3.8 HYDROLOGY AND WATER QUALITY

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b)	Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there should be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☒	☐	☐
d)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e)	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f)	Otherwise substantially degrade water quality?	☐	☐	☒	☐

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
g)	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h)	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i)	Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j)	Inundation of seiche, tsunami, or mudflow?	☐	☐	☒	☐

3.8.1 Environmental Setting

The following paragraphs describe the hydrologic and water quality setting within Northern San Mateo County and the City of Daly City.

Climate and Precipitation

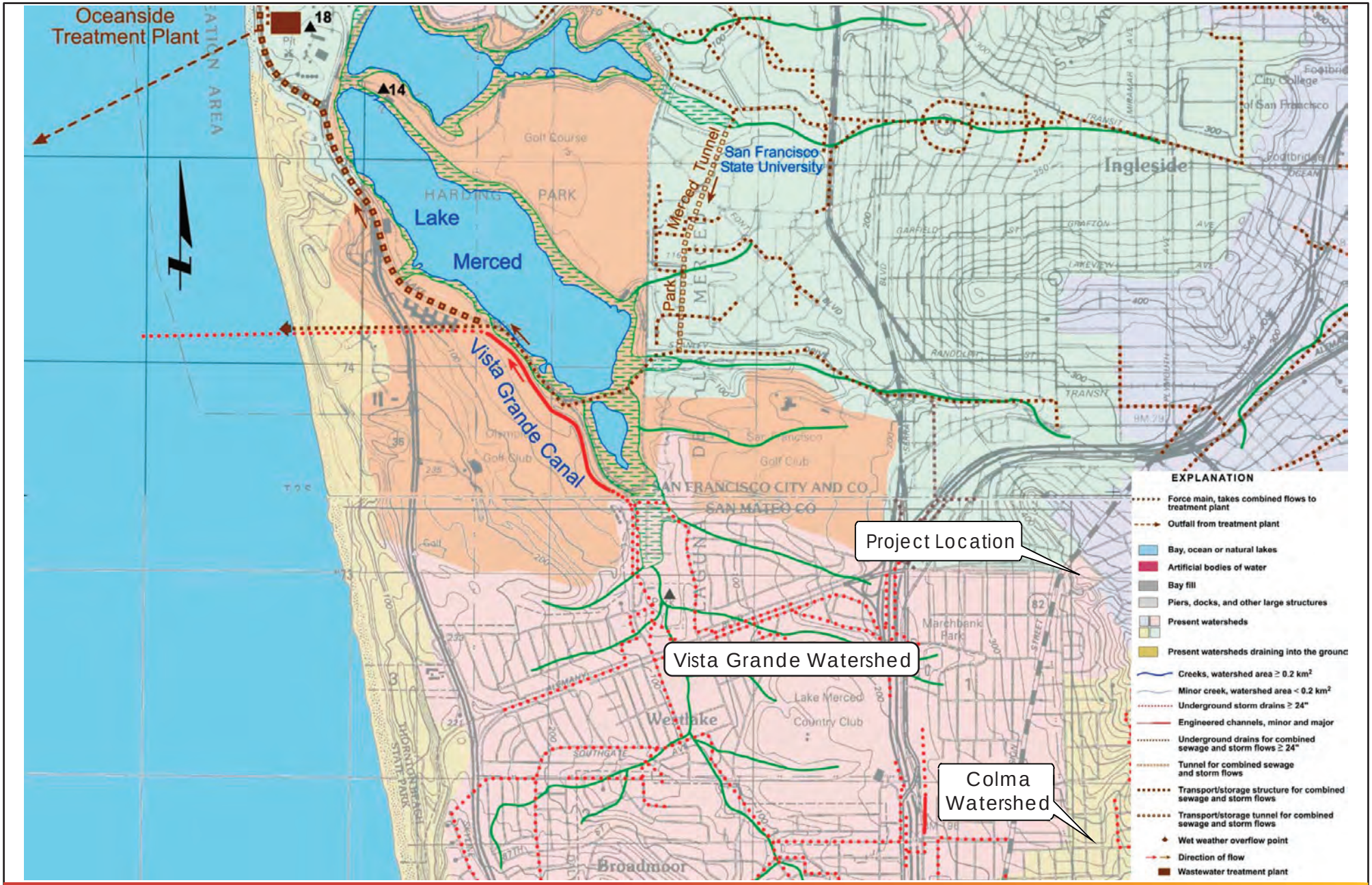
The City's climate is moderated by the cooling influence of the Pacific Ocean. Precipitation in the Bay Area typically occurs from October through April. Coastal fog during the summer months and relatively mild winter temperatures produce mean monthly minimum temperatures between 39 and 54 degrees F and mean monthly maximum temperatures between 60 and 67 degrees F. Average annual rainfall between the period from 1982 to 2010 was 16.0 inches (CIMS 2010).

Topography

The project site sits atop a flattened plateau that is elevated above street level on all sides. Elevation of the site ranges from approximately 395 feet above mean sea level (msl) at Brunswick Street to approximately 460 feet above msl at the top of the plateau. Site topography is mountainous with a range of 65 feet in height. Existing site drainage is overland, draining from east to west.

Watershed and Regional Drainage

A watershed is the geographic area draining into a river system, ocean, or other body of water through a single outlet and includes the receiving waters. The City of Daly City contains five watershed areas, the two largest are the Vista Grande and Colma Creek watersheds (Figure 3.8-1). The northern portion of the City of Daly City, including the proposed project, is located within the Vista Grande watershed area. The Vista Grande watershed area borders the City and county of San Francisco to the north, Colma Creek watershed to the south and east, and the Pacific Ocean on the west. The Vista Grande portion of the City of Daly City's stormwater collection system drains the northwestern area of Daly City and an unincorporated portion of San Mateo County.



Project: 185703059; Sources: Stantec 2015 Created By: L McCandless Updated: 5/6/2015

Stantec

Note: The current-day Lake Merced watershed is in orange. It has no surface outlet to the ocean, although the lagoon in the zoo roughly follows where the old outlet had been. As the neighborhood developed, surface runoff to the lake became polluted. Consequently the southern portion of the original watershed (pink), and eastern portion (green) were diverted from flowing into the lake. The green lines on the map show where all the surface creeks had been before being diverted.

Figure 3.8-1
Daly City Watersheds

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The project site lies on the border of the Vista Grande and Colma Creek watersheds. While the project site lies within the Vista Grande Watershed, it appears that site drainage would flow south down Mission Ave into the Colma Creek watershed, which drains east into the San Francisco Bay (Day City General Plan EIR 2013).

Local Drainage

The project site is located within the "Hillside" planning area and is served by the City's storm drain system, maintained by the Daly City Public Works Department. Existing storm water on the site runs off primarily to the south and west and into the storm drain system. A 6 inch storm drain is located within Brunswick Street, which drains into a 6 inch drain line on Hillside Drive, which flows north to an 8 inch line within Mission Street, which flows to the south. Catch basins are located across the street from the project site, on Chelsea Court, which also drain to Hillside Drive and Mission Street. The Daly City General Plan lists constraints within the Hillside Planning area as "aging sewer and water lines." Figure 3.8-2 shows the local storm drain network in the vicinity of the project site.

Groundwater Supply

The project site overlies the southwest corner of the Islais Valley Groundwater Basin, within the San Francisco Bay Hydrologic Region, as shown in Figure 3.8-3. The San Bruno Mountains bound the basin to the west. It is separated from the Downtown San Francisco Groundwater Basin to the north and the Visitacion Valley and South San Francisco Groundwater Basins to the south by bedrock topographic highs.

Geologically the Islais Valley basin can be broadly classified as bedrock and unconsolidated sediment (USGS 1993). Impermeable bedrock of the Franciscan Complex forms the base of the water bearing formations. Unconsolidated material overlying the bedrock comprise the water bearing strata and consists of dune sand, the Colma Formation, bay mud and clay, and artificial fill (USGS 1993). The Colma Formation consists of finegrained sand, silty sand and discontinuous beds of clay to five feet thick (USGS 1993). The artificial fill is largely composed of dune sand with lesser amounts of silt and clay, and some manmade debris (Schlocker 1974). It reaches a maximum total thickness of about 60 feet (USGS 1993). The unconsolidated material in aggregate has a maximum thickness of 200 feet indicating a relatively low storage capacity for groundwater and minimal protection from potential surface contamination (USGS, 1993). No municipal water supply wells are located in the Islais Valley basin. Therefore, water quality and water supply discussions will focus primarily on the SWB.

The majority of Daly City lies within the South Westside Groundwater Basin. The 14-square mile SWB underlies Daly City, Colma, South San Francisco, San Bruno, Millbrae, and portions of unincorporated San Mateo County, Burlingame, and Hillsborough. Beneath the City of Daly City, the groundwater basin (from lower to upper strata) consists of Franciscan Bedrock, Older Merced Formation, Upper Merced Formation, and Colma Formation overlain by clay and sand.

The principal production aquifer, the SWB, is separated from shallow groundwater by 50 to 100 feet of intervening clay and sand deposits. The groundwater elevation data suggest that the shallowest groundwater may be locally perched. The depth to groundwater in the primary production aquifer ranges from 200 to 300 feet below ground surface (bgs) in the City of Daly City area.

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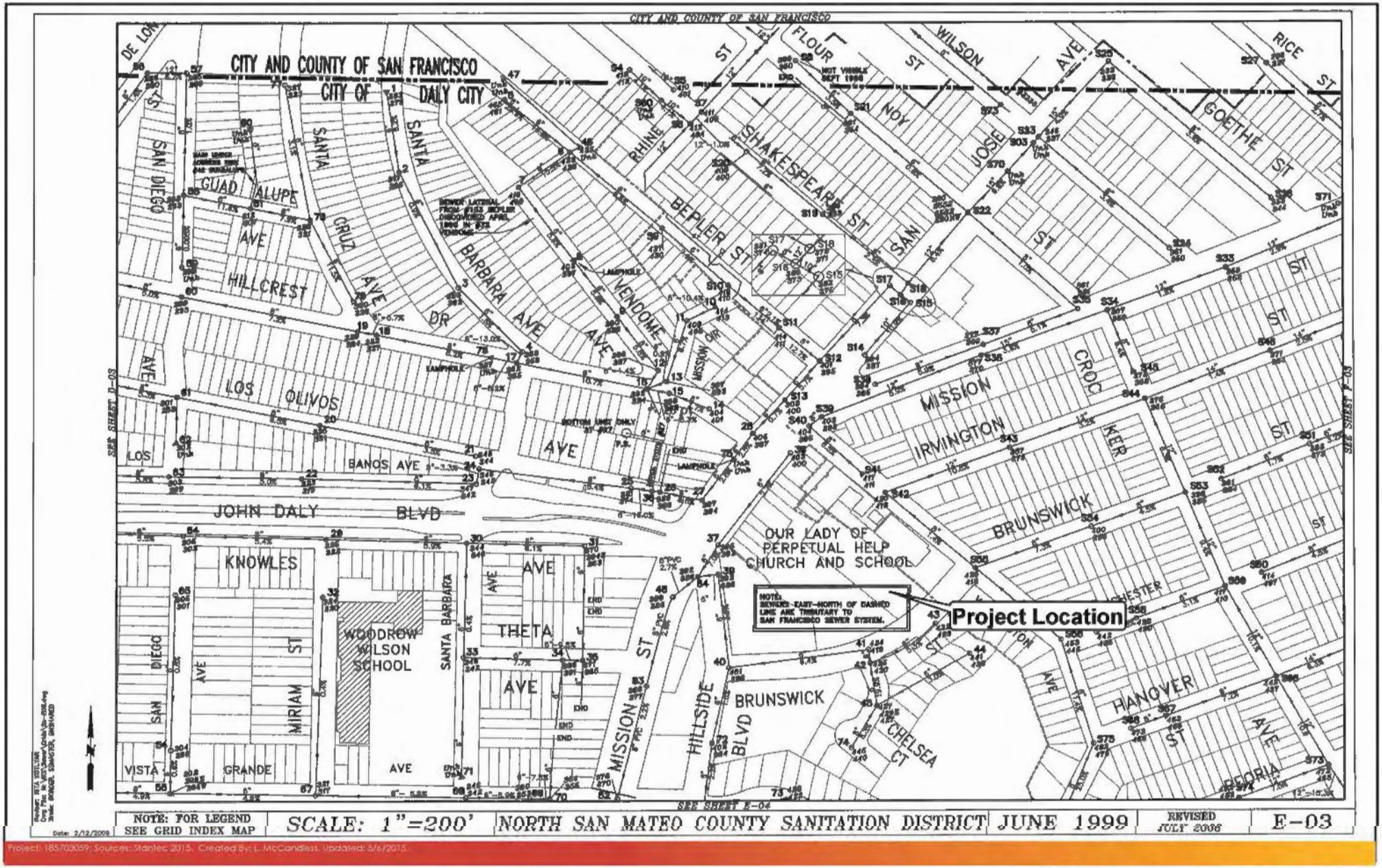

Project: 185703059; Sources: Stantec 2015. Created By: L. McCandless. Updated: 5/6/2015.

Stantec

Figure 3.8-2
Daly City Sewer System

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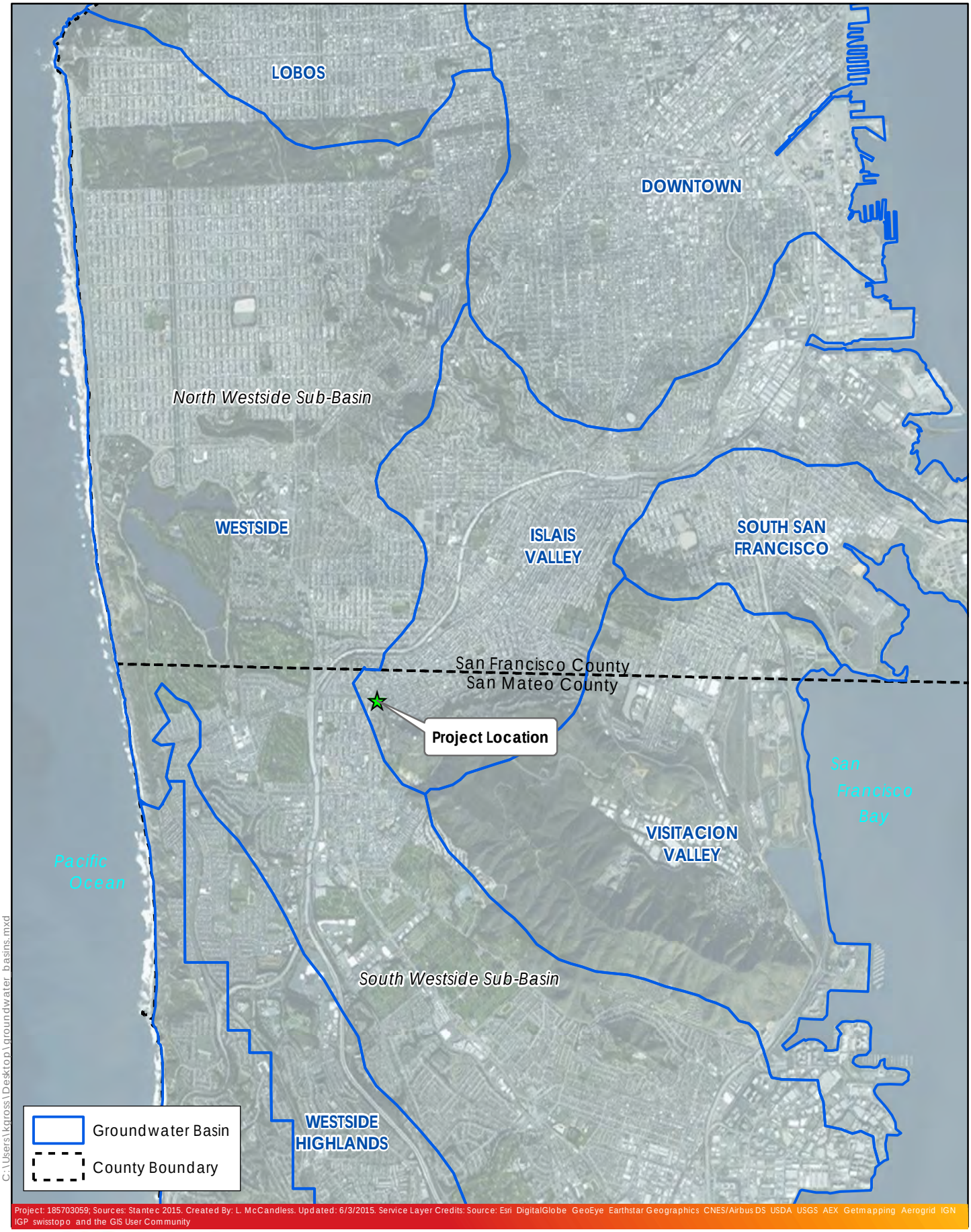

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N

0 1.2 Miles

Note: Per PUC Resolution No. 15-0070, although the Westside Basin has been designated by DWR as a single basin, it has been divided administratively on the San Francisco County/San Mateo County border

Figure 3.8-3
Groundwater Basins

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Pursuant to Water Code Section 10723.8, the SFPUC, recently notified the California Department of Water Resources (DWR) of its intent to undertake sustainable groundwater management of the seven groundwater basins that underlie the City and County of San Francisco, among them the Islais Valley (DWR Basin No 2-33 – northern portion within City, and the Westside (DWR Basin No. 2-35. All of the basins are classified by DWR as very low priority basins under the Sustainable Groundwater Management Act. A public hearing held in accordance with Water Code Section 10723(b) on March 10, 2015, established the SFPUC as the Groundwater Sustainability Agency (GSA) for the seven groundwater basins within the City and County of San Francisco (SFPUC, 2015).The composition of the GSA for the South Westside Basin has not yet been determined. Upon establishment of a GSA for the SWB, the SFPUC will enter into coordination agreements, as defined in Water Code Section 10721(d), with the individual agencies and water providers to ensure the coordinated implementation of GSPs for the entire Westside Basin. The agreements will be consistent with the Regional Groundwater Storage and Recovery Project Operating Agreement among the SFPUC, California Water Service Company, and the cities of San Bruno and Daly City (SFPUC 2015).

The City of Daly City receives the majority of its water supply from the SFPUC, with 10 SFPUC pipeline connections (turnouts). They are connected to the Sunset, San Andreas #2, and Crystal Springs #2 pipelines and can supply approximately 30.89 million of gallons per day (mgd) at a rate of approximately 21,400 gallons per minute (Daly City 2005). The City supplements this supply with groundwater pumped from five local wells in the SWB. Daly City also uses tertiary recycled water from the North San Mateo County Sanitation District Wastewater Treatment Plant (WWTP) wherever feasible, to offset water demands. From 1999 through 2009, an average of 28% of the City's water supply was from City groundwater wells. However, from 2010 through 2013, approximately 40% of the City of Daly City's water supply was obtained from groundwater (Brown and Caldwell 2014). Although the South Westside Basin is not a formally adjudicated basin, the cities of San Bruno, Daly City, and the California Water Service Company have established pumping limitations with implementation of the Groundwater Storage and Recovery Agreement, which was formally executed on December 16, 2014. Daly City has agreed to self-limit groundwater pumping to 3.43 million gallons per day (City of Daly City 2015)

According to historical groundwater elevation data contained in the South Westside Groundwater Management Plan, groundwater depth at well DC-8, located south of the project site, ranged between approximately 120 feet bgs and 60 feet bgs. Borings advanced to 7.5 feet bgs as part of a Geotechnical Study for the proposed project did not encounter groundwater.

Water Quality

The project site is located within the Vista Grande watershed near the Colma Creek watershed. Storm water runoff from the project site will discharge into the City's storm drain system within Mission Street, which connects to Colma Creek and eventually into the San Francisco Bay.

State policy for water quality control in California is directed toward achieving the highest water quality consistent with maximum benefit to the people of the state. Aquatic ecosystems and underground aquifers provide many different benefits to the people of the state. The SWRCB is charged with protecting all these uses from pollution

and nuisance that may occur as a result of waste discharges in the region. Beneficial uses of surface waters, groundwaters, marshes, and wetlands serve as a basis for establishing water quality objectives and discharge prohibitions to attain these goals.

In accordance with Section 303 (d) of the CWA, the State must present the EPA with a list of impaired water bodies that do not meet water quality standards. Once a water body has been placed on the 303(d) list of impaired waters, States are required to develop a Total Maximum Daily Load (TMDL) to address each pollutant causing impairment. A TMDL defines how much of a pollutant a water body can tolerate and still meet the water quality standards (SWRCB 2012). The City is located in Regional Board Region 2 – San Francisco Bay Region. The beneficial uses of the surface water bodies in the City of Daly City to which stormwater from the project site would discharge have been designated in the RWQCB Basin Plan, as listed in Table 3.8-1, below. Due to its close geographic proximity, Lake Merced is included as well.

Table 3.8-1: Designated Beneficial Uses and Pollutants Within Impaired Surface Waters Near Project Site

Water Body	Designated Beneficial Use	Pollutants	Source(s)	Planned TMDL Completion
Surface Water				
Lake Merced	WARM	Low Dissolved Oxygen, pH	Source Unknown	(Planned) 2019
Colma Creek	WARM, WILD, REC1, REC2	Trash, Chlordane, DDT, Dieldrin, Dioxin compounds, Furan compounds,	Nonpoint sources, Atmospheric deposition	2013 and Planned 2019
San Francisco Bay (Lower)	IND, COMM, SHELL, EST, MIGR, RARE, SPWN, WILD, REC1, REC2, NAV	Invasive Species, Furan Compounds, Mercury, PCBs, Trash	Ballast water, Industrial and municipal point sources, atmospheric deposition, unknown nonpoint sources, illegal dumping, urban runoff/storm sewers	Approved 2008 (Mercury), Planned 2019, 2021
Legend: AGR = Agricultural Supply, COMM = Commercial and Sport Fishing, EST = Industrial Service Supply, MIGR = Fish Migration, WARM = Warm Freshwater Habitat				

Groundwater Quality

Although the SWB is classified by the DWR as a very low priority basin under the SGMA, the entire SWB is a source of recharge and requires protection to ensure high quality recharge and to maintain or enhance existing recharge quantities. Pervious areas such as open spaces, parks, cemeteries, and golf courses allow water to percolate into the soil and recharge the aquifer.

According to South Westside Groundwater Management Plan, July 2012, Drinking water source assessments produced by groundwater agencies have identified uses that

threaten groundwater quality in the SWB along with delineation of capture zones around wells. Uses that threaten some wells in the basin include:

- Automobile repair shops.
- Automobile gas stations.
- Dry cleaners.
- Military Installations.
- Sewer Collection Systems.
- Underground storage tanks – confirmed leaking tanks.
- Utility Stations – maintenance areas.

Ambient groundwater quality reflects the general groundwater quality on a regional scale. Analysis of the most prominent ambient water quality concerns, iron, manganese, nitrate, and total dissolved solids (TDS) was performed based on raw groundwater quality data contained in the Department of Public Health (DPH) database in 2010. Iron and manganese do not pose a risk to human health, but are an aesthetic concern for water users. High concentrations can result in poor tasting water or water that stains fixtures. The source of iron and manganese in groundwater is typically naturally occurring soils and rocks. Nitrate in groundwater poses a health risk if concentrations are too high and the water is not properly treated. Low levels of nitrate are naturally occurring, but higher levels are almost always the result of human activity, such as inorganic fertilizer, animal manure, septic systems, and deposition of airborne compounds from industry and automobiles. Maximum contaminant levels (MCL) are enforceable standards established by EPA and DPH to set the highest level of a contaminant allowed in drinking water. MCLs are set as close as feasible to the level below which there is no known or expected health risk using the best available treatment technology and taking cost into consideration (EPA 2009).

The concentrations of manganese, iron, nitrate, and TDS at selected wells in Daly City, along with relevant SMCLs, are presented in Table 3.8-2, below.

Table 3.8-2: Water Quality Concerns in the South Westside Basin

Water Quality Concern	Concentration	SMCL
Iron	201-300	300
Manganese	20.01-50	50
Nitrate as NO_3	31-45	45
TDS	250-300	500/1000/1500
Source: South Westside Groundwater Management Plan, 2012.		

As shown in the table, current concentrations of the identified water quality concerns are currently at the SMCLs for those constituents for Iron, Manganese, and Nitrates in the Junipero Serra well located less than a mile south of the project site.

Flooding

Flood hazard zones are areas subject to flood hazards that are identified on an official Flood Insurance Rate Map (FIRM) issued by the Federal Emergency Management Agency (FEMA). Flooding can be earthquake induced or the result of intense rainfall. Areas within a 100-year floodplain have a 1% probability of flooding in a given year. The

Federal Emergency (FEMA) has designated Daly City as a Non-Special Flood Hazard Area (NSFHA), defined as an area that is in a moderate to low risk flood zone. An NSFHA is not in any immediate danger from flooding caused by overflowing rivers or hard rains (NFIP 2015)

According to FIRM Map. No. 06081C0030E the project site is not within a 100-year or 500-year flood zone.

The California Office of Emergency Services (CalOES) has compiled dam inundation maps for the San Francisco Bay area. A review of these maps indicate that the project site is not located within a dam inundation area. Therefore, the proposed project would not be subject to flooding due to dam inundation.

A tsunami is a large tidal wave generated by an earthquake, landslide, or volcanic eruption. Tsunami inundation maps have also been developed for the San Francisco Bay area.

The project site is over one mile from the Pacific Ocean at an elevation of 432 feet above msl at its lowest point, and is not within the mapped tsunami inundation area. Therefore, it would not be subject to flooding from a tsunami.

