation plan (NCCP), or other approved local, regional, or state habitat conservation plan for the City of San Mateo. As a result, there will be no impact with regard to conflict with the implementation of such plans. **(No Impact)**

4.5 CULTURAL RESOURCES

The following discussion is based, in part, on an Archaeological Resources Assessment Report prepared by *Basin Research Associates* in July 2020. A copy of this report is on file with the City of San Mateo Planning Division.

4.5.1 Environmental Setting

4.5.1.1 *Regulatory Framework*

Federal and State

National Historic Preservation Act

Federal protection of historical resources 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.[19]

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.

[19] California Office of Historic Preservation. "CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6." March 14, 2006.

California Native American Historical, Cultural, and Sacred Sites Act

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

Public Resources Code Sections 5097 and 5097.98

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

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

Local

City of San Mateo 2030 General Plan

Various policies and actions of the General Plan have been adopted for the purpose of avoiding or mitigating cultural resource impacts resulting from planned development within the City, including the following:

Policies	Description
C/OS 7.1	Preserve, to the maximum extent feasible, archaeological sites with significant cultural, historical, or sociological merit.
C/OS 8.1	Historic Preservation. Preserve, where feasible, historic buildings as follows: • Prohibit the demolition of historic buildings until a building permit is authorized subject to approval of a planning application. • Require the applicant to submit alternatives on how to preserve the historic building as part of any planning application and implement methods of preservation unless health and safety requirements cannot be met. • Require that all exterior renovations of historic buildings conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures. • Historic building shall mean buildings which are on or individually eligible for the National Register or Downtown Historic District contributor buildings as designated in the 1989 Historic Building Survey Report, or as determined to be eligible through documentation contained in a historic resources report. The City Council by resolution may add or delete any building which it finds does, or does not, meet the criteria for the National Register or other criteria.
C/OS 8.4	Promote the rehabilitation of historic structures; consider alternative building codes and give historic structures priority status for available rehabilitation funds.

Policies	Description
C/OS 8.5	Foster public awareness and appreciation of the City's historic, architectural, and archaeological resources.

City of San Mateo Historic Preservation Ordinance

Chapter 27.66 Historic Preservation of the City's Zoning Code (Municipal Code) requires public review and submittal of a Site Plan and Architectural Review planning application for any individually eligible building for the National Register of Historic Places. Any modifications are evaluated for conformance with the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Structures.

4.5.1.2 *Existing Conditions*

Prehistoric Resources

The California Native Americans who occupied the San Mateo Peninsula at the time of European contact are known as the Costanoan. The term Costanoan is derived from the Spanish word Costanos, meaning coast people. No native name for the Costanoan people is known to have existed in prehistoric times. Bay Area descendants of these people prefer the name Ohlone. Their territory covered 6,000 to 7,000 square miles extending along the Pacific Coast from south of Monterey Bay north to the San Francisco Peninsula and inland 20 to 45 miles into the Coast Ranges. The project site is within the Ramaytush subdivision of the Ohlone, which included much of present-day San Mateo and San Francisco counties. The project site is situated at or near a primary settlement of the Ssalson tribelet (San Mateo Area) of the Ramaytush. The Ssalson tribelet included seven villages, with the main villages located primarily along San Mateo Creek.

The City has been mapped for archaeological sensitivity and is divided into three sensitivity zones, based on documented archaeological sites (as of 1980). The high sensitivity zone includes recorded sites, primarily shell mounds and near creeks, and the immediately adjacent areas which are favorable sites. The medium sensitivity zone includes areas surrounding the high sensitivity areas and other locales where, while no sites are recorded, the settings are similar to those where recorded sites do occur. The majority of the City (including the project site) is in a low sensitivity zone wherein archaeological resources are not generally expected but may occur.

The cultural resources assessment of the site included an archival records review at the California Historical Resources Information System, Northwest Information Center (CHRIS/NWIC); a limited literature review; the results of a Native American Heritage Commission (NAHC) search of the Sacred Lands Inventory; and a field review of the project site by a professional archaeologist. The assessment found that there are no prehistoric archaeological sites within or adjacent to the project site. Additionally, no Native American villages, traditional use areas, or contemporary use areas or other features of significance have been identified in or adjacent to the project site. Thus, the project site has a low sensitivity for prehistoric archaeological resources.

Historic Resources

Historic resources in San Mateo are generally concentrated in the downtown area. Numerous historic buildings in this area make up the Downtown Historic District. The other historic district in San

Mateo, the Glazenwood Historic District, is located between 9th and 10th Avenue and Palm and B Streets. The City contains six buildings that are listed on the National Register: the Ernest Coxhead House on East Santa Inez Avenue; De Sabla Teahouse and Tea Garden on De Sabla Avenue; Hotel Saint Matthew on Second Avenue; National Bank of San Mateo on B Street; Vollers House on North Claremont Street; and the U.S. Post Office on South Ellsworth Street.[20] The project site does not contain any historic resources listed in the National Register of Historic Places or the California Register of Historical Resources and is not located adjacent to the Downtown Historic District or the Glazenwood Historic District. The existing buildings on-site were constructed between 1971 and 1974 and would not be eligible historic resources because they do not meet the age criteria for inclusion in the California Register (over 50 years old).[21]

The cultural resources assessment found that there are no historic archaeological sites within or adjacent to the project site. The project site is located within the former Rancho de las Pulgas, which extends from San Mateo Creek to San Francisquito Creek in Palo Alto. None of the known rancho dwellings, other structures or features (e.g., mills, corrals, roads, etc.) were located on or adjacent to the project site. Thus, the project site has a low sensitivity for historic archaeological resources.

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. **(Less than Significant Impact)**

The project site does not contain any identified historic resources and is not located adjacent to a historic district. The project site has low sensitivity for historic archaeological resources and shall implement the mitigation measures described below under Impact CUL-2 in the event that historic archaeological resources are unearthed during project construction. Therefore, implementation of the project would not result in any substantial adverse changes in the significance of any historical resources. **(Less than Significant Impact)**

[20] City of San Mateo. "Historic Resources." March 20, 2017. Accessed June 22, 2020. https://www.cityofsanmateo.org/DocumentCenter/View/64534/Historic-Resources-Info-Handout
[21] Targus Environmental. *Phase I Environmental Site Assessment – Peninsula Office Park.* May 22, 2018.

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)**

As described previously in Section 4.5.1.2 Existing Conditions, the project site is not located within or adjacent to any identified archaeological resources. Based on archival research, a review of historic maps, and a field review of the project site by a professional archaeologist, the project site was found to have a low sensitivity for archaeological resources. While archaeological resources are not anticipated to be discovered during project construction, the possibility remains that as-yet undiscovered resources could be unearthed during grading, excavation, or other site disturbances. Disturbance to these resources would constitute a significant impact.

Mitigation Measures: The project shall implement the following measures, based on the recommendations of the *Basin Research Associates* report dated July 2020, in the event that archaeological resources are discovered during project implementation.

MM CUL-2: If any unanticipated prehistoric or significant historic period cultural materials are exposed during construction grading and/or excavation, operations shall stop within 50 feet of the find and a qualified professional archaeologist contacted for evaluation and further recommendations consistent with CEQA and City of San Mateo requirements. Potential recommendations could include evaluation, collection, recordation, analysis, etc. of any significant cultural materials followed by a professional report.

Implementation of the mitigation measures described above would ensure that the proposed project does not significantly impact archaeological resources. **(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)**

The project site has been identified as having a low sensitivity for cultural materials associated with Native Americans, including human remains. Nonetheless, there is the potential for discovery of human remains during grading, excavation, and other site disturbing activities.

Mitigation Measures: The project shall implement the following measures in the event that human remains are discovered during project implementation.

MM CUL-3: In the event that human remains are discovered during excavation and/or grading of the site or public right-of-way, all activity within a 50-foot radius of the find shall be stopped. The San Mateo County Coroner shall be notified and make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner will notify the

Native American Heritage Commission (NAHC) immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

Implementation of the mitigation measures described above would allow for timely identification, analysis, and documentation of any human remains, should they be discovered. By applying these measures, the project would result in a less than significant impact to human remains. **(Less than Significant Impact 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. In 2008, Executive Order 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.

California Building Standards Code

The Energy Efficiency Standards for Residential and Nonresidential Buildings, as specified in Title 24, Part 6 of the California Code of Regulations (Title 24), was established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 is updated approximately every three years.[22] Compliance with Title 24 is mandatory at the time new building permits are issued by city and county governments.[23]

California Green Building Standards Code

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

[22] California Building Standards Commission. "California Building Standards Code." Accessed January 21, 2020. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.
[23] California Energy Commission (CEC). "2019 Building Energy Efficiency Standards." Accessed January 21, 2020. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

Advanced Clean Cars Program

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

Local

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted for the purpose of avoid or mitigating energy impacts resulting from planned development within the City, including the following:

Policies	Description
C/OS 13.6	Establish management and operating practices that are environmentally, socially and economically sustainable.
UD 2.14	Require new development and building alterations to conform with the City's Sustainable Initiative Plan and subsequent City Council adopted goals, policies, and standards pertaining to sustainable building construction.

City of San Mateo Climate Action Plan

The City of San Mateo adopted a community-wide climate action plan (CAP) on April 6, 2015, which updates and consolidates the City's existing Sustainable Initiatives Plan, GHG Emissions Reduction Plan, and Climate Action Plan for Municipal Operations and Facilities, based on the vision of San Mateo residents, businesses, and local government. The goal was to prepare a CAP that serves as an updated and Qualified GHG Reduction Strategy consistent with BAAQMD GHG Plan Level Guidance and CEQA Guidelines Section 15183.5. The CAP was developed through a robust public process that engaged the San Mateo Sustainability Commission, staff, and the community.

While the primary focus of the CAP is to achieve GHG reductions in alignment with regional, state and national targets, several reduction measures in the CAP have the added benefit of increasing energy efficiency and establishing renewable energy sources in new development. Reduction measures that are applicable to the energy demand of the proposed project are listed below:

- Reduction Measure AF 2: Provide EV charging stations with designated parking spaces capable of meeting the California Green Building Code Voluntary Standards.

[24] California Air Resources Board. "The Advanced Clean Cars Program." Accessed April 22, 2020. https://www.arb.ca.gov/msprog/acc/acc.htm.

4.6.1.2 *Existing Conditions*

Total energy usage in California was approximately 7,881 trillion British thermal units (Btu) in the year 2017, the most recent year for which this data was available.[25] Out of the 50 states, California is ranked second in total energy consumption and 48th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,416 trillion Btu) for residential uses, 19 percent (1,473 trillion Btu) for commercial uses, 23 percent (1,818 trillion Btu) for industrial uses, and 40 percent (3,175 trillion Btu) for transportation.[26] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in San Mateo County in 2018 was consumed primarily by the commercial sector (64 percent), with the residential sector consuming 36 percent. In 2018, a total of approximately 4,226 GWh of electricity was consumed in San Mateo County.[27]

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 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. [28]

Natural Gas

PG&E provides natural gas services within San Mateo. 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.[29] 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.[30]

[25] United States Energy Information Administration. "State Profile and Energy Estimates, 2017." Accessed April 22, 2020. https://www.eia.gov/state/?sid=CA#tabs-2.
[26] Ibid.
[27] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed April 22, 2020. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[28] Sources: 1) Peninsula Clean Energy. "Frequently Asked Questions." Accessed April 22, 2020. https://www.peninsulacleanenergy.com/resources/frequently-asked-questions/. 2) Peninsula Clean Energy. "Energy Choices." Accessed April 22, 2020. https://www.peninsulacleanenergy.com/our-power/energy-choices/.
[29] California Gas and Electric Utilities. 2019 *California Gas Report.* Accessed April 22, 2020. https://www.socalgas.com/regulatory/documents/cgr/2019_CGR_Supplement_7-1-19.pdf.
[30] California Energy Commission. "Natural Gas Consumption by County." Accessed April 22, 2020. http://ecdms.energy.ca.gov/gasbycounty.aspx.

Fuel for Motor Vehicles

In 2018, 15.5 billion gallons of gasoline were sold in California.[31] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13.1 miles per gallon (mpg) in the mid-1970s to 25.5 mpg in 2019.[32] 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 subsequently revised to apply to cars and light trucks model years 2011 through 2020. [33,34]

Energy Use of Existing Development

The estimated annual electricity and natural gas consumed by existing development on the project site is shown in Table 4.6-1.

Table 4.6-1: Estimated Annual Energy Use of Existing Development

Development	Electricity Use (kWh)	Natural Gas Use (kBtu)
General Office Building – 224,844 sf	2,806,050	4,346,220
Parking Lot – 5 acres	76,230	0
Total:	**2,882,280**	**4,346,220**

Source: ECORP Consulting, Inc. *Peninsula Heights – Greenhouse Gas Emissions Assessment.* August 2020.

As shown in the table above, the existing office uses on-site are estimated to consume 2,882,280 kWH of electricity and 4,346,220 kBtu of natural gas per year. Based on an existing total daily VMT of 25,740 for the office uses (see Section 4.17 Transportation) and an average fuel economy of 25.5 mpg, the office uses are estimated to consume 370,000 gallons of gasoline per year.

[31] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed April 22, 2020. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

[32] United States Environmental Protection Agency. "The 2019 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." March 2020. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100YVFS.pdf

[33] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed April 22, 2020. http://www.afdc.energy.gov/laws/eisa.

[34] Public Law 110–140—December 19, 2007. *Energy Independence & Security Act of 2007.* Accessed April 22, 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)**

Construction

Construction of the project is estimated to occur over a period of 18 to 24 months and would require energy for the manufacture and transportation of building materials, preparation of the project site (i.e. demolition and grading), and the construction of the buildings. Construction energy usage is temporary and would not result in excessive energy consumption because construction processes are generally designed to be efficient to avoid excess monetary costs. The project would be constructed in an urbanized area with close access to roadways, construction supplies, and workers, making the project more efficient than construction occurring in outlying, more isolated areas. Excessive energy would not be spent establishing new utility connections or transporting construction materials/workers to the site. The construction process is already efficient and opportunities for increasing energy efficiency during construction are limited.

The project would be required to implement BAAQMD Best Management Practices, which would restrict unnecessary idling of construction equipment and require the applicant to post signs on the project site reminding workers to shut off idle equipment, thus reducing the potential for energy waste (refer to Section 4.3 Air Quality). For this reason, and those described above, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction. **(Less than Significant Impact)**

Operation

The project would demolish four existing office buildings and redevelop the site with 290 residential units, landscaping, and open space areas. Energy would be consumed via heating and cooling of the proposed buildings, electricity use, water use, solid waste disposal, and gasoline consumption of vehicles traveling to and from the site. The project site is in an urban area and would connect to existing utilities and use existing roadways for access. Table 4.6-2 below shows the estimated annual energy use of the existing uses on the site versus the proposed project.

Table 4.6-2: Estimated Annual Energy Use of Existing Vs. Proposed Development		
	Electricity Use (kWh)	**Natural Gas Use (kBtu)**
Existing Development		
General Office Building – 224,844 sf	2,806,050	4,346,220
Parking Lot – 5 acres	76,230	0
Total:	**2,882,280**	**4,346,220**
Proposed Development		
Condo/Townhouse – 216 units	1,035,960	564,840
Single-Family Housing – 74 units	574,596	193,510
Parking Lot – 37 spaces	5,180	0
Total:	**1,615,736**	**758,350**
Net Difference:	***-1,266,544***	***-3,587,870***
Source: ECORP Consulting, Inc. *Peninsula Heights – Greenhouse Gas Emissions Assessment.* September 2020.		

As shown in the table, the proposed project would result in a gross annual energy use of approximately 1,615,736 kWh and 759,350 kBtu. As the site is developed with office buildings which currently use energy (refer to Section 4.6.1.2 Existing Conditions), the project would result in a net decrease in annual energy use of approximately 1,266,544 kWh and 3,587,870 kBtu. It should be noted that per the City's Building Electrification Reach Code (Municipal Code Chapter 23.24), the proposed single-family residences would be required to be all-electric or mixed-fuel with a higher efficiency rating than State standards, thus significantly reducing the amount of natural gas expended by the project. Additionally, the project would decrease overall gasoline consumption by approximately 58,472 gallons per year. The project is an infill development which would bring new residents to an area of the City where commercial, retail, and recreational services are readily available. The project's proximity to these services would reduce transportation energy demand. Implementation of the project's TDM Plan will further reduce vehicle trips and subsequent gasoline consumption.

The project will incorporate sustainable design and green building principles that promote energy efficiency and conservation, in accordance with City guidelines and currently accepted best practices. The proposed development will be constructed to meet or exceed the state energy efficiency standards (i.e., Part 6 of Title 24 of the California Code of Regulations) and will comply with the City's Green Building Code (Municipal Code Chapter 23.70). In addition, large portions of the project site are currently covered with paved parking areas. Redevelopment of these areas with energy efficient buildings and landscaping would reduce the heat island effect of the project and minimize the energy required to cool the proposed buildings. For these reasons, the project would not result in wasteful, inefficient, or unnecessary consumption of energy during its operation. **(Less than Significant Impact)**

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

Statewide energy efficiency and renewable energy goals are set forth in the California Renewables Portfolio Standard Program, which is one of California's key programs for advancing renewable energy. The CEC verifies the eligibility of renewable energy procured by all entities serving retail sales of electricity in California, as these entities are obligated to participate and report energy portfolios to the CEC to comply with the Renewables Portfolio Standard Program.[35] Electricity would be provided to the project by PCE from sources of renewable and carbon-free power including wind, solar, geothermal, and hydroelectric. As described above, PCE is subject to verification by the CEC as an electricity-providing entity. By sourcing electricity from PCE, the project would be compliant with statewide energy goals as set forth in the California Renewables Portfolio Standard Program.

In addition, the City of San Mateo CAP contains GHG reduction measures which focus on increasing renewable energy production and improving energy efficiency (Reduction Measures RE 5 and AF 2). In accordance with Section 23.24.030 of the San Mateo Municipal Code, the project would be required to provide a 3-killowatt or greater photovoltaic system for each residential building four stories or greater in height. Compliance with these measures, in addition to the City's green building measures and Title 24 of the California Code, would ensure that the project provides opportunities for on-site renewable energy generation and has a high overall operational energy efficiency. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **(Less than Significant Impact)**

[35] California Energy Commission. "Renewables Portfolio Standard – Verification and Compliance." Accessed June 18, 2020. https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard

4.7 GEOLOGY AND SOILS

The following discussion is based, in part, on a Geotechnical Exploration prepared for the project site by *ENGEO, Inc.* The report, last revised on April 23, 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; the most recent update went into effect on January 1, 2020.

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 are valued for the information they yield about the history of the earth and its past ecological settings. California Public Resources Code Section 5097.5 specifies that unauthorized removal of a paleontological resource is a misdemeanor. Under the CEQA Guidelines, a project would have a significant impact on paleontological resources if it would disturb or destroy a unique paleontological resource or site or unique geologic feature.

Local

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted to avoid or mitigate geology and soils impacts resulting from planned development in the City, including the following:

Policies	Description
S 1.1	Require a site specific geotechnical engineering studies, subject to the review and approval of the City Engineer and Building Official, for development proposed on sites identified in Figure S-1 of the City's General Plan as having a moderate or high potential for ground failure. Permit development in areas of potential geologic hazards only where it can be demonstrated that the project will not be endangered by, or contribute to, the hazardous condition on the site or on adjacent properties.
S 1.3	Require erosion control measures for all development sites where grading activities are occurring, including those having landslide deposits, past erosion problems, the potential for storm water quality impacts, or slopes of 15 percent or greater which are to be altered. Control measures shall retain natural topographic and physical features of the site if feasible.
C/OS 3.2	Regulate the location, density, and design of development throughout the City in order to preserve topographic forms and to minimize adverse impacts on vegetation, water, and wildlife resources.

City of San Mateo Site Development Code

The City's Site Development Code (Chapter 23.40 of the City of San Mateo Municipal Code) establishes administrative procedures, regulations, required approvals, and performance standards for site grading, construction on slopes, and removal of major vegetation. In general, a planning application and a subsequent site development permit are required for development where grading exceeds 5,000 square feet in area; grading exceeds a volume of 550 cubic yards; removal of major vegetation (trees over 6 inches in diameter) is proposed; and construction is proposed on a slope of 15 percent or greater, and/or within slope setbacks as defined in Municipal Code Section 23.40.030. The intent of the ordinance is to protect public and private lands from erosion and earth movement, minimize the risk of injury to persons and damage to property, and ensure that each development relates to adjacent lands to minimize physical problems.

4.7.1.2 *Existing Conditions*

Regional Geology

The City of San Mateo is located within the Coast Ranges geomorphic province formed by the Franciscan, Merced, and Colma assemblages, which are principally composed of marine sedimentary and volcanic rocks, as well as deposits of sandstone, claystone, siltstone, gravel, sand, silt, and clay. The Coast Ranges is a geomorphic province of California that extends from the Oregon border nearly to Point Conception in Santa Barbara County. The Coast Ranges in the Bay Area have developed on a basement of tectonically mixed Cretaceous- and Jurassic-age rocks of the Franciscan Complex (70 – 200 million years old). Younger sedimentary and volcanic units cap these rocks in the local area, and still younger surficial deposits that reflect geologic conditions of the last million years cover most of the Coast Ranges.

Seismicity and Seismic Hazards

As the San Francisco Bay Area contains numerous active and potentially active faults, there is a high potential for seismic events such as fault surface ruptures and ground shaking, which can cause ground failure (landslides), settlement, erosion, liquefaction, lateral spreading, and soil expansion.

The project site is located within the seismically active San Francisco Bay region. The faults in this region can generate earthquakes of magnitude 7.0 or higher. Major faults in the area include the San Andreas Fault, approximately 1.9 miles west of the site; the Monte Vista-Shannon Fault, approximately 8.0 miles south of the site; the San Gregorio Fault, approximately 9.4 miles west of the site; and the Hayward-Rodgers Creek Fault, approximately 16.4 miles east of the site. During an earthquake, very strong ground shaking could occur at the project site.

The project site is not located within an Alquist-Priolo Fault Zone or within a Liquefaction Zone per the Earthquake Zone of Required Investigation (EZRI) maps prepared by the CGS. However, the project site is within a Landslide Zone.[36] The site is located on a hillside with maximum slopes of up to 50 percent. The site slopes downward in a southeasterly direction.

Soils

The geotechnical exploration advanced 11 exploratory test pits to depths of six feet below existing grade across the site. An analysis of the excavated soils found that artificial fill soils are present along the southern and eastern portions of the site, consisting of medium dense to dense clayey sand with intermittent layers of stiff sandy clay and silt with variable gravel content. Most soil samples were found to have Plasticity Indices (PI) ranging from 10 to 15, indicative of low expansion potential. One sample collected along the southeastern portion of the northern parcel had a PI of 26, indicating moderate to high expansion potential. Generally, the on-site fill soils have low to moderate expansion potential with isolated pockets of high expansion potential material. Bedrock encountered consisted mainly of sandstone, with minor amounts of shale and siltstone interspersed throughout. Residual soils, typically present between the artificial fill and bedrock, consisted of sandy and clayey soil. Ultramafic rock or serpentinite was not encountered in the geotechnical exploration.

[36] California Geological Survey. "Earthquake Zones of Required Investigation". https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed May 27, 2020.

Groundwater

Groundwater was not encountered during the geotechnical exploration. It is possible that groundwater at the site is transient with perched zones located above the bedrock resulting from runoff from upland areas. Shallow groundwater may be encountered within 15 to 35 feet below ground surface (bgs) in the vicinity of the project site.[37,38] Fluctuations in the level of groundwater may occur due to variations in rainfall, irrigation practice, and other factors not evident at the time of the exploration.

Paleontological Resources

The General Plan EIR found that there are no known paleontological resources in the City of San Mateo.[39] The project site has been historically disturbed and is located on a hillside that has been extensively graded, making it less likely that undiscovered paleontological resources would be deposited and remain on-site.

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:				
– 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?	☐	☐	☒	☐

[37] ENGEO, Inc. *Peninsula Heights, San Mateo, CA Geotechnical Exploration*. April 23, 2020.
[38] Targus Associates, LLC. *Peninsula Office Park Phase I Environmental Site Assessment*. May 22, 2018.
[39] City of San Mateo. *City of San Mateo General Plan Update - Draft Environmental Impact Report.* July 2009. Page 4.10-7.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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 within 10 miles of the site, the proposed project is outside of the fault rupture zone, and significant impacts from fault ruptures are not anticipated to occur. **(Less than Significant Impact)**

Seismic Ground Shaking

The project site is located within the seismically active San Francisco Bay region. Faults in this region can generate earthquakes of magnitude 7.0 or higher. Major faults in the area include the San Andreas Fault, the San Gregorio Fault, and the Hayward Fault. During an earthquake, very strong ground shaking could occur at the project site which could damage buildings and pose a hazard to residents of the proposed development and nearby land uses. The proposed buildings would be designed and constructed in accordance with the City of San Mateo's requirements and seismic design guidelines for Seismic Design Category D in the current California Building Code. Additionally, a site-specific geotechnical report would be prepared that would include project design and construction recommendations, subject to the approval of the City of San Mateo Building Division. Thus, impacts related to seismic ground-shaking would be reduced to a less than significant level. **(Less than Significant Impact)**

Liquefaction

As mentioned in Section 4.7.1.2 Existing Conditions, the project site is not located within an EZRI for Liquefaction, according to maps prepared for the San Mateo Quadrangle by the CGS. Additionally, the soils encountered in the geotechnical exploration consisted of medium dense to very dense clayey sand and gravel or stiff to hard clay above the groundwater table and bedrock that are not susceptible to liquefaction. Thus, the potential for liquefaction to occur on-site during a strong seismic event is low and the project would not exacerbate any existing liquefaction hazards. **(Less than Significant Impact)**

Lateral Spreading

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

The project site is not located in an identified EZRI for Liquefaction. Because the soils on-site are unlikely to liquefy, the risk of lateral spread is low. 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. Therefore, lateral spread or other seismic-induced hazards would be exacerbated by the proposed project. **(Less than Significant impact)**

Landslides

As mentioned in Section 4.7.1.2 Existing Conditions, the project site is located within an EZRI for Landslides. The project would construct retaining walls around the site to accommodate grade changes between the existing terrain and the proposed development. The proposed retaining walls consist of a 22-foot high mechanical stabilized earth (MSE) wall on the eastern area of the northern parcel; a MSE wall between 20 to 25 feet in height on the southern portion of the southern parcel; and a MSE wall between 18 and 24 feet in height along the eastern site boundary of the southern parcel. The geotechnical exploration included a slope stability analysis and provided recommendations for retaining wall design to meet acceptable factors of safety for seismic conditions. The locations of the retaining walls are shown on Figures 3.2-8 through 3.2-10, in Section 3.2.8. By adhering to the recommendations of the geotechnical exploration, including but not limited to slope gradients, setbacks, and retaining walls, the project would not exacerbate landslide risk in the area. **(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, particularly due to the existing gradient of the site. The City of San Mateo's Municipal Code and Site Development Code outline procedures to be followed to prevent significant soil erosion during construction activities.

Conditions of Approval: In accordance with the General Plan and the City's Municipal Code, Site Development Code 23.40.040, the following conditions of approval will reduce potential impacts from erosion to a less than significant level.

- The applicant shall submit erosion control measures including silt fences, fiber rolls, proposed cribbing (retaining walls or riprap), terraces, and/or surface protection, required for drainage and erosion control of the property per Municipal Code Section 23.40.040 (a) prior to issuance of a building and/or site development permit, subject to review and approval of the Public Works Department. Conformance with these measures will reduce soil erosion during construction. The applicant shall submit an Erosion and Sediment Control Plan (which includes erosion control measures), if required by the City Engineer.

By adhering to the policies mentioned above, the project would not substantially increase soil erosion on-site or contribute to the loss of topsoil. **(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 described under Impact GEO-1, with adherence to standard engineering techniques in the CBC and the recommendations of the site-specific geotechnical exploration, the project would not exacerbate landslide, lateral spreading, or liquefaction risks. According to the geotechnical exploration, based on topographic and lithologic data for the area, the risk of regional subsidence or uplift at the site is low. It is not anticipated that unstable geologic units or soil would affect the proposed development or be exacerbated by it. Nonetheless, the City's Site Development Code 23.40.040 requires projects that involve over 5,000 square feet or 500 cubic yards of grading to obtain a Site Development Permit. To do so, the project would be required to follow procedures to demonstrate conformance with applicable building codes, building safety during seismic events, erosion control measures, and appropriate construction procedures for project implementation.

