



## MEMORANDUM

---

**Date:** December 1, 2023  
**To:** Somer Smith, Associate Planner (City of San Mateo, Planning Department)  
**From:** Akoni Danielsén, Principal Project Manager  
**Subject:** Nazareth Vista Mixed-Use Development at 606-616 South B Street – CEQA Categorical Exemption Qualification

---

### I. Categorical Exemptions

The California Environmental Quality Act (CEQA) Guidelines contain classes of projects that have been determined not to have a significant effect on the environment and are, therefore, exempt from the provisions of CEQA. CEQA Guidelines Sections 15301 – 15333 constitute the list of categorically exempt projects and contain specific criteria that must be met in order for a project to be found exempt. Additionally, CEQA Guidelines Section 15300.2 includes a list of exceptions to exemptions, none of which may apply to a project in order for it to qualify for a categorical exemption (i.e., if an exception applies, a project is precluded from being found categorically exempt).

CEQA Guidelines Section 15332 In-Fill Development Projects sets forth criteria for projects characterized as in-fill development, meeting the following conditions:

- a. The project is consistent with all applicable general plan and zoning designations, policies, and regulations;
- b. The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses<sup>1</sup>;
- c. The project site has no habitat value for endangered, rare, or threatened species;
- d. Approval of the project would not result in any significant effects related to traffic, noise, air or water quality; and
- e. The site can be adequately served by all required utilities and public services.

---

<sup>1</sup> The Office of Planning and Research defines in-fill development as buildings within unused and underutilized lands within existing development patterns, typically but not exclusively in urban areas. Source: Office of Planning and Research. "Infill Development". <https://opr.ca.gov/planning/land-use/infill-development/>.

The City of San Mateo, serving as the Lead Agency, is completing environmental review for the Nazareth Vista Mixed-Use Project (“project”) in compliance with CEQA, the CEQA Guidelines (California Code of Regulations Section 15000 et. seq.) and the regulations and policies of the City of San Mateo, California. This Exemption Memorandum describes the proposed project and provides evidence to support a determination by the City of San Mateo that the project would be eligible for a Categorical Exemption under CEQA.

## II. Project Site Location and Existing Setting

The approximately 27,921 square foot (0.64 acre) site is located at 616 South B Street in San Mateo, California. The site is bordered by 6<sup>th</sup> Avenue to the north, South B Street to the east, 7<sup>th</sup> Avenue to the south, and single- and multi-family residential development to the west. West of South B Street, surrounding land uses are predominantly residential, while commercial uses are present along South B Street to the north and south of the site. Refer to Figure 1, Figure 2, Figure 3 for regional, vicinity, and aerial maps of the project site and surrounding area, respectively.

## III. General Plan and Zoning

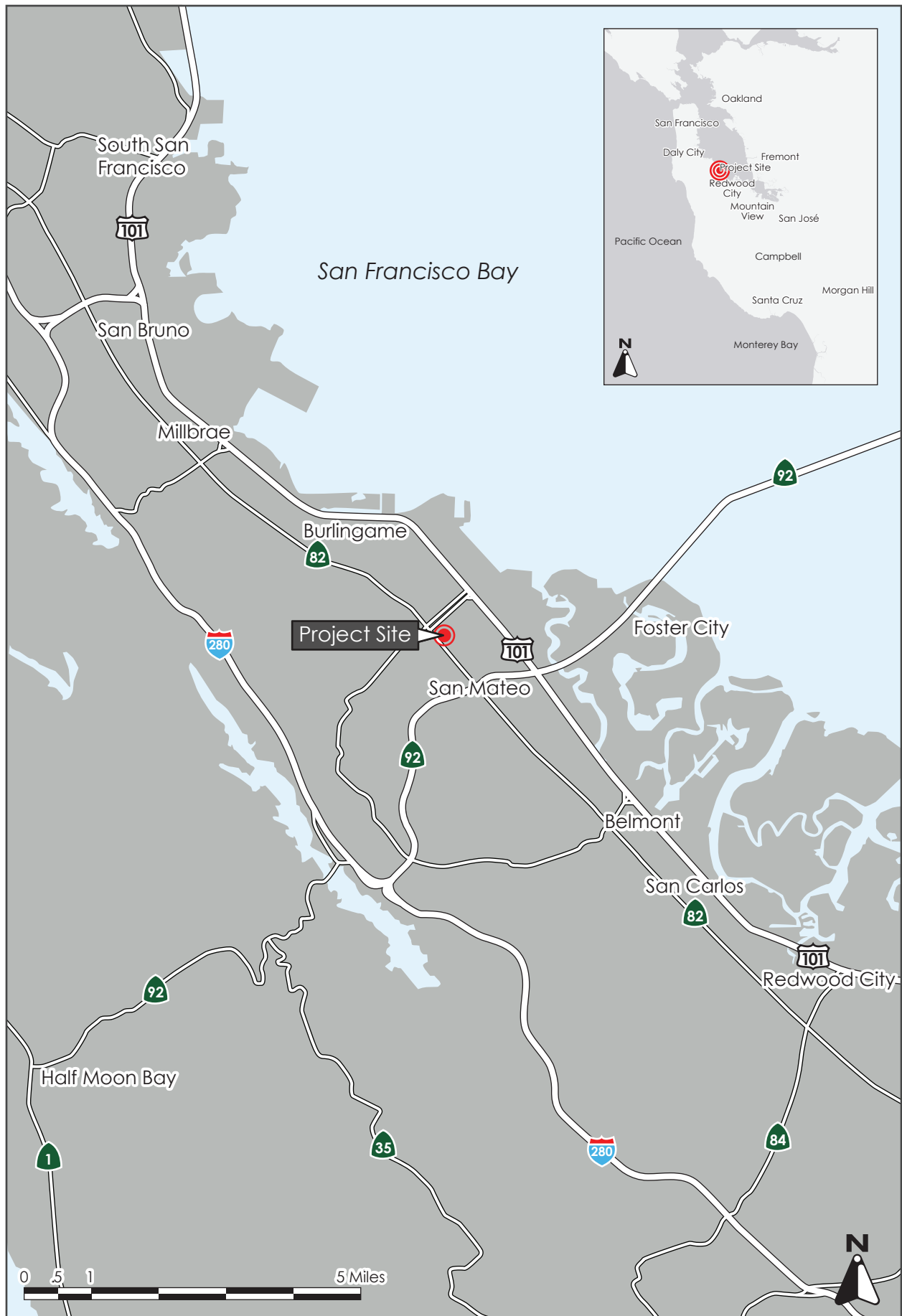
The project site is located in the City of San Mateo’s Downtown Area Plan and is zoned C1-3/R5, Neighborhood Commercial/Residential Overlay – Mixed Use with a General Plan land use designation of Neighborhood Commercial/High Density Multi-Family (Mixed Use). This land use designation is intended to combine a diversity of uses and provide greater proximity of office uses, housing, and commercial retail. It is characterized by a wide range of medium to high floor area ratios (FAR<sup>2</sup>) of 1.0 to 3.0 and heights of 25 feet to 55 feet. As 15 percent of the proposed residential units would be restricted to very low-income residents, the project would qualify for a density bonus of 50 percent under California’s Density Bonus Law.

## IV. Project Description

The project proposes to demolish the existing approximately 11,300 square-foot commercial developments and remove existing trees on-site to construct a five-story, approximately 84,132 square-foot mixed-use commercial and residential development with underground and surface parking. The project would have a FAR of 3.01. The project would include approximately 9,199 square feet of commercial space on the ground floor accessible via B Street. The project would include 57,254 square feet of residential space on floors two through five that would provide 48 residential units (including 35 one-bedroom, 12 two-bedroom, and one three-bedroom unit). Select units on the second, third, and fourth floors would include small balconies.

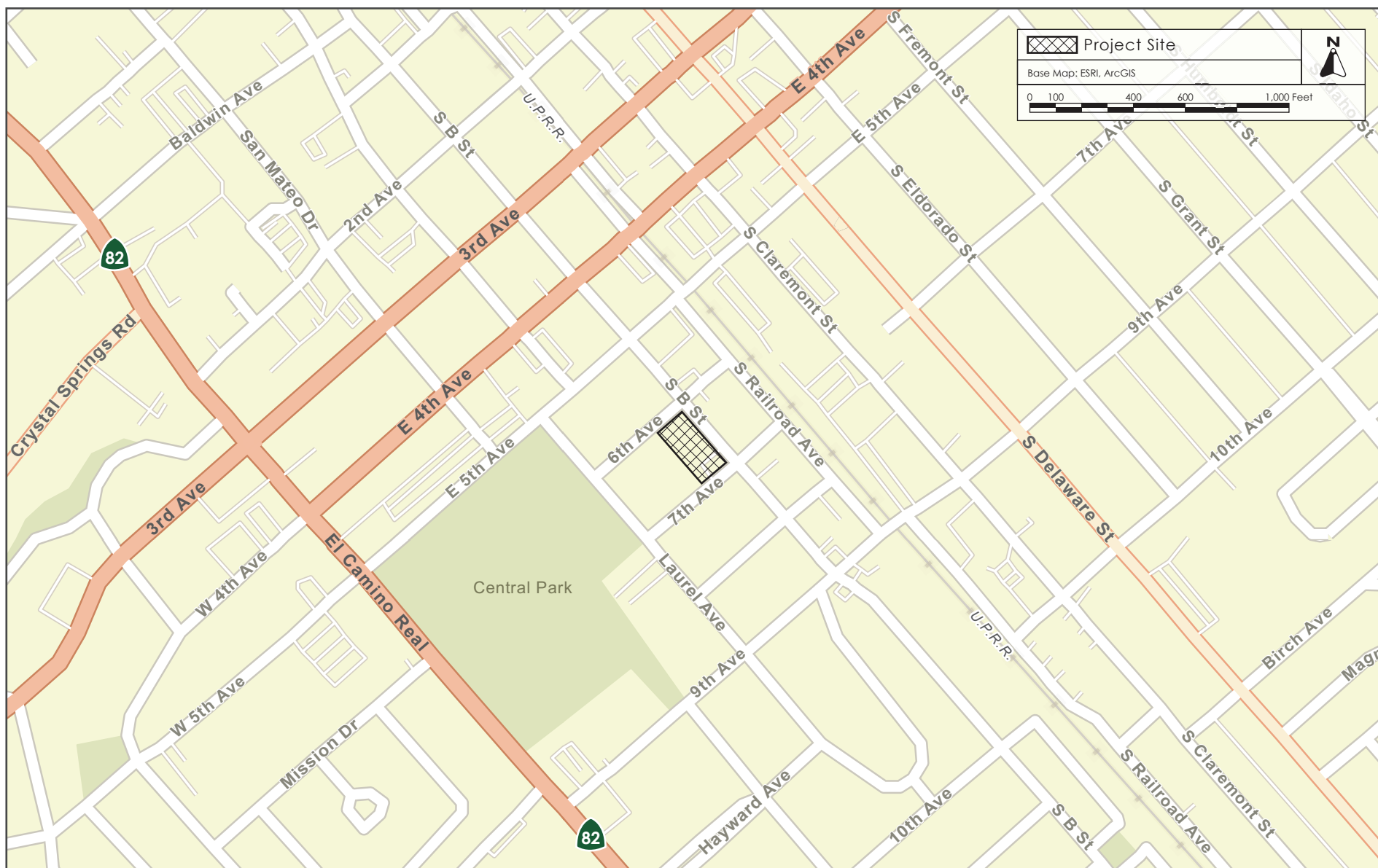
---

<sup>2</sup> FAR is the measurement of a building's floor area in relation to the size of the lot that the building is located on. FAR is expressed as a decimal number, and is derived by dividing the total area of the building by the total area of the parcel (building area divided by lot area).