Seiches are waves that oscillate in enclosed water bodies, such as reservoirs, lakes, ponds, swimming pools, or semi enclosed bodies of water, such as San Francisco Bay and Lake Merced. Because the project site is far from San Francisco Bay and Lake Merced is over one-mile away, it would not be subject to seiches.

The site is also outside of the influence of sea level rise, as shown on the NOAA sea level rise map. It is not subject to dike/levee failures.

3.8.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.8 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on hydrology, flooding, and water quality. Existing national, State, and local laws, as well as policies contained in the Daly City General Plan would reduce these potential impacts on hydrology, flooding, and water quality to less than significant levels.

Policies

Policy SE-2.1: Protect the City of Daly City from unreasonable risk to life and property caused by flood hazards by designing and constructing drainage facilities to improve the flow capacity of the City's water system in order to accommodate the storm water runoff generated by a 100-year storm.

Policy SE-2.2: Reduce localized flooding through City funded drainage system improvements; seek alternate funding where possible.

Policy SE-2.3: Continue to require the habitable portions of new structures to have a finished flood elevation 1.5 feet above the projected 100-year water surface or to be adequately protected from flooding.

Policy SE-2.4: Prohibit any reduction of creek channel capacity, impoundment or diversion of creek channel flows which would adversely affect adjacent properties or the degree of flooding. Prevent erosion of creek banks.

Policy SE-2.5: Protect new development adjacent to creeks by requiring adequate building setbacks from creek banks and provision of access easements for creek maintenance purposes.

Program S-1: Grading and Erosion Control Ordinance – to minimize runoff from grading. Adopt ordinance which ensures that new construction, on-going businesses, and municipal maintenance will preserve stormwater runoff which flows to the ocean and bay.

Program S-2: Implementation of Erosion Control Program – reduce hazards associated with soil erosion. Inspection and monitoring of construction activities to ensure compliance with the erosion and grading ordinance.

3.8.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.8.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.8 of the Plan Bay Area EIR evaluated potential impact to hydrology and water quality associated with future land development under the proposed Plan Bay Area. Where necessary and feasible, mitigation measures are identified to reduce these impacts.

a. Stormwater Discharge Requirement

The Plan Bay Area EIR analyzed the potential impact related to water quality standards or waste or stormwater discharge requirements (Impact 2.8-1), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.8(a), the impact would be less than significant with mitigation.

The Plan Bay Area EIR analyzed the potential impact related to increased non-point-source pollution of stormwater runoff from construction sites due to discharge of sediments, chemicals, and wastes to nearby storm drains and creeks (Impact 2.7-5), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.8(a), the impact would be less than significant with mitigation.

b. Groundwater Recharge

The Plan Bay Area EIR analyzed the potential impact related to interference with or reduction rates of groundwater recharge due to the increased impervious surfaces, such that there would be a net deficit in aquifer volume or a lowering of the groundwater table (Impact 2.8-2), and determined the impact would be less than significant.

c and d. Erosion by Altering Drainage Patterns

The Plan Bay Area EIR analyzed the potential impact related to erosion by altering the existing drainage patterns (Impact 2.8-3), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.8(a), the impact would be less than significant with mitigation.

e. Runoff Due to Impervious Surfaces

The Plan Bay Area EIR analyzed the potential impact related to increased rates and amounts of runoff due to additional impervious surfaces, higher runoff values for cut-and-fill slopes, or alterations to drainage systems that could cause potential flood hazards and effects on water quality (Impact 2.7-6), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.8(a), the impact would be less than significant with mitigation.

f. Water Quality

The Plan Bay Area EIR analyzed the potential impact related to increased non-point pollution of stormwater runoff due to litter, fallout from airborne particulate emissions, or discharges of vehicle residues, including petroleum hydrocarbons and metals that would impact the quality of receiving waters (Impact 2.8-4), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.8(a), the impact would be less than significant with mitigation.

g and h. 100-year Flood Hazard

The Plan Bay Area EIR analyzed the potential impact related to a 100-year flood hazard area structures which would impede or redirect flows (Impact 2.8-7), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.8(b), the impact would be less than significant with mitigation.

i and j. Flooding, Seiche, Tsunami, or Mudflow

The Plan Bay Area EIR analyzed the potential impact related to exposure of people to a significant risk of loss, injury, or death involving flooding, seiche, tsunami, or mudflows (Impact 2.8-8), and determined the impact would be less than significant.

3.8.5 Mitigation Measures From the Plan Bay Area EIR that Apply to the Project

Compliance with the applicable policies, regulations, and implementation of Plan Bay Area EIR Mitigation Measure 2.8(a) would reduce the proposed project's impacts to hydrology and water quality to a less than significant level with mitigation.

"***2.8(a)*** *To reduce the impact associated with potential water quality standards violations or waste or stormwater discharge requirement violations, implementing agencies shall require project sponsors to comply with the State, and federal water quality regulations for all projects that would alter existing drainage patterns in accordance with the relevant regulatory criteria including but not limited to the National Pollution Discharge Elimination System (NPDES) program, Provision C.3, and any applicable Stormwater Management Plans. Erosion control measures shall be consistent with NPDES General Construction Permit requirements including preparation and implementation of a Stormwater Pollution Prevention Plan, and final drainage plans shall be consistent with the San Francisco Regional MS4 NPDES permit or any applicable local drainage control requirements that exceed or reasonably replace any of these measures to project receiving waters from pollutants.*

Implementing agencies shall require project sponsors to commit to best management practices (BMPs) that would minimize or eliminate existing sources of polluted runoff during both construction and operational phases of the project. Implementing agencies shall require projects to comply with design guidelines established in the Bay Area Stormwater Management Agencies Association's Using Start at the Source to Comply with Design Development Standards and the California Stormwater Quality Association's California Stormwater Best Management Practice Handbook for New Development and Redevelopment to minimize both increases in the volume and rate of stormwater runoff, and the amount of pollutants entering the storm drain system. For the purposes of this mitigation, less than significant means consistent with federal, state, and local regulations and laws related to water quality or stormwater management.

Mitigation measures that shall be considered by implementing agencies and/or project sponsors where feasible based on project-and site-specific considerations include, but are not limited to:

Construction

- *Limiting excavation and grading activities to the dry season (April 15 to October 15) to the extent possible in order to reduce the chance of severe erosion from intense rainfall and surface runoff, as well as the potential for soil saturation in swale areas.*

- *Regulating stormwater runoff from the construction area through a stormwater management/erosion control plan that may include temporary on-site silt traps and/or basins with multiple discharge points to natural drainages and energy dissipaters if excavation occurs during the rainy season. This control plan should include requirements to cover stockpiles of loose material, divert runoff away from exposed soil material, locate and operate sediment basin/traps to minimize the amount of offsite sediment transport, and removing any trapped sediment from the basin/ trap for placement at a suitable location on-site, away from concentrated flows, or removal to an approved disposal site.*

- *Providing temporary erosion control measures until perennial revegetation or landscaping is established and can minimize discharge of sediment into receiving waterways.*

- *Providing erosion protection on all exposed soils either by revegetation or placement of impervious surfaces after completion of grading. Revegetation shall be facilitated by mulching, hydroseeding, or other methods and initiated as soon as possible after completion of grading and prior to the onset of the rainy season (by October 15).*

- *Using permanent revegetation/landscaping, emphasizing drought-tolerant perennial ground coverings, shrubs, and trees.*

- *Ensuring BMPs are in place and operational prior to the onset of major earthwork on the site. The construction phase facilities shall be maintained regularly and cleared of accumulated sediment as necessary.*

- *Storing hazardous materials such as fuels and solvents used on the construction sites in covered containers and protected from rainfall, runoff, and vandalism. A stockpile of spill cleanup materials shall be readily available at all construction sites. Employees shall be trained in spill prevention and cleanup, and individuals should be designated as responsible for prevention and cleanup activities.*

Operation

- *Designing drainage of roadway and parking lot runoff, wherever possible to run through grass median strips which are contoured to provide adequate storage capacity and to provide overland flow, detention, and infiltration before runoff reaches culverts, or into detention basins. Facilities such as oil and sediment separators or absorbent filter systems should be designed and installed within the storm drainage system to provide filtration of stormwater prior to discharge and reduce water quality impacts whenever feasible.*

- *Implementing an erosion control and revegetation program designed to allow re-establishment of native vegetation on slopes in undeveloped areas as part of the long-term sediment control plan.*

- *Using Integrated Pest Management techniques (methods that minimize the use of potentially hazardous chemicals for landscape pest control) in landscaped areas. The handling, storage, and application of potentially hazardous chemicals shall take place in accordance with all applicable laws and regulations.*

Significance After Mitigation

As required by Provision C.3, new development in the region that would introduce 10,000 or more square feet of new impervious surfaces must incorporate LID strategies—such as stormwater reuse, onsite infiltration, and evapotranspiration—as initial stormwater management strategies. Secondary methods that could be incorporated include the use of natural, landscape based stormwater treatment measures, as identified by Provision C.3. Stormwater treatment measures may also be required in the final design plans in accordance with local stormwater management plans. The treatment measures may vary from "local" improvements at individual building sites to "area wide" concepts such as stormwater treatment wetlands with large open space areas. Treatment control measures may include

use of vegetated swales and buffers, grass median strips, detention basins, wet ponds, or constructed wetlands, infiltration basins, and other measures. Filtration systems may be either mechanical (e.g., oil/water separators) or natural (e.g., bioswales and settlement ponds).

To the extent that an individual project adopts all feasible mitigation measures described above, the impact would be less than significant (LS). Projects taking advantage of CEQA Streamlining provisions of SB 375 (Public Resources Code sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measure(s) described above to address site-specific conditions. Further, because the measure is tied to existing regulations that are law and binding on responsible agencies and project sponsors, it is reasonable to determine that they would be implemented. Therefore, with the incorporation of mitigation measure 2.8(a), the impact is found to be less than significant with mitigation (LS-M)."

3.8.6 Project Specific Impact Discussion

a) Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. Development of the proposed project would result in the conversion of approximately 46,210 sf (1.06 acres) of undeveloped, permeable land, resulting in a largely impervious surface with the potential to result in an increased volume and velocity of surface water runoff.

Construction Impacts

Construction activities could result in the degradation of water quality, releasing sediment, oil and greases, and other chemicals to nearby water bodies. Construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

To minimize these potential impacts, the proposed project would be required to comply with the NPDES General Construction Permit (GCP) as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The SWRCB mandates that projects that disturb one or more acres must obtain coverage under the Statewide GCP. Since the proposed project would involve development of 1.15 acres, it would be subject to these requirements. The GCP also requires that prior to the start of construction activities the proposed project applicant must file PRDs with the SWRCB, which includes a NOI, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations.

In addition, the Project must comply with the City of Daly City's Grading, Erosion, and Sediment Control Ordinance, as specified in the Chapter 15.62 in the Municipal Code, to minimize potential impacts to water quality. An erosion and sediment control plan must be prepared and submitted with the grading plan for approval by the City Engineer prior to the start of construction.

The City of Daly City is under the jurisdiction of the San Francisco RWQCB (Region 2) and is subject to the WDRs of the Municipal Regional Stormwater Permit (MRP). Per the MRP, implementation of the following construction BMPs are also required:

- Control and prevent discharge of all potential pollutants, including pavement cutting wastes, paints, concrete, petroleum products, chemicals, wash water or sediments, rinse water from architectural copper, and non-stormwater discharges to storm drains and watercourses.
- Store, handle, and dispose of construction materials/wastes properly to prevent contact with stormwater.
- Do not clean, fuel, or maintain vehicles on-site, except in a designated area where wash water is contained and treated.
- Train and provide instruction to all employees and subcontractors regarding the construction BMPs.
- Protect all storm drain inlets in the vicinity of the site using sediment controls such as berms, fiber rolls, or filters.
- Limit construction access routes and stabilize designated access points.
- Attach the SMCWPPP's construction BMP plan sheet to project plans and require contractors to implement the applicable BMPs on the plan sheet.
- Use temporary erosion controls to stabilize all denuded areas until permanent erosion controls are established.
- Delineate with field markers clearing limits, easements, setbacks, sensitive or critical areas, buffer zones, trees, and drainage courses.
- Perform clearing and earth moving activities only during dry weather.
- Use sediment controls or filtration to remove sediment when dewatering and obtain all necessary permits.
- Trap sediment on-site, using BMPs such as sediment basins or traps, earthen dikes or berms, silt fences, check dams, soil blankets or mats, covers for soil stockpiles, etc.
- Divert on-site runoff around exposed areas; divert off-site runoff around the site (e.g., swales and dikes).
- Protect adjacent properties and undisturbed areas from construction impacts using vegetative buffer strips, sediment barriers or filters, dikes, mulching, or other measures as appropriate.

Provide notes, specifications, or attachments describing the following:

- Construction, operation, and maintenance of erosion and sediment control measures, including inspection frequency.
- Methods and schedule for grading, excavation, filling, clearing of vegetation, and storage and disposal of excavated or cleared material.
- Specifications for vegetative cover and mulch, including methods and schedules for planting and fertilization

- Provisions for temporary and/or permanent irrigation.

The project applicant would prepare a SWPPP that addresses these and other structural and non-structural BMPs that would be implemented at the site.

In addition, the City of Daly City reviews individual projects for stormwater conformance with applicable laws, policies, and guidelines and has the authority to inspect and conduct sampling at properties to ensure that the provisions of the City's Storm Water Management and Discharge Control Ordinance (Title 14 of the Municipal Code) are implemented. With development and implementation of the BMPs in the Erosion and Sediment Control Plan and the SWPPP and compliance with City, County, and State stormwater regulations, the construction impacts to water quality would be less than significant.

Operational Impacts

Runoff from high-density residential and commercial properties with parking typically contain oils, grease, fuel, antifreeze, byproducts of combustion (such as lead, cadmium, nickel, and other metals), roofing, gutter, and trim runoff, as well as fertilizers, herbicides, pesticides, and other pollutants associated with landscaping. In addition, sources of pollutants that accompany large scale buildings would be present – such as on-site storm drain inlets, dumpster storage area, fire sprinkler test water, rooftop equipment, courtyard, sidewalks, and a parking lot.

Water quality in stormwater runoff is regulated locally by the SMCWPPP, which include the C.3 provisions set by the San Francisco Bay RWQCB. The San Mateo Countywide NPDES permit was amended in 2009 and now includes stricter requirements for incorporating post-construction stormwater control/LID measures into new development and redevelopment projects. All development and redevelopment projects must incorporate site design, source control, and treatment measures to the maximum extent practicable and to use stormwater control measures that are technically feasible and not cost prohibitive. Also, each project regulated under the C.3 provisions must treat 100% of the amount of runoff for the project's drainage area with on-site LID treatment measures. Stormwater treatment requirements must be met by using evapotranspiration, infiltration, rainwater harvesting, and reuse, except where this is infeasible in which case landscape-based biotreatment is allowed.

Effective December 1, 2011, the threshold for requiring stormwater treatment was reduced from 10,000 to 5,000 sf of impervious surface for uncovered parking areas. Since more than 10,000 sf of impervious surface and more than 5,000 feet of impervious parking area would be replaced by the proposed project, adherence to the C.3 provisions of the NPDES permit apply and various prescribed measures must be incorporated into the project design. And since the replaced impervious surface equals more than 50% of the pre-project impervious surface, the entire site is subject to site design, source control, and stormwater treatment requirements.

Due to the steep terrain on the project site, many LID treatments are not feasible. However, the moderately high permeability of the silty sand to sandy silt soils that underlie the site would allow for infiltration. The proposed project would incorporate site design measures, source control measures, and stormwater treatment control measures to minimize potential water quality impacts as follows:

- Landscaped areas and permeable pavers that would retain and treat their own runoff.
- Planters located on southeast portion of site, near foot of building, would be used as flow-through planters to treat and discharge runoff from impervious areas.
- Treated runoff would be discharged from the BMPs to the storm drain line on Brunswick Street.
- No runoff would be directly discharged to drainage systems outside the project site.

Low Impact Development Design Strategies

- **Optimization of Site Layout** – maximizes use of site to meet City's C-MU requirements; zero runoff, underground parking garage; utilizes courtyards and landscaped planters to minimize the effects of impervious areas through treatment and retention; applicability of C.3 and C.6 stormwater requirements
- **Use of Permeable Pavements** – Permeable pavers reduce the amount of surface flow prior to offsite discharge; permeable pavers to minimize and treat runoff.
- **Dispersal of Runoff to Pervious Areas** – Roof runoff would be directed to curbed, flow-through planters. Flows would be dissipated with splash rock prior to entering planters. Planters serve to treat runoff through filtration, decrease time of concentration via evapotranspiration and percolation through engineered soil, and discharge the treated runoff into the storm drain system.
- **Feasibility Assessment of Harvesting and Use for Treatment and Flow Control** – The project is adding 46,210 sf (1.06 acres) of impervious surface; however, due to the project being a Category C Special Project with a 65% LID treatment reduction, rainwater harvesting is not feasible—this is a treatment only project. Due to the moderately high permeability of the silty sand to sandy silt soils that underlie the site, deep infiltration is feasible, which would naturally control the flow of runoff. The site design has many constraints, but it maximizes opportunities to utilize the courtyards and the landscape/open space to minimize the effects of the impervious area. The applicable worksheets were completed as part of the SWCP to determine that harvesting and reuse of stormwater is not feasible for this project.
- **Integrated Management Practices** – Flow-through planters are proposed to treat and detain runoff without allowing seepage into the underlying soil. They can be used next to building foundations and would receive runoff via downspouts leading from the roofs of adjacent buildings. Pollutants would be removed as runoff passes through the soil layer and is collected by an underlying layer of Class 2 aggregate base. A perforated-pipe underdrain, located in the drain rock layer, would convey excess treated runoff to the attached storm drain system or other discharge point. An overflow outlet would convey flows that exceed the capacity of the planter. A flow-through planter would be provided in the curbed landscape area adjacent to the northwest portion of the building.

With the implementation of the proposed site designs, source control, treatment control measures, and management practices, the potential operational impact to water quality would be less than significant. Therefore, operational impacts of the proposed project would be less than significant.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there should be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. New construction could result in impacts related to groundwater if areas currently available for the infiltration of rainfall runoff are reduced and permeable areas are replaced by impermeable surfaces. Proposed project implementation would involve the creation of approximately one acre of impermeable surface consisting of a single structure and outdoor common areas.

Build-out of the proposed project would lead to an increased demand for water. The project site is located within the Islais Valley groundwater basin but draws water from the South Westside Groundwater Basin. The City obtains approximately 40% of its water supply from local groundwater wells. Although the South Westside Basin is not a formally adjudicated basin, the cities of San Bruno, Daly City, and the California Water Service Company have established pumping limitations with implementation of the Groundwater Storage and Recovery Agreement, which was formally executed on December 16, 2014. The City of Daly City has agreed to self-limit groundwater pumping to 3.43 million gallons per day. Water supply impacts are discussed in detail in Section 3.16, Utilities and Service Systems, of this SCEA. Total project water consumption is estimated conservatively at 16,543 gallons/day, equivalent to 18.53 acre-feet per year (AFY). Passive water conservation requirements (plumbing and building code requirements) and active conservation savings would likely reduce the actual water consumption figures for both the residential and commercial portions of the proposed project. In addition, the City does not plan to increase its long-term groundwater pumping above existing levels and the Westside Groundwater Basin is not in critical condition from overdraft (Urban Water Management Plan, 2010). Therefore, the project would have a less than significant impact on groundwater supply.

Grading, cut-and-fill activities, and building construction at the project site are not anticipated to encounter shallow groundwater. Borings performed as part of onsite geotechnical investigations did not encounter groundwater. No WDR permit requirement is anticipated for dewatering. Impacts to groundwater supplies or groundwater recharge are anticipated to be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant With Mitigation. The proposed project does not involve alteration of any natural drainage channels or any watercourse. The proposed project would alter the upland drainage pattern of the project site; however, LID and BMP measures would be incorporated for treatment and flow of site drainage prior to discharge into the City storm drain system.

The proposed project would involve site improvements that would require grading and soil exposure during construction. If not controlled, the transport of these materials into local waterways could temporarily increase suspended sediment concentrations. To minimize this impact, the proposed project would be required to comply with all of the

requirements in the State GCP, including preparation of PRDs and submittal of a SWPPP to the SWRCB prior to the start of construction activities.

The implementation of BMPs during the construction phase would include the following measures to minimize erosion and siltation:

- Minimize disturbed areas of the site.
- Install onsite sediment basins to prevent off-site migration of erodible materials.
- Implement dust control measures, such as silt fences and regular watering of open areas.
- Stabilize construction entrances/exits.
- Install storm drain inlet protection measures.
- Install sediment control measures around the site, including silt fences or gravel bag barriers.
- Compliance with the established permits and regulations would ensure that impacts from erosion and siltation both on- and off-site would be less than significant.

The project contractor would be responsible for providing construction water for dust control Additional construction and operational BMPs and design measures are included in impact analysis discussion "a)", above. With implementation of all of these measures, as well as adherence to Daly City General Plan policies and Plan Bay Area EIR Mitigation Measure 2.8(a) and 2.7(c) (discussed in Section 3.6.5), impacts associated with the alteration of the drainage pattern of the project site would be less than significant with mitigation.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

Less Than Significant Impact. The proposed project would alter the upland drainage pattern of the project site by creating 46,210 sf of impermeable surface; however, LID and BMP measures would be incorporated for treatment and flow of site drainage prior to discharge into the City storm drain system. Flow-through planters, permeable pavers, and other LID measures and BMPs, as listed in impact discussion a), above, would retain and treat runoff. Treated runoff would be discharged from the BMPs to the storm drain line on Brunswick Street. No runoff would be directly discharged to the drainage systems outside of the project site. Therefore, the proposed project would not substantially increase the rate or amount of surface runoff which would result in flooding on or off-site. Therefore, impacts would be less than significant.

e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As required by the City and County stormwater management guidelines, BMPs would be implemented across the site, during both the

construction and operational phases. These BMPs would control and prevent the release of sediment, debris, and other pollutants from entering the storm drain system.

As described in impact analysis descriptions, a), b), and c), above, construction generated runoff would be required to comply with all of the requirements in the State GCP, including preparation of PRDs and submittal of a SWPPP to the SWRCB prior to the start of construction activities. All operational project-generated runoff would be treated prior to discharge from the permanent BMPs to the storm drain line on Brunswick Street. No runoff would be directly discharged to the drainage systems outside of the project site. As presented in Appendix E, the proposed project's stormwater runoff is calculated to be approximately 1.93 cubic feet per second (cfs) for the 1.15 acre project site; as such, the proposed project would not exceed the capacity of existing planned stormwater drainage systems. As a result of implementation of the above-described measures, the project is not anticipated to be a substantial additional source of polluted runoff. Therefore, impacts would be less than significant.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. Implementation of BMPs during construction would be in accordance with the provisions of the SWPPP, which would minimize the release of sediment, soil, and other pollutants. Operational BMPs would be required to meet the C.3 provisions of the SMCWPPP and the applicant would be required to submit a SWMP to the City for approval prior to the start of construction. These requirements include the incorporation of site design, source control, and treatment control measures to treat and control runoff before it enters the storm drain system. The project has no other pollutant sources than those addressed by the measures described above. As such, the project would not result in substantial degradation of water quality. Therefore, impacts would be less than significant.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. FEMA has designated Daly City as a Non-Special Flood Hazard Area (NSFHA). The proposed project is located on high ground and is not located within a 100 year flood hazard area. Therefore, there would be no impact.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. The project site is not located within a 100-year flood hazard area. Therefore, there would be no impact.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. CalOES has compiled dam inundation maps for the San Francisco Bay area. A review of these maps indicated that the project site is not located within a dam inundation area (Cal OES 2009). Therefore, the proposed project would not be subject to flooding due to dam inundation and there would be no impact.

j) Inundation of seiche, tsunami, or mudflow?

Less Than Significant Impact. The project area is located over 2.15 miles from the Pacific Ocean, at an elevation of 395 feet above msl. Tsunamis typically affect coastlines and areas up to ¼-mile inland. Due to the project's distance from the coast, potential impacts related to a tsunami are minimal. Additionally, the project site is not susceptible to impacts resulting from a seiche because of its distance from any enclosed bodies of water. The nearest enclosed body of water to the project site is Lake Merced, which is located approximately 1.3 miles northwest of the project site. Because the site is located on relatively high ground from the surrounding area, and project engineering design features would address any slope stability issue onsite, mudflows would not pose an issue. Therefore, a less than significant impact would occur related to inundation by seiche, tsunami, or mudflow.

3.8.7 Project Specific Mitigation Measures

None required.

3.8.8 Findings

All additional significant environmental impacts of the proposed project relating to hydrology and water quality would be mitigated to a less than significant level with implementation of Plan Bay Area EIR Mitigation Measures 2.7(c) and 2.8(a).

3.9 LAND USE AND PLANNING

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Physically divide an established community?	☐	☐	☐	☒
b)	Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c)	Conflict with any applicable habitat conservation plan or natural communities' conservation plan?	☐	☐	☐	☒

3.9.1 Environmental Setting

The project site is located in the Hillside neighborhood of Daly City at the "Top of the Hill," where Mission Street meets John Daly Boulevard. This neighborhood is also referred to in the Daly City General Plan as Planning Area 10. According to the Daly City General Plan, the Hillside neighborhood contains the greatest mixture of residential densities in Daly City. Existing densities range from a low density of 12 du/ac to a high density of over 50 du/ac. The Hillside neighborhood is located east of Mission Street and is essentially bisected by the north-south oriented Hillside Boulevard, which merges into Mission Street at John Daly Boulevard.