Conditions of Approval: Implementation of the following conditions of approval monitored by the Building Division, in compliance with the Municipal Code, will ensure significant impacts related to geologic units and soil are less than significant.

- The applicant shall provide a stamped, signed, and dated soil investigation report containing design recommendations to the Building Official. The classification shall be based on observation and any necessary tests of materials disclosed by boring or excavations made in appropriate locations. Additional studies may be necessary to evaluate soil strength, the effect of moisture variation on soil-bearing capacity, compressibility, liquefaction, seismically induced soil liquefaction, soil instability, and expansiveness. Additionally, the applicant shall submit a stamped, signed, and dated letter from the Geotechnical Engineer or Civil Engineer who prepared the soil investigation stating the following:

    - The plans and specifications substantially conform to the recommendations in the soil investigation. The Geotechnical Engineer or Civil Engineer who prepared the soil

investigation has been retained to provide soil site observation and provide periodic and final reports to the City of San Mateo.

- Prior to final inspection for any building or structure, the Geotechnical Engineer or Civil Engineer who prepared the soil investigation shall issue a final report stating the completed pad, foundation, finish grading and associated site work substantially conform to the approved plans, specifications and investigations.

Conditions of Approval: Implementation of the following conditions of approval monitored by the Public Works Department, in compliance with the Municipal Code, will ensure significant impacts related to geologic units and soil are less than significant.

- The applicant shall obtain a site development permit from the Public Works Department for hillside grading. The applicant shall submit to Public Works, for review with the building permit application and construction plans, a site grading and drainage plan prepared by a registered Civil Engineer with all supporting data, including hydraulic calculations, in accordance with requirements of the City's Site Development Code (SMMC 23.40).

    - The grading and drainage plan shall also comply with the recommendations of the Soils/Geotechnical Report.

    - The applicant shall submit a letter addressed to the Public Works Department stamped, signed, and dated from the Geotechnical Engineer who prepared the soil investigation concluding the following:

    (A) The Civil plans and specifications substantially conform to the recommendations in the soil investigation, including earthwork, grading, and drainage recommendations for long-term slope stability, and slope stability during construction.

    (B) The Geotechnical Engineer or Civil Engineer who prepared the soil investigation will provide soil site observation and provide periodic and final inspection reports to the City of San Mateo.

    (C) Upon review of the final grading plan, confirming that there is no adverse impact upon health and safety per Government Code 65915(e)(1) associated with hillside grading on slopes greater than 25%, per the Density Bonus Waivers used for Municipal Code Sections 23.40.050 (c)(2)&(3) and 26.20.110.

    - Prior to final inspection for any building or structure, the Geotechnical Engineer who prepared the soil investigation shall re-affirm conclusions stating the grading and drainage work substantially conform to the approved plans, specifications and investigations.

With implementation of the conditions of approval described above, the proposed project would not result in a significant impact due to unstable geologic units or soil. **(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)**

The soils on the project site are considered to have low to moderate expansion potential, with pockets of soils with high expansion potential. With implementation of conventional grading operations and incorporating fill placement specific to the expansive characteristics of the soil, risks associated with expansive soils on-site would be reduced. The geotechnical exploration recommends that excavated fill material be well-mixed prior to re-use to create a relatively homogenous material. With implementation of the recommendations of the geotechnical exploration and standard engineering techniques set forth in the CBC, the proposed project would not result in significant impacts due to the expansive soils on-site. **(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 site is located in an urbanized area of San Mateo. The proposed project would be served by existing municipal sewer lines and would not require the installation of septic tanks or alternative wastewater disposal systems. **(No Impact)**

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

No unique geologic features or paleontological resources have been identified at the project site. The City of San Mateo General Plan EIR did not identify any known paleontological resources in the City of San Mateo. Sensitive paleontological resources are unlikely to be unearthed during all excavation activities proposed by the project; however, the inadvertent discovery of such resources cannot be entirely ruled out. The City of San Mateo has developed conditions of project approval that address the potential for discovery of paleontological resources.

Conditions of Approval: The following conditions of approval shall be implemented by the proposed project to reduce potential impacts to paleontological resources:

- Should any potentially unique paleontological resources (fossils) be encountered during development activities, work shall be halted immediately within 50 feet of the discovery. The City of San Mateo Planning Division shall be immediately notified, and the applicant shall be responsible for retaining the services of a qualified paleontologist to determine the significance of the discovery. The paleontologist shall evaluate the uniqueness of the find and prepare a written report documenting the find and recommending further courses of action. Based on the significance of the discovery, the actions may include avoidance, preservation in place, excavation, documentation, recovery, or other appropriate measures as determined by the paleontologist.

Application of the above-listed conditions of approval would ensure that significant impacts to paleontological resources are reduced to a less than significant level. **(Less than Significant Impact)**

4.8 GREENHOUSE GAS EMISSIONS

The following discussion is based, in part, on a Greenhouse Gas Emissions Assessment prepared by *ECORP Consulting, Inc.* in September 2020. A copy of this report is attached as Appendix D to this Initial Study.

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 (RTP) 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).

Senate Bill 330

SB 330, signed into law in October 2019, makes numerous changes to the Permit Streamlining Act and the Housing Accountability Act and establishes the Housing Crisis Act. Under SB 330, cities and counties will be limited in the ordinances and policies that can be applied to housing developments. SB 330 creates a preliminary application process in which a housing development will be deemed to have completed the preliminary application process by providing specified information about the project and certain relative environmental concerns.

Under SB 330, with limited exceptions, housing developments will only be subject to those ordinances and policies in effect when the completed preliminary application is submitted. The public agency must make any historic site determination at the time the developer has complied with

the preliminary application checklist. That determination can only be changed if archaeological, paleontological or tribal cultural resources are found during development.[40]

All public agencies must compile a checklist that specifies what is required to complete a development application, in order to facilitate the preliminary application process. The application checklist must be made available in writing and on the public agency's website. The developer has 180 days from the submittal of the preliminary application to submit a development application. Under SB 330, the local agency has additional disclosure obligations when rejecting an application as incomplete and cannot request anything that is not identified on the application checklist.[41]

Regional and Local

ABAG Plan Bay Area 2040

ABAG's Plan Bay Area is the RTP/SCS for the San Francisco Bay Area. Plan Bay Area establishes GHG emissions goals for automobiles and light-duty trucks, a potent source of GHG emissions attributable to land use development. As previously described, ABAG was tasked by CARB to achieve a seven percent per capita reduction in mobile-source GHG emissions compared to 2005 vehicle emissions by 2020 and a 15 percent per capita reduction by 2035. Plan Bay Area 2013-2040 establishes an overall mechanism to achieve these GHG targets for the project region consistent with both the target date of AB 32 (end of 2020) and the post-2020 GHG reduction goals of SB 32. CARB has confirmed the Project region will achieve its GHG reduction targets by implementing Plan Bay Area (CARB 2018). The RTP/SCS contains thousands of individual transportation projects, including highway improvements, railway electrification, bicycle lanes, new transit hubs, and replacement bridges. These future investments seek to reduce traffic bottlenecks, improve the efficiency of the region's network, and expand mobility choices. The RTP/SCS is an important planning document for the region, allowing project sponsors to qualify for federal funding. In addition, the RTP/SCS is supported by a combination of transportation and land use strategies that help the region achieve state GHG emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support the vital goods movement industry, and use resources more efficiently.

BAAQMD 2017 Clean Air Plan

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

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

[40] BB&K. *SB 330 Limits Local Laws Over Housing Developments. https://www.bbklaw.com/news-events/insights/2019/legal-alerts/10/sb-330-limits-local-laws-over-housing-developments. Accessed 10.8.20.*
[41] Ibid.

guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures.

City of San Mateo Sustainable Initiatives Plan

The Sustainable Initiatives Plan (2007) addresses several areas of environmental responsibility for the City, including citywide sources of GHG emissions, impacts from new developments and construction, city planning, waste and resource management, and all modes of transportation. The plan also addresses ways to engage the public and businesses in creating solutions to these environmental challenges. The Sustainable Initiatives Plan contains two sets of actions in regard to climate change: a proactive approach, which reduces GHG emissions and therefore lessens the impacts on global warming, and the adaptive approach, which serves to ensure that the City is prepared for the inevitable change.

City of San Mateo Greenhouse Gas Emissions Reduction Program

The City prepared a Greenhouse Gas Emissions Reduction Program (2010) to summarize the City of San Mateo's GHG emissions and the actions being taken to mitigate those emissions. The emissions reduction program seeks to meet the requirements of the BAAQMD's Draft CEQA Guidelines and the corresponding criteria for a Qualified GHG Emissions Reduction Strategy as defined by the BAAQMD. The Greenhouse Gas Reduction Program calculates the GHG emissions reduction target and the impact of programs to achieve the target, consistent with state guidance.

The program demonstrates the City's ability to reduce its GHG emissions to 1990 levels by 2020 or approximately 28 percent below "business-as-usual" (BAU) forecasts in 2020. Based on a 2005 inventory prepared by the City, in order to achieve these emissions reduction targets, San Mateo would have to reduce its GHG emissions by 201,983 MTCO2e by 2020. To remain on track to reach its 2050 target, the City would have to reduce its emissions by 458,560 MTCO2e by 2030. This information was updated in the Climate Action Plan (CAP), as described below.

City of San Mateo Climate Action Plan

The City of San Mateo adopted a community-wide CAP on April 6, 2015, which updated and consolidated the City's existing Sustainable Initiatives Plan, GHG Emissions Reduction Plan, and Climate Action Plan for Municipal Operations and Facilities, based on the vision of San Mateo residents, businesses, and local government. The goal was to prepare a CAP that serves as an updated and Qualified GHG Reduction Strategy consistent with BAAQMD GHG Plan Level Guidance and CEQA Guidelines Section 15183.5. The CAP was developed through a robust public process that engaged the San Mateo Sustainability Commission, staff, and the community. The CAP has since been updated in the 2020 CAP, which was adopted on April 6, 2020.[42]

A climate action plan is a comprehensive strategy for a community to reduce emissions of GHGs. The 2020 CAP includes five key pieces:

[42] City of San Mateo. *2020 Climate Action Plan.* April 2020. https://www.cityofsanmateo.org/DocumentCenter/View/80652/2020-Climate-Action-Plan?bidId=

1. An inventory of the annual GHG emissions attributable to San Mateo based on the types of activities occurring within the community and guidance from various protocols and agencies. The City has inventories of emissions for 2005, 2010, 2015, and 2017;
2. A forecast of what GHG emissions are likely to look like in 2020, 2030, and 2050 based on expected population and economic growth adopted in the General Plan;
3. A reduction target, which identifies a goal for reducing GHG emissions by 2020, 2030, and 2050. The 2020 CAP states that to meet the City's GHG reduction goals, emissions will have to be reduced to 561,510 $MTCO_2e$ by 2020, to 529,760 $MTCO_2e$ by 2030, and to 172,310 $MTCO_2e$ by 2050;
4. Reduction strategies, which describe the actions the community intends to take to achieve the reduction target. Each strategy identifies the amount of GHGs that will be reduced once the strategy is implemented. The 2020 CAP contains 29 GHG reduction measures; and
5. A work plan and monitoring program to track progress toward the reduction targets and the status of the reduction strategies. A CAP consistency checklist for future development projects is included in the implementation program.

As part of the CAP, the City developed a CAP consistency checklist for land use projects. The checklist is a streamlined tool that identifies the CAP's mandatory requirements and provides an opportunity for project applicants to demonstrate project consistency with GHG reduction measures and actions in the CAP. The checklist is also an opportunity to identify additional project characteristics that support the GHG reduction targets and programs in the CAP. GHG reduction measures in the 2020 CAP that are applicable to the proposed project include:

- Reduction Measure BE 1: All new construction shall be all-electric;
- Reduction Measure RE 2: All new developments with residential units shall have on-site renewable energy systems that meet or exceed the minimum requirements of the California State Building Code. Residential projects shall have an on-site energy storage system, such as a battery;
- Reduction Measure EE 3: All new residential development shall include trees that provide shade to residences;
- Reduction Measure CF 1: All new development with off-street parking shall include EV charging stations or be pre-wired for EV charging stations;
- Reduction Measure SW 1: Provide an area of sufficient space to store and allow access to a compost bin;
- Reduction Measure ST 6: Require new developments of at least six multi-family units and/or 10,000 square feet of nonresidential space to implement TDM strategies; and
- Reduction Measure WW 3: Require new development to meet the voluntary indoor and outdoor water efficiency standards in CALGreen Code. Encourage developers to install greywater systems in new buildings.

As dictated by SB 330, housing developments will only be subject to those ordinances and policies in effect when the completed preliminary application is submitted. In this case, a preliminary

application was filed by the project applicant in February 2020, prior to the adoption of the 2020 CAP in April 2020. This would make the project subject only to the requirements of the 2015 CAP, which encourages, but does not specifically require the implementation of the reduction measures described above.

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted to avoid or mitigate greenhouse gas impacts resulting from planned development in the City, including the following:

Policies	Description
C/OS 3.2	Regulate the location, density, and design of development throughout the City in order to preserve topographic forms and to minimize adverse impacts on vegetation, water, and wildlife resources.
UD 2.14	Require new development and building alterations to conform with the City's Sustainable Initiative Plan and subsequent Council adopted goals, policies, and standards pertaining to sustainable building construction.
LU 8.3	Evaluate the City's GHG Emissions Reduction target, quantify greenhouse gas emissions in accordance with industry protocol, re-evaluate emission reduction measures, monitor the Greenhouse Gas Emissions Reduction Program's progress toward achieving the target GHG emissions reductions on an annual basis and require necessary amendments no less than every five years to respond to the current environmental setting, regulatory structure, and progress towards implementation.
LU 8.5	Promote or join local partnerships and opportunities that offer renewable energy options to the residents and/or help inform them of rebates and options while ensuring that the permit process is quick and inexpensive.

4.8.1.3 *Existing Conditions*

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have long atmospheric lifetimes (one to several thousand years). GHGs persist in the atmosphere long enough to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, or other forms. Of the total annual human-caused CO_2 emissions, approximately 55 percent is sequestered through ocean and land uptakes every year, averaged over the last 50 years, whereas the remaining 45 percent of human-caused CO_2 emissions remains stored in the atmosphere (IPCC 2013).

The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; suffice it to say the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature or to global, local, or microclimates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

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?	☐	☐	☒	☐

4.8.2.1 *BAAQMD Significance Thresholds*

The assessment of GHG emissions below is based on the BAAQMD CEQA Guidelines, which include guidance on assessing GHGs and climate change impacts as required under CEQA Section 15183.5(b) and establish thresholds of significance for impacts related to GHG emissions. The City uses the BAAQMD CEQA Guidelines to determine the level of impact from the project contributions of GHG emissions.

As explained above, the BAAQMD project-level operational threshold of significance for 2020 GHG emissions is:

- The project generation of 1,100 metric tons of CO_2e per year during operations (bright-line numeric threshold) for 2020, or;
- the project generation of 4.6 metric tons of CO2e per service population (employees + residents) per year during operations (efficiency-based threshold) for 2020, or;
- compliance with a Qualified GHG Reduction Strategy. For the purposes of this assessment, the project is evaluated for compliance with the City CAP, as well as the BAAQMD efficiency-based service population threshold.

Note that the bright-line threshold and service population thresholds are 2020 targets, but the project will be constructed in the years 2021 and 2022. Although the BAAQMD has not yet promulgated post-2020 thresholds, the following thresholds are utilized in this analysis for post-2020 emissions:

- The project generation of 660 metric tons of CO_2e per year during operations (bright-line numeric threshold) for 2030, or;
- the project generation of 2.6 metric tons of CO_2e per service population (employees + residents) per year during operations (efficiency-based threshold) for 2030, or;

- compliance with a Qualified GHG Reduction Strategy. For the purposes of this assessment, the project is evaluated for compliance with the City CAP, as well as the BAAQMD efficiency-based service population threshold.

The ECORP assessment utilizes a bright-line threshold of 660 MT CO2e/year based on the GHG reduction goals of SB 32. The 2030 bright-line threshold is a 40 percent reduction of the 2020 1,100 MT CO2e/year threshold. In the instance that the bright-line threshold is exceeded, the project would be compared to the service population metric of 2.6, which was calculated for 2030 based on the 1990 inventory and the projected 2030 statewide population and employment levels. [43]

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

Construction-related activities that would generate GHGs include worker commute trips, haul trucks carrying supplies and materials to and from the project site, and off-road construction equipment (e.g., dozers, loaders, excavators). Table 4.8-1 illustrates the specific construction-generated GHG emissions that would result from construction of the project.

Table 4.8-1: Construction-Related GHG Emissions

Emissions Source	*CO_2e (metric tons/year)*
Construction 2021	913
Construction 2022	634
Project Construction Total	1,547

Source: CalEEMod version 2016.3.2. Refer to Attachment A for Model Data Outputs.
Notes: Emissions estimates account for the demolition of 224,844 total square feet of office space. Building construction, paving, and architectural coating assumed to occur simultaneously.

As shown in Table 4.8-1, project construction (including demolition activities) would result in the generation of approximately 1,547 metric tons of CO_2e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. As previously stated, the BAAQMD does not have an adopted threshold of significance for construction-related GHG emissions. GHG emissions generated by the construction sector have been declining in recent years. For instance, construction equipment engine efficiency has continued to improve year after year. The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower (hp) and were phased in from 1996 to 2000. In 1996, a Statement of Principles pertaining to off-road diesel engines was signed between the USEPA, CARB, and the nation's leading industrial engine makers. On August 27, 1998, the USEPA signed the final rule reflecting the provisions of the Statement of Principles. The 1998 regulation introduced Tier 1 standards for equipment under 50 hp and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. As a result, all off-road, diesel-fueled construction equipment manufactured in 2006 or later has been manufactured to Tier 3 standards. Tier 3 engine standards reduce precursor and subset GHG emissions such as nitrogen oxide by as much as 60

[43] Association of Environmental Professionals, 2016. *Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California*. April 2016.

percent. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased in over the period of 2008-2015. The Tier 4 standards require that emissions of nitrogen oxide be further reduced by about 90 percent. All off-road, diesel-fueled construction equipment manufactured in 2015 or later will be manufactured to Tier 4 standards.
In addition, the California Energy Commission recently released the 2019 Building Energy Efficiency Standards contained in the California Code of Regulations, Title 24, Part 6 (also known as the California Energy Code). Both the 2016 and 2019 updates to the Building Energy Efficiency Standards focus on several key areas to improve the energy efficiency of newly constructed buildings and additions, and alterations to existing buildings. For instance, effective January 1, 2017, owners/builders of construction projects have been required to divert (recycle) 65 percent of construction waste materials generated during the project construction phase. This requirement greatly reduces the generation of GHG emissions by reducing decomposition at landfills, which is a source of CH_4, and reducing demand for natural resources.

Operations

Operation of the project would result in GHG emissions. Projected GHG emissions associated with proposed operations are quantified and compared to the existing baseline, which includes four office buildings totaling 224,844 square feet. For the purposes of this analysis, the buildings were assumed to be fully occupied for the baseline condition, At the present time, the buildings are mostly empty, presumably due to the COVID 19 stay-at-home order, however, they would be expected to be re-occupied if the current proposed project were not approved/implemented. Therefore, it is appropriate to assume the GHG emissions from the four buildings are part of the baseline condition. Table 4.8-2 summarizes all the direct and indirect annual GHG emissions associated with the project.

Table 4.8-2: Operational GHG Emissions

Emission Source	***Existing CO_2e (metric tons/year)***	***Project CO_2e (metric tons/year)***	***Difference (metric tons/year)***
Area source (landscaping, hearth)	0	30	+30
Energy	615	255	-360
Mobile	1,699	1,563	-136
Waste	105	95	-10
Water	94	37	-57
Total	***2,513***	***1,980***	***-533***
		BAAQMD Bright Line Significance Threshold	660
		Exceed BAAQMD Daily Threshold?	***No***

As shown in Table 4.8-2, the new project would result in a decrease in operational emissions from the baseline level by 533 metric tons of CO_2e per year. This is largely due to the improved energy efficiency standards which came into effect in 2020. The project would not exceed the adjusted 2030 bright-line threshold of 660 metric tons of CO_2e per year.

Cumulative GHG Impacts

Climate change is a global problem, and GHGs are global pollutants unlike criteria air pollutants and toxic air contaminants, which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about one day), GHGs have much longer atmospheric lifetimes of one year to several thousand years that allow them to be dispersed around the globe. It is generally the case that an individual project of this size and nature is of insufficient magnitude by itself to influence climate change or result in a substantial contribution to the global GHG inventory. GHG impacts are recognized as exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective. The additive effect of project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As previously discussed, the proposed project would not conflict with the City CAP, the BAAQMD 2017 Clean Air Plan, or Plan Bay Area, which is the RTP/SCS for the Bay Area. As a result, the project would not conflict with any GHG reduction plans. Therefore, the project's cumulative contribution of GHG emissions would be less than significant and the project's cumulative GHG impacts would also be less than cumulatively considerable. **(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 with Mitigation Incorporated)**

City of San Mateo Climate Action Plan

The City's 2020 CAP is the most recent update to the prior 2015 City CAP. The CAP is a strategic planning document that identifies sources of GHG emissions within the city's boundaries, presents current and future emissions estimates, identifies a GHG reduction target for future years, and presents strategic programs, policies, and projects to reduce emissions from the energy, transportation, land use, water use, and waste sectors. The CAP includes GHG reduction measures in the form of GHG reduction programs, policies, projects, and strategies. The BAAQMD Qualified Greenhouse Gas Emissions Reduction Program criteria, in conjunction with the BAAQMD's CEQA Guidelines (2017a), guided the development of the emissions reduction program developed by the City. All three guidelines comply with the requirements of statewide GHG-reduction targets and achieve the goals of the Scoping Plan.

A Qualified Greenhouse Gas Emissions Reduction Program adopted by a local jurisdiction should include the elements below, as described in CEQA Guidelines Section 15183.5. The BAAQMD's CEQA Guidelines outline the methodology to determine whether a GHG reduction program meets these requirements.

- Quantify GHG emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.

- Specify measures or a group of measures, including performance standards, which substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- Establish a mechanism to monitor the plan's progress toward achieving the level and to require amendment if the plan is not achieving specified levels.
- Be adopted in a public process following environmental review.

The City CAP meets BAAQMD guidelines as follows:

- The CAP quantifies citywide GHG emissions, both existing and projected over the specified time period. The CAP projects emissions for the years 2020, 2030, and 2050 based on growth assumptions from the California Department of Finance and ABAG and were approved by City staff. Relative to 2017 emissions, San Mateo's GHG emissions are expected to rise by more than 23 percent by 2050 if no action is taken.
- The CAP establishes a level, based on substantial evidence, below which the contribution of emissions from activities covered by the plan would not be cumulatively considerable.
- The CAP policy provisions reduce emissions to 15 percent below 2005 emissions levels by 2020.
- The CAP policy provisions reduce emissions to 4.3 MTCO2e per person by 2030.
- The CAP policy provisions reduce emissions to 1.2 MTCO2e per person by 2050.
- The CAP identifies and analyzes the emissions resulting from specific actions or categories of actions anticipated within the City.
- The CAP specifies measures or a group of measures, including performance standards.
- The CAP establishes a mechanism to monitor its progress toward achieving the level and to require amendment if the plan is not achieving specific levels.

The reduction measures proposed in the CAP build on inventory results and key opportunities prioritized by City staff, members of the San Mateo Sustainability Commission, and members of the public. The CAP strategies consist of measures and actions that identify the steps the City will take to support reductions in GHG emissions. The City will achieve these reductions in GHG emissions through a mix of voluntary programs and new strategic standards. All standards presented in the CAP respond to the needs of development, avoiding unnecessary regulation, streamlining new development, and achieving more efficient use of resources.

The CAP specifically states, "A project-specific environmental document that relies on this CAP for its cumulative impacts analysis must identify specific GHG reduction measures applicable to the project and demonstrate the project's incorporation of the measures. Project applicants and City staff will identify specific measures applicable to each project during project review. If applicable measures are not otherwise binding and enforceable, they must be incorporated as mitigation measures for the project." The CAP also states that new projects deemed consistent with the CAP are eligible for streamlining the analysis of GHG emissions, and that projects inconsistent with the CAP may refer to this checklist for informational purposes but may have to submit a separate GHG analysis for the project.

A specific project proposal is considered consistent with the City CAP if it complies with the "required" GHG reduction measures in the adopted CAP. The project would comply with the

following required GHG reduction checklist measures of the 2020 CAP that are applicable to the project.

- ***Reduction Measure RE 2:*** *All new developments with residential units: The project includes an onsite renewable energy system that meets or exceeds the minimum requirements of the California State Building Code:* The project is required, per California state law, to meet the minimum requirements of the 2019 California State Building Code for project approval. In addition, Section 23.24.030 of the City Municipal Code states "New residential buildings four stories or more shall provide a minimum of a 3-kilowatt photovoltaic system". Those buildings included in the project which include a fourth level rooftop would be required to comply with this provision of the Municipal Code, if the City deems a rooftop level a "story".

- ***Reduction Measure EE 3:*** *All new developments with residential units: The project includes trees that provide shade to residences:* As required by the Municipal Code landscaping requirements (Section 27.62.100), the project site plan includes trees in its landscape design, which will provide shade upon maturity.

- ***Reduction Measure CF 1:*** *All new development with dedicated offstreet parking: The project includes parking spaces with installed electric vehicle (EV) chargers or are pre-wired for EV chargers, consistent with state and any local regulations:* The project is required, per Section 23.70.040 of the Municipal Code and Green Building Code Section 4.106.4.2, to comply with the requirement that 15 percent of the total number of parking spaces on a building site shall be EV charging spaces (EV spaces) capable of supporting future electric vehicle supply equipment.

- ***Reduction Measure CF 1:*** *All new development with dedicated offstreet parking*: *The project includes parking spaces with installed EV chargers that are accessible by members of the public beyond those who live and/or work at the project:* Fifteen percent of the parking spaces for the project will be required to be EV spaces capable of supporting future electric vehicle supply equipment.

- ***Reduction Measure ST 6:*** *New developments of at least six multifamily units and/or 10,000 square feet of nonresidential space - Implement TDM strategies to comply with the appropriate trip reduction target identified in applicable area plans and San Mateo Citywide TDM Plan:* Transportation Demand Management (TDM) is a combination of services, incentives, facilities, and actions that reduce single-occupant vehicle trips to help relieve traffic congestion, parking demand, and air pollutants, including GHG emissions. The purpose of TDM is to promote more efficient utilization of existing transportation facilities, and to ensure that new developments are designed to maximize the potential for sustainable transportation usage. A TDM Plan will be prepared for the proposed project that includes trip-reduction strategies with the goal of reducing overall vehicular trip-making activity in the project area.

  The project is also located near Laurelwood Shopping Center, and thus within easy access to restaurants, a pharmacy, banks, a grocery store, and other services in the vicinity of the project site. These services are conveniently located for future residents of the project, which

will further reduce the number of vehicle trips. Additionally, the project site would be located within an area surrounded by other offsite office and residential uses. The project also includes plentiful bike storage, which would encourage residents to bike rather than drive, when feasible. Finally, the project would help increase ridership for the existing dedicated Campus Drive Caltrain shuttle route that is currently at risk of ceasing due to lack of use. This dedicated Caltrain shuttle would serve employees and residents. A Caltrain shuttle stop is located along Campus Drive, on either side of the proposed residences (Peninsula Office Park).

- ***Reduction Measure ST 7:*** *All new development: Be located along El Camino Real, within one-half mile of any Caltrain station, or in the Rail Corridor Transit Oriented Development or Hillsdale Station Area Plan areas:* The project site would be located less than 0.25 mile from the nearest Caltrain shuttle stops, located at both ends of Peninsula Office Park. Specifically, the nearest proposed residences would be as close as a one-minute walk away. Although the project is not within one-half mile of a Caltrain station or within either plan areas, the project would help increase ridership for the existing dedicated Campus Drive Caltrain shuttle route that is currently at risk due to lack of use.

The project is not consistent with the following required 2020 CAP reduction checklist measures:

- ***Reduction Measure BE 1:*** *All new development: The project does not have natural gas connections, and does not have any natural gas appliances or other equipment installed.*
- ***Reduction Measure RE 2:*** *All new developments with residential units: The project includes an onsite energy storage system, such as a battery.*
- ***Reduction Measure SW 1:*** *All developments with multifamily units or nonresidential space: Provide an area of sufficient space to store and allow access to a compost bin.*
- ***Reduction Measure WW 3:*** *All new development: Include a greywater system.*

As demonstrated above, the project is not consistent with all applicable reduction measures included in the 2020 CAP. However, as dictated by SB 330, housing developments will only be subject to those ordinances and policies in effect when the completed preliminary application is submitted. In this case, a preliminary application was filed by the project applicant in February 2020, prior to the adoption of the 2020 CAP in April 2020. This would make the project subject only to the requirements of the 2015 CAP, which encourages, but does not specifically require the implementation of these measures.