REGIONAL MAP

FIGURE 1



VICINITY MAP

FIGURE 2





AERIAL PHOTOGRAPH AND SURROUNDING LAND USES

FIGURE 3



Residential amenities include a gym, elevator lobbies, a community room, and common residential open space on the second and fifth floors. The residential uses would be accessible from the ground floor from entrances on 7<sup>th</sup> Avenue and 6<sup>th</sup> Avenue, which open into the residential lobby and mail room and an interior stairwell, respectively. The ground floor would include elevators providing access to the residential units, a trash room, two utility storage rooms, and fire control room. The roof would include a space dedicated for solar photovoltaic panels. The project would be designed primarily with cement plaster cladding and wood cladding, and with the addition of aluminum storefront framing on the ground floor.

The Neighborhood Commercial/High Density Multi-Family (Mixed Use) designation allows for a wide range of uses. The number of tenants may change over the life of the project. There would be commercial signage and exterior lighting for the commercial tenants.

The project site plan and a 'birds-eye view' rendering are shown on Figure 4 and Figure 5, respectively. Exterior elevations from the north & east and south & west are shown on Figure 6.

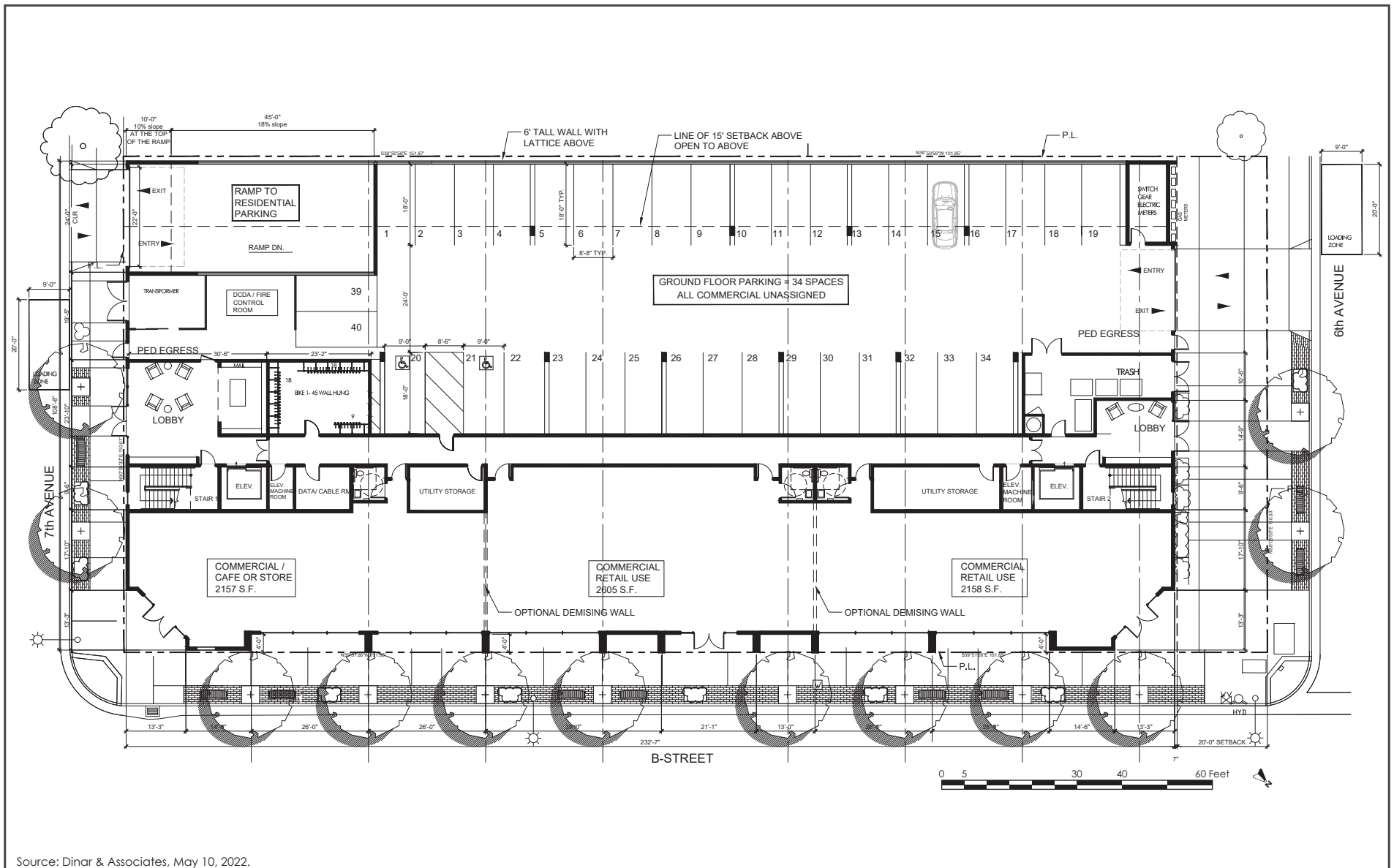
### Parking and Site Access

The project would construct one level of underground residential parking and a ground floor parking garage behind the commercial space, with commercial and residential stalls. The proposed underground garage would provide 51 residential parking spaces. The commercial parking lot would provide 19 parking spaces dedicated to commercial customers and two parking spaces dedicated for residents. The project would provide a total of 72 parking spaces, including three Americans with Disability Act (ADA) compliant spaces and 50 electric vehicle (EV) spaces. Access to the underground garage would be provided via a ramp located on 7<sup>th</sup> Avenue; access to the commercial parking lot and two residential spaces would be provided via a driveway on 6<sup>th</sup> Avenue.

A loading zone would be designated adjacent to the parking lot entrance on 6<sup>th</sup> Avenue. Long-term bicycle parking would be provided in a residential bike room in the underground parking garage and two bike lockers for commercial users would be provided in the ground floor garage. Bike racks will also be provided along 6<sup>th</sup> Avenue. The project would provide a total of 64 short- and long-term bicycle parking spaces.

### Transportation Demand Management

The City/County Association of Governments of San Mateo County's (C/CAG) TDM Policy Implementation Guide recommends that projects demonstrate a 25 percent trip reduction when the project will generate 100 or more daily vehicle trips. The project would implement a Transportation Demand Management (TDM) Plan to encourage automobile-alternative modes of transportation and reduce vehicle trips to and from the site by 25 percent. The TDM Plan includes specific measures to be implemented by the project, including TDM education programs, subsidizing active transportation, providing transit passes, and implementing carshare, carpool, and vanpool programs.



CONCEPTUAL SITE PLAN

FIGURE 4





Source: ARC TEC, Inc., May 25, 2023.

PROJECT RENDERING

FIGURE 5





NORTH ELEVATION



SOUTH ELEVATION



EAST ELEVATION



WEST ELEVATION

The project design also includes bicycle storage, active transportation site improvements, and pedestrian-oriented uses and amenities on the ground floor (i.e., public seating).

### Landscaping and Stormwater Controls

There are a total of six trees onsite, including one protected heritage tree and one protected street tree. The project proposes to remove all six trees (which would be replaced in accordance with Municipal Code Section 27.71). Landscaping along the ground floor would include street tree wells and raised planters adjacent to the building. The two open space areas of the second and fifth floors would include 15 trees and vegetated planter boxes. The project would plant 12 new street trees along the project's street frontage.

Runoff from the project site would be directed to silva cells<sup>3</sup> on the ground level on 6<sup>th</sup> Avenue. Silva cells located on South B Street and 7<sup>th</sup> Avenue would treat public right-of-way areas. Excess runoff from the silva cells would be discharged to the City storm drain system.

### Utility Improvements

Utility services to the proposed project would be provided by the City of San Mateo (storm drain, sanitary sewer), California Water Service (water service), and Pacific Gas & Electric (PG&E) (electricity). The project would install a new 12-inch City storm drain main along 6<sup>th</sup> Avenue and South B Street and new fire water line on 7<sup>th</sup> Avenue that would connect to the project.

### Construction

Construction of the project is anticipated to last approximately 20 months, with demolition and construction beginning in May 2024. Construction phases of the proposed project would include site clearing and demolition, excavation and off haul of excess soil, utility connections, building construction, frontage improvements, and landscaping. Equipment used during construction activities would include saws, excavators, dozers, tractors/loaders/backhoes, graders, cranes, forklifts, welders, air compressors, cement/mortar mixers, pavers, and rollers. No pile driving is proposed. Consistent with Section 7.30.060 of the City's Municipal Code, construction would take place between 7 a.m. to 7 p.m. on weekdays and 9 a.m. to 5 p.m. on Saturdays, and 12 p.m. to 4 p.m. on Sundays and holidays. The project would not import any soil and would export 125 cubic yards of soil associated with construction of the below level parking garage, building footings, grading, and trenching activities, which would extend to a depth of 12 feet.

---

<sup>3</sup> Silva cells are a type of suspended pavement that prevent soil from compacting around tree roots and support on-site stormwater runoff absorption and treatment.



## V. Environmental Review

The purpose of this section is to document whether any of the exceptions listed in CEQA Guidelines Section 15300.2 apply to the project, and assess the project's eligibility for a Categorical Exemption from CEQA under Section 15332 (Class 32) In-Fill Development Projects.

### Section 15300.2 – Exceptions

*(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*

This exception only applies to Class 3, 4, 5, 6, and 11 exemptions. The proposed project is categorically exempt under Class 32; therefore, this exception is not applicable to the project.

*(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

#### Agricultural and Mineral Resources

There are no agricultural, forestry, or mineral resources present on-site or in the surrounding area; therefore, the project would not have any cumulative impacts to these resources.

#### Localized Resources

Within the localized area of effect (immediately adjacent from the project site), there are no approved or future projects that are reasonably foreseeable. Therefore, the project would have no cumulative impacts to localized environmental factors, specifically including aesthetics, biological and cultural resources, geology and soils, hydrology and water quality, and vibration.