Recreational and open space needs are provided by Hillside Park, located approximately 0.62 miles south of the project site; Marchbank Park, located approximately 0.42 miles to the southwest; and other small community parks dotted throughout the neighborhood.

Land use constraints recognized in the Daly City General Plan include aging sewer and water lines, lack of land zoned for commercial uses, and a wide mixture of different residential densities that indicate uncertainty and lack of continuity in the neighborhood. Opportunities in this neighborhood include the reuse of underutilized parcels and infill single-family and multi-family subdivisions and residences (Daly City General Plan 2013).

The project site represents one of a limited number of vacant areas within the neighborhood. The largest concentration of vacant land exists in the northern and southern portions of this neighborhood. The vacant land in the northern portion is on steep slopes with limited access and is not considered easily buildable. There is also vacant land immediately east of Hillside Park, south of the project site. The vacant land

in the southern portion of the neighborhood is a mixture of vacant and underutilized parcels. These parcels represent the majority of infill residential parcels in the neighborhood.

The City of Daly City utilizes the Daly City General Plan and Zoning Ordinance to guide land use development. The General Plan Land Use Map applies a land use designation to all publicly and privately owned parcels within the Daly City General Plan planning area. The project site is designated as C-MU.

Commercial-Mixed Use (C-MU) Land Use Designation

The C-MU land use designation pertains generally to areas fronting Mission Street and Geneva Avenue, and includes certain areas within the Sullivan Corridor Specific Plan and BART Station Area Specific Plan intended for mixed-use development. The designation applies to areas where the City intends to provide, through the Zoning Ordinance, regulatory incentives and/or requirements for developers to construct buildings that contain a vertical mix of uses (e.g., retail or restaurant uses at the street level and office or residential uses at levels above the street). The introduction of the C-MU designation along Mission Street and Geneva Avenue is intended to allow for residential intensification of these corridors, both of which are well-served by public transportation, so that they may be transformed into more vibrant urban streets as identified during the Envision Daly City process. The FAR for mixed-use land uses generally ranges from 1.0 to 6.0, except in mixed-use areas of the BART Station Area Specific Plan and Sullivan Corridor Specific Plan Area, which contain specific development standards for properties within the boundaries of these plans.

Heavy Commercial Zoning Designation

The C-2 Zone allows for a range of commercial development as well as high-density residential (as would be allowed in the R-4 zone) without a Conditional Use Permit. Lot area per du (sf) is 1/300. Allowed density is 145 du/ac. (Daly City General Plan Housing Element, Table HE-18).

Surrounding Land Uses

The currently vacant project site is bordered on all sides by a mix of residential, commercial, religious, and school uses. To the north and west are commercial businesses fronting Mission Street, consisting of a dentist's office, a beauty school, the Daly City History Museum, amid a row of small storefronts. To the east is the Our Lady of Perpetual Help Parish and school associated grounds, with church parking immediately adjacent to the eastern project site border. To the south and southeast are high-density multi-family apartments. To the south, on the corner of Brunswick and Mission, is a used car sales lot, a further mix of residential and commercial uses, and a Church of Jesus Christ of Latter Day Saints.

3.9.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.9 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on land use. The Daly City General Plan EIR identified less than significant impacts on land use with implementation of the policies identified in the Daly City General Plan.

Policies

Policy LU-1:	Maintain and, where possible, encourage larger commercial development sites throughout the City.
Policy LU-2:	Continue to allow neighborhood-serving businesses in neighborhoods where such businesses presently exist and where such continued operation does not impact the quality of life within the neighborhood.
Policy LU-4	Provide regulatory incentives for developers to construct higher-density mixed-use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit.
Policy LU-7:	Recognize the physical differences between different parts of the City and regulate land uses within these areas accordingly (same as Policy RME-20).
Policy LU-9:	Ensure that traffic from commercial development does not significantly increase traffic on residential streets.
Policy LU-17:	Ensure that private development is responsible for providing any on- or off-site improvements related to and/or mitigating the impacts it causes.
Policy LU-18:	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.

3.9.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.9.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.3 of the Plan Bay Area EIR evaluated the potential impacts that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, Mitigation Measures are identified to reduce these impacts.

a. Alter/Split Communities

The Plan Bay Area EIR analyzed the potential impacts related to residential or business disruption or displacement of existing population and housing (Impact 2.3-1), and determined with the implementation of Plan Bay Area EIRA Mitigation Measure 2.3(a)-2.3(c), the impact would be less than significant with mitigation.

The Plan Bay Area EIR analyzed the potential impacts related to the physical division of an established community (Impact 2.3-2), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.3(a)-2.3(f), the impact would be less than significant with mitigation.

b and c. Conflict with Land Use Plans

The Plan Bay Area EIR analyzed the potential impacts related to the land use portion of adopted local land use plans (Impact 2.3-3) and determined the impact would be less than significant.

3.9.5 Mitigation Measures from the Plan Bay Area EIR that Apply to the Project

None Required.

3.9.6 Project Specific Impact Discussion

a) Physically Divide an Established Community?

No Impact. The project site is essentially an undeveloped island of land surrounded on all sides by existing urban development. No public access is currently allowed on the site, which, according to historical aerial photography records, appeared to serve as overflow parking for the adjacent used car lot on the corner of Brunswick Street and Mission Street up until approximately 2007. Construction of the proposed project would provide access to the property not currently afforded to the public. Therefore, the proposed project would not physically divide an established community and would instead work as an extension of the neighborhood community with the construction of the proposed project. Therefore, there would be no impact.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project (including, but not limited to, the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. Table 3.9-1 provides a consistency analysis for applicable land use plans, policies, and regulations with jurisdiction over the proposed project. Applicable regulations are as follows:

- Daly City General Plan
- Daly City Municipal Code

Table 3.9-1: Applicable Plan and Policy Consistency Analysis

Policy/Goal Number	Policy/Goal	Determination of Plan Consistency
Daly City General Plan		
Policy LU-1:	Maintain and, where possible, encourage larger commercial development sites throughout the City.	**Consistent.** The commercial component of the proposed project would bring 9,170 sf of office/commercial space.
Policy LU-2:	Continue to allow neighborhood-serving businesses in neighborhoods where such businesses presently exist and where such continued operation does not impact the quality of life within the neighborhood.	**Consistent.** The proposed project would not affect the operation of any existing businesses, and would improve quality of life within the neighborhood by providing additional commercial opportunities for new business and affordable housing.
Policy LU-4:	Provide regulatory incentives for developers to construct higher-density mixed-use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit.	**Consistent.** The proposed project represents higher-density mixed-use development in the immediate vicinity of Mission Street and 100% of the development is within a half mile from a major transit stop, thereby meeting SCEA streamlining and percentages criteria.
Policy LU-7:	Recognize the physical differences between different parts of the City and regulate land uses within these areas accordingly (same as Policy RME-20).	**Consistent.** The proposed project would comply with local regulations, such as design review, to ensure consistency between design and surrounding land uses.
Policy LU-9:	Ensure that traffic from commercial development does not significantly increase traffic on residential streets.	**Consistent**. The proposed project would generate minimal vehicle trips associated with the 9,170 sf of commercial space. The project site is within a half mile from the Daly City BART Station.

Policy/Goal Number	Policy/Goal	Determination of Plan Consistency
Policy LU-16:	Regulate of the size, quantity, and location of signs to maintain and enhance the visual appearance of Daly City.	**Consistent**. The proposed project would include the addition of new signs for both the residential and commercial components; however, the proposed project would comply with all local ordinances and regulations governing sign regulations and design guidelines.
Policy LU-17:	Ensure that private development is responsible for providing any on- or off-site improvements related to and/or mitigating the impacts it causes.	**Consistent**. The proposed project is expected to comply with and pay all applicable fees, or provide necessary improvements, at the time of development that may be required to mitigate for potential impacts. Any potential impacts identified in this SCEA, along with associated mitigation measures, are also expected to be carried out as necessary by the applicant and/or City.
Policy LU-18:	Development activities shall not be allowed to significantly disrupt the natural or urban environment and all reasonable measures shall be taken to identify and prevent or mitigate potentially significant effects.	**Consistent**. The proposed project is suitably scaled for the subject parcel and all reasonable measures would be taken to identify and address potentially significant effects.
C-MU Land Use Designation:	The designation applies to areas where the City intends to provide, through the Zoning Ordinance, regulatory incentives and/or requirements for developers to construct buildings which contain a vertical mix of uses (e.g., retail or restaurant uses at the street level and office or residential uses at levels above the street).	**Consistent**. The proposed project embodies the spirit and intent of the C-MU land use designation by incorporating a vertical mix of commercial and residential land uses. The FAR of approximately 2.47 (123,710 sf residential structure ÷ 50,094 sf lot) would be consistent with the FAR for mixed-use land uses set forth in the C-MU which range from 1.0 to 6.0.

Policy/Goal Number	Policy/Goal	Determination of Plan Consistency
Daly City Municipal Code		
Heavy Commercial Zoning Designation:	The C-2 Heavy Commercial District has a lot area per dwelling unit of 1/300 sf, with a resulting density of 145 du/ac.	**Consistent**. The proposed project consists of 206 residential units on 1.15 acres for a density of 179.13 du/ac. The maximum density allowed in the C-2 zone is 145 du/ac. CA Government Code §65915 provides for a "density bonus" with a maximum of 35% for affordable housing projects, which would equate to a maximum allowable density of 196 du/ac., or, 225 du on the 1.15 acre site.

The proposed project is consistent with all applicable land use policies as set forth by the Daly City General Plan, per the policy consistency analysis above. On May 13, 2015, the City issued the applicant a Determination of Completeness Letter for the proposed project (Appendix F). The proposed project is located within the new C-MU land use designation, the intent of which is to provide, through the Zoning Ordinance, regulatory incentives and/or requirements for developers to construct buildings that contain a vertical mix of uses. Further, the site is located on the City's "Potential Housing Sites Inventory List" (Table HE-27, of the Daly City General Plan), which, when developed, would allow the City to meet its 200-unit-per-year target as established by the Regional Housing Need Allocation (RHNA). The site is not subject to any specific plans and it is outside the coastal zone.

The proposed project is located within the historic Heavy Commercial zoning designation, which has a maximum density of 145 dwelling units per acre. However, according to the Daly City General Plan Housing Element, the new land use element C-MU zoning, which is scheduled to replace the existing C-2 zoning, "will not likely impose density limitations" (Daly City General Plan 2013). In addition, per California Government Code §65915 (a), "When an applicant seeks a density bonus for a housing development within…the jurisdiction of a city…that local government shall provide the applicant incentives or concessions for the production of housing units…as prescribed in this section." The City shall grant the density bonus and incentives or concessions when the applicant for the housing development seeks and agrees to construct, among other categories, (3) a senior housing development as defined in Sections 51.3 and 51.12 of the Civil Code. Per subsection (g)(1) of §65915, "density bonus" means a density increase of at least 20%, with a maximum of 35%. The proposed project, which has a proposed density of 179 du/acre with a total of 206 units on 1.15 acres, would meet the allowable density criteria afforded within the C-2 zoning designation with a 27% bonus (145 du/ac x 24% density bonus = 180 du/ac). The number of units allowed with the full 35% density bonus would be 225 (145 x 35% density bonus=196 du/acre x 1.15 acres = 225). Therefore, potential impacts associated with zoning designation inconsistency would be less than significant.

c) Conflict with any applicable habitat conservation plan or natural communities' conservation plan?

No Impact. The project site is located in a highly urbanized area that is not subject to any habitat conservation plans. Therefore, there would be no impact.

3.9.7 Project Specific Mitigation Measures

None required.

3.9.8 Findings

All environmental impacts of the proposed project related to land use would be less than significant.

3.10 ENERGY AND MINERAL RESOURCES

Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in impacts to power or natural gas?	☐	☐	☒	☐
b) Use non-renewable resources in a wasteful and inefficient manner?	☐	☐	☒	☐
c) Substantially increase in demand of existing sources of energy or require the development of a new source of energy?	☐	☐	☒	☐
d) Result in the loss of availability of a known mineral resource classified MRZ-2 by the State Geologist that would be of value to the region and the residents of the state?	☐	☐	☐	☒
e) 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?	☐	☐	☐	☒

3.10.1 Environmental Setting

Energy

The project site is currently undeveloped. Natural gas and electricity is currently provided to the project area by PG&E.

A number of regulations exist associated with reducing energy usage, one of the most prevalent being Parts 6 and 11 of the California's building code (CCR, Title 24). Part 6, the 2013 Building Energy Efficiency Standards, focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings, and includes requirements that will enable both demand reductions and future solar electric and thermal system installations. The 2013 Building Energy Efficiency Standards also include updates to the energy efficiency divisions of Part 11, the 2013 California Green Building Standards (otherwise known as the CALGreen Code). A set of prerequisites has been established for both the residential and nonresidential standards, which include efficiency measures that should be installed in any building project striving to meet advanced levels of energy efficiency. The California Energy Commission estimates that implementation of the 2013 Building Energy Efficiency Standards may reduce statewide annual electricity consumption by approximately 613 gigawatt-hours per year, electrical peak demand by 195 megawatts, and natural gas consumption by 10 million therms per year (California Energy Commission 2012).

In addition, the City of Daly City has developed its CAP, which identifies how the City and the broader community could reduce Daly City's GHG emissions and includes reduction targets, strategies, and specific actions.

The proposed project would be required to comply with all applicable regulations associated with energy efficiency, as well as the applicable Daly City General Plan EIR policies.

Mineral Resources

No mineral resources of value to the region and the residents of the state have been identified within the City of Daly City. The City has not been delineated as a locally important mineral recovery site.

The CGS has classified lands within San Mateo County into Aggregate and Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board, as mandated by the Surface Mining and Reclamation Act of 1974. These MRZs identify whether known or inferred significant mineral resources are present in the area. Lead agencies are required to incorporate identified MRZs resource areas delineated by the state into their general plans. The Daly City General Plan does not identify any MRZs within the City. There is no history of mineral resource extraction in the area, nor is such use planned for the future.

3.10.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.6 of the Daly City General Plan EIR evaluated the potential impacts of development under the Daly City General Plan on consumption of energy. Implementation of existing State and local laws, as well as policies contained in the proposed Daly City General Plan, would result in a slight reduction in energy use per service populations, indicating that the impact of the proposed Daly City General Plan on energy use would be less than significant.

The Daly City General Plan EIR did not evaluate the potential effects of development under the Daly City General Plan on mineral resources.

Policies

Policy HE-23: Gradually increase energy and water efficiency standards for all new and existing housing while minimizing the costs of such standards.

Policy HE-24: Mandate the inclusion of green building techniques into most new construction.

Policy HE-28: Promote alternative sources of energy in all homes.

3.10.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's

development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.10.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.4 of the Plan Bay Area EIR evaluated potential impact to consumption of energy that may result from implementation of the proposed Plan Bay Area and identified these impacts to be less than significant.

a, b, and c. Energy Resources

The Plan Bay Area EIR analyzed the potential impact related to energy resources (Impact 2.4-1), and determined the impact would be less than significant.

The Plan Bay Area EIR analyzed the potential impact related to consistency with adopted plans or polices related to energy conservation (Impact 2.4-2) and determined there to be no impact.

d and e. Mineral Resources

The City of Daly City does not contain any mineral resources within its limits.

3.10.5 Mitigation Measures from the Plan Bay Area EIR that Apply to the Project

Energy

None required.

Mineral Resources

None required.

3.10.6 Project Specific Impact Discussion

a) Result in impacts to power or natural gas?

AND

c) Substantially increase in demand of existing sources of energy or require the development of a new source of energy?

Less Than Significant Impact. The proposed project would allow for the construction of up to 206 residential units and approximately 9,170 sf of office/commercial development. Energy would be consumed throughout the construction and operation of the proposed project development. Energy would be required during construction for the transportation of building materials, manufacturing of building materials, and the actual construction of buildings and infrastructure. During the operation, energy would be consumed for purposes including, but not limited to, building heating and cooling, use of consumer products, lighting, and vehicular traffic.

Using Statewide energy consumption rates, total energy consumption for development allowed by the proposed project has been estimated. Table 3.10-1 shows estimates of

energy usage associated with the proposed project build-out prior to any mitigation. In total, the build-out assumed under the proposed would result in approximately 1,533,760 kilowatt-hours (kWh) of electricity use and 9,520,000 cubic feet (ft^3) of natural gas use per year.

Table 3.10-1: Estimated Average Annual Energy Use

Energy Type	Use/Unit	Proposed Project	Annual Energy Use
Residential			
Electricity	6,960 kWh/du/year	206 du	1,433,760 kWh
Natural Gas	45,000 ft^3/du/year	206 du	9,270,000 ft^3
Commercial			
Electricity	13 kWh/ft^2/year	10,000 ft^2	130,000 kWh
Natural Gas	25 ft^3/ft^2/year	10,000 ft^2	250,000 ft^3
Total Electricity: 1,533,760 kWh/year		**Total Natural Gas: 9,520,000 ft^3/year**	
Notes: Energy usage predictions are rough estimates. Source: California Commercial End-Use Survey, CEC, March 2006; Energy Information Administration, U.S. Department of Energy			

As discussed above, the Daly City General Plan includes numerous policies and implementation programs focused on improving the sustainability of the community, including through the reduction of energy consumption in existing and new construction. These policies and implementation programs encourage energy efficient technologies in new construction and support renewable and alternative energy sources.

Moreover, the proposed project would help reduce energy consumption in new construction through the application of a 15% energy reduction criteria as identified in the project description, requiring many improvements to the proposed structure that are above and beyond Title 24 Standards, many of which are focused on reducing new building energy consumption. While the amount of energy required to construct and operate development associated with the proposed project is considerable, existing Daly City General Plan policies and project design features, taken as a whole, would ensure that new development is constructed and operated in a manner that does not waste fuel or energy.

Furthermore, the private utility supplying the proposed project with electricity and natural gas services, PG&E, periodically updates its "load" forecasts to ensure the reliability of its electricity and gas services. As implementation of the proposed project would occur over a 2 year period, the projected incremental electric and gas demand would be incorporated into PG&E's forecasts.

Therefore, with adherence to and implementation of the City's policies and the proposed projects design features, impacts related to electricity and natural gas use from the proposed project would not result in the need for construction of new electric or natural gas infrastructure beyond what has already been assumed and would be included in PG&E's regional forecasts. Impacts related to electricity and natural gas use or the possible need for new electrical or gas generation or transmission facilities as a result of the proposed project would be considered less than significant.

b) Use non-renewable resources in a wasteful and inefficient manner?

Less Than Significant Impact. Consumption of nonrenewable resources includes issues related to increased energy consumption, conservation of agricultural lands, and lost access to mining reserves. The proposed project would require water, electric, and gas services and resources for construction. The ongoing operation of the proposed project would involve the use of non-renewable resources.

Construction and ongoing maintenance of the proposed project would irreversibly commit some materials and non-renewable energy resources. Materials and resources used would include, but are not limited to, non-renewable and limited resources such as oil, gasoline, sand and gravel, asphalt, and steel. These materials and energy resources would be used for infrastructure development, transportation of people and goods, and utilities. During the operational phase of the proposed project (post-construction), energy sources including oil and gasoline would be used for lighting, heating, and cooling of businesses, as well as transportation of people to and from the project site.

However, the proposed project would include several features that would offset or reduce the need for non-renewable resources. The proposed project would be required to comply with all applicable building and design requirements, including those set forth by Title 24 relating to energy conservation. In compliance with CALGreen, the State's Green Building Standards Code, the proposed project would be required to reduce water consumption by 20%, divert 50% of construction waste from landfills, and install low-pollutant-emitting materials. Additionally, the proposed project is sited within one-half mile of the Daly City BART Station and in close proximity to multiple modes of alternative transportation including bus and train service.

The project site does not contain any agricultural land or a mining reserve; therefore, the proposed project would have no impact on those natural resources.

d) Result in the loss of availability of a known mineral resource classified MRZ-2 by the State Geologist that would be of value to the region and the residents of the state?

No Impact. The Daly City General Plan does not identify any MRZs within the City. There is no history of mineral resource extraction in the area, nor is such use planned for the future. Therefore, the proposed project would have no impact.

e) 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. No mineral resources of value to the region and the residents of the State have been identified within the City. The City has not been delineated as a locally important mineral recovery site. As a result, the proposed project would have no impact.

3.10.7 Project Specific Mitigation Measures

None required.

3.10.8 Findings

All additional significant environmental impacts of the proposed project relating to energy and mineral resources would be less than significant.

3.11 NOISE

	Would the Project Result In:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b)	Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☐	☒	☐
c)	A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d)	A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐
f)	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☒	☐

3.11.1 Environmental Setting

The degree to which noise results in annoyance and interference is highly subjective and may be influenced by several non-acoustic factors. The number and effect of these non-acoustic environmental and physical factors vary depending on individual characteristics of the noise environment, such as sensitivity, level of activity, location, time of day, and length of exposure. One key aspect in the prediction of human response to new noise environments is the individual level of adaptation to an existing noise environment. The greater the change in the noise levels that are attributed to a

new noise source, relative to the environment an individual has become accustomed to, the less tolerable the new noise source would be to the individual.

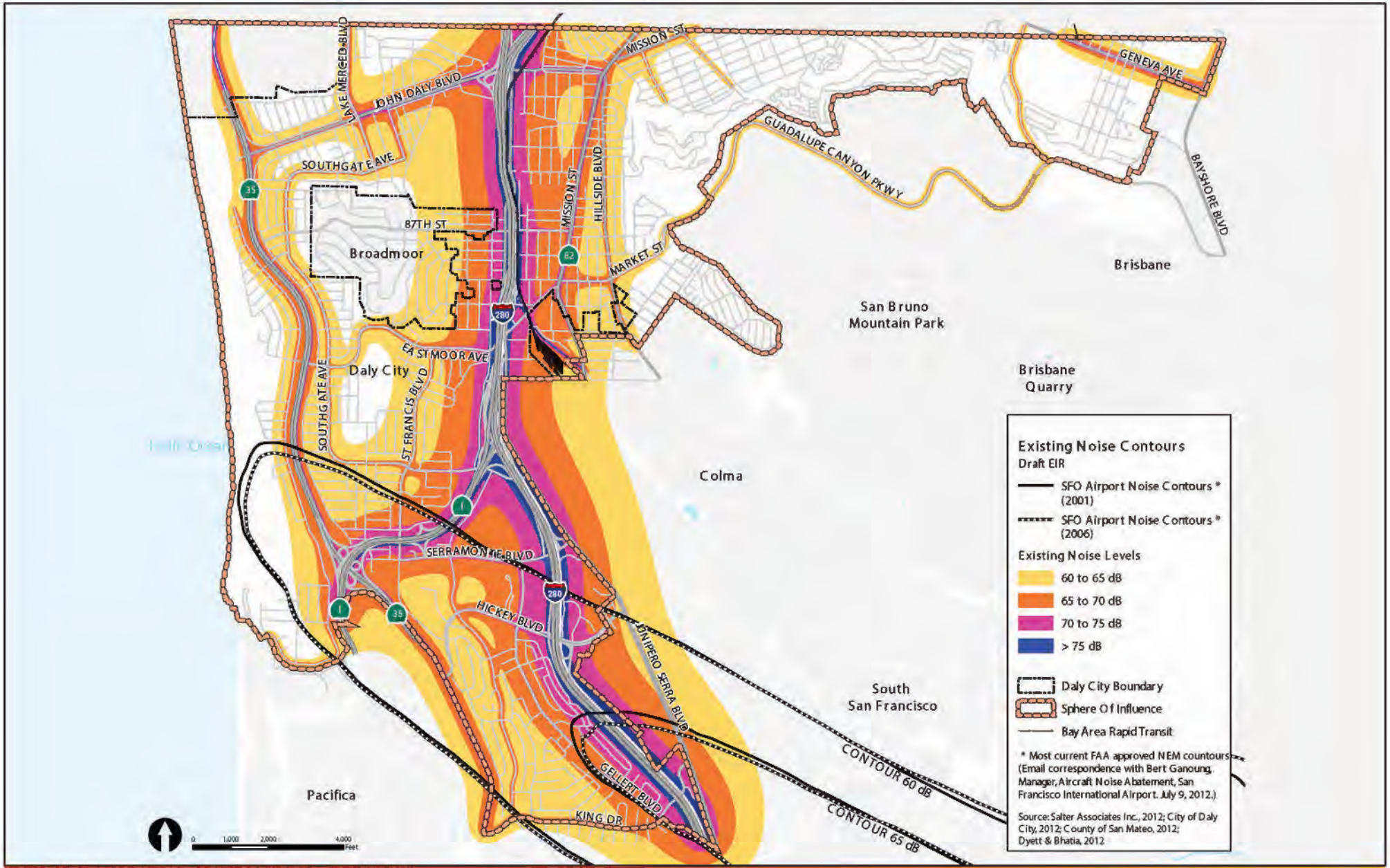
With respect to how humans perceive and react to changes in noise levels, a 1 dBA increase is imperceptible, a 3 dBA increase is barely perceptible, a 6 dBA increase is clearly noticeable, and a 10 dBA increase is subjectively perceived as approximately twice as loud (Egan 2007). These subjective reactions to changes in noise levels were developed on the basis of test subjects' reactions to changes in the levels of steady-state pure tones or broad-band noise and to changes in levels of a given noise source. These statistical indicators are thought to be most applicable to noise levels in the range of 50 to 70 dBA, as this is the usual range of voice and interior noise levels. Many agencies and municipalities have developed or adopted noise level standards, consistent with these and other similar studies, to help prevent annoyance and to protect against the degradation of the existing noise environment.