As previously stated, the CAP allows projects that are inconsistent with the CAP to refer to the checklist measures for informational purposes, but may require them to submit a separate GHG analysis for the project. The project underwent a quantitative GHG analysis that demonstrated that the project's estimated GHG emissions would fall below the BAAQMD thresholds of significance. Combined with the implementation of the checklist measures of the 2020 CAP identified above, the project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. **(Less than Significant Impact)**

BAAQMD 2017 Clean Air Plan

The BAAQMD 2017 Clean Air Plan provides a regional strategy to protect public health and protect the climate. It defines a vision for transitioning the region to a post-carbon economy needed to achieve ambitious GHG reduction targets for 2030 and 2050, and provides a regional climate protection strategy that will put the Bay Area on a pathway to achieve those GHG emissions reduction targets. The 2017 Clean Air Plan includes a wide range of control measures designed to reduce emissions of CH_4 and other super-GHGs in the near term, and to decrease emissions of CO_2 by reducing fossil-fuel combustion.

The 2017 Clean Air Plan includes a diverse range of control measures designed to decrease GHG emissions. Consistency of the proposed project with 2017 Clean Air Plan is demonstrated by assessing whether the project supports all of the project-applicable Clean Air Plan control measures for GHG emissions. The GHG-related control strategies of the Clean Air Plan include Mobile Source Measures, Transportation Control Measures and Energy and Climate Measures.

Transportation and Mobile Source Control Measures

The BAAQMD identifies transportation and mobile source control measures as part of the Clean Air Plan to reduce ozone precursor emissions from these sources. The transportation control measures are designed to reduce emissions from motor vehicles by reducing vehicle trips and vehicle miles traveled (VMT) in addition to vehicle idling and traffic congestion. The proposed project is consistent with the Clean Air Plan's transportation and mobile source control measures in that it is the redevelopment of an existing urban environment. The project is considered "infill development" as it proposes to redevelop a built-out property and enhance the physical design of the urban environment. Under Public Resources Code (PRC) section 21061.3, an "infill site" is defined as a site that "has been previously developed for qualified urban uses." In turn, a "qualified urban use" is defined, pursuant to PRC section 21072, as "a residential, commercial, or public institutional, transit or transportation passenger facility, or retail use, or any combination of those uses." Additionally, the project site is located in an "urbanized area," which is defined under PRC section 21071 as "an incorporated city" that meets the criteria of having a population of at least 100,000 persons.

The proposed project would be located in close proximity to two Caltrain shuttle stops, located on either end of Peninsula Office Park. One shuttle stop is located at the end of Campus Drive and the other is located at the junction of Campus Drive and Live Oak Drive, at a convenient location for residents. The public transit accessibility would encourage walking and non-automotive forms of transportation, thus resulting in the reduction of, or no increase in, transportation-related emissions. The project would also provide bike storage for residents within the garage of each dwelling, Sidewalks currently exist on the left and right sides of Campus Drive, and pedestrian crosswalks are included in the street design.

The project would also provide convenient accessibility to nearby offices and various retail shops, restaurants, a grocery store, and more. These places of commerce and employment are accessible to the future residents of the project via walking, biking, or a short vehicle trip, which will further reduce vehicle miles traveled.

These aspects of the project would result in the generation of a reduced amount of GHG emissions, which will be less than the site's current GHG emissions from the four office buildings that would be removed. According to the USEPA, redevelopments (namely at brownfield sites) produce 32 to 57 percent less emissions per capita relative to conventional developments; this is because the number of daily vehicle trips and daily VMT associated with the redevelopment tend to be lower compared with development on vacant land. As a result, the proposed project would not conflict with the identified transportation and mobile source control measures of the Clean Air Plan.

Land Use and Local Impact Measures

The BAAQMD Clean Air Plan includes Land Use and Local Impact Measures to ensure that planned growth is focused in a way that protects the people and environment from exposure of emissions associated with stationary and mobile sources and to promote mixed-use, compact development to reduce motor vehicle travel. The Land Use and Local Impact Measures identified by the BAAQMD are not specifically applicable to the proposed project as they relate to actions the BAAQMD will take to reduce impacts from goods movement and health risks in affected communities at the plan level. The measures also detail new regulatory actions the BAAQMD will undertake related to land use, including updates to the CEQA Air Quality Guidelines, and indirect source review. However, the proposed project would be a redevelopment infill project in support of these measures. For instance, the project can be identified for its "location efficiency." Location efficiency describes the location of the project relative to the type of urban landscape its proposed to fit within, such as an "urban area," "compact infill," or "suburban center." The project site represents an urban/compact infill location within an area of the city developed with residential and commercial uses.

The project site is served by existing public transportation as previously described; it is within an active urban center surrounded with many existing offsite office, commercial, and residential buildings. The project would locate additional residential land use in close proximity to existing offsite office, commercial, and residential uses. Therefore, the project would provide future project residents with the potential work opportunities and commercial service options in close proximity to the site. The location efficiency of the project site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide average and would result in corresponding reduction of transport-related GHG emissions.

The project would increase housing density in the vicinity over current conditions. Increased density reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies to reduce GHG emissions.

Energy and Climate Control Measures

The Clean Air Plan also includes Energy and Climate Control Measures, which are designed to reduce ambient concentrations of emissions of CO_2. Implementation of these measures is intended to promote energy conservation and efficiency in buildings throughout the community, promote renewable forms of energy production, reduce the "urban heat island" effect by increasing reflectivity of roofs and parking lots, promote the planting of (low volatile organic compound-emitting) trees to reduce biogenic emissions, lower air temperatures, provide shade, and absorb air pollutants. The measures include voluntary approaches to reduce the heat-island effect by increasing

shade in urban and suburban areas through the planting of trees. The project would increase landscaping throughout the site and would include trees to meet the landscaping requirements of the Municipal Code, which would help reduce the urban heat-island effect. In addition, the project would include EV charging in compliance with the City Municipal Code. Furthermore, the proposed buildings would be built to the 2019 Title 24 Building Energy Efficiency Standards. Per the 2019 Building Energy Efficiency Standards, 100 percent of electricity use during project operation must be generated from renewable energy; eliminating operational CO_2e emissions from the project due to energy use.

The project is consistent with the 2017 Clean Air Plan and would conform to the applicable control measures. It would not disrupt or hinder the implementation of any other control measures.

ABAG Final Plan Bay Area 2040

Plan Bay Area 2040's core strategy is "focused growth" in existing communities along the existing transportation network. This strategy allows the best "bang for the buck" in achieving key regional economic, environmental, and equity goals: it builds upon existing community characteristics, efficiently leverages existing infrastructure, and mitigates impacts on areas with less development. The RTP/SCS identifies 200 "Priority Development Areas," which are areas focused for growth and development. Priority Development Areas are defined by the RTP/SCS as existing neighborhoods that are served by public transit and have been identified as appropriate for additional, compact development.

The project site is located in an area identified as an Urbanized Area in the RTP/SCS. Because the project site is an "Urbanized Area" in the RTP/SCS planning period as opposed to "Priority Conservation Area," it is included in an area where urban development currently exists and is also predicted and encouraged by ABAG. Furthermore, the project is the replacement of existing office buildings with residential development within a built environment (infill development). The project will increase density and land use diversity in the vicinity over current conditions. Increased density, measured in terms of persons, jobs, or building square footage, as well as increased land use diversity, potentially reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies such as enhanced transit services. The project would increase the site density from 224,844 total square feet of office space to over 676,000 total square feet of residential building space.

For these reasons, the project is consistent with Plan Bay Area. Based on the project's proximity to public transportation, availability of bike storage space, proximity to retail stores, and TDM plan, it can be assumed that regional mobile emissions will decrease in line with the goals of Plan Bay Area with implementation of the project. Implementing ABAG's RTP/SCS will greatly reduce the regional GHG emissions from transportation, and the project will not obstruct the achievement of Plan Bay Area's emission reduction targets.

Conclusion

As described in the preceding paragraphs, the proposed residential project does not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. **(Less than Significant Impact)**

4.9 HAZARDS AND HAZARDOUS MATERIALS

The following discussion is based, in part, upon a Phase I Environmental Site Assessment prepared by *Targus Associates, LLC* (Targus). A copy of this report is attached as Appendix E of this Initial Study.

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. Federal regulations and policies related to development include the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as Superfund, and the Resource Conservation and Recovery Act (RCRA). 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.

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), State

Water Resources Control Board (SWRCB), and San Mateo County. The project site is not on the Cortese List.[44]

Toxic Substances Control Act

The Toxic Substances Control Act (TSCA) of 1976 provides 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 and Lead-Based Paint Regulations

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 guidelines require that potentially friable ACMs be removed prior to building demolition or remodeling that may disturb the ACMs.

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 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.

Polychlorinated Biphenyls (PCBs)

Polychlorinated biphenyls (PCBs) are chlorinated organic compounds that were produced in the U.S. between 1955 to 1978. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications, including building and structure materials such as plasticizers, paints, sealants, caulk, and wood floor finishes. In 1979, the U.S. Environmental Protection Agency banned the production

[44] CalEPA. "Cortese List Data Resources." Accessed September 17, 2020.. https://calepa.ca.gov/sitecleanup/corteselist.

and any new uses of PCBs due to concerns about their potential harmful health effects and their persistence in the environment. The one remaining approved use is for existing, totally enclosed applications (i.e., the use in electrical transformers).

Although production has been banned since 1979, PCBs can still be released to the environment today through various pathways, including building materials that contain legacy caulks and sealants or other potential PCBs-containing material potentially released during demolition or renovation. With the adoption of the reissued San Francisco Bay Region Municipal Regional Stormwater NPDES Permit (MRP) by the San Francisco Bay Regional Water Quality Control Board on November 19, 2015, the implementation of stormwater control programs for PCBs has become a high priority compliance issue for permittees throughout the Bay Area. Provision C.12.f. of the San Francisco Bay Region Municipal Regional Stormwater NPDES Permit requires that permittees develop an assessment protocol methodology for managing materials with PCBs in applicable structures that are planned for demolition, so that PCBs do not enter municipal storm drain systems.[45] Municipalities throughout the Bay Area are currently modifying demolition permit processes and implementing PCB screening protocols to comply with Provision C.12.f. (see *Section 4.10 Hydrology and Water Quality*).

Regional and Local

City of San Mateo Emergency Operations Plan

The City of San Mateo has prepared an emergency operations plan to ensure the most efficient use of resources to protect the community and its property before, during, and after a natural, technological, or man-made emergency. This plan confirms the City's emergency organization, assigns tasks, presents policies and general procedures, and coordinates planning within various emergency management functions utilizing the Standardized Emergency Management System (SEMS) in alignment with the National Incident Management System. The objective of this plan is to integrate and coordinate all San Mateo facilities and personnel into an effective team that can prevent, protect, respond to, and recover from emergencies. The emergency operations plan is an extension of the State Emergency Plan and the San Mateo County Operational Area Plan.

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted to avoid or mitigate hazards and hazardous materials impacts resulting from planned development in the City, including the following:

Policies	Description
LU 4.33	Manage toxic and hazardous wastes by following the goals and policies contained in the Safety Element
S 4.1	Maintain the City's emergency readiness and response capabilities.
S 5.2	Adopt by reference all goals, policies, implementation measures, and supporting data contained in the San Mateo County Hazardous Waste Management Plan
S 5.3	Promote on-site treatment of hazardous wastes by waste generators to minimize the use of hazardous materials and the transfer of waste for off-site treatment.

[45] Geosyntec Consultants, Technical Memorandum, Current State-of-Practice for PCBs-Containing Building Materials in California. May 9, 2017.

Policies	Description
S 5.4	Restrict the transportation of hazardous materials and waste to truck routes designated to Circulation Policy C-1.3, and limit such transportation to non-commute hours.

City of San Mateo Fire Code

The City Municipal Code has a Building and Construction Fire Code for all development and construction activities within the City of San Mateo. The Fire Code requires compliance with the California Fire Code and Uniform Fire Code and was adopted for the purpose of prescribing regulations governing conditions hazardous to life and property from fire or explosion.

4.9.1.2 *Existing Conditions*

Targus conducted a review of historic aerial photographs, topographic maps, and Environmental Data Resources (EDR) reports to obtain information about the historical uses of the project site. Targus also reviewed regulatory records from local and state agencies and completed a site reconnaissance to determine any potentially hazardous materials conditions affecting the project site. The historical uses and on-site sources of contamination for the project site as well as off-site sources of contamination are discussed below.

Historical Uses

The project site was used for pastoral and agricultural purposes from at least 1943 to the early 1960s. The site was subsequently developed into an office campus beginning with the construction of 2988 Campus Drive in 1971, followed by 2800 Campus Drive in 1973, 2655 Campus Drive in 1974, and 2755 Campus Drive in 1976.

On-Site Sources of Contamination

No environmental concerns or Recognized Environmental Concerns (RECs) were identified with respect to the site. A REC is defined as the presence of likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.

The historical agricultural use of the project site and the presence of hydraulic elevators were identified as suspect RECs. Due to the length of time between the agricultural activities and the mixing and grading of soil that occurred during development of the office campus, the potential presence of chemicals from historical agricultural activities is considered a de minimis condition. No history of significant releases of hydraulic fluid was revealed during the Phase I ESA, thus the presence of hydraulic elevators was also determined to be a de minimis condition.

The four office buildings that would be demolished with project implementation were the subject of asbestos operation & management (O&M) programs in 2004. O&M programs are intended to minimize the exposure of all building occupants to asbestos fibers through maintenance and cleanup. ACMs were abated for as needed in 2655 Campus Drive, 2800 Campus Drive, and 2988 Campus Drive between 2016 and 2017. During the site reconnaissance conducted in May 2018, a visual asbestos survey of the project site was performed that consisted of a walk-through of limited building

areas and observation of suspect ACMs. All suspect ACMs observed were in good, non-friable condition.

Off-Site Sources of Contamination

A review of databases and files from federal, state, tribal, and local environmental regulatory agencies was used to identify the use, generation, storage, treatment, or disposal of hazardous substances and chemicals, or release incidents of such materials at surrounding facilities that may have impacted the subject site. City directories were also consulted. Based on distance from the project site, regulatory status and history, and/or apparent groundwater gradient, *Targus* determined these sites were not of environmental concern.

Airports

The project site is located approximately 5.5 miles southeast of the San Francisco International Airport. It is located beyond the outer boundary of safety compatibility zones, and outside of the CNEL noise contours for the airport, as delineated in the Comprehensive Airport Land Use Plan (CLUP).[46]

Wildfires

There are developed portions of the western hills of San Mateo to the west of California State Route 92 (SR 92) that are considered very high wildland fire hazard areas.[47] These areas are subject to wildland type fires due to existing vegetation, particularly chaparral, the steep slopes and the temperate climate with dry summer months.[48] The project site is located east of California State Route 92 in San Mateo within a Local Responsibility Area (LRA) and is not mapped as a very high fire hazard severity zone.[49]

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?	☐	☒	☐	☐

[46] City/County Association of Governments of San Mateo County, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.* November 2012
[47] California Department of Forestry and Fire Protection. Fire Hazard Severity Zone Viewer. Available at: https://egis.fire.ca.gov/FHSZ/. Date Accessed: June 1, 2020.
[48] San Mateo 2030 General Plan, Safety Element. October 2010.
[49] California Department of Forestry and Fire Protection. *San Mateo County: Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE*. November 2008.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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?	☐	☐	☒	☐

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)**

As discussed under Existing Conditions, the most recent Phase I ESA conducted by *Targus* revealed no RECs, including historical and controlled RECs, in connection with the site.

Building demolition could, however, result in the release of hazardous materials to the environment, if appropriate control measures are not implemented. Hazardous materials include ACMs, which are known to exist on site. Additionally, based on the age of the existing buildings, lead-based paint and PCBs may also be present in building materials.

During demolition of existing buildings on the site, PCBs in building materials could be released and thereby exposed to stormwater runoff from the project site during rain events. To address this risk, applicants for a demolition permit must submit a PCB Screening Assessment Form with their permit application.[50] The form is designed to ascertain whether or not the building targeted for demolition is subject to the PCB Screening Assessment. If on-site buildings do contain PCBs that exceed threshold limits, the project applicant must follow applicable federal and state laws, which may include reporting to such agencies as the EPA, RWQCB, and DTSC, which may require additional sampling and abatement of PCBs. The release of ACMs, lead-based paint and/or PCBs during demolition activities would be considered a potentially significant impact.

Impact HAZ-2.1: Release of hazardous materials, specifically asbestos-containing materials, lead-based paint, and polychlorinated biphenyls present on site could pose a risk to construction workers and nearby sensitive receptors during building demolition.

Mitigation Measures: The project shall implement the following mitigation measures to reduce the impacts to construction workers and nearby sensitive receptors to a less than significant level.

MM HAZ-2.1: To reduce the potential for construction worker and nearby sensitive receptor exposure to hazardous materials (ACMs and lead-based paint), the following measures shall be incorporated at all times during the construction of 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.

[50] City of San Mateo. PCB Screening Assessment Form. https://www.cityofsanmateo.org/DocumentCenter/View/69361/PCBs-Screening-Assessment-Form?bidId=. Accessed June 2, 2020.

- 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.

- As required under the Toxic Substances Control Act (TSCA), all building materials containing PCBs at levels greater than 50 parts per million (ppm) must be removed upon discovery. If demolition is likely to impact such materials, they must be properly characterized and removed in accordance with TSCA regulations. The project shall be required to submit a PCB Screening Assessment form prior to building permit issuance.

Implementation of the above mitigation measure would reduce the impact of released hazardous materials to a less than significant level. **(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 two existing schools within one-quarter mile of the proposed development:

- The Marvegos Fine Art School, approximately 800 feet south of the project site
- The College of San Mateo, approximately 1,250 feet east 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 associated with the project. The release of ACMs, lead-based paint particles, and PCBs from building demolition would be controlled by the mitigation measures prescribed under Impact HAZ-2. Accordingly, the handling of hazardous materials and hazardous emissions associated with the proposed development would not be expected to result in a significant impact to 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. **(No Impact)**

The project site is not on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5. Thus, there would be no impact to the public or environment. **(No Impact)**

Impact HAZ-5:	The project would not be located within an airport land use plan. The project would not result in a safety hazard or excessive noise for people residing or working in the project area. **(No Impact)**

The project site is located approximately 5.5 miles southeast of the San Francisco International Airport. It is located beyond the outer boundary of safety compatibility zones, and outside of the CNEL noise contours for the airport, as delineated in the Comprehensive Airport Land Use Plan (CLUP).[51] Therefore, future development of the site would not result in a safety hazard for people related to airport activities. **(No 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)**

Development of the proposed project would not physically interfere with an adopted emergency response or evacuation plan. During construction and operation of the proposed project, roadways would not be permanently blocked such that emergency vehicles would be unable to access the site or surrounding sites. Compliance with the California Building and Fire Code requirements as amended by the City of San Mateo would ensure that proposed project would not impair or interfere with the implementation of an adopted emergency response plan or emergency evacuation plan. **(Less than Significant Impact)**

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

The project site is not within an area designated as a wildland fire hazard safety zone. In addition, the project would be in compliance with applicable building and fire codes adopted by San Mateo. For these reasons, the project would not expose people or structures, either directly or indirectly, to an increased significant risk of loss, injury, or death involving wildland fires. **(Less than Significant Impact)**

[51] City/County Association of Governments of San Mateo County, *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.* November 2012

4.10 HYDROLOGY AND WATER QUALITY

4.10.1 Environmental Setting

4.10.1.1 *Regulatory Framework*

Overview

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.

Federal and State

National Flood Insurance Program

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

Statewide Construction General Permit

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

Regional

San Francisco Bay Basin Plan

The San Francisco Bay RWQCB regulates water quality in accordance with the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan lists the beneficial uses that the San Francisco Bay RWQCB has identified for local aquifers, streams, marshes, rivers, and the San Francisco Bay, as well as the water quality objectives and criteria that must be met to protect these uses. The San Francisco Bay RWQCB implements the Basin Plan by issuing and enforcing waste discharge requirements, including permits for nonpoint sources such as the urban runoff

discharged by a City's stormwater drainage system. The Basin Plan also describes watershed management programs and water quality attainment strategies.

Municipal Regional Permit Provision C.3.

The San Francisco Bay RWQCB re-issued the Municipal Regional Stormwater NPDES Permit (MRP) in 2015 to regulate stormwater discharges from municipalities and local agencies (co-permittees) in Alameda, Contra Costa, San Mateo, and Santa Clara Counties, and the cities of Fairfield, Suisun City, and Vallejo.[52] 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.

Municipal Regional Permit Provision C.12.f

Provision C.12.f of the MRP requires co-permittee agencies to implement a control program for PCBs that reduces PCB loads by a specified amount during the term of the permit, thereby making substantial progress toward achieving the urban runoff PCBs wasteload allocation in the Basin Plan by March 2030.[53] Programs must include focused implementation of PCB control measures, such as source control, treatment control, and pollution prevention strategies. Municipalities throughout the Bay Area are updating their demolition permit processes to incorporate the management of PCBs in demolition building materials to ensure PCBs are not discharged to storm drains during demolition. Buildings demolished, constructed, or remodeled between January 1, 1950 to December 31, 1980, that are not wood-framed, and that are proposed for demolition must be screened for the presence of PCBs prior to the issuance of a demolition permit.

[52] MRP Number CAS612008

[53] San Francisco Bay Regional Water Quality Control Board. *Municipal Regional Stormwater Permit, Provision C.12.* November 19, 2015.

Local

San Mateo Countywide Water Pollution Prevention Program

The San Mateo Countywide Water Pollution Prevention Program (SMCWPPP) was established in 1990 to reduce the pollution carried by stormwater into local creeks, San Francisco Bay, and the Pacific Ocean. The program is a partnership of the City/County Association of Governments (C/CAG), each incorporated city and town in the county, and the County of San Mateo, which share a common National Pollutant Discharge Elimination System permit. The SMCWPPP includes pollution reduction activities for construction sites, illegal discharges and illicit connections, new development, and municipal operations. The program also includes a target pollutant reduction strategy and monitoring program

City of San Mateo 2030 General Plan

Various policies and actions in the General Plan have been adopted to avoid or mitigate hydrology and water quality impacts resulting from planned development in the City, including the following:

Policies	Description
S 2.5	Implement the improvements identified in the City of San Mateo's seven watershed areas to improve and maintain drainage capacity adequate to convey water during a typical storm event. Include consideration of creek maintenance and an education and/or enforcement program to minimize illegal dumping of debris and chemicals.
LU 4.4.5	Continue to implement the San Mateo Countywide Stormwater Pollution Prevention Program to ensure compliance with the National Pollutant Discharge Elimination (NPDES) permit. 1. Prevent water pollution from point and non-point sources. 2. Minimize stormwater runoff and pollution by encouraging low-impact design features, such as pervious parking surfaces, bioswales and filter strips in new development. 3. Encourage the use of drought-tolerant and native vegetation in landscaping.

San Mateo Municipal Code

Municipal Code Title 7, Chapter 39, Stormwater Management and Discharge Control, addresses stormwater management and controlling non-stormwater discharge in the City. It includes the requirement for construction projects to obtain a Stormwater Pollution Prevention Program Construction Permit from the Director of Public Works.

4.10.1.2 *Existing Conditions*

Hydrology and Drainage

The City of San Mateo Public Works Department operates and maintains the storm drainage system in the City. The City of San Mateo is divided into four major drainage basins: the North Shoreview Pump Stations (also referred to as the North San Mateo complex), San Mateo Creek complex, the Marina Lagoon complex, and the Third and Detroit watershed, which are each comprised of numerous stream channels, culverts, and storm drainage piping systems.

The project site is well-developed with office buildings and surface parking lots, with a substantial amount of landscaping interspersed around the buildings and through the surface parking lots. As it

exists, approximately 56 percent (375,700 square feet) of the project site is impervious surface while the remaining 44 percent (297,300 square feet) is pervious area.

Stormwater from the site is collected in a system of on-site storm drain facilities (inlets, catch basins, underground pipes) and conveyed to the City's existing storm drains in Campus Drive. The project site is within the 19th Avenue Watershed minor drainage basin, which drains into the Marina Lagoon complex, where collected stormwater is then pumped into the San Francisco Bay.

Groundwater and Water Supplies

The project site is located within the Santa Clara Valley Groundwater Basin, San Mateo Plain Subbasin. The regional topographic gradient is generally north northeast towards the San Francisco Bay, however, the direction in groundwater flow patterns may vary due to the hillside topography. Shallow groundwater may be encountered within 15 to 35 feet below ground surface (bgs) in the vicinity of the project site but is not a known source of drinking water.[54,55]

The City of San Mateo's water supply is provided by California Water Service (Cal Water), a private water supplier that provides water to 21 districts in California. The project site is within the Cal Water Bayshore Mid-Peninsula district, which provides water purchased from the San Francisco Public Utilities Commission's (SFPUC). Eighty five percent of the SFPUC water supply comes from the Tuolumne River through Hetch Hetchy Reservoir, while the remaining 15 percent comes from the local watersheds through the San Antonio, Calaveras, Crystal Springs, Pilarcitos and San Andreas Reservoirs. Cal Water does not have any groundwater wells to supply water to the Mid-Peninsula District. Instead, the water purchased from SFPUC is provided via eleven active and three standby metered turnouts from SFPUC transmission lines. The Cal Water Individual Supply Guarantee (ISG) from the SFPUC amounts to 39,967 acre-feet per year (AFY).[56] The volume of water drinking water supplied to the City of San Mateo by the Cal Water Bayshore Mid-Peninsula district was approximately 9,560 acre-feet (AF) in 2015.[57]

Flooding

The nearest creeks to the project site are the Madera Creek, located approximately 3,500 feet north of the site, which flows from the western hills to the 19th Street Avenue Channel; and Beresford Creek, located approximately 250 feet to the southeast of the site, which flows from the canyons south of Campus Drive to the 19th Street Avenue Channel.

The site is not located within a 100-year flood hazard zone. According to the Flood Insurance Rate Map (FIRM) prepared by the Federal Emergency Management Agency (FEMA) for the project area, the site is located within Zone X (Area of Minimal Flood Hazard)."[58]

[54] ENGEO, Inc. *Peninsula Heights, San Mateo, CA Geotechnical Exploration*. April 23, 2020.
[55] Targus Associates, LLC. *Peninsula Office Park Phase I Environmental Site Assessment*. May 22, 2018.
[56] California Water Service. *2015 Urban Water Management Plan, Mid-Peninsula District*. June 17, 2016.
[57] ibid
[58] Federal Emergency Management Agency. *Flood Insurance Rate Map*, *Community Panel No. 06081C0162FF*. Map. Effective Date: July 16, 2015.

Dam Failure

There are five dams that affect the City of San Mateo related to potential flooding. These dams are Crystal Springs, San Andreas, Laurel Creek and East Laurel Creek, and Tobin Creek (located in Hillsborough, CA). The City of San Mateo dam hazard map, contained in the General Plan EIR, shows that the project site is not within the dam failure zones.

Sea Level Rise

Global climate change has the potential to cause sea level rise, which can inundate low-lying areas. Based on a US Geological Survey analysis which predicted areas in the San Francisco Bay Area region that are subject to inundation due to future sea level rise (up to 60 inches in year 2100), the project site is not subject to inundation due to sea level rise. The project site has a surface elevation of approximately 236 feet above mean sea level.

Seiche, Tsunami, and Mudflows

A seiche is defined as a standing wave generated by rapid displacement of water within an enclosed body of water (such as a reservoir, lake, or bay) due to an earthquake that triggers land movement within the water body or landsliding into or beneath the water body. A tsunami is a large tidal wave caused by an underwater earthquake or volcanic eruption. Tsunamis affecting the Bay Area can result from off-shore earthquakes within the Bay Area. The project site is approximately 3.5 miles from the shoreline areas of the City of San Mateo where tsunami and seiche events are most hazardous.

A mudflow is a large rapid (up to approximately 50 miles per hour) mass of mud formed by loose earth and water. Hillsides and slopes of unconsolidated material could be at risk to mudflows if these areas become saturated. As discussed under Geology and Soils, the project site is mapped within a Landslide Zone per the Earthquake Zone of Required Investigation (EZRI) maps prepared by CGS.[59]

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?	☐	☐	☒	☐

[59] California Geological Survey. "Earthquake Zones of Required Investigation". https://maps.conservation.ca.gov/cgs/EQZApp/app/. Accessed October 1, 2019.