#### Air Quality and Hazards/Hazardous Materials

Within approximately 1,000 feet of the project site, the cumulative area of effect for air quality and hazards/hazardous materials, there are two pending or foreseeable projects. One is a mixed-use office and residential development project located approximately 500 feet east of the site at 477 9<sup>th</sup> Avenue. The second is a mixed-use office, commercial, and residential development project located approximately 400 feet west of the project at 222 East 4<sup>th</sup> Avenue. Both projects were accounted for in the cumulative Air Quality analysis provided below, which concluded that the cumulative conditions from both projects would not result in a significant effect on air quality. With regard to hazardous materials, neither 477 9<sup>th</sup> Avenue nor 222 East 4<sup>th</sup> Avenue are included on any lists compiled pursuant to Section 65962.5 of the Government Code, and the proposed uses on both

project sites do not generate hazardous emissions or involve the handling of any acutely hazardous materials. Therefore, the project would not have a cumulative impact with regard to air quality or hazardous materials in conjunction with the 477 9<sup>th</sup> Avenue or 222 East 4<sup>th</sup> Avenue Mixed-Use projects.

### Noise

The cumulative area of effect for noise impacts is 500 feet. The noise analysis for the project accounted for the projects at 477 9<sup>th</sup> Avenue and 222 East 4<sup>th</sup> Avenue, as well as a third mixed-use project located at 445 South B Street (approximately 350 feet northwest of the project site). The noise analysis concluded that implementation of construction noise and vibration conditions of approval for each individual project (such as those listed previously) would ensure construction noise impacts are reduced. Therefore, the project would not have a cumulative impact with regard to noise in conjunction with the 477 9<sup>th</sup> Avenue, 222 East 4<sup>th</sup> Avenue, or 445 South B Street Mixed-Use projects.

### Land Use and Population and Housing

Citywide, the project would not have a cumulative impact on land use and planning or population and housing, since there is no existing housing on-site. With the application of a 50 percent density bonus, the project would be consistent with the site's General Plan land use designation and zoning district. The San Mateo 2030 General Plan EIR found that buildout of the General Plan would have a less than significant impact on these environmental factors. The project would also not have a cumulative impact on traffic, since the analysis of the project's individual impacts on traffic (discussed below) factored in trips generated by existing, approved, and reasonably foreseeable future development through the year 2040. The analysis of the project's impacts on utilities and public services (provided below) determined the project would not have a significant effect on these resources. Further, the San Mateo 2030 General Plan EIR found that buildout of the General Plan (including the project) would not result in cumulatively considerable public service or utilities impacts.

### Greenhouse Gas Emissions

The following analysis is based, in part, on a GHG Assessment dated July 2023 prepared by ECORP Consulting, Inc. A copy of this report is attached to this Exemption Memorandum as Appendix A.

Because a project's greenhouse gas (GHG) emissions do not have localized impacts, but instead contribute to the global climate change effect, a project's GHG impact is inherently cumulative. GHG impacts are analyzed using the Bay Area Air Quality Management District's (BAAQMD's) CEQA Air Quality Guidelines, which are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. The jurisdictions in the San Francisco Bay Area Air Basin (which encompasses San Mateo) utilize the thresholds and methodology for assessing GHG impacts developed by BAAQMD within the CEQA Air Quality

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

The BAAQMD CEQA Air Quality Guidelines also include thresholds of significance for greenhouse gas emissions. For land use projects, BAAQMD developed plan- and project-level thresholds that evaluate the significance of operational GHG emissions based on its effect on the State's efforts to meet the identified long-term climate goals. Projects that comply with an adopted GHG Reduction Strategy are considered to have less than significant GHG impacts. Projects that do not comply with an adopted GHG Reduction Strategy must demonstrate that they include, at minimum:

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
- c. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts.
- d. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

Chapter 23 of the San Mateo Municipal Code prohibits natural gas infrastructure in new residential and commercial developments; therefore, the project would comply with requirement (a). The project would reduce natural gas usage in comparison with the existing development, proximity to public transit, the expected increased use of electric vehicles according to state mandates, and improvements in fuel economy throughout the project lifetime would ensure gasoline consumption is reduced overall. The project would result in 474 average daily trips (see Appendix E) which would be reduced by 25 percent in accordance with the TDM Plan described in Subsection IV. Project Description. Electricity would be provided to the project by Peninsula Clean Energy, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Accordingly, the project would satisfy requirement (b) since it would not result in any wasteful, inefficient, or unnecessary energy usage. As documented below under Section 15332 – In-Fill Development Projects, the project would have a less than significant VMT impact and therefore would satisfy requirement (c). Lastly, the proposed design of the below-grade residential parking garage and commercial parking lot provides electric vehicle spaces in compliance with CALGreen Tier 2 and therefore satisfies requirement (d).

The City's 2020 Climate Action Plan (CAP) is a qualified GHG Reduction Strategy that set quantifiable emission reduction goals of 15 percent below 2005 emission levels by 2020, 4.3 metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>e) per person by 2030, and 1.2 MTCO<sub>2</sub>e per person by 2050. The proposed project is estimated to generate a total of approximately 400 MTCO<sub>2</sub>e of GHG emissions

during construction.<sup>4</sup> These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction related GHG emissions. However, the project would implement BAAQMD construction best management practices to restrict idling of construction equipment and utilize energy-efficient equipment, which would in turn reduce GHG emissions. During operation, the proposed project is estimated to generate a total of approximately 468 MTCO<sub>2</sub>e annually, which is a net increase of 266 MTCO<sub>2</sub>e annually compared to existing conditions.<sup>5</sup> The project would result in 3.5 MTCO<sub>2</sub>e per service population per year, below the CAP threshold of 4.3 MTCO<sub>2</sub>e per service population per year by 2030.<sup>6</sup>

The project would comply with the latest BAAQMD qualitative GHG thresholds, would comply with the City's Climate Action Plan, and would not have a cumulative impact on energy or GHG emissions. Thus, the cumulative impact exclusion does not apply to the project.

*(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

The proposed project does not include any elements that are atypical for a mixed-use commercial and residential development in a downtown area. The proposed uses are consistent with commercial and residential uses that are present throughout the surrounding area in all directions. Further, the project site itself does not contain any unusual characteristics. As documented below, the site is not on any lists compiled pursuant to Section 65962.5 of the Government Code or mapped within a Very High Wildfire Hazard Zone, there are no historic resources on-site or nearby historic districts, and there is no habitat for endangered, rare or threatened species. The project site is also mapped by the City within a "Low Sensitivity Zone" for archaeological resources, and any undiscovered subsurface archaeological (including tribal cultural) or paleontological resources present would be protected with adherence to the conditions of approval identified in Subsection IV. Project Description, above, as well as in discussion (f) below.

Given that the site is fully developed with commercial uses and a surface parking lot within a heavily urbanized area, there are no agricultural, forestry, or mineral resources present on-site. Further, a Geotechnical Investigation (dated August 18, 2021) prepared by Summit Engineering for the project determined that there were no unique or unusual geological issues that would prevent development of the site as proposed. A copy of the Geotechnical Investigation is attached to this Exemption Memorandum as Appendix B.

As discussed under Section 15332 – In-Fill Development Projects below, the project would not have any significant effects on traffic, noise/vibration, air or water quality, utilities, or public services. Therefore, there are no unusual circumstances present that could result in the project having a

---

<sup>4</sup> ECORP Consulting, Inc. *Nazareth Vista Mixed Use Project*. Page 10. July 2023.

<sup>5</sup> *Ibid.*, page 11.

<sup>6</sup> *Ibid.*, page 13.

significant effect on the environment, and the significant impact due to unusual circumstances exclusion does not apply to the project.

*(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*

There are no officially designated state scenic highways in the project area. The nearest officially designated state highway is Interstate 280, which is located approximately three miles west of the project site and is not visible from the project site.<sup>7</sup> The project, therefore, would not damage scenic resources within a highway officially designated as a state scenic highway, and no exemption applies under 15300.2(d).

*(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*

The following analysis is based, in part, on a Phase I Environmental Site Assessment (ESA) dated October 2020 prepared by PIERS Environmental Services. A copy of this report is attached to this Exemption Memorandum as Appendix C.

The Phase I ESA determined a Historical Recognized Environmental Condition (HREC) is associated with the site due to previous uses. The site is listed as a closed leaking underground storage tank (LUST) case for a former tire facility's removal of underground hoists. The site is also listed on the LUST, HAZMAT, GENERATORS, and HAZNET databases for the former tire facility being a closed LUST case, and for the existing commercial use (paint company) being a chemical storage facility generating hazardous waste. Following removal of the underground hoists, the site was excavated and contaminated soil was removed. The LUST case was closed, and no further action was deemed necessary by the City.

Because the project site is not listed as an active case on any lists compiled pursuant to Section 65962.5 of the Government Code, no exception to the exemption applies under 15300.2.<sup>8</sup>

---

<sup>7</sup> California Department of Transportation. "California State Scenic Highway System Map". Accessed February 3, 2023. <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>.

<sup>8</sup> California Environmental Protection Agency. "Cortese List Data Resources". Accessed February 3, 2023. <https://calepa.ca.gov/sitecleanup/corteselist/>.

*(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The following analysis is based, in part, on a Historic Resource Evaluation Report (HRE), dated July 29, 2022, prepared by Architecture + History, LLC., and an Archaeological Literature Review (ALR), dated January 30, 2023, prepared by Basin Research Associates. A copy of the HRE is attached to this memorandum as Appendix D. The ALR contains sensitive information about cultural resources in the area and is on file with the City of San Mateo.

The existing commercial buildings on-site at 616 South B. Street and 600 South B. Street were constructed 67 and 51 years ago, respectively. Though over 50 years old, the existing buildings are not listed on the National Register of Historic Places (NRHP) or California Register of Historic Resources (CRHR) because they are not associated with events that made a significant contribution to local, regional, state, or national history; are not associated with the lives of persons important to local, state, or national history; do not embody the distinctive characteristics of a type, period, region, or method of construction; and were not designed by a master builder or architect. In addition, there are no historic resources adjacent to the project site that are listed on the NRHP or CRHR.<sup>9,10</sup>

The City of San Mateo's Archaeological Survey Map shows the project site is located in an area of low sensitivity for buried prehistoric archaeological resources.<sup>11</sup> The project would be required to implement the following conditions of approval to avoid impacts to archaeological resources, if encountered during construction.