Existing Ambient Noise Levels

The existing noise environment in a project area is characterized by the area's general level of development because the level of development and ambient noise levels tend to be closely correlated. Areas that are not urbanized are relatively quiet, while areas that are more urbanized are noisier as a result of roadway traffic, industrial activities, and other human activities. According to Table 3.11-1, given the urban mixed-use residential nature of the project area, ambient noise levels are expected to be in the range of 60 to 70 L_{dn}.

The City of Daly City is exposed to noise generated by traffic on Interstate 280, Highway 1, and Highway 35. To a lesser extent, noise is also generated along major arterial roads such as Geneva Avenue, Mission Street, and John Daly Boulevard.. Traffic noise depends primarily on traffic speed (tire noise increases with speed) and the proportion of truck traffic (trucks generate engine, exhaust, and wind noise in addition to tire noise). Changes in traffic volumes can also have an impact on overall traffic noise levels. For example, a doubling of traffic volumes results in a 3 dB increase in noise levels. Existing roadway noise contours are depicted in Figure 3.11-1. As shown in Figure 3.11-1, the existing noise levels at the project site are 60 to 65 dB (Daly City General Plan 2013). Mission Street, a major arterial road, runs close to, but not adjacent to the proposed project; however, the project site is buffered from traffic noise along Mission Street and Hillside Boulevard by existing buildings.

A community noise survey was conducted on March 31 and April 14, 2015 using a Bruel and Kjaer Type 2250 noise level meter, which meets the standards of the American National Standards Institute (ANSI) for general environmental noise measurement instrumentation. In order to assess existing noise conditions at the project site and at nearby sensitive receptors, ambient noise measurements were taken at three locations between 195 and 200 feet from the project site boundary. Daytime (7:00 AM to 7:00 PM), evening (7:00 PM to 10:00 PM), and nighttime (10:00 PM to 7:00 AM) measurements, lasting at least 10 minutes, were collected at each of the three locations. The noise measurement locations can be found on Figure 3.11-2.



Stantec

Figure 3.11-1
Existing Noise Contours

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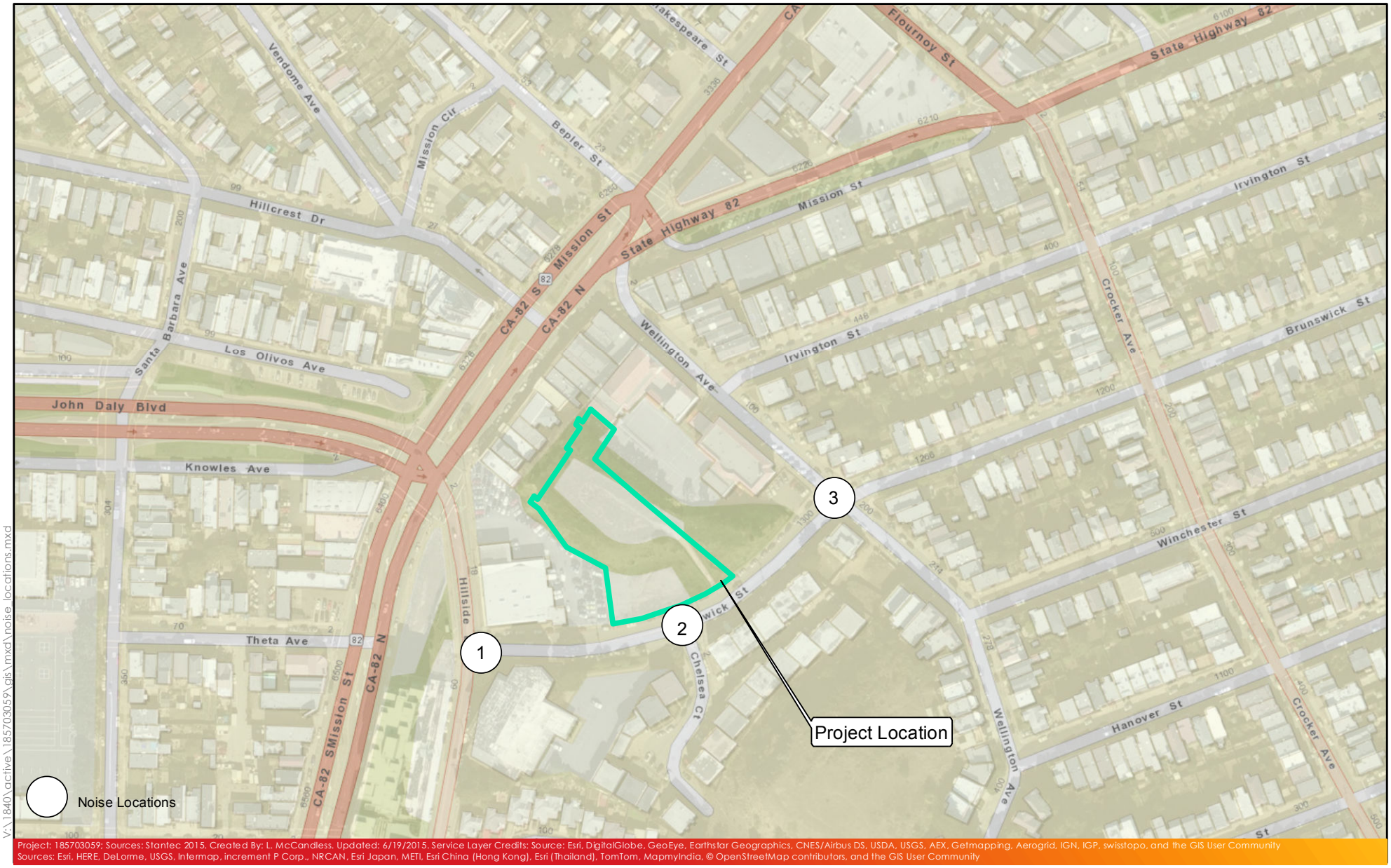

Stantec

0 0.05 0.1 Miles

Figure 3.11-2
Noise Measurement Locations

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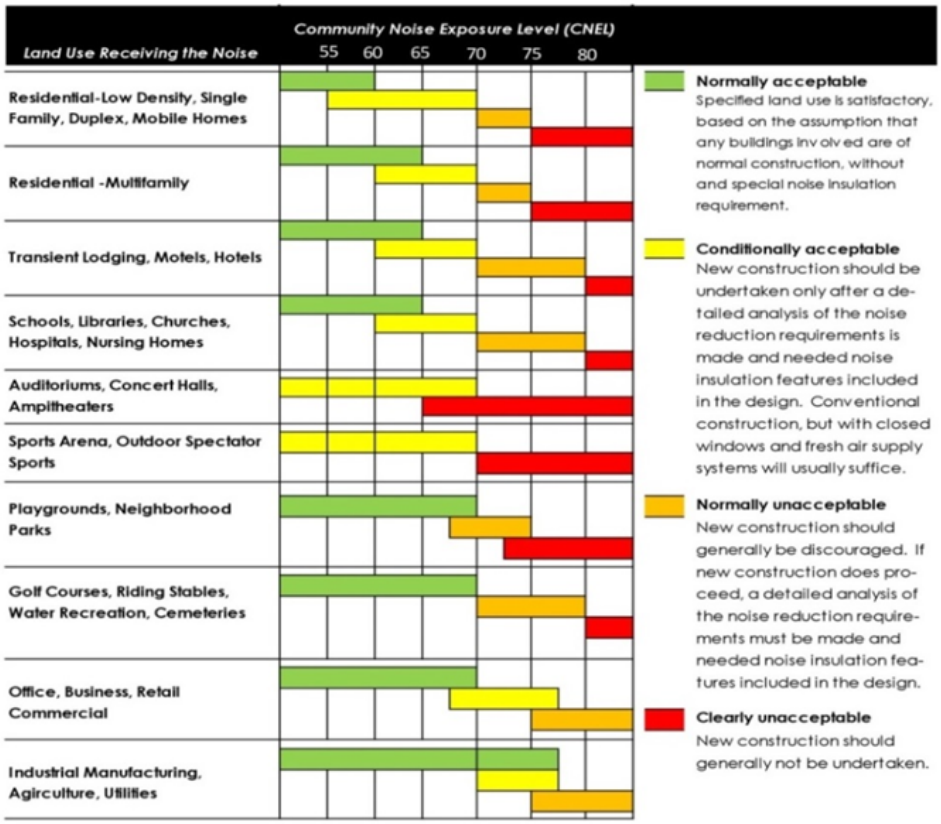
Table 3.11-1: Noise and Land Use Compatibility Matrix



Source: State of California Office of Noise Control

The noise level survey results are provided in Table 3.11-2. Appendix G provides the complete results of the noise level survey modeling outputs.

Table 3.11-2: Community Noise Survey Results

Site	Location	Distance from Project Site	Daytime (7 AM to 7 PM) L_{Aeq} (dBA)	Evening (7 PM to 10 PM) L_{Aeq} (dBA)	Nighttime (10 PM to 7 AM) L_{Aeq} (dBA)
Site 1	Intersection of Hillside Boulevard and Brunswick Street	200 feet	66.28	64.65	66.27
Site 2	On Project Site – Southern Border along Brunswick Street	0 feet	62.43	58.79	59.79
Site 3	Intersection of Brunswick Street and Wellington Avenue – Southeast Corner of Our Lady of Perpetual Help (School) Parcel	195 feet	60.30	58.72	59.20
Source: Stantec, 2015					

The community noise survey was used to establish existing noise conditions at the project site and at the surrounding sensitive receptors. According to the Daly City General Plan, sensitive receptors, including residential areas, hospitals and extended care facilities, schools, libraries, and parks and open spaces, are land uses that are considered more sensitive to high noise levels and changes in ambient noise levels. Sensitive receptors located near the proposed project include Our Lady of Perpetual Help school and church, located approximately 100 feet from the project site, parcel line to parcel line, as well as residences located approximately 100 feet from the project site, across Brunswick Street.

Vibration Standards

Vibration is like noise such that noise involves a source, a transmission path, and a receiver. While related to noise, vibration differs in that noise is generally considered to be pressure waves transmitted through air, whereas vibration usually consists of the excitation of a structure or surface. As with noise, vibration consists of an amplitude and frequency. A person's perception to the vibration would depend on his or her individual sensitivity to vibration, as well as the amplitude and frequency of the source and the response of the system that is vibrating.

Vibration can be measured in terms of acceleration, velocity, or displacement. A common practice is to monitor vibration measures in terms of peak particle velocities in inches per second. Standards pertaining to perception as well as damage to structures have been developed for vibration levels defined in terms of peak particle velocities. The City of Daly City does not have specific policies pertaining to vibration levels.

However, vibration levels associated with construction activities and proposed project operations are addressed as potential noise impacts associated with the project implementation.

Human and structural response to different vibration levels is influenced by a number of factors, including ground type, distance between source and receptor, duration, and the number of perceived vibration events. In Table 3.11-3, the general threshold at which human annoyance could occur is noted as 0.1 inch/second (in/sec) peak particle velocity (PPV). Table 3.11- 4 indicates that the threshold for damage to structures ranges from a PPV of 0.2 to 0.6 in/sec.

Table 3.11-3: Guideline Vibration Annoyance Potential Criteria

Human Response	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Sources
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.90	0.10
Severe	2.00	0.40

Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Source: California Department of Transportation, 2004.

Table 3.11-4: Guideline Vibration Damage Potential Criteria

Structure and Condition	Maximum PPV (in/sec)	
	Transient Sources	Continuous/Frequent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.20	0.10
Historic and some old buildings	0.50	0.25
Older residential structures	0.50	0.30
New residential structures	1.00	0.50
Modern industrial/commercial buildings	2.00	0.50
Notes: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment. Source: California Department of Transportation, 2004.		

3.11.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.10 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on noise. The Daly City General Plan EIR identified significant and unavoidable impacts to increased ambient noise levels in the city vicinity above acceptable noise levels, which would impact existing and anticipated sensitive receptors. All other impacts related to noise would be less than significant with implementation of the policies and goals identified in the Daly City General Plan.

Policies

Goal 1: Promote a noise environment that reflects a balance of the various City objectives while providing an environment that maintains a healthy living environment, fosters relaxation and recreation, is conducive to the work environment, and provides pleasant living conditions.

Policy NE-1: Use the future noise contour map to identify existing and potential noise impact areas.

Policy NE-2: Use the State Office of Noise Control Guidelines as a guide to assess development that will need additional noise study and mitigations.

Policy NE-3: Maintain a CNEL level of not more than 70 dBA Leq in residential areas.

Policy NE-4:	Maintain a noise level not in excess of 75 dBA CNEL in open space, parks, and tot lots, including outdoor activity areas such as outdoor entertainment or green space of multi-family projects.
Policy NE-5:	Maintain the City's current standard of 75 dBA CNEL for office, commercial, and professional areas.
Task NE-5.1:	Additional noise studies should be conducted in "Conditionally Acceptable" noise environments to ensure adequate mitigation features are employed. Usually conventional construction with closed windows and fresh air supply systems will maintain a healthy noise environment.
Policy NE-6:	Require new development to perform additional acoustical studies in noise environments that are identified as 'Conditionally Acceptable' or 'Normally Unacceptable' to the Guidelines.
Task NE-6.1:	Require acoustical studies for new development through the discretionary review and California Environmental Quality Act processes, while paying particular attention to borderline noise environments. Conditions and mitigations, as appropriate, should be attached to projects.
Task NE-6.2:	As part of the development of the new Commercial Mixed-Use zone, identify and codify, where possible, noise attenuation measures to assure that noise impacts by more intensive development to adjacent residential uses are reduced.
Policy NE-7:	Require proposed intensification of development and proposed new development in noise environments identified as "Clearly Unacceptable" in the Guidelines to reduce ambient interior noise levels to 45 dBA CNEL.
Policy NE-10:	Work with SamTrans and MUNI in the placement of bus stops in order to reduce noise associated with bus activity to noise sensitive receptors.
Policy NE-11:	Require that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.

3.11.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation

measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.11.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.6 of the Plan Bay Area EIR evaluated potential impacts to noise that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, mitigation measures are identified to reduce these impacts.

a, b, c, and d. Construction Noise Levels, Groundborne Vibration, Increased Noise from Traffic and Transit

The Plan Bay Area EIR analyzed the potential impact related to construction noise levels and/or groundborne vibration levels in excess of standards established by local jurisdictions or transportation agencies (Impact 2.6-1), and determined with the implementation of Plan Bay Area EIRA Mitigation Measures 2.6(a), 2.6(b), and 2.6(c), the impact would be less than significant with mitigation. However, MTC/ABAG cannot be ensured that these mitigation measures would be implemented in all cases, and this impact remains significant and unavoidable.

The Plan Bay Area EIR analyzed the potential impact related to increased volumes that could result in roadside noise levels that approach or exceed the FHWA Noise Abatement Criteria (Impact 2.6-2), and determined with the implementation of Plan Bay Area EIRA Mitigation Measure 2.6(d), the impact would be less than significant with mitigation.

The Plan Bay Area EIR analyzed the potential impact related to increased noise exposure from transit sources that exceed FTA exposure thresholds (Impact 2.6-3), and determined with the implementation of Plan Bay Area EIRA Mitigation Measures 2.6(e), 2.6(f), and 2.6(g), the impact would normally be less than significant with mitigation. However, for purposes of a conservative analysis, this impact remains significant and unavoidable.

b. Vibration Exposure from Transit Sources

The Plan Bay Area EIR analyzed the potential impact related to increased vibration exposure from transit sources that exceed FTA exposure thresholds (Impact 2.6-4), and determined with the implementation of Plan Bay Area EIRA Mitigation Measures 2.6(h) and 2.6(i), the impact would normally be less than significant with mitigation. However, for purposes of a conservative analysis, this impact remains significant and unavoidable.

e and f. Airport Noise Levels

The Plan Bay Area EIR analyzed the potential impact related to increased noise exposure from aircraft or airports (Impact 2.6-5), and determined there would be no impact.

3.11.5 Mitigation Measures from the Plan Bay Area EIR that Apply to the Project

Compliance with the applicable policies/regulations and the implementation of Mitigation Measures 2.6(a) would reduce the proposed project's impacts related to noise to a less than significant level.

"**2.6(a)** *Mitigation measures that shall be considered by implementing agencies and/or project sponsors where feasible based on project-and site-specific considerations include, but are not limited to the following. Implementing agencies shall require one or more of the following set of noise attenuation measures under the supervision of a qualified acoustical consultant:*

- *Restricting construction activities to permitted hours as defined under local jurisdiction regulations (e.g.; Alameda County Code restricts construction noise to between 7:00 am and 7:00 pm on weekdays and between 8:00 am and 5:00 pm on weekend);*
- *Properly maintaining construction equipment and outfitting construction equipment with the best available noise suppression devices (e.g. mufflers, silencers, wraps);*
- *Prohibiting idling of construction equipment for extended periods of time in the vicinity of sensitive receptors;*
- *Locating stationary equipment such as generators, compressors, rock crushers, and cement mixers as far from sensitive receptors as possible;*
- *Erecting temporary plywood noise barriers around the construction site when adjacent occupied sensitive land uses are present within 75 feet;*
- *Implementing "quiet" pile-driving technology (such as pre-drilling of piles and the use of more than one pile driver to shorten the total pile driving duration), where feasible, in consideration of geotechnical and structural requirements and conditions;*
- *Using noise control blankets on building structures as buildings are erected to reduce noise emission from the site; and*
- *Using cushion blocks to dampen impact noise from pile driving.*

Significance After Mitigation

Projects taking advantage of CEQA Streamlining provisions of SB 375 (Public Resources sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as feasible, to address site-specific conditions. To the extent that an individual project adopts and implements all feasible mitigation measures described above, the impact would be less than significant with mitigation (LS-M).

MTC/ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore it cannot be ensured that this

mitigation measure would be implemented in all cases, and this impact remains significant and unavoidable (SU)."

3.11.6 Project Specific Impact Discussion

The project-specific impact assessment is based upon the community noise survey conducted by Stantec on March 31 and April 14, 2015, as presented in Table 3.11-2, as well as the existing noise conditions presented in the City of Daly City General Plan, and the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM).

The data collected during the community noise survey were used as an input to the FHWA RCNM. The RCNM is used as the FHWA's national standard for predicting noise generated from construction activities. The RCNM analysis includes the calculation of noise levels (Lmax and L_{eq}) at incremental distances for a variety of construction equipment. The spreadsheet inputs include acoustical use factors, Lmax values, and L_{eq} values at various distances depending on the ambient noise measurement location. For this analysis, it was assumed that a worst-case noise scenario for construction activity would entail the operation of the three noisiest pieces of equipment (grader, dozer, and compactor) simultaneously.

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

AND

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Transportation Noise at Existing Sensitive Receptors

Less Than Significant Impact. Some noise sensitive receptors located along the project area roadways, specifically Mission Street, John Daly Boulevard, and Hillside Boulevard, are currently exposed to exterior traffic noise levels exceeding the City of Daly City threshold of 70 dB Ldn exterior noise level standard for residential uses. Such receptors would continue to experience elevated exterior noise levels with implementation of the proposed project. The proposed project's contribution to traffic noise increases is predicted to be minimal. According to the Daly City General Plan, a doubling of traffic volumes results in a 3 dB increase in noise levels, which is considered barely perceptible to the human ear. As mentioned above, the traffic study conducted by KD Anderson & Associates, Inc., shows an incremental increase in traffic counts from the proposed project, resulting in an approximate 1% increase during AM peak hours and 5% increase during PM peak hours from existing conditions. As mentioned above, a doubling of traffic counts would result in 3 dB increase of noise levels; therefore a 1% and 5% increase would be inaudible to the human ear. The increase in traffic counts from the proposed project would not change the level of service from existing conditions. Additionally, the increase in traffic level noise from the proposed project would minimally, if at all, impact the existing noise levels at the project site due to the existing building barriers shielding the site from Mission Street and Hillside Boulevard.

The proposed project would not cause increased noise levels exceeding the City of Daly City 70 dB Ldn exterior noise level standard at existing noise-sensitive residential

receptors. Therefore, existing sensitive receptors would not be exposed to a substantial permanent increase in ambient noise levels or noise levels in excess of applicable standards.

Transportation Noise at New Sensitive Receptors

Less Than Significant Impact. It is not anticipated that noise levels at the project site would expose the future residents to noise levels exceeding the Daly City threshold of 70 dB Ldn for exterior noise. As summarized in Table 3.11-2, the community noise survey conducted by Stantec identified the existing noise levels at 62.43 dBA, 58.73 dBA, and 59.79 dBA during the morning, day time, and night time surveys, respectively, on the southern boundary of the project site parcel, along Brunswick Street. According to Table 3.11-1, the recorded noise levels would be considered "normally acceptable" for mixed-use residential land uses. The City of Daly City has established a threshold of 45 dBA Ldn for indoor noise levels for designated residential land uses. Modern construction materials, consistent with the Universal Building Code (UBC), typically provide an exterior-to-interior noise level reduction of 25 to 30 dB with all exterior openings sealed (Caltrans 2013). Therefore, given the average exterior volumes recorded during the morning, day time, and night time community noise surveys on the site, 60.3 dBA, the projected interior noise conditions for the proposed housing development are estimated at 35.3 dBA. Based on the construction design, it is not anticipated that interior noise levels would exceed the City's threshold, resulting in a less than significant impact.

b) Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?

Less Than Significant Impact. The primary vibration-generating activities associated with the proposed project would occur during construction when activities such as grading and building construction take place. Construction vibration impacts include human annoyance and building structural damage. Building damage can take the form of cosmetic or structural. As stated above, the threshold for damage to structures ranges from 0.2 to 0.6 in/sec PPV, and the general threshold at which human annoyance could occur is noted as 0.1 in/sec PPV. Table 3.11-5 shows the typical vibration levels produced by construction equipment. The project foundation work would consist of spread footing columns installed via trenching and would not require pile driving or similar that could cause building damage at exterior sites.

Table 3.11-5: Vibration Source Levels for Construction Equipment

Type of Equipment	Peak Particle Velocity at 25 Feet	Peak Particle Velocity at 50 Feet	Peak Particle Velocity at 100 Feet	Threshold at which Human Annoyance Could Occur	Potential for Proposed Project to Exceed Threshold
Large Bulldozer	0.089	0.031	0.011	**0.1**	**None**
Loaded Trucks	0.076	0.027	0.010	**0.1**	**None**
Small Bulldozer	0.003	0.001	0.000	**0.1**	**None**
Auger/Drill Rigs	0.089	0.031	0.011	**0.1**	**None**
Jackhammer	0.035	0.012	0.004	**0.1**	**None**

Type of Equipment	Peak Particle Velocity at 25 Feet	Peak Particle Velocity at 50 Feet	Peak Particle Velocity at 100 Feet	Threshold at which Human Annoyance Could Occur	Potential for Proposed Project to Exceed Threshold
Vibratory Hammer	0.070	0.025	0.009	**0.1**	**None**
Vibratory Compactor/Roller	0.210	0.074	0.026	**0.1**	**None**
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Guidelines, May 2006					

Sensitive receptors could be impacted by construction-related vibrations, especially vibratory compactors/rollers. The nearest receptors are located approximately 100 feet or further from any areas of the project site that might require grading or paving. At this distance, construction vibrations are not predicted to exceed acceptable levels. The project foundation work would consist of spread footing columns installed via trenching and would not require pile driving or similar that could cause building damage at exterior sites. Additionally, construction activities would be temporary in nature and would likely occur during normal daytime working hours.

The Table 3.11-5 data indicates that construction vibration levels anticipated for the proposed project are less than the 0.1 in/sec criteria at distances of 50 feet. Therefore, construction vibrations are not predicted to cause damage to existing buildings or cause annoyance to sensitive receptors. As such, implementation of the proposed project would have a less than significant impact related to vibration.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant With Mitigation. During the construction of the proposed project, including grading and building construction, noise from construction activities would add to the noise environment in the project area. Table 3.11-6 lists equipment that is expected to be used along with noise levels generated from the FHWA RCNM (Federal Highway Administration 2006). Lmax sound levels at the nearest sensitive receptor (100 feet) are shown along with the typical acoustic use factor. The acoustical use factor is the percentage of time each piece of construction equipment is assumed to be operating at full power (i.e., its loudest condition) during construction and is used to estimate L_{eq} values from Lmax values. For example, the L_{eq} value for a piece of equipment that operates at full power 50% of the time (acoustical use factor of 50) is 3 dB less than the Lmax value.

Table 3.11-6: Summary of Federal Highway Administration Roadway Construction Noise Model

Source	Distance to Nearest Sensitive Receptor	Sound Level at Residence		
		Lmax	Acoustical Use Factor (%)	Leq
Backhoe	100 ft	71.5	40	67.6
Compactor (ground)	100 ft	77.2	20	70.2
Crane	100 ft	74.5	16	66.6
Concrete Pump Truck	100 ft	75.4	20	68.4
Compressor (air)	100 ft	74.0	40	70.0
Dozer	100 ft	75.6	40	71.7
Dump Truck	100 ft	70.4	40	66.5
Excavator	100 ft	74.7	40	70.7
Generator	100 ft	74.6	50	71.6
Paver	100 ft	71.2	50	68.2
Pneumatic Tools	100 ft	79.2	50	76.1
Roller	100 ft	74.0	20	67.0
Welder/Torch	100 ft	68.0	40	64.0
Grader	100 ft	79.0	40	75.0
Pickup Truck	100 ft	69.0	40	65.0
Source: Stantec 2015, Federal Highway Administration, 2006				

A reasonable worst-case noise condition for general construction activity is that a grader, dozer, and compactor would operate simultaneously. This represents a conservative scenario, as it assumes that all three pieces of equipment would be operating at the same time and same place. Construction would occur in sequential phases. Thus, in reality, it is not likely that the three loudest pieces of equipment would be operating simultaneously at the exact location of the project site closest to the nearest residence. Nevertheless, the RCNM calculated that this scenario would result in a combined noise level of 79.0 dBA-Lmax and 77.5 dBA-L_{eq} at 100 feet. These calculations represent the worst-case scenario at the nearest residences, located approximately 100 feet from the proposed project where general construction activity would occur.