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
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)**

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. Urban stormwater runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, animal feces, etc.), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain.

Construction Impacts

Construction activities, such as grading and excavation, have the potential to result in temporary impacts to surface water quality in adjacent waterways. When disturbance to the soil occurs, sediments may be dislodged and discharged into the storm drainage system after surface runoff flows across the site. The proposed project would disturb approximately 15.45 acres, which is above the one-acre threshold requiring compliance with the Construction General Permit.

The proposed project would be required to comply with the Construction General Permit due to the amount of soil disturbance. A NOI and SWPPP would be prepared by a qualified stormwater professional prior to commencement of construction. Additionally, the proposed project would be required to comply with Chapter 7.39 of the San Mateo Municipal Code, thereby ensuring it complies with local and regional regulations regarding the reduction of construction-related stormwater pollutants. In addition, the project would be subject to the following City of San Mateo Standard Conditions of Approval, included in the project.

Conditions of Approval: The following conditions, based on RWQCB requirements and City of San Mateo Standard Conditions of Approval, shall be implemented by the project in order to reduce potential construction-related water quality impacts:

- The applicant shall comply with the Stormwater Pollution Prevention Program Construction Permit (SWPPPCP) requirements and prepare a Stormwater Pollution Prevention Plan (SWPPP) (San Mateo Municipal Code Section 7.39).

- The project is not expected to encounter groundwater; however, groundwater levels at the site are relatively shallow and the project could require dewatering of subsurface groundwater during construction. If dewatering is necessary, the applicant shall discharge extracted groundwater to the storm drain in accordance with conditions of the Construction General Permit. If there is no reasonable alternative method of disposal available, in accordance with the City's Municipal Code (SMMC 7.38.150), the Director of Public Works may approve the discharge of ground waters to the sanitary sewer if the source is deemed unacceptable by State and Federal authorities for discharge to surface waters of the United States, whether pretreated or untreated. Following the verification of the applicable local, state and/or federal approvals, a Discharge Plan will be approved and monitored by the Public Works Department.

Construction of the proposed project, with implementation of the above measures in accordance with the City's Municipal Code and General Plan policies, would not result in significant construction-related water quality impacts. **(Less than Significant Impact)**

Post-Construction Impacts

Stormwater Pollution

The project proposes to demolish four existing office buildings and remove the adjacent surface parking lots, and construct 290 residential units and publicly accessible mini-parks, picnic areas, open spaces, terraces, and landscaped paths and trails. Approximately 56 percent of the existing site (375,700 square feet) is covered in impervious surfaces in the form of office buildings and surface parking lots and walkways, whereas the proposed project would result in approximately 63 percent impervious surface coverage (a total of approximately 424,900 square feet). This represents a net increase in impervious surfaces in comparison with existing conditions. Impervious surfaces would consist of rooftops, drive aisles, surface parking areas and walkways. Pervious surfaces would consist of landscaping, bioretention areas, and Silva cells.[60] As proposed, the project would replace

[60] Silva cells are modular suspended pavement systems that provide stormwater management through absorption, evapotranspiration, and interception.

and create more than 10,000 square feet of impervious surfaces, and would therefore be required to incorporate site design measures, and implement pollutant source control measures and stormwater treatment controls to reduce pollutant loads and runoff volumes and velocities in post-construction stormwater runoff, in accordance with Provision C.3 of the MRP.

The MRP requires regulated projects to incorporate Low Impact Development (LID) practices, which are intended to reduce runoff and mimic a site's predevelopment hydrology by minimizing disturbed areas and impervious cover and then infiltrating, storing, detaining, evapotranspiring, and/or biotreating stormwater runoff close to its source. LID employs principles such as preserving and recreating natural landscape features and minimizing imperviousness to create functional and appealing site drainage that treats stormwater as a resource, rather than a waste product. Practices used to adhere to these LID principles include measures such as rain barrels and cisterns, green roofs, permeable pavement, preserving undeveloped open space, and biotreatment through rain gardens, bioretention units, bioswales, and planter/tree boxes. The MRP also requires that stormwater treatment measures be properly sized, installed, operated and maintained.

The proposed project includes site design measures such as the incorporation of substantial amounts of landscaping, preservation of existing mature trees on the site, and the use of pervious paving materials. Source control measures proposed include covered parking and trash collection areas, and stenciling of on-site storm drain inlets. The proposed on-site LID-based treatment controls consist of bioretention areas and Silva cells.

In addition to conformance with the Provision C.3 requirements, the project would be subject to the following Conditions of Approval, which are based on RWQCB requirements and City of San Mateo Standard Conditions of Approval, and are included in the project.

Conditions of Approval:

- The project shall comply with all City of San Mateo's ordinances, policies, and processes regarding the post-construction treatment of stormwater runoff. Specifically, a Stormwater Management Plan (SWMP) will be developed, prior to issuance of building permits for project construction, to ensure compliance with City of San Mateo and Municipal Regional Permit (MRP) requirements. The SWMP will meet the criteria for stormwater protection outlined in the San Mateo Countywide Water Pollution Prevention Program C.3 Stormwater Technical Guidance.

- The project shall implement site design and source control BMPs for minimizing the volume of runoff and pollution in runoff to the extent practicable, per the MRP. These BMPs may include the following:

    - Disconnected downspouts that are directed into landscape areas;
    - Minimization of impervious surfaces and increased use of permeable pavement where feasible;
    - Location of all storm drain inlets to be stenciled with, "No Dumping! Flows to Bay" to discourage illegal dumping;

- Location and design of trash enclosures (all shall be covered) and materials handling areas;
- Use of effective, site-specific erosion and sediment control methods during post-construction periods.

Hydromodification Management

The project site is located within an area mapped as being subject to hydromodification management (HM) requirements, per Provision C.3.g of the MRP. These areas are defined as watersheds or subwatersheds that are less than 65 percent impervious. The majority of hillside areas in western San Mateo County fall into this category. The project must therefore comply with the HM requirements specified in Provision C.3.g, which can include the use of on-site HM controls such as flow duration control structures, LID features and facilities, and hydrologic source controls that collectively result in the HM Standard being met at the point(s) where stormwater runoff discharges from the project site. An alternative to on-site controls is participation in or contribution to regional HM controls, which are flow duration control structures that collect stormwater runoff discharge from multiple projects (each of which shall incorporate hydrologic source control measures as well) and are designed such that the HM Standard is met for all the projects at the point where the regional HM control discharges. There are currently no regional HM facilities available to serve this project, however, so the project will rely on the use of on-site HM controls to meet the HM Standard. A HM Plan will be developed for the project, and approved by the City prior to implementation of the project.

By adhering to the standard conditions described above and complying with the stormwater treatment and hydromodification management requirements of the MRP, the proposed project would have a less than significant impact on post-construction 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)**

Groundwater in the area ranges between 15 to 35 feet below ground surface (bgs) with an estimated north to northeast flow direction that could vary due to the hillside topography. Extensive grading on-site is proposed; however, groundwater depth in the area is relatively deep and dewatering of subsurface groundwater is not expected to occur. The proposed project would not establish new groundwater sources or result in a substantial depletion of aquifers relied upon for local water supplies (See discussion in *Section 4.19 Utilities and Service Systems*). In fact, a portion of the treated stormwater shall infiltrate the soil column and replenish the groundwater as intended using LID stormwater treatment methods. For these reasons, the proposed project would not result in a significant groundwater impact. **(Less than Significant Impact)**

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

The proposed development would not substantially alter the existing drainage pattern of the site by altering the course of a waterway. The project would be required to manage erosion and sedimentation during construction in accordance with the City's Site Development Code and the Construction General Permit. Although the project would increase the impervious surface area on the site, post-construction stormwater runoff from the project's impervious surfaces would be directed towards bioretention areas and Silva cell-supported surfaces interspersed throughout the project site for treatment. In addition to filtering pollutants, the bioretention areas and Silva cells provide a degree of detention of the stormwater runoff, which combined with the flow modification of the proposed HM controls, would result in a reduction of the rate of stormwater runoff entering the City's storm drainage system to pre-project levels as required by Provision C.3. The project would therefore not be expected to negatively impact the capacity of the existing public storm drain system. Additionally, the project would improve the quality of stormwater runoff leaving the site and entering the City's storm drainage system. The project would not create substantial new sources of polluted runoff upon adherence to the MRP and Construction General Permit. The project would, therefore, not substantially alter the drainage pattern of the site or area in a manner which would result in on or offsite erosion, flooding, or runoff impacts. **(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 the project site is not located within a 100-year floodplain, and therefore not in a flood hazard zone, there is a less than substantial risk of pollutants being released due to project inundation. There is also a less than substantial risk of project inundation due to dam failure, as the project site is not within a dam failure zone. Due to the site's location and surrounding topography, the project site is not subject to sea level rise, seiche, or tsunami hazards. As described under Impact GEO-1, the potential for landslides and mudflows is less than significant with incorporation of the geotechnical exploration recommendations and the use of the mechanical stabilized earth (MSE) retaining walls. **(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. **(No Impact)**

The project site is located in the San Mateo Plain subbasin of the Santa Clara Valley groundwater basin. The San Mateo Plain subbasin has not been identified as medium- or high-priority groundwater basin by the California Department of Water Resources; therefore, a Groundwater Sustainability Plan does not need to be prepared for the subbasin per the requirements of the Sustainable Groundwater Management Act.[61] Thus, the proposed project would not conflict with a sustainable groundwater management plan.

The RWQCB updates its Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan) triennially to reflect current conditions and track progress towards meeting water quality objectives. The proposed project would comply with the SMCWPPP, the MRP, the Construction General Permit, and the Conditions of Approval discussed in this section, thereby ensuring construction-period and post-construction water quality impacts do not occur. By adhering to these policies and regulations the proposed project would not prevent the RWQCB from attaining the water quality objectives set forth in the Basin Plan. **(No Impact)**

[61] California Department of Water Resources. "Basin Prioritization". https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization. Accessed June 2, 2020.

4.11 LAND USE AND PLANNING

4.11.1 Environmental Setting

4.11.1.1 *Regulatory Framework*

City of San Mateo 2030 General Plan

The City of San Mateo 2030 General Plan was adopted in 2010, and serves as the guiding document for development, current or planned, within the limits of the city. The General Plan contains the seven elements required by state law, including land use, circulation, housing, public safety, natural resources conservation, open space, and noise. An Urban Design element has also been included in the General Plan, focusing on preserving the city image conveyed by focal points, corridors, and gateways, and discussing the design of future residential and commercial areas. The 2030 General Plan reflects the community's long-term vision and provides the framework for land use decisions on a broad scale. The City of San Mateo has established eight major policy strategies in the 2030 General Plan:

1. Increase housing opportunities while maintaining the character of existing single-family and low density neighborhoods.
2. Maintain the commitment to strengthening the Downtown as a major commercial, residential and cultural center.
3. Concentrate major new development near transportation and transit corridors.
4. Beautify and improve El Camino Real
5. Improve design quality and maintain established height limits.
6. Develop a strategy to limit traffic congestion.
7. Increase open space and recreational opportunities.
8. Establish and maintain San Mateo as a sustainable city

Various policies and actions of the City of San Mateo 2030 General Plan have been adopted for the purpose of avoiding or mitigating land use impacts resulting from planned development within the City, including the following:

Policies	Description
LU 1.1	Plan for land uses, population density, and land use intensity as shown on the Land Use, Height and Building Intensity and City Image Plans for the entire planning area. Design the circulation system and infrastructure to provide capacity for the total development expected in 2030. Review projections annually and adjust infrastructure and circulation requirements as required if actual growth varies significantly from that projected.
LU 1.4	Adopt and maintain the development intensity/density limits as identified on the Land Use Map and Building Intensity Plan, and as specified in Policy LU 6A.2. Development intensity/density shall recognize natural environmental constraints, such as flood plains, earthquake faults, debris flow areas, hazards, traffic and access, necessary services, and general community and neighborhood design. Maintain a density and building intensity range, with densities/intensities at the higher end of the range to be considered based on provision of public benefits such as affordable housing, increased open space, public plazas or recreational facilities, or off-site infrastructure improvements.
LU 1.5	Maintain maximum building height limits contained in Appendix C, and as specified in Policy LU 6A.2, closely matched with the Land Use categories and Building Intensity standards.
LU 1.6	Facilitate housing production by carrying out the goals and policies in the Housing Element.

Policies	Description
LU 1.14	To ensure a balanced mix of land use categories and to minimize nuisance impacts between conflicting uses a special use permit shall be required for residential uses in areas designated as neighborhood commercial, regional community commercial, and executive office on the Land Use Plan. However, mixed use land designations are exempt from this requirements, as is development on the Hillsdale Shopping Center Property subject to the Q5 Qualified Overlay District, so long as such development is consistent with a Master Development Plan prepared consistent with the policies of this General Plan.
LU 1.20	As a high priority support code enforcement to ensure that all uses are in compliance with City codes and conditions of development approval.
LU 4.2	Require new development to pay on an equitable basis for new or expanded public improvements needed to support the new or changed land use or development.
LU 4.30	Require all developments including parks and public places to incorporate physical security, personal safety, and traffic measures to provide a safe environment through application of crime prevention through design principles consistent with the City's Security Ordinance.
LU 4.33	Manage toxic and hazardous wastes by following the goals and policies contained in the Safety Element.
LU 6A.1	The City shall not approve any specific plan, rezoning, permit, subdivision, variance, or other land use permit which is not consistent with and does not implement the General Plan. Specific Plan and zoning ordinances were amended so as to conform to the General Plan by the end of 1992.
LU 6A.2	Maintain Building Height and Building Intensity maps/plans which delineate development intensity in the form of building heights and FARs in a manner which implements the height, intensity, density and design standards in the General Plan, consistent with the Building Heights and Intensities maps/plans as amended by initiative in November 1991 and November 2004.

City of San Mateo Zoning Ordinance

The Zoning Ordinance is the primary tool for implementing the policies of the General Plan and address physical development standards and criteria for the City. Government Code Section 65860 requires municipalities to maintain consistency between their zoning ordinance and their adopted general plan. One of the purposes of zoning is to implement the land use designations set forth in the general plan. Existing zoning in the City includes 23 districts and provides development standards for land uses. Although the two are distinct documents, the San Mateo General Plan and Zoning Ordinance are closely related, and State law mandates that zoning regulations be consistent with the General Plan maps and policies.

4.11.1.2 *Existing Conditions*

The 15.45-acre project site is currently occupied by four office buildings totaling approximately 224,844 square feet within a larger 26-acre office campus. Surrounding land uses include residential, office, commercial, institutional, and recreational uses. The site is located just south of the Peninsula Golf and Country Club and east of the College of San Mateo. Single-family residential neighborhoods are located to the north, south and east of the site.

All four parcels have an *Executive Office* General Plan land use designation and are zoned *E1-1 (Executive Park)*. The purpose of the E1-1 zoning district is to encourage commercial uses which support administrative, executive, and professional office uses, and various accessory uses. Residential uses with this zoning are permitted with a Special Use Permit subject to the Minimum Development Standards for R3 zoning districts in Section 27.22.040 of the Zoning Code and affordable housing requirements as adopted by City Council resolution.

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 proposed project would redevelop a 15.45-acre portion of the existing 26-acre office campus with residential buildings and publicly accessible mini-parks, picnic areas, open spaces, terraces, and landscaped paths and trails. The project does not propose to construct highways, freeways, or roads that would inhibit the access of residents to the surrounding areas, or alter access to the site from the existing roadways. No changes that would affect site access are proposed, and the proposed landscaped path & trail network and improvements to the existing Emergency Vehicle Access (EVA) access road would improve connectivity with the established community. As such, the project would not physically divide an established community within the City because it would not inhibit 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)**

Land Use Compatibility

Potential incompatibility may arise from placing a particular development or land use at an inappropriate location, or from some aspect of the project's design or scope. Depending on the nature of the impacts and its severity, land use compatibility conflicts can range from minor irritation and nuisance to potentially significant effects on human health and safety.

The proposed residential project would replace existing light industrial and office uses (software companies, pharmaceutical company, professional offices) with townhouses, apartments and single-family homes on a site that includes an apartment building and single-family residences among the adjacent land uses. Additional apartment complexes and single-family tracts are located in proximity to the site, as well as commercial and recreational uses that support residential uses. The proposed uses on the site would be different than the existing uses, however, the requirement of a Special Use Permit in the existing *Executive Park* zoning district and conformance with multi-family (R-3) development standards are intended to ensure compatibility between the different uses. The Special

Use Permit would allow the City to require development standards such as setback minimums, building height limits, and private open space requirements, in addition to providing enforceable performance standards to minimize nuisance factors such as noise, parking, etc. As previously discussed, the project would be subject to the City's design guidelines and SPAR review process, which would further reduce potential incompatibilities with the surrounding light industrial and lower density residential land uses. Conformance with these land use and permit review processes would reduce potential land use impacts due to incompatibility with surrounding uses to a less than significant level. **(Less than Significant Impact)**

Consistency with Plans and Policies

Land use and planning policies and regulations adopted for the purpose of avoiding or mitigating adverse environmental effects are contained in the City's General Plan and Municipal Code. All four parcels that comprise the project site have an *Executive Office* land use designation in the General Plan and are zoned *E1-1 (Executive Park)*, which allows residential uses with the approval of a Special Use Permit. The project proposes residential uses consistent with these regulations. Consistency with other regional and local plans adopted to reduce specific environmental impacts, such as the BAAQMD 2017 CAP and the City of San Mateo 2015 CAP, is discussed in the applicable sections of this Initial Study (e.g., Section 4.3 Air Quality and Section 4.8 Greenhouse Gases). Furthermore, the project site is not subject to any adopted habitat conservation plans or natural community conservation plans. Implementation of the proposed project would be consistent with established local and regional plans and policies, and the project would not conflict with any plans adopted to reduce or prevent environmental impacts. **(Less than Significant Impact)**

4.12 MINERAL RESOURCES

4.12.1 Environmental Setting

4.12.1.1 *Existing Conditions*

The project site is located in a developed urban area of the City of San Mateo. Mineral resources within San Mateo County are located in the coastal areas, mountains, and baylands. There are no known mineral resources on or in the vicinity of the project site.[62]

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?	☐	☐	☐	☒

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)**

There are no identified mineral resources located within or adjacent to the project site. The proposed project would not result in the loss of availability of any known 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)**

There are no identified mineral resource recovery sites located within or adjacent to the project site. The proposed project would not result in the loss of a mineral resource recovery site. **(No Impact)**

[62] San Mateo County. *San Mateo County General Plan – Mineral Resources Map*. November 1986.

4.13 NOISE

The following discussion is based, in part, on a noise and vibration assessment prepared by *Illingworth & Rodkin, Inc*. A copy of the report, dated September 17, 2020, is included in this Initial Study as Appendix F.

4.13.1 Environmental Setting

4.13.1.1 *Background Information*

Noise

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

Since excessive noise levels can adversely affect human activities and human health, federal, state, and local governmental agencies have set forth criteria or planning goals to minimize or avoid these effects. Noise guidelines are generally expressed using one of several noise averaging methods, including L_{eq}, DNL, or CNEL.[63] 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. Because of the impulsive nature of construction activities, the use of the PPV descriptor has been routinely used to measure and assess groundborne vibration and almost exclusively to assess the potential of vibration to cause damage and the degree of annoyance for humans. 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.

Construction activities can cause vibration that varies in intensity depending on several factors. The use of pile driving and vibratory compaction equipment, for example, typically generates the highest construction related groundborne vibration levels. The two primary concerns with construction-induced vibration are 1) the potential to interfere with the enjoyment of life (annoyance), and 2) the

[63] 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}.

potential to damage a structure. These two concerns are evaluated against different vibration limits. Human perception to vibration varies with the individual and is a function of physical setting and the type of vibration. Persons exposed to elevated ambient vibration levels, such as people in an urban environment, may tolerate a higher vibration level.

Structural damage can be classified as cosmetic only, such as paint flaking or minimal extension of cracks in building surfaces; minor, including limited surface cracking; or major, that may threaten the structural integrity of the building. Safe vibration limits that can be applied to assess the potential for damaging a structure vary by researcher. The damage criteria presented in Table 4.13-1 include several categories for ancient, fragile, and historic structures, the types of structures most at risk to damage. Most buildings are included within the categories ranging from "Historic and some old buildings" to "Modern industrial/commercial buildings". Construction-induced vibration that can be detrimental to the building is very rare and has only been observed in instances where the structure is at a high state of disrepair and the construction activity occurs immediately adjacent to the structure.

Table 4.13-1: Reaction of People and Damage to Buildings from Continuous or Frequent Intermittent Vibration Levels

Velocity Level. PPV (in/sec)	Human Reaction	Effect on Buildings
0.01	Barely perceptible	No effect.
0.04	Distinctly perceptible	Vibration unlikely to cause damage of any type to any structure.
0.08	Distinctly perceptible to strongly perceptible	Recommended upper level of the vibration to which ruins and ancient monuments should be subjected.
0.1	Strongly perceptible	Threshold at which there is a risk of damage to fragile buildings with no risk of damage to most buildings.
0.25	Strongly perceptible to severe	Threshold at which there is a risk of damage to historic and some old buildings.
0.3	Strongly perceptible to severe	Threshold at which there is a risk of damage to older residential structures.
0.5	Severe – Vibrations considered unpleasant	Threshold at which there is a risk of damage to new residential and modern commercial/industrial structures.

Source: Transportation and Construction Vibration Guidance Manual, California Department of Transportation, September 2013.

4.13.1.2 *Regulatory Framework*

State

California Building Standards Code

The CBC establishes uniform minimum noise insulation performance standards to protect persons within new buildings housing people, including hotels, motels, dormitories, apartments, and dwellings other than single-family residences. Title 24 mandates that interior noise levels attributable to exterior sources do not exceed 45 L_{dn}/CNEL in any habitable room. Exterior windows must have

a minimum Sound Transmission Class (STC) of 40 or Outdoor-Indoor Transmission Class (OITC) of 30 when the property falls within the 65 dBA DNL noise contour for a freeway or expressway, railroad, or industrial source.

Local

City of San Mateo 2030 General

Various policies and actions of the City of San Mateo 2030 General Plan have been adopted for the purpose of avoiding or mitigating noise impacts resulting from planned development within the City, including the following:

Policies	Description
N 1.1	Require submittal of an acoustical analysis and interior noise insulation for all "noise sensitive" land uses listed in Table N-1 (Table 4.13-2) that have an exterior noise level of 60 dB (L_{dn}) or above, as shown on Figure N-1. The maximum interior noise level shall not exceed 45 dB (L_{dn}
N 1.2	Require an acoustical analysis for new parks, play areas and multi-family common open space (intended for the use of the enjoyment of residents) that have an exterior noise level of 60 dB (L_{dn}) or above. Require an acoustical analysis that uses peak hour L_{eq} for new parks and play areas. Require a feasibility analysis of noise reduction measures for public parks and play areas. Incorporate necessary mitigation measures into residential project design to minimize common open space noise levels. Maximum exterior noise should not exceed 67 dB (L_{dn}) for residential uses and should not exceed 65 dB (L_{eq}) during the noisiest hour for public park uses.
N 2.1	Continue implementation and enforcement of City's existing noise control ordinance: (a) which prohibits noise that is annoying or injurious to neighbors of normal sensitivity, making such activity a public nuisance, and (b) restricts the hours of construction to minimize noise impact.
N 2.2	Protect all "noise-sensitive" land uses listed in Table N-1 and N-2 (Table 4.13-2 and 4.13-3 below) of the General Plan from adverse impacts caused by noise generated onsite by new developments. Incorporate necessary mitigation measures into development design to minimize noise impacts. Prohibit long-term exposure increases of 3 dB (L_{dn}) or greater at the common property line, excluding existing ambient noise levels. "Noise-sensitive" land uses, such as residential neighborhoods, hotels, hospitals, schools, and outdoor recreation areas must be protected from new development that causes discernable increases in noise levels as a result of on-site activities. Noise generators such as machinery or parking lots must be mitigated through physical measures or operational limits.
N 2.3	Protect land uses other than those listed as "noise sensitive" in Table N-1 from adverse impacts caused by the on-site noise generated by new developments. Incorporate necessary mitigation measures into development design to minimize noise impacts. Prohibit new uses that generate noise levels of 65 dB (Ldn) or above at the property line, excluding existing ambient noise levels. Commercial and industrial areas typically tolerate higher noise levels than residential neighborhoods. However, some control is necessary for new development within non-residential areas so that exceptionally noisy uses are restricted.
N 2.4	Recognize projected increases in ambient noise levels resulting from traffic increases, as shown on Figure N-2. Promote the installation of noise barriers along highways where "noise-sensitive" land uses listed in Table N-1 are adversely impacted by unacceptable noise levels [60 dB (Ldn) or above]. Require adequate noise mitigation to be incorporated into the widening of SR 92 and US 101. Accept noise increases on El Camino Real at existing development, and require new multi-family development to provide common open space having a maximum exterior noise level of 67 dB (Ldn).

Table 4.13-2: Noise Sensitive Land-Use Compatibility Guidelines for Community Noise Environments (L_{dn})[1]			
Land-Use Category	**Normally Acceptable[2]**	**Conditionally Acceptable[3]**	**Normally Unacceptable[4]**
Single-Family Residential	50 to 59	60 to 70	Greater than 70
Multi-Family Residential	50 to 59	60 to 70	Greater than 70
Hotels, Motels, and Other Lodging Houses	50 to 59	60 to 70	Greater than 70
Long-Term Care Facilities	50 to 59	60 to 70	Greater than 70
Hospitals	50 to 59	60 to 70	Greater than 70
Schools	50 to 59	60 to 70	Greater than 70
Multi-Family Common Open Space Intended for the Use and Enjoyment of Residents	50 to 67	--	Greater than 67

Table 4.13-3: Noise Guidelines for Outdoor Activities (L_{eq})			
Land Use Category	**Normally Acceptable[2]**	**Conditionally Acceptable[3]**	**Normally Unacceptable[4]**
Parks, Playgrounds	50 to 65*	--	Greater than 65*

[1] These guidelines are derived from the California Department of Health Services, Guidelines for the Preparation and Content of the Noise Element of the General Plan, 2003. The State Guidelines have been modified to reflect San Mateo's preference for distinct noise compatibility categories and to better reflect local land-use and noise conditions. It is intended that these guidelines be utilized to evaluate the suitability of land-use changes only and not to determine cumulative noise impacts. Land uses other than those classified as being "noise sensitive" are exempt from these compatibility guidelines.

[2] Normally Acceptable – Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

[3] Conditionally Acceptable – New construction should be undertaken only after a detailed analysis of the noise reduction requirement is conducted and needed noise insulation features included in the design.

[4] Normally Unacceptable – New construction should be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

*Average Sound Level (L_{eq}) for peak hour.

City of San Mateo Municipal Code

San Mateo Municipal Code, Chapter 7.30 regulates noise generated by project construction activities. Section 7.30.060, subsection (e) states that construction, alteration, repair, or land development activities authorized by a valid city permit shall be allowed at the following times.

- Weekdays: between 7:00 am and 7:00 pm
- Saturdays: between 9:00 am and 5:00 pm
- Sundays and Holidays: between 12:00 pm and 4:00 pm or at other such hours as

authorized or restricted by the permit, so long as they meet the following conditions:

1. No individual piece of equipment shall produce a noise level exceeding 90 dBA at a distance of 25'. If the device is housed within a structure on the property, the measurement shall be made outside the structure at a distance as close to 25' as possible.
2. The noise level outside of any point outside the property plane of the project shall not exceed 90 dBA.

Further, Section 7.30.040 establishes maximum permissible sound levels for different time periods and noise zones. It is unlawful for any person to operate or cause to be operated any source of sound at any location within the City or allow the creation of any noise on property owned, leased, occupied, or otherwise controlled by such person, which causes the noise level when measured on any other property to exceed:

1. The noise level standard for that property as specified in Table 7.30.040 (Table 4.13-4 below) for a cumulative period of more than 30 minutes in any hour;
2. The noise level standard plus five dB for a cumulative period of more than 15 minutes in any hour;
3. The noise level standard plus 10 dB for a cumulative period of more than five minutes in any hour;
4. The noise level standard plus 15 dB for a cumulative period of more than one minute in any hour;
5. The noise level standard or the maximum measured ambient level, plus 20 dB for any period of time.