**Conditions of Approval:**

- a. Archaeological Resources. In the event of the discovery of archaeological resources whether on-site or in the public right-of-way, the applicant shall halt all construction activities, notify the Planning Manager and/or Project Planner, and retain a qualified archaeologist. The archaeologist shall evaluate the uniqueness of the find, contact local Native American and Historical organizations for proposed recommendations for continuing construction, and submit a summary of findings to the Project Planner. The applicant shall incorporate the recommendations of the local Native American and Historical organizations when continuing construction.
- b. Cultural Resources. In the event of the discovery of human remains whether on-site in the public right-of-way, the applicant shall halt all activity within 50 feet of the discovery and notify the Planning Manager and/or Project Planner. The applicant shall also immediately notify San Mateo County Coroner to have a determination made as to whether the remains are of Native American origin or whether an investigation into the

---

<sup>9</sup> Architecture + History, LLC. *Historic Resource Evaluation Report, 600-606 and 616 South B Street*. July 19, 2022.

<sup>10</sup> Basin Research Associates. *Archaeological Literature Review in Support of Environmental Clearance of 616 S. B Street (Nazareth Vista), Mixed-Use Development*. January 30, 2023.

<sup>11</sup> City of San Mateo. City of San Mateo Historic Resources Figure C/OS-5. April 2022.



cause of death is required. Treatment of human remains and any associated or unassociated funerary objects discovered during any soil-disturbing activity within the project site shall comply with applicable State laws. If the remains are determined to be Native American, the Coroner will notify the Native American Heritage Commission (NAHC) immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

- c. Cultural Resources Monitor. Should construction monitoring be required, the applicant shall submit a scope of work with a cultural resources monitor as prescribed by the Archaeological Monitoring Plan. The scope of work shall indicate that, in the event of a discovery, the monitor:
  - Has stop-work authority to halt all construction activities;
  - Will notify the Planning Manager and/or Project Planner;
  - Will evaluate the discovery to determine whether additional treatment is warranted; and,
  - Will determine adequacy of the evaluation of the discovery prior to authorization of construction activities to resume.
- d. Paleontological Resources. In the event of the discovery of paleontological resources (fossils) whether on-site or in the public right-of-way, the applicant shall halt all construction activities within 50 feet of the discovery, notify the Planning Manager and/or Project Planner, and retain a qualified paleontologist to determine the significance of the discovery. The paleontologist shall evaluate the uniqueness of the find, prepare a written report documenting the find and recommending further courses of action, and submit a summary of findings to the Project Planner. The applicant shall incorporate the recommendations of the paleontologist when continuing construction.

For the reasons described above, the project would not cause a substantial adverse change in the significance of a historical resource, and no exception to the exemption applies under 15300.2(f).

### Section 15332 – In-Fill Development Projects

*Section 15332, or Class 32, applies to projects characterized as in-fill development meeting the conditions described below:*

- (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations.*

As discussed under Subsection III. General Plan and Zoning, the site's land use designation and zoning district permit commercial and residential uses; therefore, the proposed uses are consistent. The proposed development's height, as measured to the top plate line (five stories and 54.5 feet) does not exceed the maximum building height imposed by the Building Height Plan of the General Plan, and since 15 percent of the project's residential units would be reserved for very low-income

residents, the project's FAR of 3.01 would be permitted under the California State Density Bonus Law. Further, the City has reviewed the proposed project and found it compliant with all applicable policies and regulations set forth in the San Mateo General Plan and San Mateo Municipal Code with California State Density Bonus Law concessions and waivers applied. Thus, the project meets the conditions set forth in CEQA Guidelines Section 15332(a).

*(b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.*

The proposed development would occur on a 0.64-acre site within the limits of the City of San Mateo that, as documented in Section B. Project Site Location and Existing Setting and shown on Figure 3, is surrounded by urban uses. Thus, the project meets the conditions set forth in CEQA Guidelines Section 15332(b).

*(c) The project site has no value as habitat for endangered, rare, or threatened species.*

As previously documented, the project site is fully developed with commercial buildings and a surface parking lot. Further, the project site and surrounding area is mapped on Figure 4.9-1 of the San Mateo 2030 General Plan Environmental Impact Report (EIR) as Urban Habitat, which only provides habitat for common species adapted to human habitation.<sup>12</sup> Therefore, the project does not provide any habitat for endangered, rare, or threatened species.

While the project site does not provide any habitat for endangered, rare, or threatened species, the project would remove six trees, including two protected trees, that could be used by urban-adapted raptors or other protected birds as nesting and foraging habitat. Raptors and nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and the California Department of Fish & Wildlife (CDFW). Noise and vibration generated by construction activities have the potential to disturb raptors and nesting birds, which could potentially lead to nest abandonment and/or loss of reproductive effort, both of which are prohibited by the MBTA and CDFW. As required by the MBTA and CDFW, the project would be subject to the following measures to prevent construction activities from disturbing nesting birds and raptors.

#### **Conditions of Approval:**

- a. Nesting Birds and Migratory Raptors. All potential nesting substrates (e.g., bushes, trees, grasses, and other vegetation) that are planned to be removed by the project shall be removed prior to February 1 or after August 31, unless the applicant or his/her designee complies with the following procedures:
  - Should construction activities be scheduled between February 1 and August 31, pre-construction surveys shall be conducted by a qualified ornithologist to

---

<sup>12</sup> City of San Mateo. 2030 General Plan Environmental Impact Report. Figure 4.9.-1, pages 4.9-4, -8, -9. January 2010.

ensure that no nests will be disturbed during project implementation. These surveys shall be conducted no more than 14 days prior to the initiation of construction. During this survey, the ornithologist shall inspect all trees and other potential nesting habitats within 250 feet of the limits of construction activities. If an active nest is found sufficiently close to work areas to be disturbed by these activities, the ornithologist shall determine the extent of a construction-free buffer zone (typically 250 feet for raptors and 50 feet for other species), to ensure that nests of species protected by the Migratory Bird Treaty Act and California Department of Fish & Wildlife shall not be disturbed during project implementation. These buffers may be increased or decreased, as appropriate, depending on the bird species and the level of disturbance anticipated near the nest with the permission of the ornithologist.

- The applicant shall submit a report prepared by a qualified ornithologist indicating the results of the survey and any designated buffer zones to the City's Planning Division subject to the satisfaction of the Director of Community Development, or his/her designee.

Adherence with these conditions would ensure that all potential nesting substrates on-site would be removed prior to the beginning of nesting season (February 1), and that any active nests within 250 feet of construction activities would be protected by a construction-free buffer zone. Implementation of these conditions would prevent nesting birds and raptors from being disturbed such that no nest abandonment and/or loss of reproductive effort would occur. Therefore, the project meets the conditions set forth in CEQA Guidelines Section 15332(c).

*(d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.*

### Traffic

The following analysis is based, in part, on a Traffic Impact Analysis (dated July 2023) prepared by Kittelson & Associates, Inc. A copy of this report is attached to this memorandum as Appendix E.

With the passage of Senate Bill 743 (SB 743), vehicle miles traveled (VMT) replaced level of service (LOS) as the criteria for determining the significance of traffic impacts. As required by SB 743 and the Governor's Office of Planning and Research (OPR), the City of San Mateo incorporated VMT policies and thresholds of significance into its Transportation Impact Analysis (TIA) Guidelines (dated August 17, 2020).

The City's TIA Guidelines include screening criteria which, if met by a project, would result in the project having a less than significant VMT impact under CEQA. Under the High-Quality Transit Area

(HQTA) screening criteria, projects that are within a half-mile of a high-quality transit station and meet the following criteria are considered to have a less than significant VMT impact<sup>13</sup>:

- Have a floor area ratio greater than 0.75;
- Include less parking for residents, customers, and employees than required by the jurisdiction;
- Are consistent with Plan Bay Area 2050;
- Do not replace affordable housing units with a smaller number of moderate- or high-income residential units.

The proposed project is located 0.3 miles from the San Mateo Caltrain station and 0.3 miles from the El Camino Real bus service, both of which are considered high-quality transit stops under the City's TIA Guidelines. As documented in D. Project Description, the proposed development would have an FAR of 3.01. Under the City's Municipal Code, the project would be required to provide 109 parking spaces, but as allowed under Assembly Bill 2097 (AB 2097), the project is proposing to provide 72 parking spaces.

The project would be consistent with the goals of Plan Bay Area 2050, such as building affordable housing, creating healthy and safe streets by building a complete streets network, and reducing climate emissions, because it would provide land use growth and affordable housing near high-quality transit while promoting alternative modes of travel (walking/biking) through implementation of the TDM Plan. Lastly, the existing project site is only developed with commercial uses, and therefore the proposed demolition of the existing development and construction of new commercial and residential uses would result in a net increase in affordable housing. Thus, the project satisfies the City's High-Quality Transit Area screening criteria and therefore would have a less than significant VMT impact.

As previously discussed, SB 743 and CEQA Guidelines Section 15064.3(a) prohibit the use of LOS as a metric to identify traffic impacts under CEQA. However, the San Mateo 2030 General Plan includes policies addressing potential project effects on intersection operations. The City maintains a level-of-service (LOS) standard of mid-level LOS D for all intersections. According to General Plan Policy C-2.7, a development project may be required to fund off-site circulation improvements which are needed as a result of project-generated traffic if:

- (a) The level of service at the intersection drops below mid-level LOS D (average delay of more than 45 seconds) when the project is added, and
- (b) An intersection that operates below its level of service standard under the base year conditions experiences an increase in delay of four or more seconds, and

---

<sup>13</sup> The City's TIA Guidelines define a high-quality transit station as a Caltrain station or bus stop that provides service on 15-minute headways during peak commute hours.

- (c) The needed improvement of the intersection(s) is not funded in the applicable five-year City Capital Improvement Program from the date of application approval.

While an impact on LOS is no longer considered an impact under CEQA, the CEQA Guidelines require lead agencies to assess the direct and indirect physical impacts of projects. As such, if a project's effects on intersection LOS and/or roadway operations would necessitate the construction or funding of physical improvements, the law requires an analysis of the potential adverse effects on the environment that could be caused by the construction of these physical improvements. The Traffic Impact Analysis prepared by Kittelson & Associates, Inc. analyzed the project's impact in conjunction with existing and reasonably foreseeable future development on nine nearby intersections and the roadway network through the year 2040, and determined that the project would not have any adverse effects on intersection LOS or roadway operations. Therefore, the project would not necessitate the construction or funding of any physical improvements. Further, the Traffic Impact Analysis recommended modifications to increase the residential parking garage slope by two percent and to install warning devices that alert pedestrians of vehicles exiting driveways to ensure pedestrian safety. These modifications would not impede traffic operations.

Since the project would have a less than significant VMT impact, and all physical improvements to the transportation network as a result of the project would not result in adverse effects on the environment, the project would not have any significant effects relating to traffic.

#### Noise and Vibration

The following analysis is based, in part, on a Noise and Vibration Assessment (dated November 8, 2023) prepared by Illingworth & Rodkin. A copy of this report is attached to this memorandum as Appendix F.