The nearest sensitive receptor to the project site is the Our Lady of Perpetual Help School, located approximately 100 feet to the east of the project site. Although the school is only 100 feet from the project site and therefore could potentially be affected by construction noise levels above the City noise threshold, there is a change in topographic elevation resulting in a hill separating the two parcels, located between the project site and the school. According to Figure 2.0-5, the topographic lines indicate that the hill between the project site and Our Lady of Perpetual Help is approximately 15 feet in height. This hill would act as a natural noise barrier and would shield the school from noise generated during construction activities. According to the FHWA, a noise barrier can achieve a 5 dB noise level reduction when it is tall enough to break the line-of-sight form the noise source to the receiver. Once the barrier exceeds the line of sight, it can achieve approximately 1.5 dB of additional noise level reduction for each meter of barrier height (Federal Highway Administration 2001). At 15 feet (4.6 meters) in height, the hill located between the project site and the school would achieve a noise level reduction of approximately 9.5 dB, assuming the average line-of-sight is 5 feet in height. The project foundation work would consist of spread footing columns installed via trenching and would not require pile driving or similar that could cause building damage at exterior sites. In conclusion, noise levels at the Our Lady of Perpetual Help School during construction would be adequately blocked by the hill located between the properties to levels of approximately 69.5 dBA-Lmax and 68 dBA-Leq. These levels are below the Daly City noise threshold.

Mitigation Measure 2.6(a) from the Plan Bay Area EIR would be implemented to reduce construction noise in the proximity of sensitive receptors. This would include the construction of temporary barriers where construction noise levels have the potential to exceed the maximum exterior residential noise standard, specifically along Brunswick Street where residents are located approximately 100 feet from the project area.

Noise would also be generated during the construction phase by increased truck traffic on area roadways. A substantial project-generated noise source would be truck traffic associated with transport of heavy materials and equipment to and from construction sites. This noise increase would be of short duration, and would likely occur primarily during daytime hours. The amount of additional traffic on the local roadways would represent an insignificant addition to the existing noise levels. Mission Street and John Daly Boulevard would be used for site access, both of which are arterial streets with high levels of traffic. It is anticipated that traffic from construction activities would have an insignificant impact on noise levels to sensitive receptors due to the insignificant increase of traffic from existing conditions.

The City of Daly City Municipal Code Section 9.22.030 regulates noise from the hours of 10:00 PM to 6:00 AM, including construction-generated noise as outlined below:

"*Between the hours of ten p.m. and six a.m. of the following day, no person shall cause, create or permit any noise, music, sound or other disturbance upon his property which may be heard by, or which noise disturbs or harasses, any other person beyond the confines of the property, quarters or apartment from which the noise, music, sound or disturbance emanates.*"

Construction activities would be temporary in nature, would occur during normal daytime working hours listed above, and would comply with the requirements of the Daly City Noise Ordinance. With the implementation of the Plan Bay Area EIR Mitigation

Measure 2.6(a), impacts from construction noise would be considered a less than significant with mitigation.

e) (For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport of public use airport) Expose people residing or working in the project area to excessive noise levels?

AND

f) (For a project within the vicinity of a private airstrip)Expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. The project site is not located near an existing airport and is not within an area covered by an existing airport land use plan. The nearest airport is the San Francisco International Airport (SFO), located approximately seven miles southeast of the project site. According to the Daly City General Plan, the project site is located outside of the SFO airport noise contour of 60 dB. Although aircraft-related noise could occasionally be audible at the project site, noise would be extremely minimal. Exterior and interior noise levels resulting from aircraft would be compatible with the proposed project. Therefore, a less than significant impact would occur.

3.11.7 Project Specific Mitigation Measures

None required.

3.11.8 Findings

All additional significant environmental impacts of the proposed project relating to noise would be mitigated to a less than significant level with the implementation of the Plan Bay Area EIR Mitigation Measure 2.6(a).

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3.12 POPULATION AND HOUSING

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

3.12.1 Environmental Setting

The project site is located in the Hillside neighborhood of Daly City at the "Top of the Hill," where Mission Street meets John Daly Boulevard. This neighborhood is also referred to in the Daly City General Plan as Planning Area 10. According to the Daly City General Plan, the Hillside neighborhood contains the greatest mixture of residential densities in the City of Daly City. Existing densities range from a low of 12 du/ac to a high density of over 50 du/ac. The Hillside neighborhood is located east of Mission Street and is essentially bisected by the north-south oriented Hillside Boulevard, which merges into Mission Street at John Daly Boulevard.

The City of Daly City experienced significant growth in the decades immediately following World War II. The City's population quadrupled between 1950 and 1970 with the construction of the Westlake and Serramonte subdivisions. By 1990 the population was approximately 90,000. The United States census reported a population of 101,123 in 2010. Although population growth is anticipated to continue, it is anticipated to do so at a modest rate, reflecting the fact that the City is largely built out (Daly City General Plan 2013).

According to ABAG growth estimates, the City can expect to add about 19,000 more residents between 2010 and 2030, or about 950 residents per year. This numerical estimate is likely accurate given the amount of population growth documented during the past 20 years (between 1990 and 2010), when about 14,400 people were added to the City's population. Between 1990 and 2008, the City of Daly City exhibited a population growth rate comparable to adjacent jurisdictions within San Mateo County, as well as the City and County of San Francisco. Like the City of Daly City, these communities are largely built out and it is for this reason that their population growth rates are much less than those projected for the State as a whole. Population growth projections provided by ABAG also identify a slightly higher growth rate for the Bay Area

region, where population is projected to increase by almost 20% through 2030. The projected population growth rate for the City of Daly City during this same time period is estimated to be about 13%, which is comparable to growth rates projected for San Mateo and San Francisco Counties, as well as the jurisdictions immediately adjacent to the City of Daly City (Daly City General Plan 2013). The City's population density is second only to that of San Francisco as the densest cities in the Bay Area, with approximately 13,270 persons per square mile, compared to 17,320 persons per square mile in San Francisco (Daly City General Plan 2013).

The City's housing stock composition largely mirrors that of San Mateo County, with single-family homes being the majority at 65%. Multi-family housing represents all but 2% of the remaining housing stock, which is comprised of mobile homes.

The residential growth rate in Daly City has decreased significantly since the 1980s and 1990s, when 10-year growth rates were 8.5% and 7%, respectively. The growth rate between 2000 and 2010 was 1.5%. Comparatively, this is half the growth rate of San Mateo County as a whole, and the smallest growth rate in the Bay Area. The primary reason for the limited growth rate in the City, as described in the Daly City General Plan Housing Element, is the relatively limited supply of developable land, given the lack of parcels that are large enough for substantial development projects (Daly City General Plan 2013).

The project site represents one of a limited number of vacant areas within the Hillside neighborhood. The largest concentration of vacant land exists in the northern and southern portions of this neighborhood. The vacant land in the northern portion is on steep slopes with limited access and is not considered easily buildable. There is also vacant land immediately east of Hillside Park, south of the project site. The vacant land in the southern portion of the neighborhood is a mixture of vacant and underutilized parcels. These parcels represent the majority of infill residential parcels in the neighborhood.

3.12.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.9 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on population and housing. The Daly City General Plan EIR identifies less than significant impacts on population and housing with implementation of the policies and goals identified in the Daly City General Plan.

Policies

Policy HE-1 Maintain and, where possible, create larger housing sites throughout the City.

Policy HE-4 Assure that standards for new housing construction comply with appropriate aircraft noise abatement requirements.

Policy HE-8 Avoid rezoning properties that are presently designated or zoned for residential uses for non-residential uses.

Policy HE-11 Continue to require affordable units in all new housing development and in new condominium conversions.

Policy HE-20 Encourage voluntary housing rehabilitation and reconstruction.

Policy HE-30 Require property owners to provide relocation assistance to renters displaced where rental units in which they live were constructed or are maintained in violation of the Daly City Municipal Code.

Policy HE-31 Ensure that, in instances where higher density mixed-use development is permitted adjacent to existing neighborhoods; the impacts of building height are decreased to the maximum extent feasible without reducing General Plan density.

3.12.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.12.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.3 of the Plan Bay Area EIR evaluated the potential impacts that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, Mitigation Measures are identified to reduce these impacts.

a. Displacement of Communities

The Plan Bay Area EIR analyzed the potential impacts related to residential or business disruption or displacement of existing population and housing (Impact 2.3-1), and determined with the implementation of Plan Bay Area EIRA Mitigation Measure 2.3(a), 2.3(b), and 2.3(c), the impact would be less than significant with mitigation.

Please refer to Section 3.9, Land Use and Planning, for a discussion of regional and local effects associated with this impact.

3.12.5 Mitigation Measures from the Plan Bay Area EIR that Apply to the Project

None required.

3.12.6 Project Specific Impact Discussion

a) Induce substantial 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. This analysis assesses the proposed project's potential to induce substantial population growth. There are two types of population growth: direct and indirect. Direct population growth can occur from the development of new residential units. Indirect population growth can occur from the creation of new employment opportunities or the removal of a barrier to growth (e.g., the extension of urban infrastructure to an undeveloped area). The proposed project would not significantly directly or indirectly induce population growth, as explained below.

Direct Population Growth

The proposed project would result in the construction of a 100% affordable senior mixed-use development project comprised of 206 studio unit apartments and approximately 6,451 sf of office/commercial space and 2,719 sf of leasing space (for a total of 9,170 sf) on a 1.15 acre site. Assuming an average of two residents per unit, the residential component would accommodate approximately 412 new residents. The proposed project would include approximately 34,325 sf of parking space that would consist of 59 parking stalls. The proposed project would not create new roads or extend utilities beyond those required for the project. As discussed above, according to ABAG growth estimates, the City of Daly City can expect to add about 19,000 more residents between 2010 and 2030, or about 950 residents per year. The residential portion of the proposed project would contribute approximately 412 new residents which, if full occupancy was realized within a one year period, would represent 43% of the anticipated annual residential growth. With an estimated 2015 population of approximately 108,938 (extrapolating from the 2010 population of 101,123 with a 1.5% growth rate), the proposed project's residential contribution would be approximately 0.38% of the City's annual population growth. Implementation of the proposed project, therefore, would not induce substantial growth in the area. Impacts would be less than significant.

Indirect Population Growth

The proposed project would result in the construction of up to 9,170 sf of commercial space. Based on the Daly City General Plan's allowable average FAR for the C-MU land use designation (1.0 to 6.0 or approximately 304 sf per employee), the number of employees expected from the proposed project is 30 (9,170 sf ÷ 304 = approximately 30 jobs). New jobs provided by the proposed project would reasonably be expected to be filled by the existing workforce in the City of Daly City and would not induce substantial indirect population growth. Therefore, impacts would be less than significant.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project site is currently vacant and does not contain existing housing. Development of the proposed project would not result in any housing displacement that would necessitate the construction of replacement housing elsewhere. Therefore, there would be no impact.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. Construction of the proposed project would not result in the displacement of any people, either for short-term construction or permanently as a result of project implementation that would necessitate the construction of replacement housing elsewhere. Therefore, there would be no impact.

3.12.7 Project Specific Mitigation Measures

None required.

3.12.8 Findings

All additional significant environmental impacts of the proposed project relating population and housing would be less than significant.

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3.13 PUBLIC SERVICES

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	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:				
	Fire protection?	☐	☐	☒	☐
	Police protection?	☐	☐	☒	☐
	Schools?	☐	☐	☒	☐
	Parks?	☐	☐	☒	☐
	Other public facilities?	☐	☐	☒	☐

3.13.1 Environmental Setting

The City of Daly City provides fire, police, and parks and recreation services in the vicinity of the project site.

Fire

The City of Daly City is served by the North County Fire Authority (NCFA), a Joint Powers Authority that serves Brisbane, Daly City, and Pacifica. The NCFA has eight stations, five of which are located in the City of Daly City. The station located closest to the project site is Station 92 at 18 Bepler Street, located approximately 0.2 miles west of the project site.

The NCFA and its personnel provide emergency and non-emergency service to an area approximately 60 square miles with a population of over 185,000 citizens. These services are managed through three sectors of the NCFA, including an Operations Bureau, Support Services Bureau, and the Fire Prevention and Administrative Services Bureau.

In 2012, the NCFA responded to over 12,000 emergency and non-emergency incidents and achieved an overall 95% total reflex time; from receipt of call, dispatch, turnout, and travel to arrival in seven minutes or less by a single fire company for all emergency incidents, which exceeds the goal set by Daly City of meeting that goal 90% of the time. For multiple fire companies, the total reflex time was 11 minutes or less 83% of the time, which is below the Daly City goal of 90%. However, the City of Daly City maintained its Insurance Services Offices (ISO) Class 2 rating, which meets the City's target of maintaining a Class 2 rating (North County Fire Authority- Annual Report 2012).

Police

The City of Daly City Police Department (DCPD), the largest police department in San Mateo County, provides police protection services in the City of Daly City. The Department offices are located at 333 90th Street. In 2011, the Department received 33,278 calls and the average response time for Priority One calls was seven minutes. The DCPD is structured into two Bureaus, including a Field Operations Bureau, and the Operations Support Bureau and represents San Mateo County's largest police department with 111 sworn, and 43 non-sworn personnel. The Field Operations Bureau includes standard field operations divided into two divisions, Division A and Division B, a Bicycle Patrol Unit, a Canine Program, Gang Task Force, Police Cadet Program, and a Special Weapons and Tactics (SWAT) team. The Operations Support Bureau includes an Investigations Division and a Technical Services Division. The Investigations Division includes Violent Crimes, Homicide Cold Cases, Robbery, Fraud, Sex Crimes, Property Crimes, Narcotics Task Force, and Gang Intelligence Unit. The Technical Services Division includes a Communications Unit, Records Unit, and Property and Evidence Unit.

Schools

The City of Daly City is served by five public school districts comprised of 15 elementary schools, four middle schools, and six high schools. The five districts are as follows:

- Jefferson Elementary School District serves K-8 students in the City of Daly City, except for the Bayshore, Southern Hills, and Serramonte neighborhood.
- Jefferson Union High School District serves grades 9-12 in all of Daly City, except for the Serramonte neighborhood.
- Bayshore Elementary School District provides K-8 services in the Bayshore Neighborhood, and is comprised of two schools.
- Brisbane Elementary School District serves K-8 students in the Southern Hills Neighborhood, and is comprised of three schools.
- Southern San Francisco Unified School District serves K-12 in the Serramonte Neighborhood south of Hickey.

Jefferson Elementary School District reported enrollment of 7,111 students within its district during the 2014/2015 school year. Susan B Anthony Elementary, which would service the proposed project reported enrollment of 548 students in the 2014/2015 school year. Thomas R. Pollicita Middle, which would service the project area reported enrollment of 696 students in the 2014/2015 school year. Jefferson High, which would service the proposed project reported enrollment of 1,135 students in the 2014/2015 school year.

Parks

The City of Daly City is comprised of 13 municipal parks and 12 tot lots, resulting in approximately 83 acres of developed public recreational park space. In addition to City parks, the San Bruno Mountain State and County Park provides an additional 2,063 acres of recreational open space east of the City's Hillside neighborhood. Although the San Bruno Mountain Park is comprised of State and County owned lands, it is managed by the San Mateo County Division of Parks and Recreation. Further, Thornton Beach State Park also provides an overlook near Highway 1 and at the end of John

Daly Boulevard; however, this park has largely been inaccessible due to landslides. The City also includes three private parks consisting of golf and country clubs located in the northwestern portion of the City. These private parks are the Lake Merced Golf and Country Club, and portions of the Olympic and San Francisco Golf and Country Clubs. These parks are reserved for member access only; therefore, are not open to the general public or residents of the City.

The City has six recreational facilities dispersed throughout the City and although the City has approximately 0.26 acres of parkland per 100 du, it is below the State Recreation Commission standard of 2.6 acres of parkland per 100 du. Further, the City of Daly City is comprised of 0.76 acres of parkland per 1,000 residents, which is below the National Park and Recreation Commission Standard of approximately 4 acres per 1,000 persons. In order to meet the minimum standard, the City would need to provide several hundred acres of additional parkland. The City's Municipal Code identifies a goal of 3 acres per 1,000 residents, which would mean the City would need to provide 15.8 acres of parkland to meet future need based on population.

Other Facilities

The Daly City Public Library is a member of the Peninsula Library System, which offers four locations within the City. The design, inspection and maintenance of municipal parks in the City of Daly City are the responsibility of the City of Daly City's Public Works Department while the programming of park activities and recreation services are the responsibility of the Department of Library and Recreation Services.

3.13.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.11 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on various public services including fire, police, schools, and parks. The Daly City General Plan EIR identified potentially significant impacts on public services. However, policies contained in the proposed Daly City General Plan would reduce these potential impacts on public services to less than significant levels.

Policies

Policy SE-3.1: Support and maintain the City's Insurance Service Office (ISO) rating of a Class 2, which establishes the fire insurance rates for the City.

Policy SE-3.2: Provide for a seven (7) minute total reflex time for arrival of a first due company to 90% of all emergency incidents.

Policy SE-3.3: Provide for an eleven (11) minute total reflex time for arrival of multiple companies to 90% of all structure fires.

Policy SE-3.4: Maintain fire company reliability, whereby 90% of all incidents are handled by the district fire company.

Policy SE-3.5: Continue to support and participate in the county wide auto-aid and boundary drop agreement within San Mateo County, which provides the closest fire resources to emergency and non-emergency incidents regardless of jurisdiction.

Policy SE-5.1:	Maintain the City's emergency readiness and response capabilities, especially regarding hazardous materials spills, natural gas pipeline ruptures, earthquakes, and flooding due to dam failure, peak storms, and like failure.
Policy SE-5.2:	Continue to participate with San Mateo County's Automatic and Mutual Aid Programs, Area/County Emergency Plan, and Operational Area Emergency Services Organization as a basis for community emergency preparedness.
Policy SE-5.3:	Continue to analyze the significant seismic, geologic and community-wide hazards as part of the environmental review process; require that mitigation measures be made as conditions of project approval.
Policy SE-5.4:	Utilize emergency evacuation routes as determined by the Police Department. The evacuation routes will follow the major roadways as set forth in the Circulation Element.
Policy SE-5.5:	Promote awareness of the City's emergency operations procedure; utilize media sources to inform residents.
Policy SE-5.6:	Improve inter-jurisdictional, interagency cooperation with other public and private agencies for safety in future land use planning, hazard prevention and emergency response.
Policy SE-5.7:	Support the adoption and full implementation of the Local Hazard Mitigation Plan (LHMP) which was adopted by the City Council on March 12, 2012, under resolution 12-33 and accepted by FEMA and posted by ABAG June 5, 2012.
Policy RME-12:	Encourage a diverse, equitable, and integrated system of park facilities throughout Daly City that are accessible to all age, social, and economic groups and all geographic areas of the City.
Policy RME-13:	Require the dedication of parkland or the payment of an in-lieu fee in accordance with the Subdivision Map Act.
Policy RME-14:	Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3).

3.13.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed

project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.13.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.14 of the Plan Bay Area EIR evaluated potential impact to public services that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, mitigation measures are identified to reduce these impacts.

a. Public Services

The Plan Bay Area EIR analyzed the potential impact related to the need for expanding facilities in order to maintain adequate schools, emergency services, police, fire, and park and recreation services (Impact 2.14-1), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.14(a), the impact would be less than significant with mitigation.

The Plan Bay Area EIR analyzed the potential impact related to increased use of existing parks or recreational facilities (Impact 2.14-2), and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.14(b), the impact would be less than significant with mitigation.

3.13.5 Mitigation Measures From the Plan Bay Area EIR that Apply to the Project

None required.

3.13.6 Project Specific Impact Discussion

a) 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:

Fire protection

Less Than Significant Impact. Implementation of the proposed project could potentially induce population growth, as the proposed project would include a residential use, as well as require both a temporary construction and permanent operational workforce. While the proposed project's temporary and operation workforce requirements would not induce substantial population growth in the project area or region, the proposed project would include senior housing that would serve City residents and age 55 years and older. As addressed in the Project Description the facility would consist of up to 206 units. The 2010 U.S. Census found that average household size for renter-occupied units is 1.97 persons per household. Using this resident-to-household ratio, the proposed project's facility would generate approximately 412 persons. As such, by generating up to 412 new residents, all of which would be between the age 55 years and older, the proposed project would likely result in more service calls to the NCFA. The other proposed non-residential land uses on the project site are also anticipated to result in more service calls as well, especially when compared with the current undeveloped

and nonexistent use. The number and type of service calls are expected to be consistent with other commercial retail uses located elsewhere in the City.

The project site is located within the service area of Fire Station No.92 which is approximately 0.2 miles west from the project site. Although the NCFA is not currently meeting its primary response time objective, based on the relatively shorter distance to the project site, it is anticipated that NCFA would be able to respond to the site within the NCFA response goal without the need for new or expanded facilities. A Service Letter was sent to the NCFA on May 26, 2015 and written response from NCFA indicated that the proposed project's residential use would not affect the District's ability to deliver emergency services to the project site and the surrounding service area (Appendix H).

While the NCFA stated that the proposed project would not result in the construction of new or the expansion of existing Fire District facilities, it is assumed given the infill nature of the project and its location to existing stations, would not indirectly result in future environmental impacts from construction or expansion of facilities. However, the high number of service calls typically associated with senior housing facilities could still impact NCFA response times to other emergencies within its service area. According to the FEMA, the "expanding older adult population may require ever-increasing amounts of public services, health care, and additional services. Of particular importance to fire and emergency medical services (EMS) is finding a way to accommodate a vastly increased demand for services from an already large and continually growing segment of the population." This aging segment of the population, combined with current overcrowding conditions in medical emergency departments, could serve as an additional crisis for fire protection and EMS providers. To meet this service demand, fire protection cannot focus on response as the primary intervention, and thus FEMA recommends prevention and education efforts as necessary to curtail the increasing need for fire protection and EMS providers.

Generally, the risk of structural fires on the project site would be low, as the buildings, structures, and facilities developed on the project site would be constructed with newer, flame retardant building materials using modern construction methods. All structural improvements constructed on the site would comply with the standards contained in the current California Fire and Building Codes. In addition, the NCFA Fire Prevention Bureau would review the proposed project's development plans during the project's planning and design phase, and would inspect the project's construction site during the construction phase to ensure that all new improvements meet State and local Building and Fire Code requirements. Further, once operational, the proposed project would be subject to the NCFA building inspection program, which would ensure compliance with applicable State and local standards, including requirements for emergency access. Finally, the project site is not located in a high-risk area for wild fires.

To help offset the construction of facilities, the procurement of equipment, and the hiring of additional personnel, the NCFA collects mandatory fees on new development projects. As part of the proposed project's entitlement process, the project would be responsible for paying its fair share of these impact fees, therefore the project would have a less than significant impact on fire protection services.

Police protection

Less Than Significant Impact. As addressed in impact a-1) the proposed project would potentially induce population growth, as the proposed project would include a residential use, as well as require both a temporary construction and permanent operational workforce. While the proposed project's temporary and operation workforce requirements would not induce substantial population growth in the project area or region, the proposed project would include senior housing that would generate approximately 412 persons. As such, by generating up to 412 new residents, the proposed project would likely result in more service calls to the DCPD, although possibly not to the same extent as traditional single-family residential units. The other proposed non-residential land uses on the project site are also anticipated to result in more service calls as well, especially when compared with the current undeveloped and nonexistent use. The number and type of service calls are expected to be consistent with other commercial uses located elsewhere in the City.

The project Site is already located within the DCPD's service area and is currently served by the Police Department located at 333 90th Street approximately 1.25 miles southwest of the project site. The Department's average response time for priority-one calls was seven minutes, from the time the dispatcher received the call to when the police arrived. The average response time between the police receiving notice from the dispatcher to police arrival was four minutes, though the Department does not have a formally adopted response time standard (Daly City General Plan EIR 2012). Given that the proposed project is promoting infill development along transit corridors, that are in central locations in the City which leads to shorter response time; it is anticipated that since the existing project area is already patrolled by the DCPD, and since the Department is already meeting its response time goal, DCPD would be capable to continue to responds to the site within its established response time standard without the need for new or expanded facilities.

Correspondence from the DCPD supports this finding, indicating that the proposed project would not result in the construction of new or the expansion of existing WCPD facilities (Appendix H). In addition, as part of proposed project approval, the DCPD would review and comment on the site plan as it relates to access and egress that are designed to enhance safety on the project site and reduce crime. Therefore, impacts associated with DCPD facilities would be less than significant.

Schools

Less Than Significant Impact. The proposed project consists of a 206-unit, five-story, senior housing facility with ground floor commercial that would not likely generate additional students in the area, as senior citizens generally do not have school-aged children. The residential aspect of the proposed project would not directly or indirectly generate a substantial increase in new students in the area, result in any adverse physical impacts, or impede performance objectives for any of local schools.