Table 4.13-4: Noise Level Standards (Municipal Code Table 7.30.040)

Noise Zone	Time Period	Noise Level, dBA
Noise Zone 1	10 p.m.--7 a.m.	50
	7 a.m.--10 p.m.	60
Noise Zone 2	10 p.m.--7 a.m.	55
	7 a.m.--10 p.m.	60
Noise Zone 3	10 p.m.--7 a.m.	60
	7 a.m.--10 p.m.	65
Noise Zone 4	Anytime	70

4.13.1.3 *Existing Conditions*

The project site consists of a 15.45-acre portion of an existing 26-acre office campus on a hillside to the east of SR 92 in San Mateo. The site is developed with four office buildings, totaling 224,844 square feet, and surface parking areas. Existing uses in the vicinity of the site include office buildings to the east and west, commercial uses to the south, single-family residences to the north, and more distant single-family residences to the east.

Due to the County's Shelter-in-place order responding to the COVID-19 pandemic and the resulting reduction in traffic activity, a current noise monitoring survey to characterize the noise environment of the site would not be representative of typical ambient noise levels. Therefore, the normal baseline noise environment was determined through noise modeling and a review of traffic noise contours

provided in the City of San Mateo 2030 General Plan EIR. This approach is consistent with CEQA case law which provides discretion for a lead agency to establish an alternate baseline when existing conditions are not representative of typical environment conditions on and around a site. The General Plan EIR identifies distance to traffic noise contours at 276 feet for the 70 dBA L_{dn} contour and 1,283 feet for the 60 dBA L_{dn} contour for the segment of SR 92 nearest the site. These contour distances assume an at-grade roadway alignment with no intervening shielding. Traffic volumes for SR 92 in the vicinity of the site were obtained from Caltrans via the Traffic Census Program and traffic volumes for Campus Drive were obtained from the project's traffic study.[64,65] These volumes were used to model traffic noise at the site and were validated using the contour distances specified in the General Plan EIR. Traffic noise was modeled using the Federal Highway Administration Traffic Noise Model 2.5 implemented in SoundPLAN 8.2. SoundPLAN is a three-dimensional noise modeling software that considers site geometry, the characteristics of noise sources, and shielding from structures, barriers, and terrain.

Based on the above methodology, the baseline noise environment at the project site is characterized primarily by vehicular traffic on SR 92 and Campus Drive. As mentioned above, the General Plan EIR contours assume at-grade roadway alignment with no intervening shielding. Because the project site is located on a hillside separated by intervening terrain and buildings, the project site experiences lower noise levels than would be estimated based on distance attenuation alone. The results of the noise model indicate that the baseline ambient noise levels are between 46 to 58 dBA L_{dn}. The highest calculated noise levels at the site occur along Campus Drive and along the western property line of the northern parcel nearest to SR 92.

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?	☐	☐	☐	☒

[64] Caltrans. *Traffic Census Program: 2017 Traffic Volumes: Route 92-98.* Accessed September 3, 2020. https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-92-98
[65] Kittelson & Associates. *Peninsula Heights Development Draft Transportation Impact Analysis.* August 2020.

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

Section 7.30.060 of the City's Municipal Code limits construction to weekdays between 7:00 a.m. and 7:00 p.m., Saturdays between 9:00 a.m. and 5:00 p.m., and Sundays and holidays between 12:00 p.m. and 4:00 p.m. Additionally, the Municipal Code specifies that no individual piece of equipment shall produce noise levels exceeding 90 dBA at a distance of 25 feet and that the noise level at any point outside of the property plane of the project shall not exceed 90 dBA. Construction hours in the public right-of-way are more restrictive based on Public Works conditions of approval.

Noise impacts resulting from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day, the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

Project construction is anticipated to occur over a period of 18 to 24 months and would include demolition of existing structures and pavement, site preparation, grading and excavation, trenching and foundations, building erection, and paving. The hauling of excavated materials and construction materials would generate truck trips on local roadways. Construction of the project would not include pile driving.

Typical construction noise levels at a distance of 50 feet, based on construction phase, are shown below in Table 4.13-5.

Table 4.13-5: Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA)

	Domestic Housing		Office Building, Hotel, Hospital, School, Public Works		Industrial Parking Garage, Religious Amusement & Recreations, Store, Service Station		Public Works Roads & Highways, Sewers, and Trenches	
	I	II	I	II	I	II	I	II
Ground Clearing	83	83	84	84	84	83	84	84
Excavation	88	75	89	79	89	71	88	78

Table 4.13-5: Typical Ranges of Construction Noise Levels at 50 Feet, L_{eq} (dBA)							
Foundations	81	81	78	78	77	77	88	88
Erection	81	65	87	75	84	72	79	78
Finishing	88	72	89	75	89	74	84	84

I - All pertinent equipment present at site.
II - Minimum required equipment present at site.
Source: U.S.E.P.A., Legal Compilation on Noise, Vol. 1, p. 2-104, 1973.

Construction noise levels drop off at a rate of about six dBA per doubling of the distance between the source and receptor. Shielding by buildings or terrain can provide an additional five to 10 dBA noise reduction at distant receptors. Based on the noise levels shown in the table above, in addition to typical noise levels for the project's construction equipment, average project construction noise levels are anticipated to range from 72 to 88 dBA L_{eq} at 50 feet from the source and from 78 to 94 dBA L_{eq} at 25 feet from the source. Individual pieces of construction equipment, such as jackhammers and dump trucks, would have the potential to generate hourly average noise levels greater than 90 dBA L_{eq} at a distance of 25 feet.

Construction along property lines would occur within 20 feet of residential land uses to the northwest and within 75 feet of office uses to the west. The approximate center of construction in the northern half of the project site is about 250 feet from the nearest residence to the northwest. The approximate center of construction in the southern half of the project site is about 250 feet from the nearest office building to the west. Average noise levels from project construction would reach 58 to 74 dBA L_{eq} at the nearest residential and office buildings. Hourly average construction noise levels could potentially exceed 90 dBA L_{eq} at the nearby uses when construction occurs within 35 feet of shared property lines, which would not be in compliance with Section 7.30.060 of the Municipal Code. This would constitute a significant impact.

Mitigation Measures: The following mitigation measures shall be implemented by the project applicant during construction to reduce temporary construction noise impacts:

MM NOI-1.1: Modification, placement, and operation of construction equipment are possible means for minimizing the impact of construction noise on existing sensitive receptors. Construction equipment should be well-maintained and used judiciously to be as quiet as possible. Additionally, construction activities for the project should include the following best management practices to reduce noise at sensitive land uses:

- Construction activities shall be limited to the hours between 7:00 a.m. and 7:00 p.m., Monday through Friday, Saturdays between 9:00 a.m. and 5:00 p.m., and Sundays and holidays between 12:00 p.m. and 4:00 p.m., in accordance with the City's Municipal Code, unless permission is granted with a development permit or other planning approval. Work in the public right-of-way shall be restricted to weekdays. No work shall be allowed to take place within the public right-of-way after 5:00 p.m.

Earth haul and materials delivery to and from the site, including truck arrivals and departures to and from the site, will be prohibited between the weekday hours of 4:00 p.m. to 5:30 p.m. Signs outlining these restrictions shall be posted at conspicuous locations on-site.

- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction.
- Use of exceptionally loud equipment such as jackhammers and concrete saws within 35 feet of shared property lines shall be limited, as feasible.
- Equip all internal combustion engine-driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment.
- Unnecessary idling of internal combustion engines should be strictly prohibited.
- Locate stationary noise-generating equipment, such as air compressors or portable power generators, as far as possible from sensitive receptors and property lines. If they must be located within 35 feet of receptors and property lines, adequate muffling (with barriers or enclosures where feasible and appropriate) shall be used to reduce noise levels at the adjacent sensitive receptors.
- Utilize "quiet" air compressors and other stationary noise sources where technology exists.
- Control noise from construction workers' radios to a point where they are not audile at existing residences bordering the project site.
- The contract 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 residential land uses so that construction activities can be scheduled to minimize noise disturbance.
- Designate a "disturbance coordinator" who would be responsible for responding to any complaints about construction noise and vibration during demolition and construction activities. The disturbance coordinator will determine the cause of the noise and vibration complaints (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 it in the notice sent to neighbors regarding the construction schedule.

Implementation of the above best management practices would reduce construction noise levels emanating from the site, limit construction hours, and minimize disruption and annoyance. With implementation of these measures, and recognizing that construction activities would be temporary, the impact would be less than significant. **(Less than Significant Impact with Mitigation Incorporated)**

Operational Noise

Traffic Noise

A significant noise impact would occur if traffic generated by the project would increase noise levels at sensitive receptors by three dBA L_{dn} or more. For reference, existing traffic volumes would have to double for noise levels to increase by three dBA L_{dn}. Traffic volumes for future cumulative scenarios with and without the project were analyzed to determine the project's potential to result in traffic noise increase. To assess the highest expected traffic levels on the surrounding roadways, the project's AM and PM peak hour traffic volumes were evaluated to determine if significant noise increases would occur. The project would result in an overall decrease in future traffic volumes in both AM and PM peak hours (compared to the existing office uses on-site); therefore, project traffic noise would be less than significant. **(Less than Significant Impact)**

Mechanical Equipment Noise

Operational noise is limited to the levels specified in Table 7.30.040 of the Municipal Code (see Table 4.13-4 in Section 4.13.1.2 Regulatory Framework). Noise-sensitive uses in the vicinity of the site include single-family residences to the north and east and office buildings to the east and west. Maximum permissible sound levels for residences would be 50 dBA between 10:00 p.m. and 7 a.m. and 60 dBA between 7:00 a.m. and 10:00 p.m. Maximum permissible sound levels for offices would be 55 dBA between 10:00 p.m. and 7 a.m. and 60 dBA between 7:00 a.m. and 10:00 p.m.

The proposed project would include mechanical equipment, such as heating, ventilation, and air conditioning (HVAC) systems. Information regarding the type and size of the mechanical equipment units to be used on-site was not available at the time of the noise assessment; however, the site plans show that HVAC equipment will be located on rooftops and partially shielded by parapet walls. Typical air conditioning units and heat pumps for multi-level residential buildings range from about 50 to 60 dBA L_{eq} at a distance of 50 feet. The nearest sensitive receptors would be single-family residences located approximately 25 feet from HVAC equipment on the roof of the northernmost proposed residential building and office uses located approximately 75 feet from HVAC equipment on the roof of residences along the western property line of the southern parcel. At a distance of 25 feet, HVAC equipment noise would reach 56 to 66 dBA L_{eq}. At a distance of 75 feet, HVAC equipment noise would reach 46 to 56 dBA L_{eq}. If parapet walls along the perimeters of the proposed buildings are constructed without any gaps or cracks and have a minimum surface weight of three pounds per square foot, they will provide a reduction in noise of about 10 to 15 dBA. Resulting noise levels would be approximately 41 to 56 dBA at the nearest residences and 31 to 46 dBA at the nearest office uses. Noise from HVAC equipment could exceed the daytime and nighttime hourly thresholds at adjacent uses. This would constitute a significant impact.

Mitigation Measure: The following mitigation measure shall be implemented by the project applicant to reduce noise impacts due to mechanical equipment:

MM NOI-1.2: Mechanical equipment shall be selected and designed to reduce impacts on surrounding uses to meet the City's Noise Ordinance. A qualified acoustical consultant shall be retained to review mechanical noise as these systems are selected to determine the specific noise reduction measures necessary, if any, to reduce noise to comply with the City's Noise Ordinance. Noise reduction

measures shall include, but are not limited to, selection of equipment that emits low noise levels and the installation of noise barriers, such as enclosures or parapet walls to block the line-of-sight between the noise source and the nearest receptors. Verification of review by an acoustical consultant, and any noise reduction measures to be implemented, shall be provided to the Planning Division prior to issuance of building permits for the superstructure.

With implementation of the mitigation measure above, operational noise impacts due to mechanical equipment would be reduced to a less than significant level. **(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 City does not specify a construction vibration limit. For structural damage, Caltrans recommends a vibration limit of 0.25 in/sec PPV for historic and old buildings, 0.3 in/sec PPV for older residential structures, and 0.5 in/sec PPV for new residential and modern commercial/industrial structures. There are no historic structures in the project vicinity. Thus, the 0.3 in/sec PPV vibration limit would be applicable to properties in the vicinity of the project.

Construction of the project may generate perceptible vibration when heavy equipment or impact tools (jackhammers, hoe rams) are used. Construction activities would include demolition, site preparation, grading and excavation, trenching and foundation, building (exterior), interior/architectural coating, and paving. Pile driving, which can result in higher groundborne vibration levels, is not anticipated as a method of construction.

Table 4.13-6 below shows vibration levels from construction equipment at the reference distance of 25 feet and levels calculated at distances representing the nearest adjacent residential and office structures.

Table 4.13-6: Vibration Levels for Construction Equipment at Various Distances

Equipment		PPV at 25 ft. (in/sec)	PPV at 20 ft. (in/sec)	PPV at 75 ft. (in/sec)
Clam shovel drop		0.202	0.258	0.060
Hydromill (slurry wall)	in soil	0.008	0.010	0.007
	in rock	0.017	0.022	0.000
Vibratory Roller		0.210	0.268	0.001
Hoe Ram		0.089	0.114	0.007
Large bulldozer		0.089	0.114	0.003
Caisson drilling		0.089	0.114	0.003
Loaded trucks		0.076	0.097	0.003
Jackhammer		0.035	0.045	0.001
Small bulldozer		0.003	0.004	0.000

Source: Transit Noise and Vibration Impact Assessment, United States Department of Transportation, Office of Planning and Environment, Federal Transit Administration, October 2018 as modified by Illingworth & Rodkin, Inc., September 2020.

The closest structures to the project site are residences located approximately 20 feet to the northwest of the site and the office building located at 2775 Campus Drive, approximately 75 feet to the west. As shown in the table above, vibration levels at these locations would not exceed the 0.3 in/sec PPV threshold. Therefore, nearby land uses would not be exposed to excessive groundborne vibration or groundborne noise levels. **(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)**

As discussed in *Section 4.9 Hazards and Hazardous Materials*, the project site is located approximately 5.5 miles southeast of the San Francisco International Airport. It is located beyond the outer boundary of safety compatibility zones, and outside of the CNEL noise contours for the airport. The project would therefore not result in any aircraft related noise impacts. **(No Impact)**

4.13.3 Non-CEQA Effects

Per *California Building Industry Association v. Bay Area Air Quality Management District,* 62 Cal. 4th 369 *(BIA v. BAAQMD)*, effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of San Mateo has policies that address existing noise conditions affecting a proposed project. As described in the Noise Element of the City's General Plan, the City's "Normally Acceptable" exterior noise level objective is 59 dBA L_{dn} or less for residential land uses. The maximum exterior noise in multi-family outdoor activity areas intended for the use of residents should not exceed 67 dBA L_{dn}. The interior noise level limit is 45 dBA L_{dn} or less for residential land uses consistent with the requirements of the California Building Code.

Future Exterior Noise Environment

The future exterior noise environment at the project site would continue to be characterized by vehicular traffic along SR 92 and Campus Drive. The noise environment at the site would vary depending on the proximity to these roadways and shielding provided by intervening structures. Open space outdoor areas for residents are proposed throughout the project site.

Existing noise levels at the site range from 46 to 58 dBA L_{dn}. Based on the project's traffic study, future traffic levels along Campus Drive would decrease slightly following project implementation. Therefore, there would be no expected future traffic noise increase along Campus Drive. Additionally, according to the Traffic Operations Report for the SR 92/El Camino Real Interchange Project Approval/Environmental Document (2013), future 2038 traffic volumes along SR 92 are anticipated to increase and would result in an increase in traffic noise of approximately two dBA L_{dn}. However, due to the intervening terrain between the site and SR 92, the noise environment at the site would remain mostly unaffected. Overall, the future noise environment at the site will remain mostly unchanged from existing conditions. The existing noise levels are within the "Normally Acceptable" ranges for single- and multi-family residential uses and the "Normally Acceptable" range for multi-family common open space.

Future Interior Noise Environment

Interior noise levels would vary depending upon the design of the buildings (relative window area to wall area) and the selected construction materials and methods. Standard residential construction provides approximately 15 dBA of exterior-to-interior noise reduction, assuming the windows are partially open for ventilation. Standard construction with the windows closed provides approximately 20 to 25 dBA of noise reduction in interior spaces. Where exterior noise levels range from 60 to 65 dBA L_{dn}, the inclusion of adequate forced-air mechanical ventilation can reduce interior noise levels to acceptable levels by allowing occupants the option of closing the windows to control noise. Where noise levels exceed 65 dBA L_{dn}, forced-air mechanical ventilation systems and sound-rated construction methods are normally required.

Both the City of San Mateo and the California Building Code require that interior noise levels be maintained at 45 dBA L_{dn} or less for residences. The highest residential façade noise exposures are anticipated to reach approximately 57 dBA L_{dn} at the northwesternmost residences. Assuming a noise reduction of 15 dBA resulting from standard construction with windows partially open for ventilation, interior noise levels within residences would reach up to 42 dBA L_{dn}. Project plans indicate forced-air mechanical ventilation is to be provided for all proposed residential units. This would allow for residents to control ventilation with windows in a closed position, resulting in a greater reduction in interior noise. Future interior noise levels would not exceed 45 dBA L_{dn} and would be consistent with the City of San Mateo General Plan and the California Building Code.

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.[66] The City of San Mateo Housing Element and related land use policies were last updated in 2015.

Regional and Local

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).[67]

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).

City of San Mateo 2030 General Plan

The San Mateo General Plan contains land use policies that support a wide variety of land uses and substantial growth of both the commercial and residential sectors. The following General Plan Land Use Policies are relevant to the proposed project:

Policies	Description
LU 1.6	Facilitate housing production by carrying out the goals and policies in the Housing Element.

[66] California Department of Housing and Community Development. "Regional Housing Needs Allocation and Housing Elements" Accessed April 23, 2020. http://hcd.ca.gov/community-development/housing-element/index.shtml.
[67] Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." http://projectmapper.planbayarea.org/.

Policies	Description
LU 1.7	Allow multi-family areas to develop at densities delineated on the Land Use Plan.
LU 1.8	Facilitate housing production by allowing commercial mixed use development which includes multi-family dwellings in all non-residential land use categories except service commercial, manufacturing/industrial and parks/open space.
H 2.2	Maintain an overall balance of housing and employment within the community over the term of the Plan.

4.14.1.2 *Existing Conditions*

The project site is located approximately 300 feet east of SR 92 in southwestern San Mateo. SR 92 runs from Half Moon Bay on the San Mateo County coastline to the San Francisco Bay, where it becomes the San Mateo Bridge, extending eastward across the Bay to the City of Hayward. According to the Land Use Element of the San Mateo 2030 General Plan, 17 percent of the City's employed population works along the SR 92 corridor. Employment intensification is expected along the SR 92 corridor, particularly in the vicinity of the U.S. 101 interchange, and is expected to continue to contain the largest number of jobs.

The project site is developed with office buildings and provides no housing. There are single-family residential neighborhoods located to the north, south, and east of the site.

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).

The proposed project involves the demolition of four office buildings to allow for the construction of 290 residential units. The project site has an *Executive Office* land use designation in the General Plan and is zoned *E1-1 (Executive Park)* which allows residential development with a Special Use Permit, subject to the minimum development standards for R-3 zoning districts (Section 27.22.040 of the Zoning Code) and affordable housing requirements as adopted by City Council resolution. The project proposes approximately 2,320 square feet per dwelling unit, which exceeds the minimum development standards, and would provide 29 affordable housing units consistent with the City's affordable housing requirements. Additionally, planned residential development in San Mateo through 2030 is expected to provide 8,330 dwellings for a total of 48,360 dwellings.[68] Under the current estimate of 2.62 persons per household in San Mateo, the 290 dwelling units proposed would result in an increase in population of approximately 906 people.[69] Accordingly, implementation of the proposed project would result in an incremental increase in population consistent with ABAG projections for population growth used by the City of San Mateo in its 2030 General Plan. Therefore, the proposed project would not directly or indirectly induce substantial growth beyond planned levels of development for the City of San Mateo. **(Less than Significant Impact)**

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

The project site is currently developed with four office buildings and surface parking lots, and there are no permanent or temporary residents on-site. Therefore, the proposed project would not remove existing housing, displace people, or necessitate the construction of replacement housing elsewhere. **(No Impact)**

[68] City of San Mateo. *2030 General Plan – Land Use Element*. April 18, 2011.
[69] Kittleson. Peninsula Heights Draft Transportation Analysis. August 2020.

4.15 PUBLIC SERVICES

4.15.1 Environmental Setting

4.15.1.1 *Regulatory Framework*

State

Quimby Act – Parks

The Quimby Act (California Government Code Sections 66475-66478) was approved by the California legislature to preserve open space and parkland in the State. This legislation was in response to California's increased rate of urbanization and the need to preserve open space and provide parks and recreation facilities for California's growing communities. The Quimby Act authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate parks, pay an in-lieu fee, or perform a combination of the two.

School Facilities

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. Sections 65995-65998 sets 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 goes on to say that the payment of school impact fees "are hereby deemed to provide full and complete school facilities mitigation" under CEQA (Section 65996[b]).

In accordance with California Government Code Section 65996, developers pay a school impact fee to the school district to offset the increased demands on school facilities caused by their proposed residential development project. The school district is responsible for implementing the specific methods for mitigating school impacts under the Government Code.

Local

City of San Mateo 2030 General Plan

Applicable General Plan policies related to public services include, but are not limited to, the following listed below.

Policies	Description
LU 4.10	Provide Police Station facilities to meet the facility requirements through 2030.
LU 4.24	Maintain fire inspection staffing levels to meet existing needs and the projected 2025 population, employment and development, and inspections mandated by other governmental agencies.
LU 4.25	Continue fire apparatus replacement and maintenance programs to provide a high state of readiness.
LU 4.29	Maintain facilities, equipment, and personnel to provide an effective police force to serve existing and future population and employment as identified in the Land Use Element.
LU 4.30	Require all developments including parks and public places to incorporate physical security, personal safety, and traffic measures to provide a safe environment through application of crime prevention through design principles consistent with the City's Security Ordinance.

Policies	Description
C/OS 12.1	Provide the appropriate mix of parkland that balances the needs of active and passive facilities, that are accessible for all residents, and that meet existing and future recreation needs.
C/OS 12.2	Adopt and use the Park and Recreation Facility Standards to assess the adequacy of existing facilities, designing, developing and redeveloping sites, and acquiring or accepting new sites.

City of San Mateo Parkland Dedication/Fees

The City of San Mateo has established standards for dedication of land or payment of in-lieu fees for park and recreation facilities serving new residential subdivisions (Chapter 26.64 of the City of San Mateo Municipal Code). The code sets a standard of two acres per 1,000 residents to be dedicated by residential developers, with fees based on the value of real property and the number of residents estimated for various unit sizes. The Municipal Code also establishes park impact fees for residential units not subject to Chapter 26.64. In Section 13.05.070 of the Municipal Code, the City outlines land dedication requirements and fees for residential units that are not subject to Chapter 26.64. Fees and land dedications are calculated in the same manner as described in Chapter 26.64, while the applicability to residential projects varies.

4.15.1.2 *Existing Conditions*

Fire Protection Services

The San Mateo Fire Department (SMFD) provides fire protection services in the City of San Mateo. Six fire stations serve the City's residents. These stations include Station 21 (located in the Downtown area at 120 South Ellsworth Avenue), Station 23 (located at 31 West 27th Avenue), Station 24 (located at 318 South Humboldt Street), Station 25 (located at 545 Barneson Avenue), Station 26 (located at 1500 Marina Court), and Station 27 (located at 1801 De Anza Boulevard). The nearest station to the project site is Station 27, which is located approximately 0.9 miles southwest of the site. The SMFD response time to 90 percent of calls received is typically six minutes.

Police Protection Services

The San Mateo Police Department (SMPD) provides police protection services in the City of San Mateo. The main police station for the City of San Mateo is located at 200 Franklin Parkway, approximately 4.3 miles east of the project site.

The SMPD is divided into three service units: Field Operations Services, Investigation Services, and Support Services, totaling 171 full time personnel. The average response time for Priority 1 (emergency) calls was estimated at five minutes and 20 seconds minutes in 2019-2020, and the percentage of Priority 1 calls dispatched within 90 seconds of receipt of the call was 92 percent.[70]

Parks

The City of San Mateo has 40 park sites and open space areas, and more than 40 miles of paths and trails. Recreational facilities include baseball and softball fields, soccer fields, tennis courts,

[70] City of San Mateo. "Adopted 2020-21 Budget." Page 169. https://www.cityofsanmateo.org/DocumentCenter/View/81747/Adopted-Budget-FY-2020-21?bidId=

basketball and volleyball courts, golf courses, swimming pools, dog parks, skate parks, playgrounds, gardens and picnic areas. The nearest parks/recreational facilities are Laurelwood Park (approximately 1.3 miles south), Beresford Park (approximately 1.7 miles east), and Indian Springs Park (approximately 2.4 miles southeast).

Schools

The City of San Mateo is served by three public school districts: the San Mateo-Foster City School District serves grades K–8; the San Mateo Union High School District serves grades 9–12; and the County Community College District serves high school graduates and anyone over 18.

The proposed project is located within the San Mateo-Foster City Unified School District (SMFCUSD). The SMFCUSD operates 20 schools in the cities of San Mateo and Foster City and in the unincorporated area west of San Mateo. The total enrollment in the District, which consists of elementary and middle schools, is approximately 10,000 students. The project site is served by the Meadow Heights Elementary School (2619 Dolores Street, approximately 1.6 miles northeast) and the Abbott Middle School (600 36th Avenue, approximately 2.0 miles southeast).[71]

The proposed project is located within the San Mateo Union High School District (SMUHSD). The SMUHSD operates seven high schools, one continuation school, and one adult school in the cities of San Mateo, Burlingame, San Bruno, and Millbrae. The closest school in this District is Hillsdale High School (approximately 1.5 miles east of the site).

Additionally, the site is located within the San Mateo County Community College District. The College of San Mateo is located approximately 1,000 feet west of the project site, across SR 92.

Libraries and Community Centers

There are three public libraries located within the City of San Mateo. These libraries include the San Mateo Public Library (approximately 3.9 miles north of the site), the Marina Library (approximately 3.9 miles to the northeast), and the Hillsdale Library (approximately 2.2 miles east of the site).

The City of San Mateo has six community centers within the city limits. These community centers include the Central Park Recreation Center (approximately 3.4 miles north of the site), the Martin Luther King Jr. Community Center (approximately 4.4 miles north of the site), Joinville Park (approximately 5.3 miles northeast of the site), the San Mateo Senior Center (1.8 miles east of the site), and the Beresford Recreation Center (approximately 1.9 miles east of the site).

[71] SchoolVision Software. *San Mateo-Foster City School District SchoolFinder*. Date accessed May 14, 2020. http://www.schfinder.com/SMFC/

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. **(Less than Significant Impact)**

The proposed project would place a new demand on fire protection services within the City of San Mateo. The project would result in an estimated increase in the local population of approximately 906 people, assuming full occupancy of the proposed residential buildings, which is consistent with ABAG projections for population growth used by the City of San Mateo in its 2030 General Plan. As a result, there would be an incremental and anticipated increase in demand on the San Mateo Fire Department. This increase in demand would not prevent the San Mateo Fire Department from maintaining acceptable response times nor would it require the construction of new facilities to ensure adequate service to the surrounding areas, as Fire Station 27 is within 1.5 miles of the project site. The proposed buildings would be constructed in compliance with the most recent California Building Code and California Fire code to ensure the building is fire-safe, and includes improvements to the Emergency Vehicle Access (EVA) access road east of the roundabout on the south end of the project site. In addition, the proposed project is not located within a San Mateo County Fire Hazard Safety Zone for wildland fires as identified by CalFIRE.[72] **(Less than Significant Impact)**

[72] California Department of Forestry and Fire Protection. *San Mateo County Fire Hazard Safety Zone Map.* November 2007.

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

The redevelopment of the project site with 290 residential units would increase the need for police protection services. The increase in demand for police protection services is not expected to be environmentally significant, as the approximately 906 new residents represents anticipated population growth in San Mateo. The proposed project would not require substantially expanded or new police facilities to retain current service ratios and/or response times in the area, which are below recommendations contained in the 2030 General Plan DEIR.[73] The need for increased police staffing, and the impact to current police facilities, may be reduced by the deployment of new facilities, partnerships, and technology. Furthermore, the proposed residential buildings and public amenities would be constructed in accordance with the City's Security Ordinance and reviewed by the SMPD to ensure appropriate safety features that minimize criminal activity are incorporated into the project design. As such, the SMPD would be able to adequately service the project site and surrounding area upon implementation of the proposed project. **(Less than Significant 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)**

Based on the San Mateo-Foster City School District's student generation rates of 0.10 student per residential unit for elementary schools and 0.04 student per unit for middle schools[74], the 290 residential units proposed would generate approximately 29 new students at the Meadow Heights Elementary School and 12 new students at Abbott Middle School. Using the San Mateo Union High School District's student generation rate of 0.04 high school students per residential unit, the project would generate approximately 12 new students at San Mateo High School. These numbers represent relatively small increases in enrollment at these schools, which had total enrollments of 339 (Meadow Heights Elementary School), 813 (Abbott Middle School) and 1,713 (San Mateo High School) students during the 2018-2019 school year.[75] It is not anticipated that the additional students would result in the need to expand or construct new school facilities.