#### *Project Construction*

##### Construction Noise

Pursuant to Municipal Code Section 7.30.060, construction activities that would occur outside the permitted hours of construction (weekdays between 7:00 a.m. and 7:00 p.m., Saturdays between 9:00 a.m. and 5:00 p.m., and Sundays and holidays between 12:00 p.m. and 4:00 p.m.) or would generate noise exceeding 90 dBA at adjacent property lines would have a significant construction-related noise impact.

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

Construction activities would generate considerable amounts of noise, especially during earth-moving activities when heavy equipment is used. During each stage of construction, there would be a different mix of equipment operating, and noise levels would vary by stage and vary within stages, based on the amount of equipment in operation and the location at which the equipment is operating.

As described in Section D. Project Description, construction of the project is anticipated to last approximately 20 months. Construction activities would occur on weekdays between 7 a.m. to 7 p.m. and Saturdays between 9 a.m. to 5 p.m. Construction phases of the proposed project would include site clearing and demolition, excavation and off haul of excess soil, utility connections, building construction, frontage improvements, and landscaping. Equipment used during construction activities would include saws, excavators, dozers, tractors/loaders/backhoes, graders, cranes, forklifts, welders, air compressors, cement/mortar mixers, pavers, and rollers. No pile driving is proposed.

The Federal Highway Administration's Roadway Construction Noise Model was used to calculate the hourly average noise levels for each stage of construction, assuming every piece of equipment would operate simultaneously, which would represent the worst-case scenario. Table 1 below shows the calculated construction noise levels at the surrounding land uses shown on Figure 3. Additional information on the methodology and assumptions used to estimate the project's construction noise levels is available in Appendix F.

**Table 1: Estimated Construction Noise Levels at Adjacent Property Lines**

Construction Phase	Calculated Hourly Average Noise Levels, dBA Leq			
	Adjoining West Residences (90 feet)	North Residences (125 feet)	East Commercial Uses (175 feet)	South Residences and Commercial Uses (125 feet)
Demolition	82	79	76	79
Site Preparation	78	76	73	76
Grading	80	77	74	77
Trenching	79	76	73	76
Building Exterior	81	78	75	78
Building Interior	73	70	67	70
Paving	79	76	73	76

Source: Illingworth & Rodkin, Inc. *Nazareth Vista Mixed-Use Project Noise and Vibration Assessment*. November 8, 2023.

Notes: The distances shown above were measured from the center of the proposed mixed-use building to the receiving property lines. These levels represent construction noise levels calculated from all equipment per phase operating simultaneously.



Although construction noise levels are not anticipated to exceed 90 dBA at adjacent property lines, the use of construction equipment (specifically saws, cement mixers, cranes, dozers, excavators, graders, and pavers) could generate noise levels in excess of 90 dBA if used within 25 feet of adjacent property lines. General Plan policies N-2.1, N-2.2, and N-2.3 require new development to incorporate measures to minimize their noise impacts. As required by the City's General Plan and Municipal Code, the project would be required to adhere to the following measures to minimize noise below 90 dBA at adjacent property lines.

The applicant and contractor shall place and operate construction equipment to minimize the impact of construction noise on existing sensitive receptors. Construction equipment shall be well-maintained and used judiciously to be as quiet as possible. Additionally, the applicant and contractor shall incorporate the following conditions of approval to reduce noise from construction activities on nearby sensitive land uses:

**Conditions of Approval:**

- a. Construction Plan for Noise. The contractor shall prepare and submit a construction plan that complies with all standards and best management practices established in the Noise and Vibration Assessment by Illingworth & Rodkin, Inc., dated November 8, 2023, showing how noise levels during demolition or construction will not exceed 90 A-Weighted Sound Level (dBA) at distance of 25 feet from the source of noise. The contractor shall submit the construction plan to the City's Building Division subject to the satisfaction of the Community Development Director, or his/her designee prior to the issuance of any demolition, building, and site development permit relating to the construction of the superstructure and prior to the pre-construction conference. At minimum, the construction plan for noise shall include:
  - A staging area map, establishing locations that will create the greatest distance between the construction-related noise sources and adjacent residential uses to the west of the project site.
  - A schedule indicating the stages of construction that will generate high noise levels. The schedule shall also indicate at which points the contractor or his/her designee will submit verification letters to the Building Division verifying compliance with the plan.
  - Name and contact information for a designated Disturbance Coordinator(s) responsible for registering and investigating claims of excessive vibration.

The Noise and Vibration Assessment prepared by Illingworth & Rodkin (refer to Appendix F) determined that adherence with the above conditions of approval would ensure noise levels generated during construction of the project would not exceed 90 dBA at adjacent property lines. Accordingly, the project would not result in any significant effects related to construction noise.

## Construction Vibration

The California Department of Transportation recommends a vibration limit of 0.5 in/sec PPV for buildings structurally sound and designed to modern engineering standards, which typically consist of buildings constructed since the 1990s. Conservative vibration limits of 0.3 in/sec PPV has been used for buildings that are found to be structurally sound but where structural damage is a major concern. For historical buildings or buildings that are documented to be structurally weakened, a cautious limit of 0.08 in/sec PPV is often used to provide the highest level of protection.

Construction of the project may generate perceptible vibration when heavy equipment or impact tools (e.g., jackhammers, hoe rams) are used in the vicinity of nearby sensitive land uses. As previously discussed, construction activities would include site clearing and demolition, excavation and off haul of excess soil, utility connections, building construction, frontage improvements, and landscaping. Equipment used during construction activities would include saws, excavators, dozers, tractors/loaders/backhoes, graders, cranes, forklifts, welders, air compressors, cement/mortar mixers, pavers, and rollers. Pile driving (which generates substantial vibration) is not proposed as a method of construction.

Based on a review of the NRHP<sup>14</sup>, CRHP<sup>15</sup>, and City of San Mateo Historic Building Survey, the nearest historical buildings are located opposite South B Street from the proposed project site (approximately 65 feet from the eastern property line) and more than 200 feet northeast of the project boundary. These buildings would be subject to the 0.08 in/sec PPV threshold, while all other buildings surrounding the site would be of conventional materials and subject to the 0.3 in/sec PPV threshold. Based on typical vibration levels generated by construction equipment, the vibration levels from project construction were estimated from the boundary of the project site, which would represent the nearest location for use of vibration generating equipment, at the nearest building facades (refer to Appendix F for more information on the methodology used to calculate vibration levels). Table 2 on the following page summarizes the vibration levels from construction activities at buildings within the project's area of effect.

---

<sup>14</sup> National Register of Historic Places. "National Register Database and Research. Accessed July 20, 2023. <https://www.nps.gov/subjects/nationalregister/database-research.htm>

<sup>15</sup> California Register of Historic Places. "California Historical Resources". Accessed July 20, 2023. <https://ohp.parks.ca.gov/listedresources/>

**Table 2: Estimated Vibration Levels at Nearby Buildings**

Equipment	PPV (in/sec) at Nearest Building Facades					
	North Residences (60 feet)	East Commercial Uses (65 feet)	South Residences (100 feet)	Adjoining West Residences (5 feet)	Nearest Historical Building (65 feet)	Northeast Historical Building (216 feet)
Clam shovel drop	0.077	0.071	0.044	<b>1.186</b>	0.071	0.019
Hydromill	In soil	0.003	0.002	0.047	0.03	0.001
	In rock	0.006	0.004	0.100	0.006	0.002
Vibratory roller	0.080	0.073	0.046	<b>1.233</b>	0.073	0.020
Hoe ram	0.034	0.031	0.019	<b>0.523</b>	0.031	0.008
Large bulldozer	0.034	0.031	0.019	<b>0.523</b>	0.031	0.008
Caisson drilling	0.034	0.031	0.019	<b>0.523</b>	0.031	0.008
Loaded trucks	0.029	0.027	0.017	<b>0.446</b>	0.027	0.007
Jackhammer	0.013	0.012	0.008	0.206	0.012	0.003
Small bulldozer	0.001	0.001	0.001	0.018	0.001	0.0003

Source: Illingworth & Rodkin, Inc. *Nazareth Vista Mixed-Use Project Noise and Vibration Assessment*. November 8, 2023.

Note: Bolded values indicate an exceedance of the 0.3 in/sec PPV threshold.

As shown in Table 2, the nearest historical building would not be exposed to vibration levels exceeding the conservative 0.08 in/sec PPV threshold. However, buildings adjoining the site consisting of conventional construction materials would potentially be exposed to vibration levels exceeding the 0.3 in/sec PPV threshold. The applicant and contractor would be required to incorporate the following measures to reduce vibration levels from construction activities to below the 0.3 in/sec PPV threshold. Infill development commonly involves construction adjacent to sensitive receptors, as is the case for the subject project, and the conditions below represent common restrictions and requirements on construction activity when proposed adjacent to sensitive receptors. The nature of the proposed construction and its effects on adjacent land use do not constitute unusual circumstances.

**Conditions of Approval:**

- b. Construction Equipment Vibration. The contractor shall submit a construction vibration plan prepared by a technical expert subject to all standards and best management practices established in the Noise and Vibration Assessment by Illingworth & Rodkin, Inc., dated November 8, 2023, showing how vibration levels during demolition or construction will not exceed 0.3 in/sec Peak Particle Velocity (PPV) at the conventional buildings within 25 feet of the project site. The contractor shall submit the plan to the City's Planning and Building Divisions, subject to the satisfaction of the Director of Community Development, or his/her designee, prior to issuance of a demolition permit. At minimum, the construction vibration plan shall include:
- A list of all heavy construction equipment. The list shall also specify smaller equipment (less than 18,000 pounds) to be used near the property lines adjacent to the residential uses to the west of the project site.
  - A schedule indicating the stages of construction anticipated to generate high vibration levels. The schedule shall also indicate at which points the contractor or his/her designee will submit reports to the Planning and Building Divisions to verify compliance with the plan. The reports shall include the activities that triggered alerts, the PPV readings, and the actions enacted to reduce the impact, all time and dated stamped. Reports shall be submitted to the Planning and Building Divisions at a minimum after demolition: shoring and tieback placement; excavation; pier placement; compaction activities; and any other activities that create a vibration reaching the threshold of 0.3 in/sec PPV.
  - A list of demolition methods to be used in order to minimize vibration impacts.
  - Name and contact information for a designated Disturbance Coordinator(s) responsible for registering and investigating claims of excessive vibration, and coordinating any outreach or noticing to inform neighboring properties of activities that may generate high vibration levels.
  - A plan to document conditions at all structures located within 25 feet of construction site, where access is granted, prior to, during, and after vibration-generating construction activities.

The Noise and Vibration Assessment prepared by Illingworth & Rodkin (refer to Appendix F) determined that adherence with the above conditions of approval would ensure vibration generated during construction of the project would not exceed the 0.3 in/sec PPV threshold. Accordingly, the project would not result in any significant effects related to construction vibration.