Correspondence from Jefferson Union High School District indicated there would be no need to expand school district facilities even if the proposed project included multi-family housing (Appendix H).

Additionally, the other proposed non-residential land uses on the project site are not anticipated to trigger a substantial increase in the school population because it is anticipated that the temporary and permanent employees required by proposed

project could come from the City and County without the need for relocation of themselves and their families. Thus, the proposed project would not result in the construction of new or the expansion of existing school facilities. Furthermore, the proposed project would be required to pay statutory developer fees under California SB 50. The payment of SB 50 impact fees is full mitigation for school facilities under CEQA, and levels of applicant fee contribution are determined by the State Allocation Board and increase annually. Currently, SB 50 requires developers to pay $2.97 per square foot for new residential development. Therefore, because the proposed project would generate less than one-tenth of 1% of the existing student populations and pay the required SB 50 developer fees, a less than significant impact would occur regarding school facilities and services.

Parks

Less Than Significant Impact. The City currently does not have a parkland ratio standard. There are 13 municipal parks and 12 tot lots in the City of Daly City, resulting in a total of 82.95 acres of developed public recreational space, which works out to only approximately 0.82 acres per 1,000 residents. School playgrounds provide additional recreational open space opportunities; however they are not included in the acreage because they are owned and regulated by their respective school districts, and are only available during limited periods of time.

This parkland to population ratio also does not take into account the numerous regional park facilities accessible to residents. San Bruno Mountain State and County Park, a 2,063 acre park located in the Hillside Planning Area, includes multiple recreational facilities and trails. At the coastline, Thornton Beach State Park includes a panoramic overlook and parking lot adjacent to

Highway 1, at the end of John Daly Boulevard. Lake Merced, which is adjacent to the City limits, north of the Westlake Planning Area, is a freshwater lake located in San Francisco but utilized by many Daly City residents due to its proximity. Lake Merced includes a circuit path all the way around as well as facilities such as picnic areas and barbeques. Additionally, the Fort Funston/Golden Gate National Recreation Area is also adjacent to the city limits, north of the Westlake Planning Area, and includes multiple trails. The abundance of regional open space around the city indicates that residents have access to more open space than shown in the above ratio, although these facilities are trail oriented, rather than active facilities (such as those that include playfields).

Based on the City's current parkland dedication ratio of three acres per 1,000 residents in the Municipal Code, the City would need to provide 15.8 acres of parkland to meet future need resulting from the additional population (without ameliorating existing deficiencies). Assuming an average of two residents per unit, the residential component of the proposed project would accommodate approximately 412 new residents. To meet this demand, the proposed General Plan includes a task to develop part of the 140-acre undeveloped Mussel Rock area into a park for community use. General Plan policies have been adopted to ensure adequate parks and recreational facilities are provided to accommodate the increase in new residents. During the proposed project's entitlement process, the applicant would coordinate with the City of Daly City regarding the collection of fees in accordance with AB1600 prior to operation of the proposed project and occupancy of the facility. Because the proposed project would increase the number of residents in the area and increase the demand on park facilities, a potentially-significant impact would occur; however, this impact would be

reduced to a less than significant level with adherence to the City code and payment of in-lieu impact fees.

Other public facilities

Less Than Significant Impact. The design, inspection and maintenance of municipal parks in the City of Daly City are the responsibility of the City of Daly City's Public Works Department while the programming of park activities and recreation services are the responsibility of the Department of Library and Recreation Services. The Daly City Public Library is a member of the Peninsula Library System, which offers four locations within the City. The closest location is John Daly branch located at 134 Hillside Boulevard, approximately 300 yards southwest of the project site. Given the proposed project's generation of approximately 412 new residents would not affect the City's ability to provide library space. Thus, the proposed project would not result in the construction of new library branches or the expansion of existing branches. Therefore, impacts associated with other public facilities such as public libraries would be less than significant.

3.13.7 Project Specific Mitigation Measures

None required.

3.13.8 Findings

All additional significant environmental impacts of the proposed project relating to public services would be less than significant.

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3.14 RECREATION

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

3.14.1 Environmental Setting

Parklands

The parklands of the City of Daly City include 13 municipal parks and 12 tot lots, resulting in approximately 83 acres of developed public recreational park space. In addition to City parks, San Bruno Mountain State and County Park provides an additional 2,063 acres of recreational open space east of the City's Hillside neighborhood. Although San Bruno Mountain Park is State- and County owned land, it is managed by the San Mateo County Division of Parks and Recreation. Further, Thornton Beach State Park also provides an overlook near Highway 1 at the end of John Daly Boulevard; however, this park has largely been inaccessible due to landslides.

The City also includes three private parks consisting of golf and country clubs located in the northwestern portion of the City. These private parks are the Lake Merced Golf and Country Club and portions of the Olympic and San Francisco Golf and Country Clubs. These parks are reserved for member access only; therefore, they are not open to the general public or residents of the City.

The City has six recreational facilities dispersed throughout the City, and, although the City has approximately 0.26 acres of parkland per 100 du, it is below the State Recreation Commission standard of 2.60 acres of parkland per 100 du. Further, the City of Daly City has 0.76 acres of parkland per 1,000 residents, which is below the National Park and Recreation Commission Standard of approximately 4.00 acres per 1,000 persons.

In order to meet the minimum standard, the City would need to provide several hundred acres of additional parkland. The City's Municipal Code identifies a goal of 3.0 acres per 1,000 residents, which would mean the City would need to provide 15.8 acres of parkland to meet future needs, based on population growth.

3.14.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.11 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on recreational resources. The Daly City General Plan EIR identified potentially significant impacts on recreation. However, existing national, State, and local laws, as well as policies contained in the proposed Daly City General Plan, would reduce potential impacts on recreational resources to less than significant levels.

Policies

Policy RME-12: Encourage a diverse, equitable, and integrated system of park facilities throughout Daly City that are accessible to all age, social, and economic groups and all geographic areas of the City.

Policy RME-13: Require the dedication of parkland or the payment of an in-lieu fee in accordance with the Subdivision Map Act.

Policy RME-14: Prioritize the dispersal of park in-lieu fees collected from the development of new subdivisions to ensure that the fees are spent in the appropriate areas (see Program RME-3).

3.14.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.14.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.14 of the Plan Bay Area EIR evaluated potential impact to recreation resources that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, mitigation measures are identified to reduce these impacts.

a. Increase the Use of Existing Recreational Facilities

The Plan Bay Area EIR analyzed the potential impact related to recreational facilities (Impact 2.14-2) and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.14(b), the impact would be less than significant with mitigation.

b. Require Construction/Expansion of Recreational Facilities

The Plan Bay Area EIR analyzed the potential impact related to recreational facilities (Impact 2.14-1) and determined with the implementation of Plan Bay Area EIR Mitigation Measure 2.14(a), the impact would be less than significant with mitigation.

3.14.5 Mitigation Measures from the Plan Bay Area EIR that Apply to the Project

Compliance with the applicable policies/regulations and the implementation of Plan Bay Area EIR Mitigation Measure 2.14(b) would reduce the proposed project's impacts related to recreational resources to a less than significant level.

"***2.14(b)*** *Mitigation measures that shall be considered by implementing agencies and/or project sponsors where feasible based on project-and site-specific considerations include, but are not limited to:*

- *Ensuring that adequate parks and recreational facilities will be available to meet or satisfy levels identified in the applicable local general plan or service master plan prior to approval of new development.*
- *Complying with existing local regulations and policies that exceed or reasonably replace measures that reduce impacts on recreational facilities.*

Significance After Mitigation

Projects taking advantage of CEQA Streamlining provisions of SB 375 (Public Resources sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as feasible, to address site-specific conditions. To the extent that an individual project adopts and implements all feasible mitigation measures described above, the impact would be less than significant with mitigation (LS-M).

MTC/ABAG cannot require local implementing agencies to adopt the above mitigation measures, and it is ultimately the responsibility of a lead agency to determine and adopt mitigation. Therefore it cannot be ensured that these mitigation measures would be implemented in all cases, and this impact remains significant and unavoidable (SU)."

3.14.6 Project Specific Impact Discussion

a) 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 With Mitigation. As discussed above, the City's Municipal Code identifies a goal of 3.0 acres per 1,000 residents. The proposed project's generation of up to 406 new residents would not affect the City's ability to maintain its parkland standard because even with the addition of these new residents, the City's parkland-to-residents ratio would still be adequately satisfied. To the contrary, the proposed project would include on-site passive recreation and open space amenities for use by residents and tenants. These on-site amenities would include passive recreation areas, including pedestrian paths and sidewalks that would connect the project site to the City's sidewalk system.

Within the project site, approximately 7,927 sf of common open space would be dedicated to provide open outdoor space. The proposed project open space would consist of 3,757 sf of common open space courtyard, 82 private balconies; which would provide 50 sf of open space, and seven Juliette balconies; which would provide 10 sf of

open space. Thus, not only would the proposed project not substantially increase the use of existing parks or other recreational facilities, but it would also offer residents new passive recreational and open space areas to patronize. Therefore, with adherence to applicable City Codes and regulations, Daly City General Plan policies, and Plan Bay Area EIR Mitigation Measure 2.14(b), proposed project impacts associated the physical deterioration of existing parks or other recreational facilities would be less than significant.

b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less Than Significant Impact. The proposed project would include passive recreation and open space totaling approximately 7,927 sf. The proposed project's open space would include: 3,757 sf of common open space courtyard; 82 private balconies, which would provide 50 sf of open space, each; and seven Juliette balconies, which would provide 10 sf of open space, each. These passive areas and open space would be accessible to onsite users. The potential environmental effects of the planning, construction, and operation of the proposed project, as a whole, including these recreational facilities, are being identified and evaluated as part of the SCEA. This SCEA addresses the potential adverse environmental impacts that could occur as a result of implementation of the proposed project, and where applicable and feasible, identifies recommended mitigation measures that would reduce impacts to acceptable levels of significance. No additional environmental effects would occur beyond those that have already been identified as part of this proposed project analysis, and no additional mitigation is required as a result of the proposed project's inclusion of passive recreational and open space areas on the project site. Therefore, impacts associated with adverse environmental impacts of recreational facilities would be less than significant.

3.14.7 Project Specific Mitigation Measures

None required.

3.14.8 Findings

All additional significant environmental impacts of the proposed project relating to recreational facilities would be mitigated to a less than significant level with the implementation of Plan Bay Area EIR Mitigation Measure 2.14(b).

3.15 TRANSPORTATION AND TRAFFIC

	Would the Project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☒	☐	☐
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways	☐	☒	☐	☐
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?	☐	☐	☐	☒
d)	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒
e)	Result in inadequate emergency access?	☐	☐	☐	☒
f)	Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☒	☐

3.15.1 Environmental Setting

This section of the SCEA is based on the *Final Transportation Impact Analysis* prepared for the proposed project by KD Anderson & Associates, dated April 28, 2015 (see Appendix E). The proposed project qualifies as TPP under Senate Bill (SB) 375. Environmental documents for TPPs are not required to reference, describe or discuss: 1) growth inducing impacts, 2) impacts from car and light duty truck trips on climate change or regional transportation network, or a 3) reduced density alternative to the project. Accordingly, analysis of project effects on US 280 within the project area was not necessary because the freeway is part of the regional transportation network.

However, potential off-site traffic impacts of the proposed project have been analyzed under existing and cumulative conditions, as well as impacts to alternative modes of transportation, access, and temporary impacts during construction.

Study Area and Analysis Scenarios

In urban environments such as the project area, roadway capacity is governed by the operations of intersections. For this reason and because roadway segments were included in the traffic analysis for the Daly City General Plan, the City determines impacts on the roadway system based upon the operations of intersections. The project area includes the following four intersections. The four intersections were selected based on their proximity to the project site, expected usage by project traffic, and susceptibility for being impacted. The list was reviewed and approved by the City's Engineering Division. Figure 3.15-1 illustrates the intersections surrounding the project area. The project area also includes bicycle, pedestrian, and transit facilities within the project vicinity.

- The Mission Street / John Daly Boulevard / Hillside Boulevard intersection is controlled by a traffic signal that is maintained by Caltrans, and auxiliary lanes that have been provided in each direction. The three-lane John Daly Boulevard approach is configured with a separate left turn, and through and right turn lanes. The Mission Street approaches each have separate left turn lanes, but right turns are made from the #3 through lane. The two-lane Hillside Boulevard approach is striped with a separate left turn lane and a combined through plus right turn lane. Crosswalks are provided across each approach and the intersection is illuminated. Bus stops are marked on the southbound Mission Street and the eastbound John Daly Boulevard approaches.

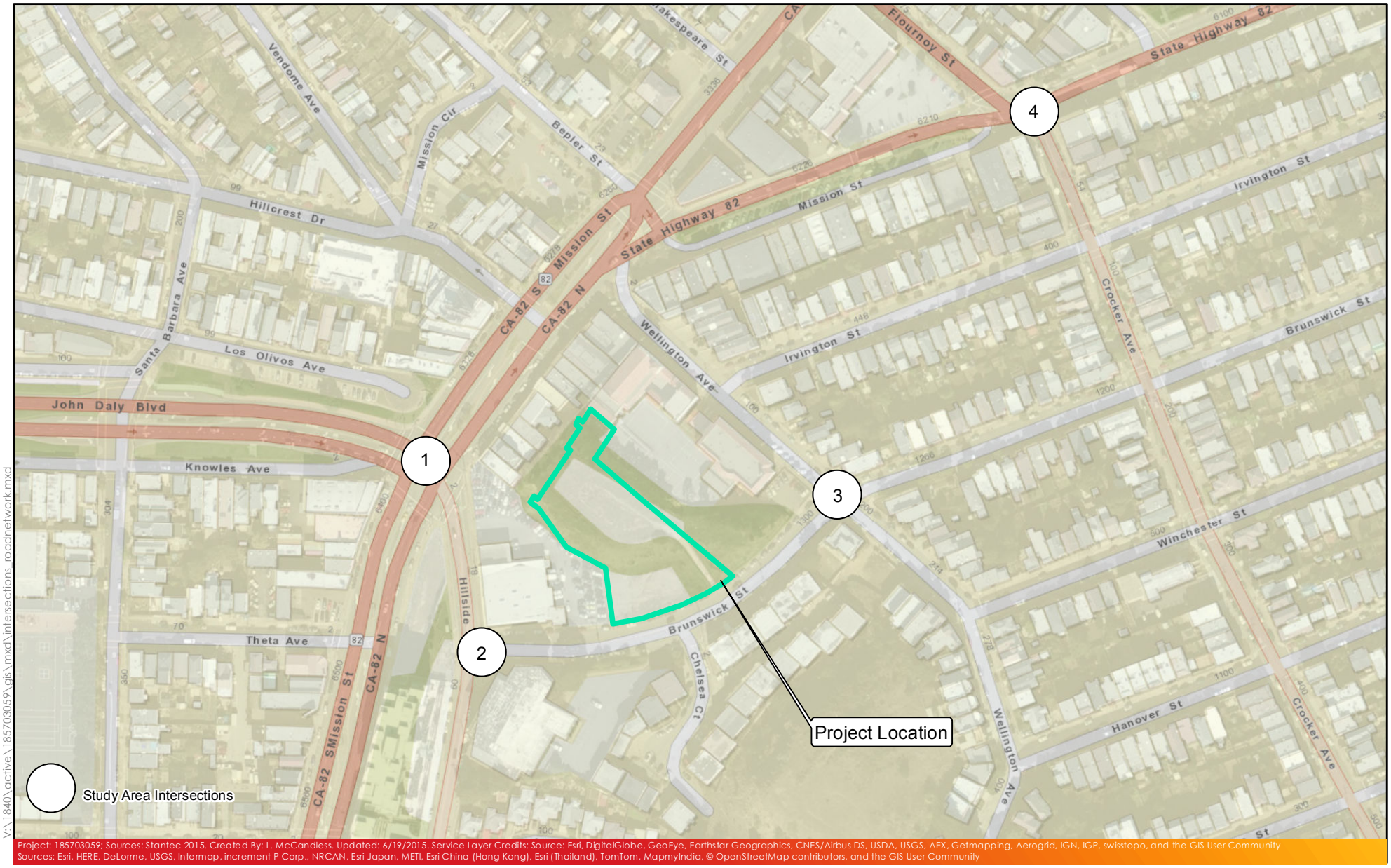
- The Hillside Boulevard / Brunswick Street intersection is a "tee" intersection controlled by a stop sign on the westbound Brunswick Street approach. The Hillside Boulevard approaches have single lanes and the two-lane Brunswick Street approach has separate left turn and right turn lanes. A crosswalk is striped across the Brunswick Street approach.

- The Wellington Avenue / Brunswick Street intersection is controlled by an all-way stop. Each approach has a single lane and crosswalks are striped across each leg of the intersection.

- The Mission Street / Crocker Avenue intersection is controlled by a traffic signal. The three lane one-way eastbound Mission Street approach features a separate left turn lane, a through lane and a combined through plus right turn lane. Westbound Mission Street approach has two lanes striped as a combined left turn and right turn lane and has a separate right turn lane. The northbound Crocker Avenue approach is a single lane that permits through traffic and right turns. The north leg of the intersection is one-way to the north. Crosswalks are striped across three legs of the intersection.

The following scenarios were analyzed:

- Existing Conditions – represents the baseline condition, upon which project impacts are measured. The baseline condition represents conditions in Fall 2014 (i.e., traffic counts were collected in September 11, 2014).



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Stantec

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Figure 3.15-1
Study Area Intersections / Study Area Existing Roadway Network

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- Existing Plus Project Conditions – reflects changes in travel conditions associated with implementation of the proposed project.

- Cumulative Plus Project Conditions – Analyzes conditions for a cumulative scenario, which includes reasonably foreseeable land uses and proposed project implementation.

Weekday AM and PM peak hour intersection turning movement counts were collected for the four study intersections on September 11, 2014. These counts were conducted when area schools were in session. Intersection turning movement counts were made at study intersections during the periods from 7:00 AM to 9:00 AM and from 4:00 PM to 6:00 PM. The four consecutive 15 minute periods with the greatest total volume within each two hour window was identified as the peak hour.

Existing Levels of Service and Signal Warrants

Existing Levels of Service

Figure 3.15-2 displays the existing AM and PM peak hour traffic volumes, lane configurations, and traffic controls at each intersection. At the John Daly Boulevard / Mission Street intersection, the AM peak hour occurred from 7:15 to 8:15 AM and the PM peak hour occurred from 4:30 to 5:30 PM. Table 3.15-1 identifies current intersection Levels of Service at the intersections surrounding the project area. As shown, the level of service at each signalized location satisfies the minimum level of service required by the City of Daly City.

Table 3.15-1: Existing Intersection Level of Service

#	Intersection	Control	Minimum LOS Standard	Time Period					
				AM Peak Hour (7:00 to 9:00 AM)			PM Peak Hour (4:00 to 6:00 PM)		
				LOS	Average Delay (sec/veh)	Signal Warrants Met?	LOS	Average Delay (sec/veh)	Signal Warrants Met?
1	John Daly Blvd / Mission Street / Hillside Blvd	Signal	D	C	29.7	-	C	30.0	-
2	Hillside Blvd / Brunswick Street (westbound left and right turns)	WB Stop	D	**F**	**65.4**	Yes	D	29.6	No
		Signal		B	10.4	-	-	-	-
		All-Way Stop		C	22.8	-	-	-	-
3	Wellington Avenue / Brunswick Street	All-Way Stop	E	B	13.1	No	B	11.55	-
4	Mission Street / Crocker Ave	Signal	D	B	17.6	-	B	17.1	-

Bold indicates conditions in excess of adopted minimum LOS standard
Source: KD Anderson & Associates, 2015

The levels of service reported for un-signalized intersections have also been identified. In each case, the reported value represents "worst case" conditions calculated for motorists waiting to turn onto the major street. At one location, the reported level of service exceeds the minimum level of service required by the City of Daly City (i.e., LOS D or better). Motorists waiting on Brunswick Street at the Hillside Boulevard intersection experience delays that are indicative of LOS F conditions during the AM peak hour.

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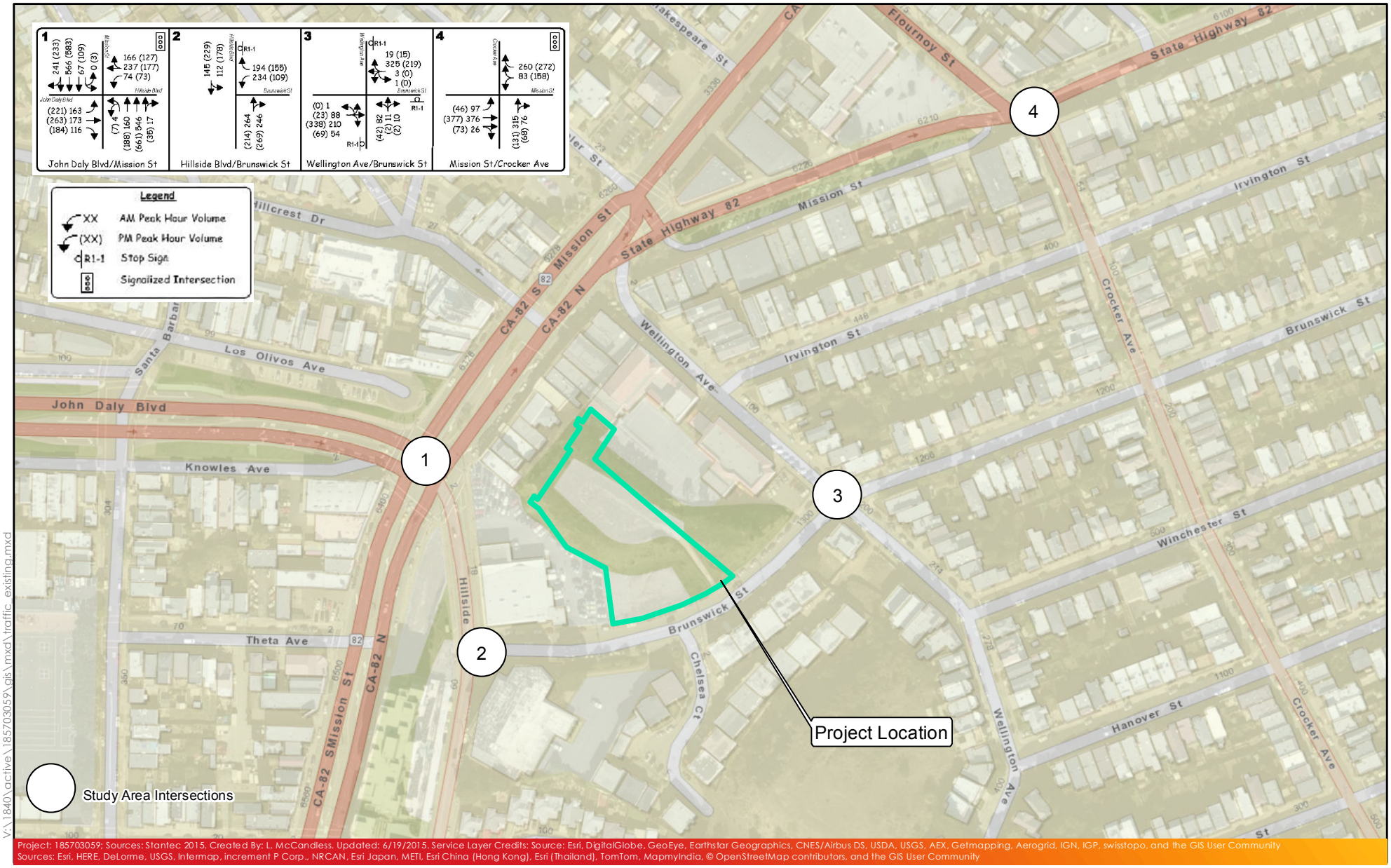

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Project: 185703059; Sources: Stantec 2015. Created By: L. McCandless. Updated: 6/19/2015. Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community
Sources: Esri, HERE, DeLorme, USGS, Intermap, increment P Corp., NRCAN, Esri Japan, METI, Esri China (Hong Kong), Esri (Thailand), TomTom, MapmyIndia, © OpenStreetMap contributors, and the GIS User Community

Stantec

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Figure 3.15-2
Peak Hour Traffic Volumes and Lane Configurations - Existing Conditions

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Alternatives for improving the level of service at this intersection have been considered, but in each case there are issues associated with implementation. A traffic signal might be installed, but the distance between the Brunswick Street and Mission Street intersection is relatively short (i.e., 350 feet from intersection to crosswalk along Mission Street). Coordinating the operation of closely spaced signals can be problematic and because Mission Street is a state highway, Caltrans approval would be required.

An all-way stop is sometimes an alternative to signalization. In this case, however, the overall intersection level of service would be LOS C during the AM peak hour with an all-way stop. However, due to the short distance between the intersection and Mission Street, it is possible that peak period traffic would queue back to Mission Street.

Traffic Signal Warrants

The extent to which current traffic conditions at un-signalized intersections may already justify installation of traffic signals has been reviewed. At the Hillside Boulevard / Brunswick Street intersection, the current AM peak hour volume satisfies MUTCD Warrant 3 (peak hour volume).

The intersection would operate at LOS B during the AM peak hour with the installation of a traffic signal. However, due to the short distance between the intersection and Mission Street, it is possible that peak period traffic would queue back to Mission Street.

Alternative Transportation Modes

Transit

Public transit options, including bus routes are available to the City residents. The City of Daly City is served by two BART stations, SamTrans bus service, and Muni bus service. The proposed project is ½ mile from the Daly City BART station.