School impact fees will be paid to the affected school districts prior to the issuance of a building permit by the City. School districts would then be responsible for implementing the specific methods

[73] City of San Mateo. *General Plan Update – Draft Environmental Impact Report*. July 27, 2009. Pages 4.11-10 through 4.11-12.
[74] San Mateo – Foster City School Board. *Projected Enrollments 2017-18 to 2024-25*. March 8, 2018.
[75] Education Data Partnership. http://www.ed-data.org/district/San-Mateo/San-Mateo--Foster-City. Accessed July 2, 2020.

for mitigating school impacts under the Government Code. The responsibility for payment of school impact fees would lie with the project applicant. By law, payment of the school impact fee is considered adequate mitigation and no further mitigation would be required to offset the impact of projected increases in student populations from the proposed project. **(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)**

Government Code Section 66477, or the Quimby Act, outlines fees and/or amounts of parkland to be dedicated as a condition of approval for new residential developments. The proposed project would result in an increase in the local population by approximately 906 people. New residents of the proposed project could reasonably be expected to utilize park and recreation facilities in the vicinity of the site, such as Laurelwood Park, Beresford Park, and Indian Springs Park, though this impact would be offset by the provision of mini-parks and community amenities within the proposed development. As such, the demand on existing facilities would be marginally increased by the proposed project; however, the dedication of parkland or payment of in-lieu fees under the Quimby Act provisions would facilitate the acquisition of parkland or improvement of parks in San Mateo consistent with General Plan goals.

- To offset the impacts to park facilities in the City, the applicant is required to pay a park impact fee in accordance with SMMC Section 13.050.070 or fee in-lieu of dedication of lands for park and recreation purposes in accordance with SMMC Chapter 26.64 (park in-lieu fee).

By requiring in-lieu fees for park and recreation purposes, the project would have a less than significant impact on existing park and recreation facilities in San Mateo. **(Less than Significant Impact)**

Impact PS-5:	The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities. **(Less than Significant Impact)**

It can be reasonably expected that new residents of the proposed project would utilize nearby libraries and community centers. The demand on libraries and community centers in the area would be marginally increased as a result of the projected 906 new residents. However, demand for these facilities would not be expected to necessitate the construction of new facilities, or expansion of existing facilities, to accommodate future residents of the project. The existing libraries and

community centers in San Mateo would be equipped to provide services to new residents of the proposed project. **(Less than Significant Impact)**

4.16 RECREATION

4.16.1 Environmental Setting

4.16.1.1 *Regulatory Framework*

State

Quimby Act – California Code Sections 66475-66478

The Quimby Act (California Government Code Sections 66475-66478) was approved by the California legislature to preserve open space and parkland in the State. The Quimby Act authorizes local governments to establish ordinances requiring developers of new subdivisions to dedicate parks, pay an in-lieu fee, or perform a combination of the two.

Local

City of San Mateo Parkland Dedication/Fees

The City of San Mateo has established standards for dedication of land or payment of in-lieu fees for park and recreation facilities serving new residential subdivisions (Chapter 26.64 of the City of San Mateo Municipal Code). The code sets a standard of two acres per 1,000 residents to be dedicated by residential developers, with fees based on the value of real property and the number of residents estimated for various unit sizes. The Municipal Code also establishes park impact fees for residential units not subject to Chapter 26.64 (not requiring land subdivision). In Section 13.05.070 of the Municipal Code, the City outlines land dedication requirements and fees for residential units that are not subject to Chapter 26.64. Fees and land dedications are calculated in the same manner as described in Chapter 26.64, while the applicability to residential projects varies.

City of San Mateo 2030 General Plan

The following recreation policies, contained in the City's General Plan, are applicable to the proposed project:

Policies	Description
C/OS 12.1	Provide the appropriate mix of parkland that balances the needs of active and passive facilities, that are accessible for all residents, and that meet existing and future recreation needs.
C/OS 12.2	Adopt and use the Park and Recreation Facility Standards to assess the adequacy of existing facilities, designing, developing and redeveloping sites, and acquiring or accepting new sites.
C/OS 12.3	Create an asset management plan that identifies the highest and best use of undeveloped parcels or underutilized areas within existing parks to insure they are best positioned to meet current and future needs and where appropriate, identify options for alternative uses.
C/OS 12.7	Preserve existing parklands, open spaces and the golf course for open space and recreational use as directed by ordinance.
C/OS 13.1	Maintain the park system by a set of maintenance standards that reflect community values and in a manner that maintains, promotes, and optimizes positive use, and prevents degradation of facilities and ensures that particular equipment and facilities are maintained in a safe condition.
C/OS 13.2	Give priority to Capital Improvement Program projects that rehabilitate facilities that have become or will become costly to maintain, only marginally usable, or unusable without action.

Policies	Description
C/OS 13.3	When existing parks undergo reconstruction or rehabilitation the site facilities and layout must be reviewed to determine if they effectively meet community needs, and whether modification would provide significant benefits in relation to costs.
C/OS 13.4	Utilize an infrastructure lifecycle management program that extends the useful life of all park and recreation assets and insures that sufficient funds are available for replacement or major rehabilitation.
C/OS 14.9	Establish principles for all new or renovated parks to maximize productivity, efficiency and community value.

4.16.1.2 *Existing Conditions*

The City of San Mateo has 40 park sites and open space areas, and more than 40 miles of paths and trails. Recreational facilities include baseball and softball fields, soccer fields, tennis courts, basketball and volleyball courts, golf courses, swimming pools, dog parks, skate parks, playgrounds, gardens and picnic areas. The nearest parks/recreational facilities are Laurelwood Park (approximately 1.3 miles south), Beresford Park (approximately 1.7 miles east), and Indian Springs Park (approximately 2.4 miles southeast).

The City of San Mateo currently operates approximately 200 acres of parks. The acreage of parkland is currently below the goal established in the City's General Plan of 6.0 acres per 1,000 residents. At the time of analysis in the General Plan EIR (based on a population of 95,500), the ratio of existing neighborhood and community (including mini parks, regional parks, and Coyote Point County Park) park and recreational facilities to population was 4.90 acres per 1,000 persons. Under the planned development and population growth expected through 2025, the City's projected population of 119,200 would result in a parkland ratio of 3.93 acres per 1,000 persons.

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 would marginally increase the use of existing neighborhood and regional parks and recreational facilities in San Mateo. The project would increase the local population by approximately 906 residents. Future residents of the proposed project could reasonably be expected to utilize nearby parks such as Laurelwood Park, Indian Springs Park, and the Beresford Park and Recreation Center to meet their recreational needs. As discussed in *Section 4.15, Public Services* of this Initial Study, parkland dedications and/or in-lieu fees would be applied to the proposed project to offset the additional demand on existing facilities. It is not anticipated that the additional demand placed on existing park and recreational facilities would result in substantial physical deterioration of these facilities. Park fees collected from the project would be used to maintain and upgrade affected park facilities, as necessary. Thus, the impact would be less than significant. **(Less than Significant Impact)**

Impact REC-2:	The project does not 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 development, recreational facilities including pocket parks featuring dog parks, playgrounds, communal gardens, viewpoint overlooks, picnic areas, and flexible green spaces would be developed. This would reduce demand on existing recreation facilities in the City by project residents. The project would therefore not result in the requirement to construct or expand existing facilities, and would not have an adverse physical effect on the environment. **(Less than Significant Impact)**

4.17 TRANSPORTATION

The following discussion is based, in part, on a Traffic Impact Study prepared by Kittelson and Associates in October 2020 and a Transportation Demand Management Plan prepared by Steer in September 2020. Copies of these reports are included in Appendix G and Appendix H, respectively, of this Initial Study.

4.17.1 Environmental Setting

4.17.1.1 *Regulatory Framework*

State

Senate Bill 743

SB 743 establishes criteria for determining the significance of transportation impacts using a vehicle miles traveled (VMT) metric intended to promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses. Specifically, SB 743 requires the replacement of automobile delay described solely by level of service (LOS) or similar measures of vehicular capacity or traffic congestion with VMT as the recommended metric for determining the significance of transportation impacts. The Governor's Office of Planning and Research (OPR) approved the CEQA Guidelines implementing SB 743 on December 28, 2018. Local jurisdictions were required to implement a VMT policy by July 1, 2020.

Regional

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 RTP in the region. MTC and ABAG adopted Plan Bay Area 2040 in July 2017, which includes an RTP to guide regional transportation investment for revenues from federal, state, regional and local sources through 2040.

City/County Association of Governments

The City/County Association of Governments of San Mateo County (C/CAG) works on issues that affect the quality of life in general: transportation, air quality, stormwater runoff, airport/land use compatibility planning, hazardous waste, solid waste and recycling. 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. The CMP is required to be consistent with the MTC planning process that includes regional goals, policies, and projects for the Regional Transportation Improvement Program.[76] A project is required to submit a Transportation Demand Management (TDM) plan in

[76] C/CAG of San Mateo County. "Congestion Management". 2017.

compliance with the CMP guidelines if the project will generate 100 net new peak hour vehicle trips to the CMP roadway network.

The proposed project is estimated to generate 58 fewer vehicle trips (-130 inbound, 72 outbound) during the weekday AM peak hour and 22 fewer vehicle trips (73 inbound, -95 outbound) during the weekday PM peak hour compared to the existing office campus. Accounting for the difference between the proposed project trips and the existing occupancy of the office buildings, the proposed project would not meet the minimum threshold of 100 new peak hour vehicle trips for a congestion management program (CMP) analysis per C/CAG CMP guidelines.

San Mateo County Comprehensive Bicycle Route Plan

The San Mateo County Comprehensive Bicycle Route Plan was written by the C/CAG, the Bicycle and Pedestrian Advisory Committee, and individual cities and agencies. The intent of the plan is to provide a comprehensive bicycle network for San Mateo County and adjacent communities, and to improve inter-city and regional travel for bicycles. The plan includes existing roadways within San Mateo County, including roadways in the project area.

Local

City of San Mateo 2030 General Plan

The City of San Mateo 2030 General Plan contains goals and policies related to traffic and circulation patterns that are relevant to the proposed project, including those listed below:

Policies	Description
C 2.1	Maintain a Level of Service no worse than mid LOS D, average delay of 45.0 seconds, as the acceptable Level of Service for all intersections within the City.
C 2.4	Require new developments to pay for on-site improvements to meet the needs of development and their proportionate share of the costs for mitigating cumulative traffic impacts within the City of San Mateo. Utilize a Transportation Fee Ordinance to finance necessary off-site improvements equitably. The off-site improvements will include intersection and street improvements to maintain intersection levels of service, traffic safety improvements and improvements to reduce single occupant vehicle trips such as bicycle system enhancements, pedestrian improvements, and trip reduction measures.
C 2.5	Require site-specific traffic studies for development project where there may be a substantial impact on the local street system. Traffic impacts caused by a development project are considered to be unacceptable and warrant mitigation if the addition of project traffic results in a cumulative intersection level of service exceeding the acceptable level established in Policy C-2.1; where there may be safety hazards created; or where there may be other substantial impacts on the circulation system.
C 2.7	In addition to paying the transportation impact fee, a development project may be required to fund off-site circulation improvements which are needed as a result of project generated traffic if: a) The level of service at the intersection drops below mid-level LOS D (average delay of more than 45 seconds) when the project is added, and b) An intersection that operates below its level of service standard under the base year conditions experiences an increase in delay of four or more seconds, and c) The needed improvement of the intersection(s) is not funded in the applicable five-year City Capital Improvement Program from the date of application approval.
C 2.10	Participate in the TDM Program as outlined by the San Mateo City/County Association of Government (C/CAG). Encourage TDM measures as a condition of approval for development projects, which are anticipated to cause substantial traffic impacts. C/CAG requires the preparation of

Policies	Description
	a TDM program for all new development that would add 100 peak hour trips or more to the regional road network.
C 4.1	Implement the Bicycle Master Plan's recommended programs and projects to create and maintain a fully-connected safe and logical bikeways system; support the City's Sustainable Transportation Actions; and coordinate with the countywide system.
C 4.4	Implement the Pedestrian Master Plan's recommended programs and projects to create and maintain a walkable environment in San Mateo and support the City's Sustainable Transportation Actions.
C 4.5	Continue to require as a condition of development project approval the provision of sidewalks and wheelchair ramps where lacking and the repair or replacement of damaged sidewalks. Require that utility poles, signs, streetlights, and street landscaping on sidewalks be placed and maintained to permit wheelchair access and pedestrian use. Increase awareness of existing trails and routes by promoting these amenities to residents.
C 4.6	Continue to assess and improve wheelchair access throughout the City. Install wheelchair ramps or take other corrective measures where most needed in accordance with the established Citywide Wheelchair Program.
C 4.7	Pedestrian safety shall be made a priority in the design of intersection and other roadway improvements.
C 5.1	a) Adopt parking requirements to provide adequate parking supply as a condition of development approval. b) Adopt parking requirements to provide adequate parking supply for change and/or expansion of land use resulting in increased parking demand.
C 6.6	Reduce fuel consumption and vehicle emissions for trips originating in or destined for the City of San Mateo by providing incentives for the purchase and use of fuel efficient vehicles such as recharging station for electric vehicles or preferential parking for carpools, hybrids, and alternative fuel vehicles and develop a way to make this action enforceable and by providing discounted parking rates for carpools, hybrids, and other vehicles that help reduce CO2 emissions.

City of San Mateo Transportation Impact Analysis Guidelines

The City of San Mateo adopted new Transportation Impact Analysis (TIA) Guidelines on August 17, 2020 to implement VMT as the transportation analysis metric for CEQA analysis, and to formalize the City's procedures for local transportation analysis outside of CEQA. The new TIA Guidelines provide processes for analyzing the potential transportation impact of transportation projects. The TIA Guidelines include:

- Parameters for when transportation analysis is required;
- Guidance on determination of impacts and negative effects;
- Technical processes for calculating VMT for projects;
- Mitigation measures for VMT impacts and local plan requirements to address negative LOS effects;
- Require analysis for CEQA and local transportation purposes.

The TIA Guidelines include screening criteria which, if met by a project, would result in the project having a less than significant VMT impact under CEQA. For projects that do not meet the screening criteria, the Guidelines set forth thresholds of significance for comparison in quantified VMT analyses to make a determination of significance.

As described previously, the proposed project was applied for under the provisions of SB 330. Under SB 330, with limited exceptions, housing developments will only be subject to those ordinances and policies in effect when the completed preliminary application is submitted. At the time the preliminary application was submitted for the proposed project, the City had not yet adopted the TIA Guidelines; however, the provisions of the OPR's Technical Advisory on Analyzing Transportation Impact in CEQA (2018) were followed. Therefore, the proposed project is analyzed in accordance with the OPR document, which was in effect at the time the SB 330 preliminary application was filed.

City of San Mateo Bicycle Master Plan

The City of San Mateo Bicycle Master Plan was first adopted in October 2011. It contains goals and objectives to provide a blueprint for a citywide system of bicycle facilities to allow for safe, efficient, and convenient bicycle travel within the City and to regional destinations in the Bay Area. The purpose of the plan is to build on the success of previous bicycle infrastructure improvements by enhancing and expanding the existing bikeway network, connecting gaps, addressing constrained areas, and providing for greater local and regional connectivity. The updated 2020 Bicycle Master Plan was adopted by City Council on April 6, 2020.

City of San Mateo Pedestrian Master Plan

The City of San Mateo Pedestrian Master Plan was adopted in April 2012. It contains goals, objectives and policies to improve the pedestrian environment and increase the number of walking trips in San Mateo. The purpose of the Plan is to prioritize pedestrian improvements through a needs analysis of the City's network to identify gaps in the network and potential improvements. The Plan applies prioritization criteria to the output of the needs assessment to establish rankings for infrastructure improvements as well as programmatic recommendations.

4.17.1.2 *Existing Conditions*

Regional access to the project site would be primarily provided by State Route 92 via West Hillsdale Boulevard and Campus Drive.

State Route 92 is a four-to six-lane state highway, serving as a major east-west corridor in the San Francisco Bay Area. It extends from State Route 1 in Half Moon Bay at the west end and the San Mateo-Hayward Bridge to downtown Hayward in the East Bay at its junction with State Route 238. Access to and from the project study area is provided via interchanges at Hillsdale Boulevard.

Hillsdale Boulevard is an arterial roadway that extends in an east-west direction from the College of San Mateo in the west to Foster City at San Mateo's eastern boundary before eventually transitioning into Beach Park Boulevard. In the vicinity of the project site, Hillsdale Boulevard has four lanes, and provides access to the project site via Campus Drive and State Route 92.

Campus Drive is a north-south local collector that extends from Hillsdale Boulevard to 26th Avenue. Collector streets are designed to channel traffic from local streets to arterials, and to handle short trips within the neighborhood areas. In the vicinity of the project site, Campus Drive has four lanes, and provides direct access to the project site via driveways.

Alameda de Las Pulgas is a north-south, four-lane arterial roadway extending from the St. Bartholomew School at Crystal Springs Road on the north and extending south through Belmont before transitioning into San Carlos Avenue at the San Carlos city limits. Alameda de Las Pulgas continues further south of San Carlos Avenue through Redwood City, Atherton, and Menlo Park until reaching its terminus at Sand Hill Road. In the vicinity of the project site, Alameda de Las Pulgas has four lanes, and provides access to the project site via Hillsdale Boulevard and Campus Drive.

Pedestrian Facilities and Amenities

Pedestrian facilities consist of sidewalks, crosswalks, and pedestrian signals at signalized intersections. In the project vicinity, sidewalks exist along both sides of Campus Drive, Hillsdale Boulevard, and Alameda de Las Pulgas, providing pedestrian access to and from the project site. Marked crosswalks with pedestrian signal heads and push buttons are provided at the Campus Drive/Hillsdale Boulevard intersection and marked crosswalks on all stop-controlled approaches are provided at the Hillsdale Boulevard/Alameda de Las Pulgas intersection. The overall network of sidewalks and crosswalks in the study area has good connectivity and provides pedestrians with safe routes to maneuver.

Bicycle Facilities and Amenities

Bicycle facilities are defined in the Caltrans Highway Design Manual by the following four classes.

- Class I (Multi-use Path) – Provides a completely separated facility designed for the exclusive use of bicyclists and pedestrians with crossing points minimized.
- Class II (Bike Lane) – Provides a restricted right-of-way designated lane for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with vehicle parking and crossflows by pedestrians and motorists permitted.
- Class III (Bike Route) – Provides a right-of-way designated by signs or permanent markings and shared with pedestrians and motorists.
- Class IV (Separated Bike Lane) – Provides a restricted right-of-way designated lane for the exclusive use of bicyclists that is separated by a vertical element to provide further separation from motor vehicle traffic.
- The existing and proposed bicycle routes within the study area are described below.

Alameda de Las Pulgas – This corridor has been identified by the public and local jurisdictions as a key bicycling corridor connecting Santa Clara County to San Mateo. It provides an inland alternative to the North-South Bikeway, which is identified as a priority corridor connecting San Francisco County to Santa Clara County in the San Mateo County Comprehensive Bicycle and Pedestrian Master Plan. Bike lanes (Class II) are striped on approximately half the length of the corridor (South of Belmont) while the remainder is a signed bicycle route (Class III). There is an existing Class III bike route on Alameda de Las Pulgas, in the vicinity of the project. The 2020 Bicycle Master Plan proposes upgrading the existing Class III bike route to a Class II buffered bike lane from 42nd Avenue to 26th Avenue near the project site. A Class II bike lane is proposed between 26th Avenue and Crystal Springs Road.

Hillsdale Boulevard – There is an existing Class II bike lane on Hillsdale Boulevard extending from Alameda de Las Pulgas to Laurel Creek Drive, in the vicinity of the project site. The Bicycle Master Plan proposes extending the existing Class II bike lane from Laurel Creek Drive to 31st Avenue, and installing a Class IV separated bike lane from 31st Avenue to College of San Mateo.

Campus Drive/26th Avenue – There is an existing Class III bike route on Campus Drive extending from Hillsdale Boulevard to 26th Avenue, providing access to the project site. The Bicycle Master Plan proposes upgrading the existing Class III bike route to a Class II bike lane on Campus Drive to 26th Avenue, and implementing a Class III bicycle boulevard from 26th Avenue to Hacienda Street.

Transit Service

The existing transit service to the study area is provided by the San Mateo County Transit District (SamTrans), Norfolk Caltrain Shuttle, and Caltrain. The project site has five bus routes (Route 250, 251, 256, 294 and 295) nearby, operated by SamTrans with the nearest bus stops located at the intersection of Alameda de Las Pulgas and Hillsdale Boulevard and in the study area vicinity. Two bus routes (school-day only), Route 57 and 58, operate in the vicinity of the project site. Caltrain commuter shuttles are available at the Hillsdale Caltrain Station and they have stops in the vicinity of project site at Glendora Drive/Hillsdale Boulevard, 31st Avenue/Hillsdale Boulevard, Del Monte Street/ Hillsdale Boulevard, and Alameda de Las Pulgas/Hillsdale Boulevard, Laurelwood Shopping Center stop on Campus Drive, Peninsula Office Park, and Campus Drive/26th Avenue intersections. The shuttle service operates during commute hours between transit stations and major employment areas (i.e. various office buildings in the area). The bus routes that provide the peak-hour services near the project site are described in Table 4.17-1.

Table 4.17-1: Existing Bus Service

Bus Route	*Description*	*Operating Hours*	*Peak Hour Headway*	*Closest Bus Stop*
57	Hillsdale High School – Edgewater/Beach Park (School-day only)	6:30 AM – 8:30 AM 3:30 PM – 4:30 PM	57	Hillsdale High School – Edgewater/Beach Park (School-day only)
58	Borel School – Polhemus / Paul Scannell (School-day only)	7:00 AM – 8:00 AM 1:00 PM – 3:30 PM	58	Borel School – Polhemus / Paul Scannell (School-day only)
250	5th/El Camino Real – College of San Mateo	6:00 AM – 11:00 PM	1 hour	Clearview Way / W. Hillsdale Blvd.

Table 4.17-1: Existing Bus Service				
251	Foster City – Hillsdale Mall	8:30 AM – 7:00 PM	2 hours	Alameda de las Pulgas / W. Hillsdale Blvd.
256	Hillsdale Mall – Foster City	6:30 AM – 8:00 PM	1 - 4 hours	Alameda de las Pulgas / W. Hillsdale Blvd.
294	San Mateo Medical Center – Hillsdale – CSM – Half Moon Bay	6:00 AM – 10:00 PM	1 hour	Clearview Way / W. Hillsdale Boulevard
295	San Mateo Caltrain – Redwood City Transit Center	6:00 AM – 7:00 PM	2 hours	Alameda de Las Pulgas / 26th Avenue
Norfolk Caltrain Shuttle	Between Hillsdale Caltrain Station and Various Office Area Buildings	7:00 AM – 9:30 AM and 3:00 PM – 7:00 PM	30 – 45 minutes	Various stops on W. Hillsdale Blvd. and Campus Dr.
Source: SamTrans, 2020				

Commuter rail service between San Francisco and Gilroy is provided by Caltrain. The project site is located approximately 2.7 miles west of the Hillsdale Caltrain Station, which is about an 11-minute car ride, and a 12-minute bike ride away. Caltrain provides service at this station with approximately 15-minute frequency during the weekday AM and PM commute hours, midday, and at night. Service is provided with approximately 90-minute headways on weekends.

In addition, the Millbrae BART station is located approximately 10 miles north of the site and is accessible to the project site via car and transit. BART connects the site to the wider Bay Area including San Francisco, East Bay, San José, and Richmond. There are 1,200 parking spots available at the station for individuals and carpoolers who park and ride. The service is available Monday to Friday before 9 p.m., with trains servicing the station approximately every 30 minutes.

Emergency Vehicle Access

The project proposes to maintain the existing emergency vehicle access (EVA) road connecting Campus Drive to 26th Avenue as an EVA. The nearest fire station is Station 27, which is located approximately 0.9 miles southwest of the site.

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)**

There are three regional/local plans addressing the multimodal circulation system that are relevant to this project:

- City of San Mateo General Plan
- City of San Mateo Bicycle Master Plan
- City of San Mateo Pedestrian Master Plan

Level of Service Analysis for General Plan Consistency

The City of San Mateo General Plan includes policies addressing potential project effects on intersection operations. The City maintains a level-of-service (LOS) standard of mid-level LOS D for all intersections. According to General Plan Policy C-2.7, a development project may be required to fund off-site circulation improvements which are needed as a result of project generated traffic if:

a) The level of service at the intersection drops below mid-level LOS D (average delay of more than 45 seconds) when the project is added, and
b) An intersection that operates below its level of service standard under the base year conditions experiences an increase in delay of four or more seconds, and
c) The needed improvement of the intersection(s) is not funded in the applicable five-year City Capital Improvement Program from the date of application approval.

However, in accordance with CEQA Guidelines Section 15064.3(a) level of service can no longer be used as a metric to identify traffic impacts under CEQA. Therefore, the project traffic impacts related

to the City's General Plan are considered less than significant, and the following analysis of level of service is presented for information purposes only.

Intersection Levels of Service

The traffic impact study analyzed Level of Service (LOS) at four key intersections in the vicinity of the project under five different scenarios: Existing Conditions; Baseline LOS Conditions, Baseline Plus Project Conditions; Cumulative Conditions; and Cumulative Plus Project Conditions. The resulting delay and LOS conditions at the intersections are shown on the following Tables 4.17-2 through 4.17-6.

Table 4.17-2: Existing LOS Conditions

No.	*Location*	*Control*	*Existing AM*		*Existing PM*	
			Delay	*LOS*	*Delay*	*LOS*
1	Campus Drive & Hillsdale Blvd.	Signal	11.4	B	9.3	A
2	SR 92 Westbound Ramps & Hillsdale Blvd.	Signal	10.9	B	15.5	B
3	SR 92 Eastbound Ramps & Hillsdale Blvd.	Signal	27.6	C	15.8	B
4	Alameda de Las Pulgas & Hillsdale Blvd.	**AWSC**	**95.3**	**F**	**86.4**	**F**

Notes: **Bold** lettering indicates an intersection that does not meet the City's minimum acceptable design level of service (LOS D for signalized intersections); AWSC = All-Way Stop Control; AM = weekday a.m. peak hour; PM = weekday p.m. peak hour; LOS = Level of Service; Delay reported in seconds per vehicle.
Source: Highway Capacity Manual 2010; Kittelson & Associates, 2020

The Baseline LOS Conditions scenario is defined as the conditions just prior to the completion of the proposed project, with the calculated LOS comprising volumes from existing traffic counts and traffic generated by other approved developments in the vicinity of the project site. The Baseline Conditions analysis assumes the reconfiguration of Campus Drive from a four-lane roadway to a three-lane roadway with Class II bike lanes on both sides.

Table 4.17-3: Baseline LOS Conditions

No.	*Location*	*Control*	*Baseline AM*		*Baseline PM*	
			Delay	*LOS*	*Delay*	*LOS*
1	Campus Drive & Hillsdale Blvd.	Signal	11.5	B	11.8	B
2	SR 92 Westbound Ramps & Hillsdale Blvd.	Signal	10.9	B	15.5	B
3	SR 92 Eastbound Ramps & Hillsdale Blvd.	Signal	27.6	C	15.7	B
4	Alameda de Las Pulgas & Hillsdale Blvd.	AWSC	**95.3**	**F**	**86.4**	**F**

Notes: **Bold** lettering indicates an intersection that does not meet the City's minimum acceptable design level of service (LOS D for signalized intersections); AWSC = All-Way Stop Control; AM = weekday a.m. peak hour; PM = weekday p.m. peak hour; LOS = Level of Service; Delay reported in seconds per vehicle.
Source: Highway Capacity Manual 2010; Kittelson & Associates, 2020

As shown in Table 4.17-3, under Baseline Conditions, the three signalized intersections would continue to operate at LOS C or better during both peak hours, and the all-way stop controlled intersection at Alameda de Las Pulgas and Hillsdale Boulevard would continue to operate at LOS F during both peak hours.