### *Project Operation*

#### Project-Generated Traffic

Pursuant to General Plan Policy N2.2, noise produced by project-generated traffic would result in a significant effect if it caused a permanent noise increase of three dBA  $L_{dn}$  or greater. Based on the traffic volumes provided in the Traffic Impact Analysis prepared for the project (refer to Appendix E) for the scenarios involving 'existing no project', 'existing plus project', 'cumulative no project', and 'cumulative plus project' scenarios, the project would increase noise levels along nearby roadway segments by one dBA  $L_{dn}$  or less. Further, noise levels along these roadways under both cumulative no project and cumulative plus project scenarios would increase by one dBA  $L_{dn}$  or less, and therefore the project's contribution would not be cumulatively considerable. Accordingly, noise from project-generated traffic would not result in any significant effects.

#### Mechanical Equipment

Policy N.3 of the San Mateo 2030 General Plan prohibits new uses that would generate noise levels of 65 dBA  $L_{dn}$  or above at the property line, excluding existing ambient noise levels. Section 7.30.040 of the San Mateo Municipal Code limits noise levels at commercial/office property lines to 65 dBA during daytime hours (7 a.m. to 10 p.m.) and 60 dBA during nighttime hours (10 p.m. to 7 a.m.).

Noise measurements conducted for the Noise and Vibration Assessment determined that daytime noise levels ranged from 54 to 63 dBA  $L_{eq}$  and nighttime noise levels ranged from 42 to 58 dBA  $L_{eq}$  along the southwest corner of the project site. Daytime noise levels ranged from 58 to 68 dBA  $L_{eq}$  and nighttime noise levels ranged from 44 to 62 dBA  $L_{eq}$  along the eastern boundary of the project site. Based on existing ambient noise levels, the noise level thresholds would be 60 dBA during daytime hours and 50 dBA during nighttime hours at the west residences; 63 dBA during daytime hours and 54 dBA during nighttime hours for the north and south residences; and 63 dBA during daytime hours and 55 dBA during nighttime hours for the east commercial uses.

The proposed project includes a transformer room and pump room in the ground level of the proposed building, along the northern building façade. Transformers up to 1,000 kVA typically generate noise levels up to 64 dB, as measured at 3.28 feet. Assuming the transformer runs continuously during daytime and nighttime hours, the day-night average noise level would be 70 dBA  $L_{dn}$  at a distance of 3.28 feet. With no windows in the transformer room, the building would provide about 20 dBA attenuation for surrounding receptors. Noise levels generated by equipment within the pump room would not be audible at the property line. For all existing receptors, the

noise level increase due to transformer noise would not be measurable or detectable (0 dBA Ldn increase).

Additional mechanical equipment and solar panels would be located on the roof. Solar panels would not generate noise levels audible at the property lines. While details for the other rooftop equipment, such as type of units, number of units, and specific locations of the units, were not available at the time the noise analysis was conducted, typical rooftop equipment for this type of building would include heating, ventilation, and air conditioning (HVAC) units. Typical heat pump condensing units for buildings of this size generate noise levels up to 66 dBA at a distance of three feet. Assuming worst-case conditions, up to eight units are assumed to operate at any given time in the same general area of the roof, for a combined noise level of 75 dBA at three feet. These types of units would cycle on and off continuously over a given 24-hour period, and assuming all eight units would run continuously, the day-night average noise level under worst-case conditions would be 81 dBA Ldn at three feet.

The project also proposes a parapet wall surrounding the roof and a mechanical screen surrounding potential locations for the equipment. These features would provide a minimum attenuation of 10 dBA for elevated receptors with direct line-of-sight to the project's rooftop. Ground-level receptors surrounding the site would receive attenuation of up to 20 dBA.

Table 3 below summarizes the hourly average noise levels and day-night average noise levels projected at the surrounding land uses.

**Table 3: Operational Noise Levels from Mechanical Equipment**

Receptor	Distance from Center of Condenser Units	Leq from Condenser Units Only, dBA	Combined Ldn, dBA	Noise Level Increase, dBA Ldn
Adjoining West Residences	20 feet	49 <sup>1</sup>	55 <sup>2</sup>	0
North Residences	65 feet	38 <sup>2</sup>	45 <sup>2</sup>	0
East Commercial Uses	100 feet	25 <sup>1</sup>	31 <sup>1</sup>	0
South Residences and Commercial Uses	125 feet	33 <sup>2</sup>	39 <sup>2</sup>	0

Source: Illingworth & Rodkin, Inc. *Nazareth Vista Noise and Vibration Assessment*. November 8, 2023.

Notes:

<sup>1</sup> Conservative 20 dBA noise level reduction is assumed from the parapet wall, mechanical screen, and elevation of the rooftop sources.

<sup>2</sup> Conservative 10 dBA noise level reduction is assumed from the parapet wall and roof screen for elevated receptors with direct line-of-sight to the project roof.

As shown in Table 3, noise generated by the project's mechanical equipment would not exceed the City's daytime and nighttime noise thresholds or increase ambient noise levels at the land uses



north and east of the site. Accordingly, the project would not result in any significant effects related to mechanical equipment noise.

#### Truck Loading and Unloading

A loading zone would be designated adjacent to the parking lot entrance on 6<sup>th</sup> Avenue. The south residences and commercial uses would be shielded from truck loading and unloading activities by the proposed building. Thus, the south receptors would not be exposed to substantial noise. In contrast, the adjoining west residences, north residences, and east commercial uses would have direct line-of-sight to the loading zone.

For all loading and unloading activities, truck maneuvering would take more than five minutes but less than 15 minutes per delivery.<sup>16</sup> Truck maneuvering noise would include a combination of engine, exhaust, and tire noise, as well as the intermittent sounds of back-up alarms and releases of compressed air associated with truck/trailer air brakes. Medium-sized delivery trucks would be expected at the proposed building. Medium-sized delivery trucks typically generate maximum noise levels of 60 to 65 dBA at 50 feet. The noise level of backup alarms can vary depending on the type and directivity of the sound, but maximum noise levels are typically in the range of 65 to 75 dBA at 50 feet.

It is conservatively assumed that up to one delivery would occur daily at the project site. While the proposed building would provide some shielding for the receptors to the west and to the east, no attenuation is assumed for this analysis. Table 4 summarizes expected noise levels generated by typical truck deliveries at the receptors with exposure to the loading areas.

**Table 4: Operational Noise Levels from Truck Loading and Unloading Activities**

Receptor	Distance from Center of Loading Area	Noise Levels from Truck Deliveries, dBA L <sub>08</sub> <sup>1</sup>	dBA L <sub>dn</sub>	Noise Level Increase, dBA L <sub>dn</sub>
Adjoining West Residences	60 feet	63	44	0
North Residences	60 feet	63	44	0
East Commercial Uses	130 feet	57	37	0

Source: Illingworth & Rodkin, Inc. *Nazareth Vista Noise and Vibration Assessment*. November 8, 2023.

<sup>1</sup> L<sub>08</sub> refers to the A-weighted noise levels that are exceeded eight percent of the time during the measurement period.

Based on the estimated noise levels in Table 4, truck loading and unloading activities would not exceed the City's L<sub>08</sub> daytime thresholds, which are summarized above to be 70 dBA L<sub>08</sub> at the

<sup>16</sup> Based on the Illingworth & Rodkin, Inc.'s (I&R's) experience, truck maneuvering activities at loading docks last a few minutes. Conservatively, I&R estimates more than five minutes. Source: Illingworth & Rodkin, Inc. *Nazareth Vista Noise and Vibration Assessment*. November 8, 2023.

adjoining west residences and 73 dBA  $L_{08}$  at the north residences and east commercial uses. For all existing receptors, the noise level increase due to truck loading and unloading activities would not be measurable or detectable (0 dBA  $L_{dn}$  increase). Thus, the project would not result in any significant effects related to truck loading and unloading.

#### *Total Combined Project-Generated Noise*

Once operational, noise generated by all project activities (i.e., traffic, mechanical equipment, and truck loading/unloading activities) would result in an increase of one dBA  $L_{dn}$  or less at surrounding land uses. Therefore, operation of the project would not result in any significant effects related to noise.

#### Air Quality

The following discussion is based, in part, on an Air Quality Assessment prepared for the project by Ramboll US Consulting, Inc. A copy of this report, dated July 19, 2023, is attached to this memorandum as Appendix G.

Air quality impacts may occur when a project conflicts with or obstructs the applicable air quality plan, or results in a cumulatively considerable net increase in any criteria air pollutant for which the region (i.e., the San Francisco Bay Area) is non-attainment under the applicable federal or state standard, the exposure of sensitive receptors to substantial pollutant concentrations (including toxic air contaminants (TACs), such as diesel particulate matter (DPM) that would result in community health risks, or in odors that would adversely affect a significant number of people.<sup>17</sup>

#### *2017 Clean Air Plan*

The proposed project would not conflict with the 2017 CAP because the project would not exceed the BAAQMD thresholds of significance for construction and operational criteria air pollutant emissions, as described below. Because the project would not exceed the BAAQMD screening criteria, it would not result in significant impacts due to the generation of construction or operational-related criteria air pollutants. Thus, the project is not required to incorporate project-specific control measures listed in the 2017 CAP. Further, the project is considered urban infill and would be located near bike facilities and transit with regional connections. Implementation of the project would not prevent BAAQMD or partner agencies from continuing progress toward attaining State and federal air quality standards and eliminating health-risk disparities from exposure to air pollution among Bay Area communities, as described within the 2017 CAP. Accordingly, the project would not result in significant effects due to a conflict with the 2017 CAP.

---

<sup>17</sup> The applicable air quality plan is the Bay Area Air Quality Management District 2017 Clean Air Plan. The San Francisco Bay Area is non-attainment for ground-level ozone (O<sub>3</sub>), nitrogen oxides (NO<sub>x</sub>), particulate matter (PM), sulfur dioxide (SO<sub>x</sub>), and lead. The project does not include substantial new emissions of sulfur dioxide or lead; therefore, these criteria pollutants are not discussed further.

## Criteria Air Pollutants

### Construction Period Emissions

The California Emissions Estimator Model (CalEEMod) Version 2022.1 was used to estimate emissions from project construction. Construction emissions were modeled based on equipment list and schedule information provided by the applicant. CalEEMod defaults for the associated land use and size were used where project-specific information was unavailable. Details about the equipment list, construction schedule, modeling, data inputs, and assumptions are included in Appendix G. Table 5 summarizes the unmitigated annualized average daily construction emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub> exhaust, and PM<sub>2.5</sub> exhaust during construction of the project.