San Mateo County Transit District (SamTrans)

SamTrans operates an overall fixed route bus system of 82 routes with a service area of 150 square miles. SamTrans operates 14 fixed bus routes in the City of Daly City with 14 routes directly serving the BART station. Four of the fixed bus routes have vehicles equipped with handicapped access and one route is an express route which runs along Interstate 280 directly into San Francisco.

The project site is adjacent to numerous SamTrans routes. The El Camino Real (ECR) runs along Mission Street south of John Daly Boulevard; as well as, Route 24 and Route 121. Route 130 runs along Hillside Boulevard and Route 14 uses Mission Street, east of the project site.

San Francisco Municipal Railway (Muni)

The San Francisco Municipal Transportation Agency (SFMTA) operates five routes into the City. Route 28-19th Avenue and route 54-Felton serve the Daly City BART station, and the 14-Mission route serves Mission Street at the Top of the Hill. Routes 8-Bayshore Express and 9-San Bruno serve the Bayshore neighborhood. Of the three routes that serve the Daly City BART station, the 28-19th Avenue has the highest number of passengers. Muni has also expressed an interest in extending the 14-Mission line to the Daly City BART station.

Bay Area Rapid Transit (BART)

The City of Daly City is presently served by two BART stations: the Daly City BART Station located at the corner of John Daly Boulevard and Junipero Serra Boulevard, and the Colma BART Station located south of San Pedro Road in unincorporated Colma. The Daly City General Plan reports that in Fiscal Year 2009, the Daly City and Colma stations in combination were used by almost 12,000 riders each weekday.

Paratransit Services

Paratransit is an alternative mode of flexible passenger transportation that does not follow fixed routes or schedules. In the City of Daly City, paratransit consists of shuttlebuses, carpools, vanpools, and taxicab services. As described below, some paratransit services respond to special needs of people who cannot use public transit and require an on-call service to get to a doctor's appointment, shopping, or social event. Other paratransit services are pre-arranged ridesharing services that operate mainly during peak times and provide commuters with constant work schedules the opportunity to share vehicles.

Shuttlebuses

Shuttlebuses services are typically provided by employers or homeowners associations to transport residents or employees to work or to public transit hubs. Examples of shuttlebuses in the City of Daly City are the Seton Shuttle and the shuttle provided by Crown Colony Condominium Association, and Bayshore Shuttle Service goes near the project site. These shuttles provide the opportunity for a large concentration of individuals to ride to a specific common destination such as BART, where the rider can continue their commute to work.

Two shuttlebus programs serve the mobility-impaired population in the City of Daly City. SamTrans contracts with the Redi-Wheels program to operate a county-wide service. This program provides curb-to-curb service for handicapped individuals and the elderly who have impairments that exclude them from effectively using public transit. The service is provided on-call to persons who make reservations. In the City of Daly City, Redi-Wheels focuses on taking people to various medical offices in the St. Francis Heights neighborhood, Seton Hospital on Sullivan Avenue, and Kaiser medical facilities. The service is also extended to groups of elderly people for trips to adult day care centers and social gatherings, and handicapped students who attend Skyline College in San Bruno.

Vanpools

Vanpools allow groups of people to share a ride similar to a carpool, but on a larger scale with concurrent savings in fuel and vehicle operating costs, providing a flexible and cost effective mode of transportation. Vehicles may be provided by individuals, individuals in cooperation with various public and private support programs, through a program operated by or on behalf of an element of government, or a program operated by or on behalf of an employer. The key concept is that people share the ride from home or one or more common meeting locations and travel together to a common destination or work center.

Carpools

Carpooling, also known as car-sharing, is the sharing of car journeys so that more than one person travels in a car. Carpooling reduces the costs involved in car travel by sharing journey expenses such as fuel, tolls, and car rental between the people travelling. Carpooling is also an environmentally friendly and sustainable way to travel as sharing journeys reduces carbon emissions, traffic on the roads, and the need for parking spaces.

Carpools are typically established by private individuals who may work together or are brought together by Rideshare 511, a private non-profit corporation funded mostly by the Metropolitan Transportation Commission and Caltrans. Established as rides in 1977, the program was established to promote and facilitate alternative transportation for commuters who work and/or live in the nine-county Bay Area and Santa Cruz. Rides provides carpooling services for both individual commuters and large employers. The services for individual commuters includes free computerized car pool matching, general commuter and transit information, and specialized information on how to establish, operate, and maintain a carpool.

Taxicabs

Two companies provide twenty-four hour private taxi service in the City of Daly City. The City Council reviews and approves the license to operate a taxi service in the City. The Gateway Cab Company operates 11cabs and, with a fleet of 16 vehicles, the Daly City Cab Company provides about 500 trips per day to locations within and outside of the City.

Bicycle System

The Daly City General Plan notes that the topography, level of development, and high traffic volumes in the City of Daly City provide the greatest challenge to providing a safe environment for bicyclists. There are a limited number of flat or even relatively flat through-routes in the City, and bicycles must compete for space on these streets with automobiles and transit. In spite of these challenges, much can be done to make bicycling safer and more convenient. Figure 3.15-3 identifies the City's existing bicycle network. The following are descriptions of the three major bikeway types identified in the figure.

- Class I bikeways are designed and operated for the exclusive use of bicycles. Street and pedestrian crossings are minimized or are avoided altogether by building underpasses or overpasses. This type of bikeway is best located in parks or alongside freeways, railroad right-of-way or waterways. An example of a Class I bikeway located in the City of Daly City is on Lake Merced Boulevard extending from Westlake Park into San Francisco. Another example is John Daly Boulevard between Ashland Drive and Poncetta Drive, although there is a gap between Lake Merced Boulevard and Park Plaza Drive.

- Class II bikeways are adjacent to, but separated from motor vehicle and/or pedestrian traffic. While the cyclist has a separate path, it may be preempted by turning or parking vehicles. This type of bikeway can be added easily to existing streets by removing curb parking or narrowing travel lanes to provide a path separated by a low berm or painted markings. One way lanes should be at least 5

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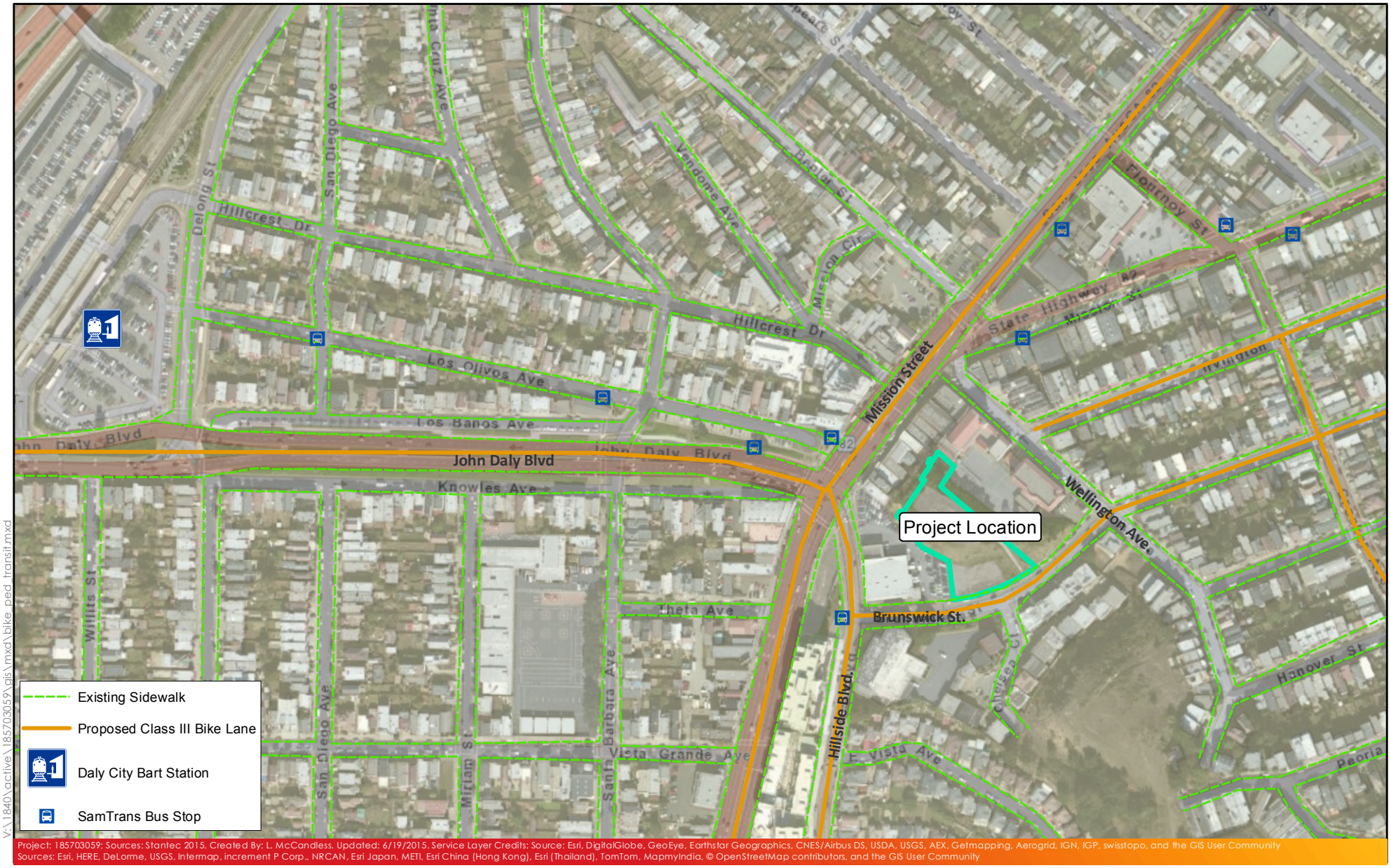

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Figure 3.15-3
Bicycle, Pedestrian, and Transit Facilities - Existing Conditions

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feet wide. An example of a Class II bikeway in Daly City is found along Callan Boulevard between Hickey Boulevard and King Drive.

- Class III bikeways are shared bikeways where the cyclist occupies the same right-of-way with either motor vehicles or pedestrians. Signs are used to designate that the street or path also is to be used by cyclists. While this type of bikeway is the most hazardous, it also is the least expensive to install and is often used to provide continuity to other bicycle facilities (e.g., Class II bikeways) where right-of-way is limited. The segment of Hillside Boulevard from Mission Street to East Market Street is an example of this type of bikeway in Daly City.

In 2013, the City's adopted Bicycle and Pedestrian Master Plan intended to provide a comprehensive network of signed and mapped routes for bicyclists and identified improvements that would expedite travel and improve safety along these routes. Since the Bicycle and Pedestrian Master Plan's adoption, new bicycle facilities not contemplated by the Bicycle and Pedestrian Master Plan, have been installed. Other aspects of the Bicycle and Pedestrian Master Plan are in need of refinement to the extent that the Bicycle and Pedestrian Master Plan's Circulation Element has identified the update of the Bicycle and Pedestrian Master Plan as a task.

3.15.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.12 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on traffic and circulation. The Daly City General Plan EIR identified potentially significant and unavoidable impacts to certain intersection LOS. The Daly City General Plan, along with the increase in regional traffic, would degrade LOS at certain intersections to operate below the standards established by the Daly City General Plan, resulting in significant and unavoidable impacts. Additionally, the Daly City General Plan would promote public transit, bicycle and pedestrian facilities, resulting in less than significant impacts. The Daly City General Plan would have no impact on the remaining criteria.

Policies

Policy CE-1:	Use the City's traffic model and environmental review process outlined by CEQA to ensure that the City's existing roadway network is relatively free flowing during peak traffic periods.
Policy CE-2:	Minimize impacts on collector and local streets by moving traffic with origins and destinations outside of Daly City efficiently to area freeways and major arterial streets.
Policy CE-6:	Support regional efforts to improve traffic while accommodating future development.
Policy CE-7:	Ensure an effective transit system by supporting the work of other agencies in their efforts to expand public transit in and around Daly City.
Policy CE-8:	Accommodate the transit system by considering mechanisms which help public transit agencies reduce the headway times of their vehicles.

Policy CE-10:	Parking requirements contained within the Zoning Ordinance should, as closely as possible, reflect accepted current parking trends. Regulations for residential uses should recognize the ability for high density mixed-use development that is close to transit to reduce parking requirements.
Policy CE-13:	View transportation improvements (new and retrofit) as opportunities to improve safety, access, and mobility for all travelers and recognize bicycle, pedestrian, and transit modes as integral elements of the transportation system.
Policy CE-16:	Strengthen pedestrian access between and within residential areas and schools, commercial areas, recreational facilities, transit centers, and major activity centers in the City.
Policy CE-18:	Continue to install bicycle facilities throughout the city in accordance with the Bicycle Master Plan.
Policy CE-20:	Integrate Complete Streets infrastructure and design features into street design and private construction to create safe and inviting environments for people to walk, bicycle, and use public transportation.

3.15.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.15.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.1 of the Plan Bay Area EIR evaluated the potential impact to transportation and traffic that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, mitigation measures are identified to reduce these impacts.

a. Measures of Effectiveness for the Performance of the Circulation System

The Plan Bay Area EIR analyzed the potential impact related to per-trip travel time for commute travel (Impact 2.1-1), and determined the impact would be less than significant.

The Plan Bay Area EIR analyzed the potential impact related to per-trip travel time for non-commute travel (Impact 2.1-2), and determined the impact would be less than significant.

The Plan Bay Area EIR analyzed the potential impact related to a substantial increase in per capita VMT on facilities experiencing LOS F compared to existing conditions during AM peak periods, PM peak periods, or during the day as a whole (Impact 2.1-3), and determined with the implementation of Plan Bay Area EIR Mitigation Measures 2.1(a), 2.1(b), and 2.1(c), for purposes of a conservative analysis, the impact would remain significant and unavoidable.

The Plan Bay Area EIR analyzed the potential impact related to a substantial increase in per capita VMT compared to existing conditions (Impact 2.1-4), and determined no impact.

The Plan Bay Area EIR analyzed the potential impact related to an increased percent utilization of regional transit supply resulting in an exceedance of transit capacity at AM peak hours, at PM peak hours, or for the day (Impact 2.1-5), and determined no impact.

3.15.5 Mitigation Measures From the Plan Bay Area EIR that Apply to the Project

None required.

3.15.6 Project Specific Impact Discussion

a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

AND

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways

Less Than Significant With Mitigation. The proposed project's trip generation during the weekday AM and PM peak hours are presented in Table 3.15-2. As shown, a total of 830 daily trips would accompany these uses. Of that total, 58 trips would be generated during the AM peak hour and 68 trips would be generated during the PM peak hour.

These forecasts are based on nationally reported rates derived from locations with varying degrees of transit availability. It is likely that the actual trip generation achieved at the project site may be lower due the site's proximity to transit (i.e., BART Station, etc.). However, to provide a "worst case" assessment, no specific discount has been made for transit uses.

Table 3.15-2: Project Trip Generation

ITE Code	Description	Quantity	Trips						
			Daily	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
252	Senior Adult Housing – Attached	206 du's	709	14	27	41	28	20	48
710	General Office Building	9.17 Ksf	121	15	2	17	3	10	13
	Total		**830**	**29**	**29**	**58**	**31**	**30**	**61**
Source: KD Anderson& Associates, 2015									

The traffic impacts of the project have been assessed by superimposing project trips onto the current background condition and recalculating operating Levels of Service at study area intersections, and the results are presented in Figure 3.15-4.

Existing Plus Project Impacts

Intersection Levels of Service

Table 3.15-3 compares existing Levels of Service, at the intersections surrounding the project area, with conditions occurring with development of the project. As shown, the addition of trips accompanying the project does not result in appreciable changes to current Levels of Service. At the Hillside Boulevard / Brunswick Street intersection, the addition of project trips would lengthen the average delays experienced by motorists waiting to turn from westbound Brunswick Street onto Hillsdale Boulevard. Since the approach already operates at LOS F, which exceeds the City's LOS D minimum standard and because the proposed project would add traffic, the proposed project would result in having a significant impact.

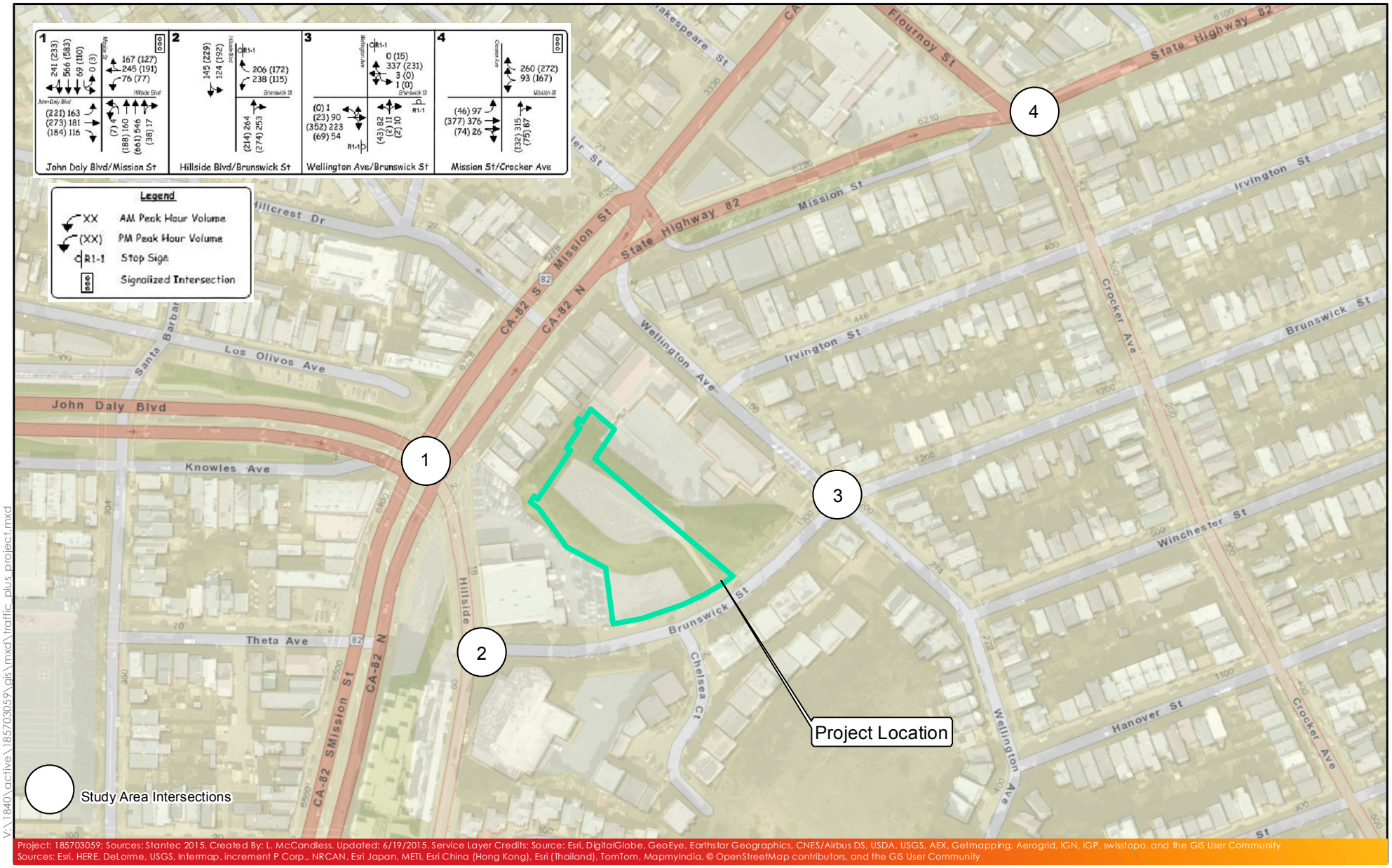

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Figure 3.15-4
Peak Hour Traffic Volumes and Lane Configurations - Project Plus Existing Conditions

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Table 3.15-3: Existing Plus Project Peak Hour Intersection Level of Service

#	Intersection	Control	Minimum LOS Standard	Time Period							
				AM Peak Hour (7:00 to 9:00 AM)				PM Peak Hour (4:00 to 6:00 PM)			
				Existing		Existing Plus Project		Existing		Existing Plus Project	
				LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)
1	John Daly Blvd / Mission Street / Hillside Blvd	Signal	D	C	29.7	C	30.2	C	30.0	C	30.5
2	Hillside Blvd / Brunswick Street (westbound left and right turns)	WB Stop	D	**F**	**65.4**	**F**	**80.0**	D	29.6	D	33.8
		Signal		B	10.4	B	9.0	-	-	-	-
		All-Way Stop		C	22.8	C	24.3	-	-	-	
3	Wellington Avenue / Brunswick Street	All-Way Stop	D	B	13.1	B	13.3	B	11.5	B	12.0
4	Mission Street / Crocker Ave	Signal	D	B	17.6	B	17.9	B	17.1	B	17.3

Bold indicates conditions in excess of adopted minimum LOS standard. **Bold and Underlined** are a significant impact
Source: KD Anderson & Associates, 2015

The measures to improve the level of service at this location would be the same as those noted under existing conditions. Levels of service at other intersections would remain within the City's LOS D minimum, and the project's impact to these locations is not significant.

The Hillside Boulevard / Brunswick Street intersection would operate at LOS F during the AM peak hour, with and without the project. The proposed project would add traffic trips to the Hillside Boulevard / Brunswick Street intersection, which already operates at the unacceptable LOS. Therefore, implementation of proposed project Mitigation Measure TRANS-1 would require the applicant to pay fair share fees for intersection improvements in order to increase LOS to an acceptable level, thereby reducing impacts to less than significant.

Traffic Signal Warrants

The AM and PM peak hour traffic volumes at un-signalized intersections were compared to MUTCD Warrant 3. The Hillside Boulevard / Brunswick Street intersection would continue to carry volumes that satisfy this warrant during the AM peak hour, but no other location would reach the volume level that satisfied warrant requirements.

Cumulative Condition

Table 3.15-4 compares cumulative peak hour levels of service at the intersections surrounding the project area. As indicated, without the proposed project, two intersections would operate with levels of service that exceed the adopted minimum standard:

- John Daly Boulevard / Mission Street intersection: LOS F in the PM peak hour and
- Hillside Boulevard / Brunswick Street intersection: LOS F in both the AM and PM peak hour.

Measures to improve the level of service at the intersections surrounding the project area were evaluated. At the John Daly Boulevard / Mission Street intersection, it would be necessary to add additional auxiliary lanes to increase the intersection's capacity and deliver a level of service that satisfies the City's minimum LOS D. However, because the area around the intersection is built out, widening the intersection is not feasible. This conclusion is consistent with the findings outlined in the Daly City General Plan EIR, which notes that impacts to this intersection are significant and unavoidable.

Table 3.15-4: Cumulative Plus Project Peak Hour Intersection Level of Service

#	Intersection	Control	Minimum LOS Standard	Time Period							
				AM Peak Hour (7:00 to 9:00 AM)				PM Peak Hour (4:00 to 6:00 PM)			
				Existing		Existing Plus Project		Existing		Existing Plus Project	
				LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)	LOS	Average Delay (sec/veh)
1	John Daly Blvd / Mission Street / Hillside Blvd	Signal	D	D	42.4	D	43.9	**F**	**75.9**	**F**	**77.6**
2	Hillside Blvd / Brunswick Street (westbound left and right turns)	WB Stop	D	**F**	**245.2**	**F**	**275.9**	**F**	**177.8**	**F**	**215.5**
		Signal		B	14.8	C	29.0	B	14.1	B	15.5
		All-Way Stop		**E**	**42.1**	**E**	**44.9**	**E**	**65.62**	**E**	**71.3**
3	Wellington Avenue / Brunswick Street	All-Way Stop	D	D	25.7	D	29.7	C	19.7	C	21.4
4	Mission Street / Crocker Ave	Signal	D	C	22.0	C	22.9	C	25.6	C	26.2

Bold indicates conditions in excess of adopted minimum LOS standard. **Bold and Underlined** are a significant impact
Source: KD Anderson & Associates, 2015

The Hillside Boulevard / Brunswick Street intersection is projected to operate with side street delays that are indicative of LOS F during both the AM and PM peak hours. An all-way stop would deliver LOS E, with and without the proposed project. A traffic signal would deliver acceptable level of service (LOS B), but the possibility of queuing back to the Mission Street intersection (SR 82) remains. Coordinate operation with the John Daly Boulevard / Mission Street traffic signal would be required.

As noted in Table 3.15-4, development of the project would exacerbate conditions at the John Daly Boulevard / Hillside Boulevard / Mission Street intersection and the Hillside Boulevard / Brunswick Street intersection, both of which fail to satisfy the City's minimum LOS D standard without the proposed project. The John Daly Boulevard / Hillside Boulevard / Mission Street intersection would operate at LOS F during the PM peak hour, with and without the project. This is a significant impact. The Daly City General Plan EIR acknowledged that in the future, the intersection would operate with Levels of Service that are below the City's minimum standard. The Daly City General Plan EIR notes that there is no feasible mitigation for this impact. Thus, this impact is significant and unavoidable. As discussed above, the Daly City General Plan EIR identified significant unavoidable cumulative traffic impacts and findings of overriding consideration for those impacts. Public Resources Code 21083.3 allows the use of an Initial Study to conclude a significant and unavoidable impact only if a previous EIR identified significant unavoidable effects to a specific resource, which resulted in the Lead Agency adopting overriding considerations. In the case of the proposed project, the Daly City General Plan EIR identified such significant and unavoidable effects on traffic impacts related to the intersections discussed above and as such, the City of Daly City

adopted overriding considerations for said unavoidable effects in April 2012. Furthermore, as stated in Section 3.9, Land Use and Planning, the proposed project is consistent with the Land Use and Zoning designations of the project site. As such, impacts associated with proposed project would be consistent with those evaluated in the Daly City General Plan EIR and at the time of adoption of the Daly City General Plan EIR and related overriding considerations. Therefore, impacts from cumulative traffic would be less than significant.