Table 4.17-4: Baseline Plus Project Conditions						
No.	***Location***	***Scenario***	***Weekday AM***		***Weekday PM***	
			Delay	***LOS***	***Delay***	***LOS***
1	Campus Drive & Hillsdale Blvd.	No Project	11.5	B	11.8	B
		Plus Project	12.6	B	11.1	B
2	SR 92 Westbound Ramps & Hillsdale Blvd.	No Project	10.9	B	15.5	B
		Plus Project	10.7	B	15.0	B
3	SR 92 Eastbound Ramps & Hillsdale Blvd.	No Project	27.6	C	15.7	B
		Plus Project	28.1	C	20.9	C
4	Alameda de Las Pulgas & Hillsdale Blvd.[1]	No Project	**95.3**	**F**	**86.4**	**F**
		Plus Project	**95.9**	**F**	**80.9**	**F**

Notes: **Bold** lettering indicates an intersection that does not meet the City's minimum acceptable design level of service (LOS D for Signalized intersections); No. = intersection number; LOS = Level of Service; Delay reported in seconds per vehicle;
1. This intersection is an all-way stop-controlled intersection.
Source: Highway Capacity Manual 2010; Kittelson & Associates, 2020

As shown in Table 4.17-4, under Baseline Plus Project Conditions, the three signalized intersections would continue to operate at LOS C or better during the AM and PM peak hours, and the all-way stop-controlled intersection at Alameda de Las Pulgas and Hillsdale Boulevard would continue to operate at LOS F during the both peak hours. The proposed project would not cause any intersection to exceed level of service standard and no intersection modifications would be required.

Table 4.17-5: Cumulative Conditions						
No.	***Location***	***Control***	***Cumulative AM***		***Cumulative PM***	
			Delay	***LOS***	***Delay***	***LOS***
1	Campus Drive & Hillsdale Blvd.	Signal	13.3	B	14.3	B
2	SR 92 Westbound Ramps & Hillsdale Blvd.	Signal	13.2	B	**60.9**	**E**
3	SR 92 Eastbound Ramps & Hillsdale Blvd.	Signal	36.8	D	32.7	C
4	Alameda de Las Pulgas & Hillsdale Blvd.	Signal	17.6	B	18.2	B

Note: **Bold** lettering indicates an intersection that does not meet the City's minimum acceptable design level of service (LOS D for Signalized intersections); No = intersection number; LOS = Level of Service; Delay reported in seconds per vehicle.
Source: Highway Capacity Manual 2010; Kittelson & Associates, 2020.

As shown in Table 4.17-5, under Cumulative Conditions, all study intersections would be signalized. Conversion of Alameda de Las Pulgas and Hillsdale Boulevard to a signalized intersection would reduce delay and improve operations at this location from LOS F under Existing and Baseline conditions to LOS B under Cumulative Conditions. Three of the study intersections would operate at LOS D or better, and one study intersection, SR 92 Westbound Ramps and Hillsdale Boulevard, would operate at LOS E during the PM peak hour.

Table 4.17-6: Cumulative Plus Project Conditions						
No.	***Location***	***Scenario***	***Weekday AM***		***Weekday PM***	
			Delay	***LOS***	***Delay***	***LOS***
1	Campus Drive & Hillsdale Blvd.	No Project	13.3	B	14.3	B
		Plus Project	12.9	B	13.7	B
2	SR 92 Westbound Ramps & Hillsdale Blvd.	No Project	13.2	B	**60.9**	**E**
		Plus Project	13.3	B	**57.9**	**E**

3	SR 92 Eastbound Ramps & Hillsdale Blvd.	No Project	36.8	D	32.7	C
		Plus Project	37.5	D	38.8	D
4	Alameda de Las Pulgas & Hillsdale Blvd.	AWSC	17.6	B	18.2	B
			17.8	B	18.1	B

Note: **Bold** lettering indicates an intersection that does not meet the City's minimum acceptable design level of service (LOS D for Signalized intersections); All intersections are signalized; No = intersection number; Delay presented in seconds per vehicle; LOS = level of service.
Source: Highway Capacity Manual 2010; Kittelson & Associates, 2020.

As shown in Table 4.17-6, three study intersections that would operate at LOS D or better under Cumulative Conditions would continue to operate at LOS D or better under Cumulative plus Project conditions. The SR 92 Westbound Ramps and Hillsdale Boulevard intersection would operate at LOS E under Cumulative Conditions during the PM peak hour and would continue to operate at LOS E during the PM peak hour under Cumulative plus Project Conditions. The proposed project would not cause any of the study intersections to exceed the level of service standard, and no intersection modifications would be required.

95th Percentile Queue Analysis

In addition to the operations analysis, *Kittelson* also reviewed the changes in 95th percentile queue lengths for the study intersections under Existing, Baseline, Baseline Plus Project, Cumulative, and Cumulative Plus Project conditions. Queue lengths are typically evaluated as part of the network-level or design-related considerations (i.e., to gauge interaction between nearby intersections). The 95th percentile queue lengths are reported to provide an appropriate storage for all but the worst 5% of traffic scenarios, and are presented for informational purposes only. There are no impact criteria available to evaluate queue length.

The results of the analysis concluded that under Baseline Plus Project conditions, the proposed project would change queue lengths by one or two vehicles on some turning movements. Under Cumulative Plus Project conditions, the proposed project would change queue lengths by one or two vehicles on some turning movements.

Conclusion

The results of the LOS analysis conducted by *Kittelson* for all scenarios indicated that the proposed project would not cause any study intersections to exceed the level of service standard as specified in the City's General Plan and Interim TIA Guidelines. **(Less than Significant Impact)**

Pedestrian Facilities

As mentioned previously, the existing network of sidewalks and crosswalks in the project vicinity has good connectivity and provides pedestrians with safe access to major streets and nearby commercial establishments.

Outside of trips to and from local transit stops, the project is expected to generate some pedestrian and bicycle traffic to the nearby commercial center and schools. The Laurelwood Shopping Center and various commercial businesses are located approximately ½-mile south of the site, at the intersection of Campus Drive and W. Hillsdale Boulevard. The College of San Mateo is located approximately 1,000 feet west of the project site, across SR 92. Hillsdale High School is located

approximately 1.5 miles east of the site, Meadow Heights Elementary School is approximately 1.6 miles northeast of the site, and Abbott Middle School is approximately 2.0 miles southeast of the site.

The project includes pedestrian pathways that would link the proposed development to the surrounding neighborhood. Approximately 2.2 acres of the site is dedicated to open space with 1.2 miles of paths and trails. Two pedestrian pathways (i.e. loops) are proposed within the northern parcel and one pedestrian pathway is proposed within the southern parcel to provide circulation and access to the proposed activity and fitness centers on the site. Wayfinding signage would be provided to direct people to the on-site amenities. The project proposes detached sidewalks along the streets fronting the project site. Detached sidewalks provide barriers between pedestrians and roadway traffic and would improve pedestrian safety and comfort levels. Therefore, the project would be in conformance with the Pedestrian Master Plan. **(Less than Significant Impact)**

Bicycle Facilities

Per City requirements, the project is required to provide 31 short-term and 320 long-term bicycle parking spaces for the proposed residential uses. The project proposes 33 short-term bicycle parking spaces and 432 long-term bicycle parking spaces. Overall, the project the meets City requirements for on-site bicycle parking. Bicyclists would access the site from the proposed Class II bike lanes on Campus Drive. Therefore, the project would not conflict with the adopted Bicycle Master Plan or interfere with any other programs, plans, policies, or ordinances addressing bicycle facilities. **(Less than Significant Impact)**

Transit Facilities

As discussed above, the project site has three SamTrans bus routes and a Caltrain shuttle stop nearby. The shuttle stops are adjacent to or within walking distance of the project site. The SamTrans Route 250 bus stop is approximately 0.7 miles from the site and the Route 251 and 256 stops are approximately 1.3 miles from the site. Continuous pedestrian facilities connect the project site to the various bus and shuttle stops. The project is anticipated to generate additional transit ridership on the buses, the Caltrain shuttles, and Caltrain. It is expected that the Caltrain electrification project would accommodate the potential increase in transit ridership generated by the project. Additionally, the project could increase BART ridership, as the Millbrae Station is located within driving distance of the site. The anticipated minor increase in BART ridership due to the project would not inhibit the provision of BART service to the area or result in any need for expansion or construction of new facilities which could result in secondary environmental impacts. **(Less than Significant Impact)**

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

The City of San Mateo adopted its VMT policy on August 17, 2020, which established methodology to evaluate transportation impacts based on VMT to comply with Senate Bill 743 requirements. As described previously, the VMT policy was adopted after the project's preliminary application under SB 330 was filed, thus the project is subject to the OPR's Technical Advisory. The transportation impact analysis prepared for the project is intended to determine whether the proposed project would have transportation impacts as defined by the City of San Mateo's Interim TIA Guidelines. The

Interim TIA Guidelines, adopted in conformance with OPR's Technical Advisory, specifically address the requirements of California Senate Bill (SB) 743 which mandated specific types of CEQA analysis of land use development and transportation projects effective July 1, 2020. The quantitative methodology, significance thresholds, and mitigation measures for conducting transportation analysis are based on VMT metrics.

Screening Criteria

In accordance with the OPR's Technical Advisory, a project requires a detailed VMT analysis unless it meets at least one of the City's five screening criteria:

1. Small Projects
2. Affordable Housing
3. Local-Serving Retail and Public Services
4. High-Quality Transit Area
5. Project Located in Low VMT Areas

The proposed project does not meet any of the City's screening criteria and is therefore required to prepare a detailed VMT analysis.

Thresholds of Significance

For projects which do not meet the screening criteria; the following threshold is used to assess a significant impact related to VMT, consistent with the OPR's Technical Advisory. For residential projects, the project's impact would be considered significant if it would:

- Generate VMT per Capita greater than 15 percent below the existing San Mateo County average of 13.1 VMT per Capita.

VMT Impacts

According to the project's traffic impact analysis, the project is located in an area with VMT per Capita of 23.9. San Mateo County has a regional average of 15.5 VMT per Capita with an impact threshold of 13.1 VMT per Capita for residential uses. The threshold of 13.1 VMT per capita represents a figure equal to 15% below the County's regional average of 15.5 VMT per capita. However, according to Section E Redevelopment Projects (Page 17) of the OPR's Technical Advisory, *"When a project replaces existing VMT-generating land uses and the project leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact."* Since the proposed project is a redevelopment project that would replace the existing office uses (totaling approximately 224,844 square feet) with 290 new residential units, the total VMT for existing and proposed uses was calculated to determine whether there is a net decrease or increase in the overall VMT. The total VMT calculations are presented in Table 4.17-7.

Table 4.17-7: Total VMT Calculations for Existing and Proposed Uses				
Site Conditions	***Site (Characteristics)***	***No. of Employees/ Residents***	***Existing VMT per Employee or VMT per Capita***	***Total VMT Generated by the Site***
Existing Office Use	224,844 (73.3% occupancy rate)[1]	1,320 employees[2]	19.5	25,740
Proposed Residential Use	290 Units (906 Bedrooms)	906 residents[3]	23.9	21,655
Net VMT Change (Proposed Residential Use – Existing Office Use)				-4,085
Source: Kittelson & Associates, 2020. Notes: 1. Assumes an average occupancy rate of 73.3% over the most recent three-year period. Occupancy data provided by City staff via email, dated July 24, 2020. 2. Assumes an average of 125 square feet per employee based on data obtained from Gensler Workplace Standards Benchmarking (March 6, 2012) for the technology, finance, and biotech and science fields. https://www.gsa.gov/cdnstatic/Workplace_Standards_Benchmark.pdf. 3. Assumes one person per bedroom.				

As shown in Table 4.17-7, the project would result in a net decrease in VMT. The proposed residential use would generate 4,085 fewer daily vehicle miles traveled than the existing office buildings. Based on the significance threshold contained in the OPR's Technical Advisory, stated above, the proposed project would result in a less than significant impact with respect to VMT and no further analysis or mitigations are required. **(Less than Significant Impact)**

Transportation Demand Management

Transportation Demand Management (TDM) is a combination of services, incentives, facilities, and actions that reduce single-occupant vehicle trips to help relieve traffic congestion, parking demand, and air pollution. The purpose of a TDM Plan is to propose trip reduction strategies with the goal of reducing overall vehicular trip making activity in the area. The project would implement a TDM Plan to encourage sustainable, automobile-alternative modes of transportation and reduce vehicle trips to and from the site. The TDM Plan will be provided as part of the project's entitlement process, as mentioned in Section 3.2.7.

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)**

The project proposes two driveways on Campus Drive for the northern portion, and two driveways on Campus Drive for the southern portion. No sight distance or line-of-sight issues have been identified for these driveways, which provide the project's principal points of vehicle access to the existing public street system. The streets and driveways internal to the north and south portions of the project site have been designed to comply with City standards for minimum width and turning radii, and the parking spaces conform to the required dimensions. The proposed project would not substantially increase hazards on-site due to a design feature, nor would the project be incompatible with the surrounding office and residential land uses. The project would be subject to the City's Site Plan and Architectural Review process for additional review of the adequacy of circulation patterns.

For these reasons, the proposed project would not create or increase on-site hazards. **(Less Than Significant Impact)**

Impact TRN-4: The project would not result in inadequate emergency access. **(No Impact)**

Emergency vehicle access would be provided via Campus Drive, which runs adjacent to both the north and south portions of the project site. In addition, the project proposes to maintain the existing EVA access that connects the roundabout on Campus Drive to 26th Avenue, northeast of the site. The project will improve the existing EVA access road with a rolled curb and gutter to replace the existing curb and gutter on the north side to provide a drivable sidewalk for emergency vehicles. All driveway and drive aisles are at least 20 feet wide, which complies with the City's requirements for emergency vehicle access. Therefore, emergency access would not be inhibited by the proposed project. **(No Impact)**

4.18 TRIBAL CULTURAL RESOURCES

4.18.1 Environmental Setting

4.18.1.1 *Regulatory Framework*

Federal

Senate Bill 18

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

State

Assembly Bill 52

Assembly Bill (AB) 52, effective as of July 2015, established a new category of resources for consideration by public agencies when approving discretionary projects under CEQA, 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 when it is concluded that mutual agreement cannot be reached.

Under AB 52, a 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[77]
    - 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.

[77] See Public Resources Code section 5024.1. The State Historical Resources Commission oversees the administration of the CRHR and is a nine-member state review board that is appointed by the Governor, with responsibilities for the identification, registration, and preservation of California's cultural heritage. The CRHR "shall include historical resources determined by the commission, according adopted procedures, to be significant and to meet the criteria in subdivision (c) (Public Resources Code, Section 5024.1 (a)(b)).

Local

City of San Mateo 2030 General Plan

The City of San Mateo General Plan contains the following policies pertaining to tribal cultural resources which are applicable to the project:

Policies	Description
C/OS 7.1	Preserve, to the maximum extent feasible, archaeological sites with significant cultural, historical, or sociological merit.
C/OS 8.5	Foster public awareness and appreciation of the City's historic, architectural, and archaeological resources.

4.18.1.2 *Existing Conditions*

The City has been mapped for archaeological sensitivity and is divided into three sensitivity zones, based on documented archaeological sites (as of 1980). The high sensitivity zone includes recorded sites, primarily shell mounds and near creeks, and the immediately adjacent areas which are favorable sites. The medium sensitivity zone includes areas surrounding the high sensitivity areas and other locales where, while no sites are recorded, the settings are similar to those where recorded sites do occur. The majority of the City (including the project site) is in a low sensitivity zone wherein archaeological resources are not generally expected but may occur.

In accordance with the provisions of AB 52, the NAHC was contacted for a search of the Sacred Lands File (Busby 2020a). The review was negative (Fonseca 2020). Letters and emails soliciting additional information were sent to the following five Native American individuals/groups recommended by the NAHC on June 5, 2020:

- Irene Zwierlein, Chairperson, Amah Mutsun Tribal Band of Mission San Juan Bautista, Woodside;
- Tony Cerda, Chairperson, Costanoan Rumsen Carmel Tribe, Pomona;
- Ann Marie Sayers, Chairperson, Indian Canyon Mutsun Band of Costanoan, Hollister;
- Monica Arellano, Muwekma Ohlone Indian Tribe of the San Francisco Bay Area, Castro Valley;
- Andrew Galvan, The Ohlone Indian Tribe, Fremont.

One response from The Ohlone Tribe was received via email. Mr. Galvan, representing the Ohlone Tribe, had no concerns due to previous development and with the assumption that *Basin Research Associates'* recommendation(s) regarding unexpected discoveries during construction are followed (see Section 4.5 Cultural Resources). No other agencies, departments or local historical societies were contacted.

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)**

The cultural resources assessment prepared for the site found that there are no historic or prehistoric archaeological sites within or adjacent to the project site. No Native American villages, traditional use areas, contemporary use areas or other features of significance have been identified in or adjacent to the project site. Thus, the project site has a low sensitivity for historic and prehistoric archaeological resources. Development of the proposed project would therefore 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)**

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)**

No formal consultation requests by Native American tribes were received pursuant to AB 52 for the proposed project. Although tribal cultural resources or archaeological resources are not anticipated to be discovered during project construction, the possibility remains that as-yet undiscovered resources are unearthed during grading, excavation, or other site disturbances. Implementation of the mitigation measures described previously (MM CUL-2 and MM CUL-3) would protect the resources by suspending work in the area of the discovery until an assessment of their eligibility for the NRHP or CRHR is completed and an archaeological research design and work/treatment plan is prepared (if necessary); and would allow for timely identification, analysis, and documentation of any human remains, should they be discovered. By applying these measures, the project would not result in a substantial adverse change in the significant of a tribal cultural resource **(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

Assembly Bill 939

Assembly Bill 939, signed in 1989, established the California Integrated Waste Management Board (CIWMB; now the California Department of Resources Recycling and Recovery [CalRecycle]) and required all California counties to prepare integrated waste management plans. AB 939 also required all municipalities to divert 50 percent of the waste stream by the year 2000.

California Green Building Standards Code

In January 2010, the State of California adopted the California Green Building Standards Code, establishing mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include the following mandatory set of measures, as well as more rigorous voluntary guidelines, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent;
- Reducing wastewater by 20 percent;
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris; and
- Providing readily accessible areas for recycling by occupants.

Local

City of San Mateo 2030 General Plan

Applicable San Mateo General Plan policies related to utilities and service systems include, but are not limited to, the following listed below.

Policies	Description
LU 4.4	Seek to ensure a safe and predictable water system for existing and future development by taking the following actions: 1. As a high priority, work with California Water Company and Estero Municipal Improvement District and adjacent jurisdictions to develop supplemental water sources and conservation efforts. 2. Strongly encourage water conservation by implementing pro-active water conservation methods, including requiring all new development to install low volume flush toilets, low-flow shower heads, and utilize drip irrigation while promoting high-efficiency washing machines and establishing an education program to improve water conservation practices. 3. Investigate the feasibility of developing reclaimed water facilities or ground water or treating stormwater runoff that will enable reuse of water for irrigation purposes, freeing comparable potable water supplies for other uses.

Policies	Description
LU 4.7	Provide a sewer system which safely and efficiently conveys sewage to the wastewater treatment plant. Implement the Sewer System Management Plan (SSMP) to ensure proper maintenance, operations and management all parts of the wastewater collection system.
LU 4.16	Seek to ensure adequate gas, electric, and communication system to serve existing and future needs while minimizing impacts and existing and future residents by taking the following actions: 1. Underground electrical and communication transmission and distribution lines in residential and commercial areas as funds permit. 2. Require all new developments to underground lines and provide underground connections when feasible. 3. Balance the need for cellular coverage with the desire to minimize visual impacts of cellular facilities, antennas, and equipment shelters.
LU 4.28	Seek to ensure that the California Water Service Company and the Estero Municipal Improvement District provide and maintain a water supply and distribution system which provides an adequate static pressure to deliver a minimum fire hydrant flow of 2,500 gallons per minute to all areas of the City, except where a lesser flow is acceptable as determined by the Fire Chief. Ensure that new development does not demand a fire flow in excess of that available.
LU 4.31	Continue to support programs to reduce solid waste materials in landfill areas in accordance with State requirements.
LU 4.32	Support programs to recycle solid waste in compliance with State requirements. Require provisions for onsite recycling for all new development.
LU 8.5	Implement actions to achieve Goal 8e which states: Reduce citywide gross water consumption per capita to 102 gallons/day. Reduce the residential per capita to 70 gallons/day. Potential supportive actions include: 1. Increase costs for residential and commercial waste collection and use increased waste collection revenue to provide waste reduction incentives. 2. Mandate recycling. 3. Require modifications within existing buildings to accommodate recycling bins. 4. Require mandatory segregation of recyclables for all public (on-street, parks, public buildings) waste collection. 5. Set aggressive waste reduction goals for all new development. 6. Provide expanded waste reduction outreach and support for local businesses and residential customers. 7. Support backyard composting while maintaining public health safeguards.
LU 8.6	Increase measured waste diversion to 50 percent in 2020 and maximum diversion 90 percent by 2050 by mandating recycling, setting aggressive waste reduction goals for all new development and increasing costs for residential and commercial waste collection then using increased waste collection revenue to provide waste reduction incentives.
LU 8.7	Establish a partnership with California Water Service (CWS), Bay Area Water Supply Conservation Agency and other mid-peninsula cities to promote the water reduction strategies that are offered and to create an outreach program that will help inform residence and businesses of increase costs and the need for conservation efforts.

4.19.1.2 *Existing Conditions*

Water Service

The site is currently serviced by the California Water Service Company (Cal Water) and is located within Cal Water's Mid-Peninsula Water District. Cal Water purchases water from the San Francisco Public Utilities Commission (SFPUC) to meet the City's water demand. The demand from the Mid-Peninsula Water District as a whole was estimated to be 18,780 acre-feet per year in 2015 and forecasted to increase to 19,004 acre-feet per year in 2020.[78] The Urban Water Management Plan (UWMP) determined that the majority of water demand in the Mid-Peninsula Water District stems from single-family residences (52.7%), followed by commercial uses (20%) and multi-family residences (14.6%). Water in San Mateo comes primarily from the Sierra Nevada, but also includes treated water produced by SFPUC from local watersheds and facilities in Alameda and San Mateo Counties. The UWMP forecasts that water supplies will be available to meet the City's projected future water demands during normal and wet years until at least 2040.

The existing development on the project site consists of 224,844 square feet of office uses. Using water demand rates for a "General Office Building" land use, the existing development has a water demand of approximately 176,600 gallons per day (gpd).[79] Existing water lines located in Campus Drive are available to serve the project.

Sanitary Sewer/Wastewater Treatment

The City of San Mateo Department of Public Works (DPW) Clean Water Program (CWP) and Environmental Services Division provides oversight of the City's sanitary sewer collection system, including the San Mateo/Estero Municipal Improvement District Wastewater Treatment Plant (WWTP) serving more than 130,000 people, 240 miles of collection system mainlines, 6,032 manholes, and 27 pump stations. San Mateo's WWTP is a jointly owned facility. Ownership of the WWTP facility is shared between San Mateo and Foster City/Estero Municipal Improvement District, with ownership respectively split approximately 75 percent and 25 percent. The WWTP collects wastewater from these two facility owners, plus portions of Hillsborough, Belmont, Crystal Spring Sanitation District, and the County of San Mateo, for treatment and eventual discharge into the San Francisco Bay.

The WWTP currently treats approximately 11 million gallons per day (mgd) of average dry weather flow (ADWF), with this amount expected to increase with the increase in population within the service area.[80] The WWTP can treat up to 60 mgd per day through primary treatment and 40 mgd through secondary treatment. During heavy rains, the WWTP's treatment capacity is regularly exceeded. San Mateo has recently updated the collection system model to better estimate peak flows and to project flows through 2035. According to the 2014 model, the peak wet weather flow (PWWF) that would be conveyed to the plant in 2035 (assuming there is adequate conveyance), is

[78] City of San Mateo. *City of San Mateo 2030 General Plan EIR, Public Services p. 4.11-21*. 2010.
[79] California Emissions Estimator Model. Appendix D – Default Data Tables – Table 9.1 Water Use Rates. September 2016. Assumes 177,734 gallons per year per 1,000 sf for indoor water use and 108,934 gallons per year per 1,000 sf for outdoor water use.
[80] San Mateo Clean Water Program. *Wastewater Treatment Plant Nutrient Removal and Wet Weather Flow Management Upgrade and Expansion Project.* November 2017.

projected to be 98 mgd.[81] The City's Clean Water Program has initiated capacity improvement projects in its collection system to manage flows to the WWTP, reducing WWTP influent PWWF down to 78 mgd. In 2019, the CWP has started construction on the upgrade and expansion of the WWTP, which will be done in three phases over five years. The upgrade and expansion project consists of new liquids treatment process facilities, including a headworks, primary treatment, biological nutrient removal/membrane bioreactor process, biological and chemically enhanced high-rate wet weather treatment, and other plant upgrades, including odor control to serve the new facilities. These facilities will be designed to provide advanced treatment to 21 mgd and allow the plant to better handle heavy storm events up to 78 mgd.[82]

There are existing sanitary sewer mains in Campus Drive available to serve the project.

Storm Drainage

The City of San Mateo Public Works Department operates and maintains the storm drainage system in the City. Stormwater from the project site currently flows into the City's existing storm drains on Campus Drive. Runoff from the site is conveyed through the City's system of underground storm drainpipes until its release into the San Francisco Bay. As described in *Section 4.10 Hydrology and Water Quality*, the project site is located within the 19th Avenue Watershed minor drainage basin, which drains into the Marina Lagoon complex, where collected stormwater is then pumped into the San Francisco Bay. The watersheds of the Marina Lagoon complex are located in the southern two-thirds of San Mateo, covering ten square miles and originating in the western hills of San Mateo and Belmont. Peak storm flows from the western hills are controlled by three dams on Laurel Creek. The watershed is almost entirely urbanized with the exception of Sugarloaf Mountain (located approximately 0.75-mile southeast of the project site), and little increase in runoff due to future development is anticipated.[83] The City's storm drain system has sufficient capacity to accommodate storm drainage from the existing development.

Solid Waste

Solid waste collection and recycling services for residents and businesses in San Mateo are provided by Recology San Mateo County. Once collected, solid waste and recyclables are transported to the Shoreway Environmental Center for sorting. After the solid waste is collected and sorted at the San Carlos Transfer Station, non-recyclable waste is transported to the Corinda Los Trancos (Ox Mountain) Landfill, located in 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.[84] The remaining capacity at this facility is 22,180,000 cubic yards.

Assuming an average of 125 square feet per employee[85], the existing office uses contain 1,320 employees. It is estimated that employees in the City of San Mateo generate 7.6 pounds of waste per

[81] City of San Mateo. Final Environmental Impact Report, City of San Mateo Clean Water Program. April 2016.
[82] Clean Water Program. Wastewater Treatment Plant Nutrient Removal and Wet Weather Flow Management Upgrade and Expansion Project. March 27, 2020. https://cleanwaterprogramsanmateo.org/wwtp/.
[83] City of San Mateo. *General Plan Update Draft EIR.* July 2009.
[84] CalRecycle. Solid Waste Facility Permit – Corinda Los Trancos Landfill (Ox Mountain). April 12, 2017. https://www2.calrecycle.ca.gov/PublicNotices/Details/2078
[85] Kittelson. *Peninsula Heights Draft Transportation Analysis.* August 2020.

day.[86] Based on this metric, the existing office uses generate approximately 10,032 pounds of solid waste per day.

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)**

The project proposes to relocate segments of the storm drain main in Campus Drive and may make improvements to other utilities to allow for the proposed roadway diet and sidewalk relocation. As described below for each respective utility service, the proposed utility improvements/relocations would not result in significant environmental effects. The project will be subject to the following

[86] City of San Mateo. "Recycling, Compost, and Garbage." https://www.cityofsanmateo.org/2076/Recycling-Compost-and-Garbage. Accessed September 1, 2020.

condition of approval to ensure conformance with City requirements for the relocation of utility mains in the public right-of-way:

Condition of Approval:

- The applicant shall provide will-serve letters from the various utility companies including, but not limited to, domestic water, electric, gas, etc. to ensure adequate service can be provided for the proposed development.