**Table 5: Project Construction Period Emissions**

Year	Annualized Daily Construction Emissions (pounds/day)			
	ROG	NO <sub>x</sub>	PM <sub>10</sub> Exhaust	PM <sub>2.5</sub> Exhaust
2023	0.69	6.6	0.30	0.28
2024	2.3	2.5	0.10	0.093
2025	3.9	0.58	0.018	0.017
BAAQMD Threshold	54	54	82	54
Exceed Threshold?	No	No	No	No

Source: Ramboll US Consulting, Inc. *CEQA Air Quality and Health Risk Assessment for Nazareth Vista Mixed-Use Project*. July 19, 2023.

As shown in Table 5, the unmitigated average daily emissions of ROG, NO<sub>x</sub>, PM<sub>10</sub>, or PM<sub>2.5</sub> generated by project construction would not exceed BAAQMD thresholds. Accordingly, the project's construction period emissions would have a less than significant impact.

### Operational Period Emissions

Operational period criteria pollutant emissions associated with the project would be generated primarily from vehicles driven by future commercial occupants and residents, and to a lesser extent by waste disposal and daily energy and water usage. The proposed project falls below the BAAQMD operational criteria air pollutants screening thresholds of 638 dwelling units and 452,000 square feet for the "Apartments" and "Retail" land use types, respectively. The project proposes a mix of uses, and the residential component of 48 units is approximately seven percent of the screening level of 638 dwelling units, and the commercial component of 9,199 square feet is approximately two percent of the screening level of 452,000 square feet. Collectively, the size of the proposed mixed-use development equates to nine percent of the screening level, equivalent to less than one-tenth of the size of a mixed-use development that would exceed the BAAQMD screening criteria and warrant a detailed operational period criteria air pollutant emissions analysis. Therefore, the

project would result in a less than significant air quality impact due to operational-related criteria air pollutant emissions.

### *Community Health Risks*

Project impacts related to increased community risk can occur either by introducing a new source of TACs with the potential to adversely affect existing sensitive residents and workers in the project vicinity or by significantly exacerbating existing cumulative TAC impacts. The project would introduce new sources of TACs during construction (i.e., on-site construction and truck hauling emissions) and operation (i.e., mobile sources).

Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. During project operation, the project would generate emissions associated with traffic consisting of mostly light-duty vehicles.

Project impacts to existing sensitive receptors were addressed for temporary construction activities and long-term operational conditions, as discussed below. There are also several sources of existing TACs and localized air pollutants in the vicinity of the project. The impact of the existing sources of TACs was also assessed in terms of the cumulative risk which includes the project's contribution.

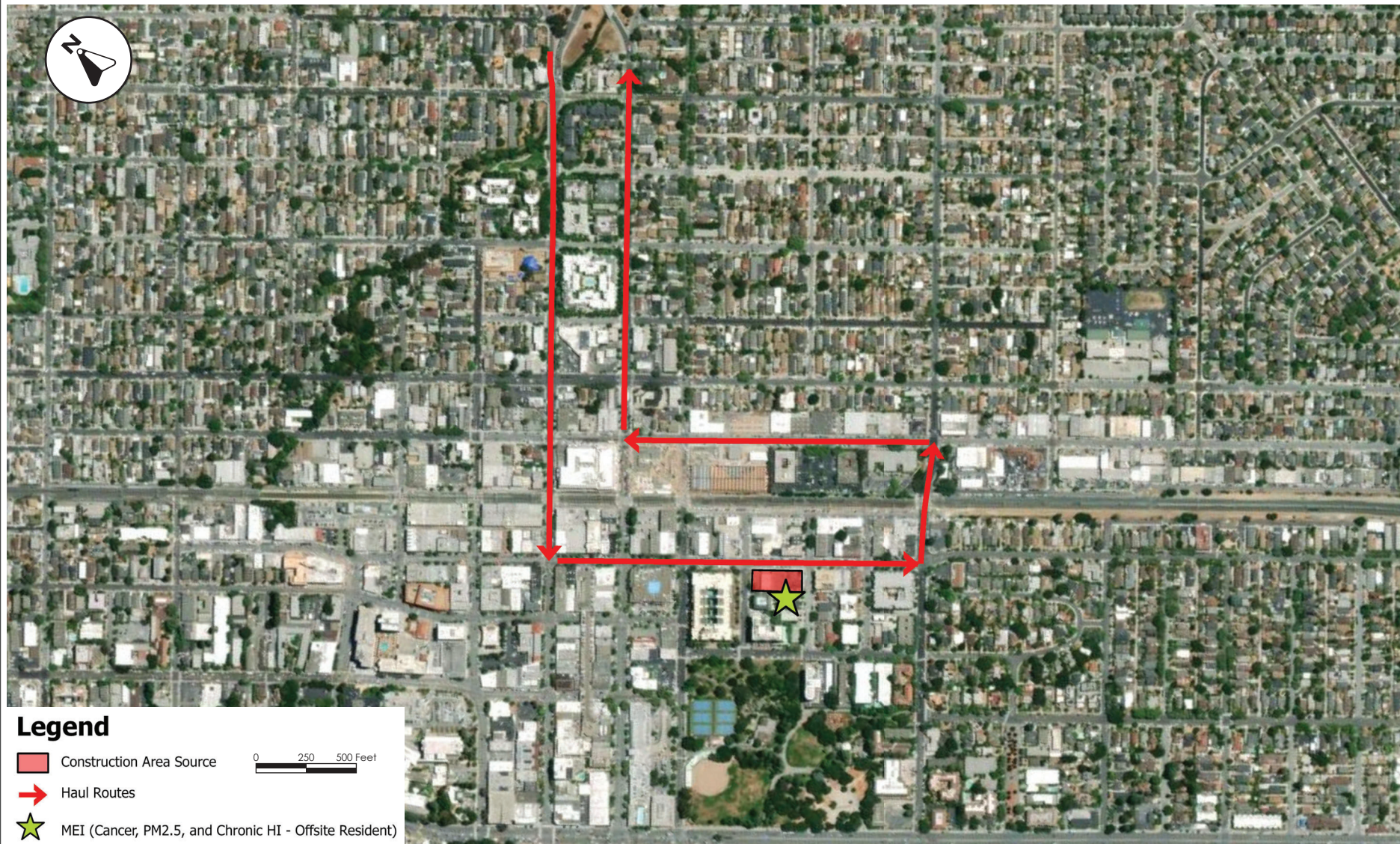
Community risk impacts were addressed by predicting increased cancer risk, the increase in annual  $PM_{2.5}$  concentrations and computing the Hazard Index (HI) for non-cancer health risks. The risk impacts from the project are the combination of risks from construction and operation sources. These sources include on-site construction activity, construction truck hauling, and increased traffic from the project. To evaluate the increased cancer risks from the project, a 30-year exposure period is typically used (per BAAQMD guidance), with the nearby residential sensitive receptors being exposed to both project construction and operation emissions during this timeframe.

The project's increased cancer risk is computed by summing the project construction cancer risk and operation cancer risk contributions. Unlike the increased maximum cancer risk, the annual  $PM_{2.5}$  concentration and HI values are not additive but based on the annual maximum values for the entirety of the project. The project's maximally exposed individual (MEI) is identified as the existing resident or worker that would be most impacted by the project's construction and operation. Other residents and workers in the surrounding area would be exposed to a lower health risk than identified for the MEI. Additional explanation of the methodology for computing community risk impacts is provided in Appendix G.

### *Construction Health Risks*

The MEI with the greatest cancer risks, exposure to  $PM_{2.5}$ , and exposure to non-cancer health risks during construction would be a single-family residence located on 7<sup>th</sup> Avenue between South B Street and Laurel Avenue. The location of the MEI is shown on Figure 7.





Source: Ramboll US Consulting, Inc.

LOCATION OF MEI DURING PROJECT CONSTRUCTION

FIGURE 7

Construction equipment and associated heavy-duty truck traffic generates diesel exhaust, which is a known TAC. Although construction exhaust air pollutant emissions would not contribute substantially to existing or projected air quality violations, construction exhaust emissions may still pose health risks for sensitive receptors such as surrounding residents. Diesel exhaust particulate matter (DPM) poses both a potential health and nuisance impact to nearby receptors. The primary community risk impact issues associated with construction emissions are cancer risk and exposure to PM<sub>2.5</sub>. A quantitative health risk assessment of the project construction activities was conducted to evaluate the potential health effects to nearby sensitive receptors from construction emissions of DPM and PM<sub>2.5</sub>, pursuant to the BAAQMD CEQA Air Quality Guidelines using CalEEMod and the U.S. EPA AERMOD dispersion model. Details about the community health risk modeling, data inputs, and assumptions are included in Appendix G.

Table 6 below summarizes maximum cancer risks, PM<sub>2.5</sub> concentrations, and hazard index from project construction activities at the MEI.

**Table 6: Construction Health Risks at Offsite MEI**

Source	Cancer Risk per Million	Hazard Index	PM <sub>2.5</sub> Concentration
Construction	20	0.015	0.43
BAAQMD Threshold	10.0	1.0	0.30
<b>Exceed Threshold?</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>

Source: Ramboll US Consulting, Inc. *CEQA Air Quality and Health Risk Assessment for Nazareth Vista Mixed-Use Project*. July 19, 2023.

As shown in Table 6, the project’s construction-related community health risks would exceed BAAQMD thresholds for cancer risk and PM<sub>2.5</sub> concentration. The applicant and contractor would be required to comply with the following BAAQMD best management practices for reducing construction emissions of fugitive PM<sub>10</sub> and PM<sub>2.5</sub>. Infill development commonly involves construction adjacent to sensitive receptors, as is the case for the subject project, and the conditions below represent common restrictions and requirements on construction activity when proposed adjacent to sensitive receptors. The nature of the proposed construction and its effects on adjacent land use do not constitute unusual circumstances.

**Conditions of Approval<sup>18</sup>:**

- a. The following provision to control traffic congestion, noise, and dust shall be followed during site excavation, grading, and construction:

<sup>18</sup> Please note the Air Quality Report (Appendix G) identifies impact-reducing measures as “mitigation measures” rather than “conditions of approval.” They are listed as “conditions of approval” in this CE Memo because they are standard practice for construction projects and do not constitute unusual circumstances.



- Construction activities related to the issuance of any Public Works permit shall be restricted to the weekday between 7:00 a.m. and 7:00 p.m. Please note, however, that no work shall be allowed to take place within the City right-of-way after 5:00 p.m. In addition, no work being done under the issuance of a Public Works encroachment permit may be performed on the weekend unless prior approvals have been granted by Public Works. Earth haul and materials delivery to and from the site, including truck arrivals and departures to and from the site, will be prohibited between the weekday hours of 4:00 p.m. 5:30 p.m. Signs outlining these restrictions shall be posted at conspicuous locations on site. The signs shall be per the City Standard Drawing for posting construction hours. The sign shall be kept free of graffiti at all times. Contact the Public Works Department to obtain sample City Standard sign outlining hours of operation.