Additionally, the Hillside Boulevard / Brunswick Street intersection would operate at LOS F during the AM and PM peak hour, with and without the proposed project. Since the project would add traffic to the intersection, this is a significant impact. As noted under existing conditions, a traffic signal would be needed to deliver acceptable level of service. Signalizing the intersection would yield LOS B under cumulative plus project conditions. An all-way stop would not deliver level of service that meet the LOS D minimum. However, the distance between the Brunswick Street and Mission Street intersection is relatively short (i.e., 350 feet from intersection to crosswalk along Mission Street). Coordinating the operation of closely spaced signals can be problematic and both all-way stop and signal could result in queueing to Mission Street. As a result, improvements would need to be designed and constructed with City/Caltrans coordination. Project trips during the AM peak hour total 32, which represents 2.1% of the 1,553 trips through the intersection during that time period. Therefore, with the implementation of proposed project Mitigation Measure TRANS-1 this impact is less than significant with mitigation.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that result in substantial safety risks?

No Impact. The proposed project would not result in any changes to air traffic patterns and would not result in any associated safety risks. No impact would occur as the proposed project would not involve use of air transit, nor is it expected to cause any change in air traffic patterns.

d) Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

No Impact. The proposed project does not propose to make changes to a roadway that would create road hazards or alter design features developed to mitigate such hazards. Vehicular access to the project site would be via multiple new and existing driveways on Brunswick Street. Therefore, this impact would result in having no impact.

e) Result in inadequate emergency access?

No Impact. The proposed project would not result in inadequate emergency access during construction and/or operation. Brunswick Street is connected to more than four adjacent connecter streets providing adequate access in the event of an emergency. Therefore, the proposed project would have no impact.

f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. Development of the proposed project may incrementally contribute to increased demand for facilities to serve pedestrians, cyclists and transit riders in the City of Daly City.

Project residents may elect to walk throughout the community and to and from the Daly City BART Station. However, sidewalks are available on surrounding project area streets and crosswalks are striped at intersections surrounding the project area. Signalized intersections between the project site and transit opportunities are equipped with pedestrian indications and controls. Thus there are no gaps in the pedestrian circulation system within the vicinity of the proposed project. Pedestrians attributed to the proposed project would add to the current pedestrian volumes occurring during peak hours at intersections surrounding the project area. However, because the project site is age restricted, the number of pedestrians generated during peak commute periods would be less than that associated with a conventional apartment project. Additionally, development of the proposed project does not interfere with the implementation of any other planned pedestrian facilities.

As with any residential development, residents may elect to use bicycles to reach area retail, employment, or social destinations. While cycling may be a choice for some residents, the number of residents electing to use bicycles as a regular commute option is limited by the nature of the City's circulation system site topography, and the surrounding uses. No Class 1 or Class 2 bicycle facilities are available near the project site, although Hillside Boulevard is a designated Class 3 route. The proposed project does not interfere with the implementation of any planned bicycle facility, including planned Class 3 routes on Brunswick Street.

Project residents may wish to take advantage of public transit services offered by BART and SamTrans. These facilities are readily available to project residents and are within walking distance. The number of transit riders associated with an age restricted apartment project would likely be similar to those associated with conventional apartments. However, fewer residents of an age restricted project would likely be employed than would residents of a conventional apartment project, and therefore project residents would be making fewer peak period commute trips than would residents of conventional housing. As a result, proposed project transit usage is likely to be spread throughout the day. Because existing transit facilities are readily available, the proposed project's impact on transit is expected to be less than significant.

3.15.7 Project Specific Mitigation Measures

Mitigation Measure TRANS-1:

Fair Share Fees for Intersection Improvements

Prior to the issuance of building permits, the project applicant shall pay fair share fees for the implementation of improvements at the Hillside Boulevard / Brunswick Street intersection. The project adds 32 trips to the intersection during the A.M. peak hour. The total volume through the intersection under Cumulative Plus Project condition is 1,553 trips during that time period. Thus, the proposed project's fair share is 2.1% of the improvement cost.

Mitigation Measure TRANS-1 Implementation:

- **Timing:** Prior to the issuance of building permits, the project applicant shall pay fair share fees for the implementation of improvements.

- **Monitoring and Reporting Program:** The Daly City Engineering Division shall approve the needed improvements and document in writing receipt of the applicants fair share fees for contribution to improvements at Hillside Boulevard / Brunswick Street intersection.

- **Standards for Success:** Payment of fair share fees prior to building occupancy.

3.15.8 Findings

All additional significant environmental impacts of the proposed project relating to transportation resources would be mitigated to a less than significant level with the implementation of proposed project Mitigation Measure TRANS-1.

3.16 UTILITIES AND SERVICE SYSTEMS

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b)	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☒	☐	☐
c)	Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d)	Have sufficient water supplies available to serve the proposed project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☒	☐
e)	Result in a determination by the wastewater treatment provider that serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f)	Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g)	Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

3.16.1 Environmental Setting

The proposed project includes one five-story, 206 studio unit senior apartment complex with ground floor commercial/residential space above a two-level podium parking garage and approximately 9,170 sf of office/commercial space on a 1.15 acre parcel. The following paragraphs describe the City's current utility and service system facilities and their capabilities.

Wastewater Treatment

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

The WWTP has an average dry weather flow design capacity of 10.3 mgd; however, the NSMCSD discharges and operates the WWTP at or below the permitted average dry weather flow rate of 8.0 mgd (averaged over 3 consecutive dry months) and, as of 2009, WWTP did not anticipate a need to increase the permitted flow rate within the next 5 years. Dry weather flow to the WWTP averaged 6.3 mgd in 2009 (Daly City General Plan 2013).

Stormwater Management

Municipalities are required to proactively control and regulate pollution from their municipal storm sewer systems in order to mitigate the potential detrimental impacts of urban runoff.

Storm water management in the City of Daly City is subject to the Municipal Regional Stormwater NPDES Permit for the San Francisco Bay Region, adopted in 2009. The Daly City Municipal Code contains regulations related to stormwater management in Title 14 of the Municipal Code. In addition, the State of California's Porter-Cologne Water Quality Control Act of 1969 and other State legislation require municipalities to protect water quality.

The intent of these various laws and permits is to mitigate potentially detrimental effects of urban runoff through proper site design and source control early in the development review process, and to provide guidance in the selection of appropriate BMPs. BMPs are defined as methods, activities, maintenance procedures, or other management practices for reducing the amount of pollution entering a water body.

Water Supply

The project site is served by the City's DWWR. A large portion of the City's water supply is received from the SFPUC, which provides water primarily from Hetch Hetchy Reservoir. Recycled water from the North San Mateo County Sanitation District wastewater treatment plant is always provided to the City whenever feasible.

The Urban Water Management Plan (UWMP) for the City of Daly City addresses the water system operated by the DWWR and describes the water supply sources, magnitudes of historical and projected water use, and a comparison of water supply to demands during normal, single-dry, and multiple-dry years. The UWMP, prepared in accordance with the Urban Water Management Planning Act (AB797 as amended), is required for every urban water supplier that provides water for municipal purposes to

more than 3,000 connections or supplying more than 3,000 AFY of water to adopt and submit UWMPs every five years to the DWR.

The City presently has a contracted water supply of 4,808 AFY from the SFPUC, with additional supply from local groundwater wells, which brings total potable supply to approximately 8,157 AFY in 2015. According to the Water Supply Assessment, Serramonte Shopping Center Expansion Project, potable surplus for the City (supply minus demand) increases from 971 AFY in 2015 to 1,502 AFY in 2035 (Brown and Caldwell 2014).

Solid Waste

Solid waste services within the City are provided by Allied Waste Services. Waste collected from homes and businesses within the City is processed at the Mussel Rock Transfer Station. Material that cannot be recycled or composted is transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. The current permitted disposal acreage is 191 acres, with a closure date of the facility scheduled for 2023, with a longer period of operation allowed; pending renewal of the landfill's permit (CalRecycle, 2014). The landfill is expected to reach capacity in 2028. However, capacity is subject to change based on factors such as amount of waste landfilled, compaction rates, waste settlement, and cover soil use. The City has significantly reduced its waste stream in the last several years, with a combined yearly percent change of -26% between 2006 and 2010 (CalRecycle 2012).

3.16.2 Summary of Analysis Under the 2030 Daly City General Plan EIR

Chapter 3.13 of the Daly City General Plan EIR evaluated the potential impacts of future development under the Daly City General Plan on utilities and service systems. The Daly City general Plan EIR identified potentially significant impacts on utilities and service systems. However, existing local laws, as well as policies contained in the proposed Daly City General plan, would reduce potential impacts on utilities and service systems to less than significant levels.

Policies

Policy RME-1: Reduce average per capita demand by implementing cost effective water conservation programs that address all applicable methods of water conservation.

Policy RME-2: Require drought-resistant landscaping and water conserving irrigation methods in new developments, and encourage the replacement of existing water-intensive landscaping.

Policy RME-3: Continue to use recycled wastewater for irrigating and explore opportunities to expand capacity to accommodate its use in development projects, landscaped medians, golf courses, cemeteries, parks, and school playgrounds.

Policy RME-4: For development projects that will create water demand exceeding a pre-defined amount, require that developers provide a water supply analysis for the proposed project to demonstrate water availability to adequately serve the project.

Policy RME-8: Through the development of a Stormwater Management Program, ensure that all new development complies with the applicable municipal stormwater Municipal Regional Stormwater NPDES Permit by incorporating controls that reduce water quality impacts over the life of the proposed project in way that is both technically and economically feasible, and reduce pollutants in stormwater discharges to the maximum extent practicable.

Policy RME-9: Balance stormwater mitigation measures with the other inherent benefits of higher density development that is in close proximity to public transit (i.e., reduction of VMT on local and regional roadways to the extent permitted under the Municipal Regional Stormwater Permit).

Policy SE-4.4: Promote measures aimed at significantly decreasing solid waste generation, including community recycling. Require recycled materials storage and collection areas in accordance with requirements of the Recycling Ordinance.

3.16.3 Mitigation Measures from 2030 Daly City General Plan EIR That Apply to the Project

The Daly City General Plan was developed to be a self-mitigating document; consequently, all policies included in the Daly City General Plan were designed to avoid or minimize impacts resulting from plan implementation. As such, the corresponding Daly City General Plan EIR does not include impact specific mitigations. Rather, the Daly City General Plan EIR references policies that reduce the Daly City General Plan impacts to each respective resource category. As a result, there are no mitigation measures from the Daly City General Plan EIR that directly apply to the proposed project but the proposed project is subject to all relevant policies through the City's development review process. A comprehensive table of Daly City General Plan policies that reduce impacts to the Daly City General Plan is provided in Appendix K.

3.16.4 Summary of Analysis Under the Plan Bay Area EIR

Chapter 2.12 of the Plan Bay Area EIR evaluated potential impacts to water resources, utilities, and service systems that may result from implementation of the proposed Plan Bay Area. Where necessary and feasible, mitigation measures are identified to reduce these impacts.

a. Exceed Wastewater Treatment Requirements of the RWQCB

The Plan Bay Area EIR analyzed the potential impact related to exceedance of wastewater treatment requirements of the RWQCB (Impact 2.12-5), and determined the impact would be less than significant.

b. Construction of New or Expanded Water and Wastewater Treatment Facilities

The Plan Bay Area EIR analyzed the potential impact related to construction of new or expanded water and wastewater treatment facilities, which could cause significant environmental impacts (Impact 2.12-4), and determined with the implementation of Plan Bay Area Mitigation Measure 2.12(h), the impact would be less than significant with

mitigation; however, MTC/ABAG cannot ensure that this mitigation measure would be implemented in all cases, and this impact remains significant and unavoidable.

c. Construction of New or Expanded Stormwater Drainage Facilities

The Plan Bay Area EIR analyzed the potential impact related to construction of new or expanded stormwater drainage facilities, which could cause significant environmental impacts (Impact 2.12-3), and determined with the implementation of Plan Bay Area Mitigation Measures 2.12(e), 2.12(f), and 2.12(g), the impact would be less than significant with mitigation; however, MTC/ABAG cannot ensure that this mitigation measure would be implemented in all cases, and this impact remains significant and unavoidable.

d. Water Supply Entitlements and Resources

The Plan Bay Area EIR analyzed the potential impact related to insufficient water supplies from existing entitlements and resources to serve expected development (Impact 2.12-1), and determined with the implementation of Plan Bay Area Mitigation Measures 2.12(a), 2.12(b), and 2.12 (c), the impact would be less than significant with mitigation; however, MTC/ABAG cannot ensure that this mitigation measure would be implemented in all cases, and this impact remains significant and unavoidable.

e. Wastewater Treatment Capacity

The Plan Bay Area EIR analyzed the potential impact related to inadequate wastewater treatment capacity to serve new development (Impact 2.12-2), and determined with the implementation of Plan Bay Area Mitigation Measure 2.12(d), the impact would be less than significant with mitigation; however, MTC/ABAG cannot ensure that this mitigation measure would be implemented in all cases, and this impact remains significant and unavoidable.

f and g. Insufficient Landfill Capacity

The Plan Bay Area EIR analyzed the potential impact related to insufficient landfill capacity to serve new development while complying with applicable regulations (Impact 2.12-6), and determined with the implementation of Plan Bay Area Mitigation Measures 2.12(i) and 2.12(j), the impact would be less than significant with mitigation; however, MTC/ABAG cannot ensure that this mitigation measure would be implemented in all cases, and this impact remains significant and unavoidable. In addition, while individual land development and transportation projects can mitigate their impacts on landfill capacity, the combined and cumulative impacts of the proposed Plan Bay Area will still be significant and unavoidable given the expected closure of most of the landfills in the Bay Area during the project horizon. While there are potential mitigations to this impact, such actions will require regional cooperation by multiple agencies unrelated to MTC and ABAG.

3.16.5 Mitigation Measures from the Plan Bay Area EIR that Apply to the Project

Compliance with the applicable policies, regulations, and implementation of Plan Bay Area EIR Mitigation Measure 2.12(h) would reduce the proposed project's impacts to utilities and services to a less than significant level with mitigation.

*"**2.12(h)** Mitigation measures that shall be considered by implementing agencies and/or project sponsors where feasible based on project-and site-specific considerations include, but are not limited to the following. For projects that could increase demand on water and wastewater treatment facilities, project sponsors shall coordinate with the relevant service provider to ensure that the existing public services and utilities could be able to handle the increase in demand. If the current infrastructure servicing the project site is found to be inadequate, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.*

Significance After Mitigation

Projects taking advantage of CEQA Streamlining provisions of SB 375 (Public Resources sections 21155.1, 21155.2, and 21159.28) must apply the mitigation measures described above, as feasible, to address site-specific conditions. To the extent that an individual project adopts and implements all feasible mitigation measures described above, the impact would be less than significant with mitigation (LS-M)."

3.16.6 Project Specific Impact Discussion

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. The proposed project is consistent with the Daly City General Plan EIR and Plan Bay Area EIR. Both documents examined potential impacts to wastewater treatment facilities and potential exceedances of the RWQCB requirements at full buildout of the City of Daly City and municipalities within the Plan Bay Area. Wastewater generated by the proposed project would be treated by the City of Daly City WWTP, which operates according to regulations administered by the RWQCB and Clean Water Act of 1972. The WWTP currently operates below the permitted flow rate of 8 mgd and the proposed project would not drastically increase current operating conditions; thus, proposed project impacts would be less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant With Mitigation. The proposed project would be served by the WWTP, operated by the NSMCSD. The WWTP has an average dry weather flow design capacity of 10.3 mgd; however, the NSMCSD discharges and operates the WWTP at or below the permitted average dry weather flow rate of 8.0 mgd (averaged over 3 consecutive dry months). As of 2009, WWTP did not anticipate a need to increase the permitted flow rate through 2014. Dry weather flow to the WWTP averaged 6.3 mgd in 2009 (Daly City General Plan 2013).

Table 3.16-1 provides estimated wastewater generation for the proposed project. Based on available wastewater generation factors, the proposed project would generate a combined (for both residential and commercial uses) 69,409 gallons per day of wastewater, or, approximately 5.8% of the 10.3 mgd dry weather flow design capacity. Actual generation rates would likely be lower due to water conservation measures such as the 2010 California Green Building Standards Code, Title 24 of the CCR, compliance

with policies set forth under the Daly City General Plan EIR, and the Plan Bay Area EIR Mitigation Measure 2.12(h).

Table 3.16-1: Projected Wastewater Generation

Project Component	Residents / Commercial	Gallons per Capita per Day	Rate per Day/ Gal
Residential Units	206	105*	21,630
Commercial	9,170	100**	917
Total Infiltration			1,768
		Totals:	69,409 gpd
Avg. Flow per Multi-Family Residential Dwelling Unit per Day* Avg. Daily Flow per 1000 sf** Per City Standards: QD = QP + I Where : QD = Design Flow (gallons per day) QP = Peak Flow = 3 x Avg. Flow per day 68,220 gal I = Infiltration 1,768 gal Source: Bellecci & Associates, 2015			

As discussed in Section 2.0, Project Description, the proposed project includes the replacement of a 320 foot section of wastewater pipe to accommodate the proposed project projected flows. Therefore, impacts are anticipated to be less than significant.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. The project site design includes landscaped areas and permeable pavers that would retain and treat their own runoff. As described in the Stormwater Control Plan (Appendix E) for the proposed project, flow-through planters would be used to treat and discharge the runoff from the impervious areas. Treated runoff would be directly discharged from the BMPs to the existing 8-inch storm drain line on Brunswick Street. No runoff would be directly discharged to the drainage systems outside of the project area. In addition, the project site is underlain by highly permeable silty sands and sandy silts, which would naturally control the flow of runoff. Due to the stormwater treatment and retention measures incorporated into project design, in combination with the highly permeable site soils, the proposed project would not require the construction of new stormwater drainage facilities. Therefore, impacts would be less than significant.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. Utilizing water consumption data from the California Water Resources Control Board CWRCB, the City of Daly City's water consumption is 39 gallons per capita per day. As presented in Table 3.16-2, potential water consumption for the residential portion of the project site housing, 412 residents (assuming two residents per

206 units), therefore, 16,068 gallons per day. Water consumption for the office/commercial portion of the proposed project was calculated using data from the USGBC and the EPA Energy Star Portfolio Manager. The USGBC determines that an average of 304 sf /employee is needed for general office space. The proposed project consists of 9,170 sf of office/commercial space, which would hold approximately 30 employees. The EPA estimates employee water consumption at 13 gallons/worker/day. Using these estimates, it is proposed that the office/commercial portion of the proposed project would consume 390 gallons of water/day. Total project consumption would therefore be 16,543 gallons/day, equivalent to 18.53 AFY.

Table 3.16-2: Estimated Project Water Consumption

Project Component	Gallons per Day	Gallons per Year	AFY
Residential	16,068	5,864,820	18.00
Commercial	390	142,350	0.44
Totals:	16,458	6,007,170	18.44

Notes: 1 acre foot = 325,851.43 gallons

Commercial and residential water use assumes 365 days per year. Actual commercial consumption would probably be less.

Source: USGBC, 2014

The City presently has a contracted water supply of 4,808 AFY from the SFPUC, with additional supply from local groundwater wells, which brought total potable supply to approximately 8,157 AFY in 2015. Proposed project water consumption would represent 0.23% of the City's potable water supply. According to the Water Supply Assessment, Serramonte Shopping Center Expansion Project, potable surplus for the City (supply minus demand) increases from 971 AFY in 2015 to 1,502 AFY in 2035 (Brown and Caldwell, 2014). Therefore, the incremental water consumption by the proposed project would be sufficient and not require new or expanded entitlements; therefore, proposed project impacts would be less than significant.

e) Result in a determination by the wastewater treatment provider that serves or may serve the proposed project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less than Significant Impact. The City has the current ability and permits to produce a maximum of 3,100 AFY of tertiary treated recycled water. Currently the City distributes less recycled water than its capacity, producing approximately 547 AF of tertiary treated recycled water in 2010 (UWMP 2010).

Furthermore, the proposed project would generate 69,409 gallons per day of wastewater and accommodate 5.8 % of the existing 6 inch pipe capacity. As such, the proposed project would be required to replace a 320 foot section of the 6 inch wastewater line with an 8 inch line. This would be accomplished using a pipe bursting method. The proposed project would continue to be provided with wastewater collection and treatment services from the NSMCSD collection system and the NSMCSD treatment plant. Future wastewater demands from the proposed project would not exceed the design or permitted capacity of the wastewater treatment plant serving the proposed project. Additionally, the City of Daly City has plans to expand the existing wastewater treatment, transmission, and distribution system. As a result from the plans to expand portions of the existing treatment facility system, adjacent to the project site,

and adequate capacity available to treat wastewater generated by the proposed project, a less than significant impact would occur.

f) Be served by a landfill with sufficient permitted capacity to accommodate the proposed project's solid waste disposal needs?

Less than Significant Impact. Solid waste from the project site would be transferred to the Ox Mountain Landfill in Half Moon Bay. As described above, the Ox Mountain landfill is permitted to receive up to 3,598 tons of waste per day. Remaining capacity is 27 million cubic yards. The proposed project would have 206 residential units. Using the waste generation factor for residential use of 12.23 lbs/unit (Calrecycle, 2015), the residential component of the proposed project would be expected to generate a total of 460 tons of waste disposal per year, or 1.26 tons of waste per day. In addition to the residential component, the commercial component would employ an estimated 37 employees. Using the waste disposal generation estimate for commercial uses of 10.53 pounds per employee per day, the commercial component would generate 71 tons per year, or 0.19 tons per day, as shown in Table 3.16-3.

Table 3.16-3: Estimated Project Solid Waste Generation

Project Component	Quantity	Generation Rate (lbs/day)*	Pounds per Day	Tons per Day	Tons per Year
Residential Units	206	12.23	2,519.38	1.26	460
Commercial Employees	30	10.53	315.90	0.16	58.4
Totals:			**2,835.28**	**1.42**	**518.4**
Source: CalRecycle, 2015					

Total waste generated for residential and commercial uses, based on the CalRecycle usage factors, is anticipated to be 518.4 tons per year, or, 1.42 tons per day. Based on the Ox Mountain permitted intake of 3,598 tons per day, project-generated waste would represent approximately 0.04% of daily capacity. The actual percentage would probably be less as all employees would not likely work 365 days per year. The proposed project contribution to solid waste facilities would be less than significant.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less than Significant Impact. As the City continues to promote additional diversion, there is expected to be no adverse impact on meeting waste diversion goals as a result of implementation of the proposed project. Additional waste generated by the proposed project would likely be further offset by increased diversion, though even at existing rates it is expected that there is sufficient landfill capacity to meet demand.

As noted above, in accordance with State mandates, cities and counties must reduce per capita waste disposal through source reduction, recycling, and composting activities. The City of Daly City missed its target in 2010, but reduced overall yearly waste by 26% between 2006 and 2010. Therefore, impacts are anticipated to be less than significant.

3.16.7 Project Specific Mitigation Measures

None required.

3.16.8 Findings

All additional significant environmental impacts of the proposed project relating to public services and utilities would be mitigated to a less that significant level with the implementation of the Plan Bay Area EIR Mitigation Measure 2.12(h).

3.17 MANDATORY FINDINGS OF SIGNIFICANCE

	Would the Project:	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
a)	Does the Project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b)	Does the Project have impacts that are individually limited, but cumulative considerable? ("Cumulative considerable" means that the incremental effects of a Project are considerable when viewed in connection with the effects of past Projects, the effects of other current Projects, and the effects of probable future Projects)?	☐	☐	☒	☐
c)	Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

3.17.1 Project Specific Impact Discussion

a) Does the Project have the potential to 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, 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. As described in Section 3.4, Biological Resources, and Section 3.5, Cultural Resources, of this SCEA, the proposed project would not 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, 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 with the implementation of the included mitigation measures. Therefore, the impact would be less than significant.

b) Does the Project have impacts that are individually limited, but cumulative considerable? ("Cumulative 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)?

Less Than Significant Impact. The proposed project was anticipated by and would be consistent with the Daly City General Plan EIR and Daly City General Plan , Plan Bay Area EIR and Plan Bay Area As such, buildout of the proposed project was anticipated and has been analyzed. As presented throughout this SCEA, all potential impacts associated with the proposed project would be reduced to less than significant levels with implementation of the identified mitigation measures. Thus, the proposed project would not be expected to result in a considerable cumulative contribution to impacts on the environment. As such, the proposed project would also result in a less than significant cumulative impact.

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

Less Than Significant Impact. The only potentially significant impacts associated with the proposed project's effects on human beings are related to air quality, noise, and transportation. However, as discussed in Section 3.3, Air Quality and Greenhouse Gases; Section 3.11, Noise; and Section 3.15- Transportation and Traffic of this SCEA, with implementation of the identified mitigation measures, all project specific impacts would be reduced to less than significant levels. Therefore, impacts of the proposed project associated with effects on human beings would be less than significant.

3.17.2 Project Specific Mitigation Measures

All project specific mitigation measures are identified in Section 4.0, Summary of Mitigation Measures.

3.17.3 Findings

All additional significant environmental impacts of the proposed project would be mitigated to a less than significant level with the implementation of the mitigation measures identified within this SCEA.