  On the building permit plans for the superstructure, the applicant shall show required clearances between all existing utilities and the proposed relocated City Storm Main and green infrastructure (drainage appurtenances, street trees, etc.) on Campus Drive. If the project cannot meet required clearances between an existing utility and the proposed relocated City Storm Main and/or green infrastructure, the applicant shall submit documented approval from the agency with jurisdiction over said utility, or relocate the utility within the Public Right-of-Way as required by the agency at the applicant's cost, subject to review and approval by the City Engineer. (PUBLIC WORKS)

Water Facilities

The proposed project would rely on the existing water delivery system to supply water to the site. As discussed in Impact UTL-2, below, the project would incrementally increase the water demand in the City but would not require additional water supply other than what is currently allocated for the City by the Cal Water Mid-Peninsula District. The project proposes to construct eight-inch diameter lateral connections to the existing water mains in Campus Drive to provide domestic and fire water supply to the project. New fire hydrants would be installed on the northern and southern parcels. These fire hydrants would also connect to existing water mains in Campus Drive. Other relocation and/or construction of water facilities may be required by the proposed project due to the relocation of the existing sidewalk, installation of green infrastructure and relocation of segments of the storm drain main on Campus Drive. Lateral connections to existing water mains and improvements to existing water facilities, if required, shall be subject to review and approval by California Water Service and the Public Works Department, and would not result in significant environmental effects. **(Less than Significant Impact)**

Wastewater Treatment Facilities

Wastewater generated by the proposed project would be disposed of at the San Mateo WWTP. As discussed under Impact UTL-3, the San Mateo WWTP has adequate disposal capacity through 2030. No expansion or construction of wastewater treatment facilities would be required to accommodate the project. On-site sanitary sewer will consist of six-inch laterals, cleanouts, and manholes to serve each unit cluster and route flows through the site. Sanitary sewer from the proposed development will tie into the existing eight-inch diameter gravity sewer mains in the street. Lateral connections to existing sewer mains and minor improvements to existing sewer facilities, if required, shall be subject to review and approval by the Public Works Department, and would not cause significant environmental effects. **(Less than Significant Impact)**

Stormwater Drainage Facilities

On-site storm drainage would include six-inch diameter pipes from roof downspouts and minor area drains and 12-inch diameter pipes for conveyance to the City storm drain system. On-site storm drainage will also include biotreatment planters, Silva cells, catch basins, and manholes to treat and collect runoff prior to discharge into the existing 24- and 33-inch diameter storm drain main in Campus Drive. Stormwater from the 33-inch main discharges to Beresford Creek below the southern terminus of Campus Drive.

As described in Section 4.10 Hydrology and Water Quality, the project's stormwater treatment system would reduce the rate of stormwater runoff entering the City's storm drainage system. Because the project is anticipated to result in reduced runoff volumes compared to the existing development on the site, it is not expected to negatively impact the capacity of the existing public storm drain system. As described above, the project would require the relocation of segments of a storm drain main in Campus Drive, which shall be subject to review and approval by the Public Works Department, as reflected in the condition of approval below.

Condition of Approval:

- On the building permit plans for the superstructure, the applicant shall show required clearances between all existing utilities and the proposed relocated City Storm Main and green infrastructure (drainage appurtenances, street trees, etc.) on Campus Drive. If the project cannot meet required clearances between an existing utility and the proposed relocated City Storm Main and/or green infrastructure, the applicant shall submit documented approval from the agency with jurisdiction over said utility, or relocate the utility within the Public Right-of-Way as required by the agency at the applicant's cost, subject to review and approval by the City Engineer.

With implementation of the above condition of approval, the proposed relocation of the storm drain main in Campus Drive would not result in significant environmental effects. No other construction or relocation of storm drainage infrastructure is proposed which could result in significant environmental effects. **(Less than Significant Impact)**

Electric Power, Natural Gas, and Telecommunication Facilities

The project would connect to existing electric utility, natural gas, and telecommunication facilities within the project area. The project may require the relocation or construction of new electrical, natural gas, or telecommunication facilities. On-site electrical will tie into existing PG&E primaries located at the back of the sidewalk in Campus Drive and will incorporate on-site transformers for electrical distribution. Gas service will consist of one- to two-inch diameter gas laterals from the residential units to four-inch diameter gas mains located in the street. Connections to existing utility lines or relocation of existing lines would be subject to review and approval by the service provider (e.g. PG&E, etc) and the Public Works Department, and would not result in significant environmental effects. **(Less than Significant Impact)**

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

The proposed project falls below the 500-dwelling unit residential development threshold that would require preparation of a water supply assessment by a local provider, as specified in Senate Bill 610 and CEQA Guidelines Section 15155. Although the project would not require a water supply assessment to comprehensively analyze its water use impact, the project would reduce the demand for water use on the project site when compared to its current use. Using a water demand rate of 65,154 gallons per year per dwelling unit for indoor uses and 41,075 gallons per year per dwelling unit for outdoor uses, the proposed project would have a gross water demand of approximately 84,400 gallons per day (gpd).[87] When factoring in the water demand of the existing office buildings (see Section 4.19.1.2 Existing Conditions), the project would result in a net reduction in water demand of approximately 92,200 gpd.

The proposed project would reduce water use on-site and would not prevent Cal Water from meeting its customers' water demands. The proposed project would not require additional water supply other than what is currently allocated for the City by the Cal Water Mid-Peninsula District. The UWMP found that actual water demand for multi-family and single-family land uses in the Mid-Peninsula District's service area (the cities of San Mateo and San Carlos) was 1,861 acre-feet per year (or 606 million gallons per year) and 6,691 acre-feet per year (or 2.1 billion gallons per year), respectively, in the year 2015.[88] The water demand for multi-family uses is forecasted to increase to 2,807 acre-feet per year by 2025 and 3,007 acre-feet per year by 2030. The water demand for single-family uses is forecasted to increase to 9,393 acre-feet per year by 2025 and 9,324 acre-feet per year by 2030. The project would reduce water demand relative to the existing use of the site and would not exceed expected values for single-family or multi-family uses. The estimated water use on the project site will be minimal in comparison to the District's projected total demand, which is calculated based on historical growth rates for the last five and 20 years for San Carlos and San Mateo, respectively. The District's UWMP anticipates that the City will meet projected water demand through 2040 during normal year scenarios. Available water supply will be reduced during single and multiple drought years. Implementation of the Cal Water Service's water shortage contingency plan (and other conservation measures) will reduce the demand for water in the District during the years of drought. The development of alternative water supplies by Cal Water also ensures that there is not a water deficit. Finally, the proposed project would be required to comply with various City policies established to reduce water use in addition to the City's Green Building Codes, Water Conservation in Landscaping Ordinance, and Cal Water's Water Shortage Contingency Plan and water conservation measures. Adherence to these ordinances and measures would prevent excessive use of water and ensure the proposed project incorporates water saving measures into its building design.

Implementation of water conservation measures and adherence to applicable building codes would ensure the proposed project does not significantly impact water supplies in the Mid-Peninsula Water District. **(Less than Significant Impact)**

[87] California Emissions Estimator Model. Appendix D – Default Data Tables – Table 9.1 Water Use Rates. September 2016.
[88] California Water Service. *2015 Urban Water Management Plan – Mid-Peninsula District.* Table 4-1. June 2016.

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)**

As described in Section 4.19.1.2 Existing Conditions, the San Mateo WWTP currently can treat up to 60 mgd through primary treatment and 40 mgd through secondary treatment. During heavy rains, the WWTP's treatment capacity is regularly exceeded. According to an updated collection system model, the peak wet weather flow (PWWF) that would be conveyed to the plant in 2035 (assuming there is adequate conveyance), is projected to be 98 mgd, which exceeds existing treatment capacity.[89] The City's CWP has initiated capacity improvement projects in its collection system to manage flows to the WWTP, reducing WWTP influent PWWF down to 78 mgd. In 2019, the CWP has started construction on the upgrade and expansion of the WWTP, which will be done in three phases over five years. The upgraded facilities will be designed to provide advanced treatment to 21 mgd and allow the plant to better handle heavy storm events up to 78 mgd.[90]

The City performed a sewer analysis through the City's Sewer Model using the project's proposed wastewater generation. The analysis determined that the proposed project would have a low risk of an adverse impact to the sewer system and WWTP. Further, the project would be consistent with expected growth metrics for population and housing in the City that were used to analyze impacts from planned development until 2030 under the General Plan. The amount of wastewater generated on-site would not require the development or expansion of new or existing wastewater treatment facilities and would be adequately treated under the existing system. Therefore, the proposed project would not significantly impact the wastewater treatment capacity of the City of San Mateo. **(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)**

The proposed project includes 290 residential units, amounting to an increase in local population of 906 people. The City has established solid waste generation rates of approximately 3.9 pounds of waste per resident per day.[91] The project would generate a gross total of approximately 3,533 pounds of waste per day. This represents a net decrease of approximately 6,500 pounds per day relative to the existing office uses. The project would not interfere with the City's goals of increasing measured waste diversion to 50 percent in 2020 and maximum diversion to 90 percent by 2050, as set forth by General Plan Policy LU-8.6.

[89] City of San Mateo. Final Environmental Impact Report, City of San Mateo Clean Water Program. April 2016.
[90] Clean Water Program. Wastewater Treatment Plant Nutrient Removal and Wet Weather Flow Management Upgrade and Expansion Project. March 27, 2020. https://cleanwaterprogramsanmateo.org/wwtp/.
[91] City of San Mateo. Recycling, Compost, and Garbage. http://www.cityofsanmateo.org/index.aspx?NID=2076. Accessed May 21, 2020.

Solid waste from the City of San Mateo is disposed of at Ox Mountain Landfill in Half Moon Bay, which is expected to reach its permitted capacity in 2034.[92] The City implements programs to reduce solid waste materials in landfills, and in 2015 achieved a landfill diversion rate of approximately 73 percent.[93] The proposed residential project, which includes the provision of recycling services to residents, will not result in a substantial increase in waste landfilled at Ox Mountain Landfill, or be served by a landfill without sufficient capacity. **(Less than Significant Impact)**

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 project residents, large amounts of construction waste would be generated during construction and demolition activities. At least 50 percent of this construction waste will be recycled, in compliance with the City's Construction and Demolition Debris Ordinance (Section 7.33 of the San Mateo Municipal Code). 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)**

[92] CalRecycle website. https://www2.calrecycle.ca.gov/swfacilities/Directory/41-AA-0002/. Accessed May 21, 2020.
[93] City of San Mateo. *Recycling, Compost, and Garbage*. http://www.cityofsanmateo.org/index.aspx?NID=2076. Accessed May 21, 2020.

4.20 WILDFIRE

4.20.1 Environmental Setting

4.20.1.1 *Existing Conditions*

There are no wildland fire hazards in the City of San Mateo; however, to the west of the City within the City's Sphere of Influence there are undeveloped portions of the western hills that are considered wildland fire hazards. These areas are subject to wildland type fires due to existing vegetation, particularly chaparral, the steep slopes and the temperate climate with dry summer months.[94]

The project site is located east of SR 92 in San Mateo within a Local Responsibility Area (LRA) and is not mapped as a very high fire hazard severity zone.[95]

The San Mateo Community Emergency Response Team (CERT) is made up of San Mateo residents who are trained by the San Mateo Fire Department to take care of themselves and their community in the aftermath of a major disaster, when first responders are overwhelmed or unable to respond because of communication or transportation difficulties. The intention of this training is to give volunteers a higher level of basic skills in firefighting, search and rescue, emergency medical, and basic disaster preparedness.

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?	☐	☐	☐	☒

[94] San Mateo 2030 General Plan, Safety Element. October 2010.
[95] California Department of Forestry and Fire Protection. *San Mateo County: Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE*. November 2008.

	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?	☐	☐	☒	☐

Impact WF-1: The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. **(No Impact)**

The proposed project would not negatively impact the CERT program or any emergency response or evacuation plan. **(No Impact)**

Impact WF-2: The project would not, 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. **(Less than Significant Impact)**

Although not located within one, the project site is located in close proximity to an area mapped as a Very High Fire Hazard Severity Zone (VHFSZ) by the California Department of Forestry and Fire Protection. The boundary of the nearest VHFSV is within approximately ¼-mile of the project site, on the opposite (west) side of SR 92 and upslope from the northern portion of the site. Project residents could be exposed to smoke, ash, and other pollutants or respiratory hazards in the event of an uncontrolled wildfire within this VHFSZ. The applicant has made some concessions to increase the building construction type of some buildings bordering the WUI to type 7A construction. Type 7A construction (2019 California Building Code) establishes materials and construction methods for exterior wildfire exposure. This will increase buildings' resiliency should a wildfire event occur.

The San Mateo Fire Department's Station 27 is less than two miles from the VHFSZ and the project site and would be able to respond quickly to a wildfire in this location. The Department is also supported by Cal Fire, which has substantial resources for fighting wildfires. In addition, the project site, which is already developed with office uses, is located within Emergency Response District 27 of the CERT program, which could provide emergency services for project residents. **(Less than Significant Impact)**

Impact WF-3:	The project would not 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. **(No Impact)**

The project site, already developed with office uses, would continue to be accessed by existing roads and be served by existing utilities in the area. It would not require the installation or maintenance of any infrastructure that would exacerbate fire risk or result in temporary or ongoing impacts to the environment. **(No Impact)**

Impact WF-4:	The project would not 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. **(Less than Significant Impact)**

The project site, already developed with office uses, is located near lands classified as very high fire hazard severity zones; however, the site is separated from those lands by a State highway (SR 92), and the project would include appropriate grading design and construction of on-site drainage facilities that would reduce potential flooding, drainage, landslide and/or slope stability hazards resulting from a fire to a less than significant level. **(Less than Significant 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 of this Initial Study, the proposed project would not degrade the quality of the environment with implementation of the identified existing regulations, conditions of approval, and mitigation measures.

As discussed in Section 4.4 Biological Resources, the project would not impact sensitive habitats or species. The project would be required to comply with the city's tree replacement policy and mitigation measures to avoid abandonment of raptor and other protected migratory bird nests.

Construction activities may disturb and uncover subsurface cultural resources on-site. Implementation of the standard measures and mitigation measures identified in Section 4.5 Cultural

Resources would avoid or reduce impacts to cultural resources and tribal cultural resources to a less than significant level.

The project would be required to comply with the conditions of approval identified in Section 4.7 Geology and Soils and all applicable City regulatory programs related to unknown buried paleontological resources. Additionally, the project would be required to implement the mitigation measures set forth in Section 4.9 Hazards and Hazardous Materials to reduce potential impacts related to hazardous building materials (ACMs, LBPs, and PCBs) to a less than significant level.

As discussed in Section 4.10 Hydrology and Water Quality, the project would be required to implement conditions of approval in compliance with regional and local regulations to minimize potential construction and operational water quality impacts.

For the reasons described above, with implementation of conditions of approval, existing regulations, and mitigation measures, the project would not degrade the quality of the environment, substantially reduce wildlife habitat, cause a decline in wildlife population below self-sustaining levels, threaten to eliminate a plant or animal community, restrict the range of a rare or endangered plant or animal, or eliminate important examples of major periods of California history or prehistory. **(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." San Mateo is expected to continue to develop and grow through the year 2030, with the majority of new development consisting primarily of infill, reuse, or redevelopment. The community will continue to diversify with major increases in office and retail space and a substantial number of additional dwellings. The San Mateo 2030 General Plan contains growth projections that include increased employment intensification along the SR 92 corridor and redevelopment of underutilized sites.

The proposed development would result in temporary air quality, biological resource, hazardous materials, water quality, and noise impacts during construction. With the implementation of the identified conditions of approval, BMPs, mitigation measures, and consistency with adopted City policies, construction impacts would be mitigated to a less than significant level. Because the nature of the identified impacts are temporary, localized to the site, and would be mitigated, the proposed project would not have a cumulatively considerable impact on air quality, water quality, biological resources, and noise.

Criteria air pollutant and GHG emissions would contribute to regional and global emissions of such pollutants, therefore the BAAQMD thresholds used by the City of San Mateo were developed so that a project-level impact would also be a cumulatively considerable impact. The health risk assessment prepared for the project included an analysis of cumulative health risk impacts. Per BAAQMD guidance, the analysis included the effects of permitted stationary sources within 1,000 feet of the MEI, roadways with over 10,000 vehicle trips, and other major emissions sources such as railways. The emissions of these existing sources, in combination with project construction emissions, were calculated and compared to BAAQMD cumulative health risk thresholds, and it was determined that project construction in combination with cumulative emission sources in the area (would not result in an exceedance of BAAQMD cumulative-source thresholds. Therefore, the project would not result in a cumulative health risk impact.

As discussed in Section 4.8, GHG impacts are recognized as exclusively cumulative impacts, and the additive effect of project-related GHGs would not result in a reasonably foreseeable cumulatively considerable contribution to global climate change. As the project would not conflict any GHG reduction plans (local or regional), its cumulative contribution of GHG emissions would be less than significant and the project's cumulative GHG impacts would also be less than cumulatively considerable.

Implementation of the proposed project could result in the loss of up to 327 trees, including 145 Heritage Trees. All trees removed would be replaced in accordance with Chapter 27.71 of the Municipal Code, and existing Heritage Trees to remain would be protected in accordance with the conditions of approval described in Section 4.4 Biological Resources. Additionally, the project would implement mitigation measures to ensure nesting birds are not impacted from tree removal or construction disturbances. The project would have no long-term effect on the urban forest or the availability of trees as nesting and/or foraging habitat. Cumulative projects in the City would be required to implement similar conditions of approval and mitigation measures to reduce their individual impacts. Therefore, the project would not have a cumulatively considerable long-term impact on biological resources.

Earthmoving activities may result in the disturbance of subsurface prehistoric and historic resources on-site. The project would implement conditions of approval and mitigation measures discussed in Section 4.5 Cultural Resources to reduce impacts to undiscovered archaeological resources and human remains. In addition, as described in Section 4.7 Geology and Soils, the project would adhere to conditions of approval which would protect and preserve for study any paleontological resources accidentally discovered during construction. Cumulative projects in the City would be required to implement similar conditions of approval and mitigation measures to reduce their individual impacts. As a result, the proposed project would not have a cumulatively considerable impact on cultural resources or tribal cultural resources in the project area.

The project would result in temporary hazardous materials impacts during construction due to the removal of potentially hazardous building materials. The project would adhere to the mitigation measures described in Section 4.9 Hazards and Hazardous Materials to reduce hazardous materials impacts during construction to less than significant levels. Cumulative redevelopment projects in the City would be required to adhere to similar measures. With implementation of these measures, the project would not make a cumulatively considerable contribution to a hazardous materials impact.

As discussed in Section 4.17 Transportation, the project would result in a net reduction in VMT. Per the City's transportation policy, redevelopment projects which reduce VMT would result in less than significant impacts with respect to VMT. Thus, the project would not result in a cumulatively considerable contribution to VMT impacts within the project TAZ.

Operational impacts from the proposed project would be reduce by adherence to local, state, and federal regulations. The proposed project would comply with all California Codes, General Plan policies, municipal code, and State Water Board regulations. The project would not result in cumulatively considerable operational impacts by adhering to established policies and regulations. **(Less than Significant Impact with Mitigation Incorporated)**

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 air quality, hazardous materials, and noise. Implementation of General Plan policies, conditions of approval, and mitigation measures would, however, 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

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

Association of Bay Area Governments and Metropolitan Transportation Commission. "Project Mapper." http://projectmapper.planbayarea.org/.

Association of Environmental Professionals, 2016. Beyond 2020 and Newhall: A Field Guide to New CEQA Greenhouse Gas Thresholds and Climate Action Plan Targets for California. April 2016.

Bay Area Air Quality Management District. California Environmental Quality Act Air Quality Guidelines. May 2017.

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

Basin Research Associates. Cultural Resources Assessment Report – Residential High Density Housing, Peninsula. July 21, 2020.

Heights, Campus Drive, City of San Mateo, San Mateo County

C/CAG of San Mateo County. Congestion Management. 2017.

CalEPA. Cortese List Data Resources. Accessed October 11, 2019. https://calepa.ca.gov/sitecleanup/corteselist.

California Air Resources Board. Overview: Diesel Exhaust and Health. Accessed April 22, 2020. https://www.arb.ca.gov/research/diesel/diesel-health.htm.

California Air Resources Board. The Advanced Clean Cars Program. Accessed April 22, 2020. https://www.arb.ca.gov/msprog/acc/acc.htm.

California Building Standards Commission. California Building Standards Code. Accessed January 21, 2020. https://www.dgs.ca.gov/BSC/Codes#@ViewBag.JumpTo.

California Department of Conservation, Division of Land Resource Protection. San Mateo County Williamson Act FY 2006/2007. 2012.

California Department of Conservation. Farmland Mapping and Monitoring Program. Accessed April 22, 2020. http://www.conservation.ca.gov/dlrp/fmmp/Pages/Index.aspx.

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

California Department of Finance. E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark. Accessed May 20, 2020. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/.

California Department of Forestry and Fire Protection. Fire and Resource Assessment Program. Accessed April 22, 2020. http://frap.fire.ca.gov/.

California Department of Forestry and Fire Protection. Fire Hazard Severity Zone Viewer. Accessed June 1, 2020. https://egis.fire.ca.gov/FHSZ/.

California Department of Forestry and Fire Protection. San Mateo County Fire Hazard Safety Zone Map. November 2007.

California Department of Forestry and Fire Protection. San Mateo County: Very High Fire Hazard Severity Zones in LRA as Recommended by CAL FIRE. November 2008.

California Department of Housing and Community Development. Regional Housing Needs Allocation and Housing Elements. Accessed April 23, 2020. http://hcd.ca.gov/community-development/housing-element/index.shtml.

California Department of Tax and Fee Administration. Net Taxable Gasoline Gallons. Accessed April 22, 2020. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.

California Department of Transportation. California Scenic Highway Mapping System. Accessed April 22, 2020. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

California Department of Water Resources. Basin Prioritization. Accessed June 2, 2020. https://water.ca.gov/Programs/Groundwater-Management/Basin-Prioritization.

California Emissions Estimator Model. Appendix D – Default Data Tables – Table 9.1 Water Use Rates. September 2016.

California Emissions Estimator Model. Appendix D – Default Data Tables – Table 10.1 Solid Waste Disposal Rates. September 2016.

California Energy Commission (CEC). 2019 Building Energy Efficiency Standards. Accessed January 21, 2020. https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency.

California Energy Commission. Natural Gas Consumption by County. Accessed April 22, 2020. http://ecdms.energy.ca.gov/gasbycounty.aspx.

California Energy Commission. Renewables Portfolio Standard – Verification and Compliance. Accessed June 18, 2020. https://www.energy.ca.gov/programs-and-topics/programs/renewables-portfolio-standard/renewables-portfolio-standard

California Energy Commission. Energy Consumption Data Management System. Electricity Consumption by County. Accessed April 22, 2020. http://ecdms.energy.ca.gov/elecbycounty.aspx.

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

California Geological Survey. Earthquake Zones of Required Investigation. Accessed May 27, 2020. https://maps.conservation.ca.gov/cgs/EQZApp/app/.

California Natural Resources Agency. San Mateo County Important Farmland 2018. September 2019. Accessed May 15, 2020. https://www.conservation.ca.gov/dlrp/fmmp/Pages/SanMateo.aspx

California Office of Historic Preservation. CEQA Guidelines Section 15064.5(a)(3) and California Office of Historic Preservation Technical Assistance Series #6. March 14, 2006.

California Regional Water Quality Control Board San Francisco Bay Region. Administrative Liability for City of San Mateo, San Mateo County. Order No. R2-2009-0015. 2009.

California Water Service. 2015 Urban Water Management Plan – Mid-Peninsula District. June 2016.

CalRecycle website. Accessed May 21, 2020. https://www2.calrecycle.ca.gov/swfacilities/Directory/41-AA-0002/

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

City of San Mateo. 2020 Climate Action Plan. April 2020. https://www.cityofsanmateo.org/DocumentCenter/View/80652/2020-Climate-Action-Plan?bidId=

City of San Mateo. 2030 General Plan Draft Environmental Impact Report. July 2009.

City of San Mateo. 2030 General Plan – Land Use Element. April 18, 2011.

City of San Mateo. Estero Municipal Improvement District. Wastewater Treatment Plant. 20-year Master Plan (2035). August 2013.

City of San Mateo. Historic Resources. March 20, 2017. Accessed June 22, 2020. https://www.cityofsanmateo.org/DocumentCenter/View/64534/Historic-Resources-Info-Handout

City of San Mateo. PCB Screening Assessment Form. Accessed June 2, 2020. https://www.cityofsanmateo.org/DocumentCenter/View/69361/PCBs-Screening-Assessment-Form?bidId=.

City of San Mateo. Recycling, Compost, and Garbage. Accessed May 21, 2020. http://www.cityofsanmateo.org/index.aspx?NID=2076.

City/County Association of Governments of San Mateo County, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. November 2012.

County of San Mateo – Office of Sustainability. San Mateo Plain Subbasin Assessment – Groundwater Levels. Accessed May 27, 2020. https://www.smcsustainability.org/energy-water/groundwater/

ECORP Consulting, Inc. Peninsula Heights Greenhouse Gas Emissions Assessment. August 2020.

Education Data Partnership. http://www.ed-data.org/district/San-Mateo/San-Mateo--Foster-City. Accessed July 2, 2020.

ENGEO, Inc. Peninsula Heights, San Mateo, CA Geotechnical Exploration. April 23, 2020.

Federal Emergency Management Agency. Flood Insurance Rate Map, Community Panel No. 06081C0162FF. Map. Effective Date: July 16, 2015.

Geosyntec Consultants, Technical Memorandum, Current State-of-Practice for PCBs-Containing Building Materials in California. May 9, 2017.

Illingworth & Rodkin, Inc. Peninsula Height Noise and Vibration Assessment, San Mateo, California. September 17, 2020.

Kittelson & Associates, Inc. Peninsula Heights Development TIA. November 2020.

Peninsula Clean Energy. Frequently Asked Questions. Accessed April 22, 2020. https://www.peninsulacleanenergy.com/resources/frequently-asked-questions/.

Peninsula Clean Energy. "Energy Choices." Accessed April 22, 2020. https://www.peninsulacleanenergy.com/our-power/energy-choices/.

Public Law 110–140—December 19, 2007. Energy Independence & Security Act of 2007. Accessed April 22, 2020. http://www.gpo.gov/fdsys/pkg/PLAW-110publ140/pdf/PLAW-110publ140.pdf.

Ramboll. Draft CEQA Air Quality and Health Risk Assessment for the Peninsula Heights Townhouses Project, San Mateo, California. August 28, 2020.

San Francisco Bay Regional Water Quality Control Board. Municipal Regional Stormwater Permit, Provision C.12. November 19, 2015.

San Mateo – Foster City School Board. Projected Enrollments 2017-18 to 2024-25. March 8, 2018.

San Mateo 2030 General Plan, Safety Element. October 2010.

San Mateo Clean Water Program. Wastewater Treatment Plant Nutrient Removal and Wet Weather Flow Management Upgrade and Expansion Project. November 2017.

San Mateo County. General Plan. November 1986.

SchoolVision Software. San Mateo-Foster City School District SchoolFinder. Accessed May 14, 2020. http://www.schfinder.com/SMFC/

Targus Associates, LLC. Peninsula Office Park Phase I Environmental Site Assessment. May 22, 2018.

Traverso Tree Service. Tree preservation Report for Peninsula Heights, 2655, 2755, 2800 & 2988 Campus Drive, San Mateo. February 6, 2020; revised May 21, 2020.

United States Department of Energy. Energy Independence & Security Act of 2007. Accessed April 22, 2020. http://www.afdc.energy.gov/laws/eisa.

United States Department of the Interior. Memorandum M-37050. The Migratory Bird Treaty Act Does Not Prohibit Incidental Take. Accessed April 22, 2020. https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf.

United States Energy Information Administration. State Profile and Energy Estimates, 2017. Accessed April 22, 2020. https://www.eia.gov/state/?sid=CA#tabs-2.

United States Environmental Protection Agency. The 2019 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975. March 2020. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P100YVFS.pdf

SECTION 6.0 LEAD AGENCY AND CONSULTANTS

6.1 LEAD AGENCY

City of San Mateo - Planning Division

Aaron Aknin, AICP, Interim Planning Manager
Rendell Bustos, Acting Senior Planner

6.2 CONSULTANTS

David J. Powers & Associates, Inc.
Environmental Consultants and Planners

Akoni Danielsen, Principal Project Manager
Mike Campbell, AICP, Project Manager
Danny DeBrito, Associate Project Manager
Matthew Moore, Researcher
Ryan Osako, Graphic Artist

ECORP Consulting, Inc.
Greenhouse Gas Consultants

Ramboll US Corporation
Air Quality Consultants

Traverso Tree Service
Arborists

ENGEO, Inc.
Geotechnical Consultants

Kittelson and Associates
Transportation Consultants

Targus Environmental, Inc.
Hazardous Materials Consultants

Basin Research Associates
Archaeological Resources Consultants

Illingworth & Rodkin, Inc.
Noise and Vibration Consultants