The allowed hours of Public Works construction activities may be waived or modified through an exemption, for limited periods, if the Director of Public Works or designee finds that:

- The following criteria are met:
  - Permitting extended hours of construction will decrease the total time needed to complete the project thus mitigating the total amount of noise associated with the project as a whole; or
  - Permitting extended hours of construction are required to accommodate design or engineering requirements, such as a large concrete pour. Such a need would be determined by the project's design engineer and require approval of the Director of Public Works or designee.
  - An emergency situation exists where the construction work is necessary to correct an unsafe or dangerous condition resulting in obvious and eminent peril to public health and safety. If such a condition exists, the City may waive any of the remaining requirements outlined below.
- The exemption will not conflict with any other condition of approval required by the City to mitigate significant impacts.
- The contractor or owner of the property will notify residential and commercial occupants of property adjacent to the construction site of the hours of construction activity which may impact the area. This notification shall be provided three days prior to the start of the extended construction activity.
- The approved hours of construction activity will be posted at the construction site in a place and manner that can be easily viewed by any interested member of the public.

The Director of Public Works or designee may revoke the exemption at any time if the contractor or owner of the property fails to abide by the



conditions of exemption or if it is determined that the peace, comfort, and tranquility of the occupants of adjacent residential or commercial properties are impaired because of the location and nature of the construction. The waiver application shall be submitted to the Public Works Construction Inspector ten (10) working days prior to the requested date of waiver.

- b. The following conditions shall be complied with at all times during the construction phase of the project:
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour (mph).
  - All construction vehicles shall be properly maintained and equipped with exhaust mufflers that meet State standards.
  - All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
  - All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
  - All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
  - All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times a day. Newly disturbed soil surfaces shall be watered down regularly by a water trucks or by other approved method maintained on site during all grading operations. Construction grading activity shall be discontinued in wind conditions that in the opinion of the Public Works Construction Inspector cause excessive neighborhood dust problems. Wash down of dirt and debris into storm drain systems will not be allowed.
  - Construction activities shall be scheduled so that paving and foundation placement begin immediately upon completion of grading operation.
  - Unpaved roads providing access to sites located 100 feet or further from a paved road shall be treated with a six- to twelve-inch layer of compacted wood chips, mulch, or gravel.
  - All aggregate materials transported to and from the site shall be covered in accordance with Section 23114 of the California Vehicle Code during transit to and from the site.
  - Publicly visible signs shall be posted with the telephone number and name of the person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's General Air Pollution Complaints number shall also be visible to ensure compliance with applicable regulations.
- c. Prior to issuance of any permit, the applicant shall submit traffic control plans for any impact to the right-of-way for each phase of operation, including pedestrian and bicycle

detour plans as applicable. The traffic control plan shall comply with the most recent version of the California Manual of Uniform Traffic Control Devices (CA MUTCD) and the City's Traffic Control Plan Requirements. The applicant shall also submit a site logistics plan for each phase of operation. The plan, at a minimum, shall include estimated timeframes for implementation, duration, construction operations.

In addition, the applicant and contractor would be required to incorporate the following measures to reduce construction equipment emissions.

**Conditions of Approval:**

- a. Prior to issuance of a demolition permit, the applicant shall submit a construction management plan to the Building Division that demonstrates that all cranes, forklifts, generator sets, and welders used in project construction shall be equipped with Tier 4 diesel engines or better (e.g., natural gas generators or electric welders). The construction management plan is subject to review and approval of the Community Development Director, or his/her designee
- b. Prior to issuance of a demolition permit, the applicant shall also submit an emissions reduction plan to the Planning Division that details the equipment to be used during construction and be signed by a qualified air quality specialist, verifying that the equipment included in the plan meets the standards set forth in this measure.
  - Alternatively, if use of Tier 4 equipment is not available, the applicant may propose use of equipment that meets U.S. EPA emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve a 90 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment. The use of Tier 3 equipment shall not exceed five percent of all equipment usage (described in terms of total horsepower hours during a phase). Alternatively, the project may also use electrical or non-diesel fueled equipment. All construction vehicles shall be properly maintained and equipped with exhaust mufflers that meet State standards.
  - The emissions reduction plan is subject to review and approval of the Community Development Director, or his/her designee.

The Air Quality and Health Risk Assessment prepared by Ramboll (refer to Appendix G) determined that adherence with the above conditions of approval would reduce cancer risk and by PM<sub>2.5</sub> concentration by approximately 70 percent, below the BAAQMD thresholds. Therefore, the project would not result in any significant effects related to construction health risks.

## Cumulative Health Risks from All TAC Sources

Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of the project site. These sources include busy surface streets (i.e., roadways that exceed 10,000 vehicles per day), stationary sources, railways, and projects with concurrent construction schedules. There are two projects within 1,000 feet of the project site (located at 222 East 4<sup>th</sup> Avenue and 477 9<sup>th</sup> Street, respectively) that are projected to be constructed at around the same time as the proposed project, i.e., their schedules could overlap. Construction of these projects were factored into the cumulative analysis based on data provided by the City and project applicants.

Modeling was completed to calculate the community health risk from the cumulative sources at the project MEI. Refer to Appendix G for details about the cumulative health risk modeling, including model inputs and assumptions. Table 7 below shows the cumulative community risk impacts from project construction and other cumulative sources at the MEIs.

**Table 7: Cumulative Health Risks at Offsite MEI**

Source	Cancer Risk per Million	Hazard Index	PM <sub>2.5</sub> Concentration
Project Construction	9.7 <sup>1</sup>	0.013	0.20 <sup>2</sup>
Stationary Sources	0.14	0.00041	0.00018
Roadways	7.9	0.030	0.23
Railways	31	0.0085	0.040
Future Cumulative Development <sup>3</sup>	0.72	0.00051	0.0040
<b>Total</b>	<b>51</b>	<b>0.053</b>	<b>0.48</b>
BAAQMD Threshold	100.0	10.0	0.80
<b>Exceed Threshold?</b>	<b>No</b>	<b>No</b>	<b>No</b>

Source: Ramboll US Consulting, Inc. *CEQA Air Quality and Health Risk Assessment for Nazareth Vista Mixed-Use Project*. July 19, 2023.

Notes:

<sup>1</sup> Reduced from 20 cases per million with implementation of conditions of approval.

<sup>2</sup> Reduced from 0.43 with implementation of conditions of approval.

<sup>3</sup> Foreseeable future cumulative development projects include the mixed-use development at 477 9<sup>th</sup> Street and 222 East 4<sup>th</sup> Avenue.

As shown in Table 7, the cumulative cancer risks, annual PM<sub>2.5</sub> concentrations, and hazard index for non-cancer health risks would not exceed BAAQMD's cumulative-source thresholds. Accordingly, the project's cumulative health risks would not have a significant effect.

## *Odors*

According to the BAAQMD CEQA Guidelines, an odor source with five or more confirmed complaints per year averaged over three years is considered to have a significant impact.<sup>19</sup> BAAQMD has identified a variety of land uses that produce emissions that may lead to odors and generate complaints including, but are not limited to, wastewater treatment plants, landfills, composting operations, and food manufacturing facilities.

Commercial and residential uses do not typically generate objectionable odors, nor do they fall under any of the land uses identified by BAAQMD to cause objectionable odors. Localized odors, mainly resulting from diesel exhaust and construction equipment on-site, would be created during the construction phase of the project. These odors would be temporary and not likely to be noticed beyond the project site's boundaries. Odors associated with the application of paints and coatings may also be noticeable on occasion by adjacent receptors. Painting and coating of the project would occur during daytime hours only, be localized, and be generally confined to the project site. These odors would also be temporary. Operation and maintenance of the project would require the use of cleaning supplies, maintenance chemicals, and herbicides and pesticides for landscape maintenance. Any odors generated by the use of these materials would be both temporary and highly localized. Therefore, the project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

## Water Quality

The water quality of streams, creeks, ponds, and other surface water bodies can be greatly affected by pollution carried in contaminated surface runoff. Pollutants from unidentified sources, known as non-point source pollutants, are washed from streets, construction sites, parking lots, and other exposed surfaces into storm drains. Urban stormwater runoff often contains contaminants such as oil and grease, plant and animal debris (e.g., leaves, dust, animal feces, etc.), pesticides, litter, and heavy metals. In sufficient concentration, these pollutants have been found to adversely affect the aquatic habitats to which they drain.

## *Construction*

Construction activities, such as grading and excavation, have the potential to result in temporary impacts to surface water quality in adjacent waterways and groundwater. When disturbance to the soil occurs, sediments may be dislodged and discharged into the storm drainage system after surface runoff flows across the site.

Construction of the below level parking garage, building footings, grading, and trenching activities would extend to a depth of 12 feet and would not encounter groundwater on-site.<sup>20</sup> No dewatering

---

<sup>19</sup> Bay Area Air Quality Management District. California Environmental Quality Act Air Quality Guidelines. May 2017. Page 2-1.

<sup>20</sup> Based on a Geotechnical Investigation prepared by Summit Engineering and a Phase I ESA prepared by PIERS Environmental Services, groundwater on-site is located at depths greater than 15 feet below ground surface (bgs).

would be required as a result of the project. Projects that would disturb one acre or more of soil are required by the State Water Resources Control Board (SWRCB) to file a Notice of Intent (NOI) and prepare a Storm Water Pollution Prevention Plan (SWPPP). Projects are required by Chapter 7.39 of the San Mateo Municipal Code to adhere with the SWRCB regulations and obtain a Stormwater Pollution Prevention (STOPPP) Construction permit. Adherence with the aforementioned regulations would ensure that the discharge of pollutants is minimized to the extent feasible, and would protect beneficial uses and receiving waters from the adverse effects of construction-related storm water discharges. Accordingly, construction of the project would not result in any significant effects on water quality.

#### Post-Construction

Provision C.3 of the San Francisco Bay Regional Water Quality Control Board (RWQCB) Municipal Regional Stormwater Permit (MRP) requires project that create or replace 5,000 square feet or more of impervious surface area are required to implement site design, source control, and Low Impact Development (LID)-based stormwater treatment controls to treat post-construction stormwater runoff. The project would replace over 50 percent of the existing impervious area and therefore would be required to comply with Provision C.3. As documented in Section D. Project Description, the project would comply with Provision C.3 by treating stormwater runoff through the use of silva cells on 6<sup>th</sup> Avenue. Silva cells located on South B Street and 7<sup>th</sup> Avenue would treat public right-of-way areas. Excess runoff from the silva cells would be discharged to the City storm drain system. Additionally, as required by Chapter 7.39 of the San Mateo Municipal Code and the San Mateo Countywide Stormwater Management Plan, the project applicant would be required to implement the following measures.

#### Conditions of Approval:

- a. Owner/occupant shall inspect private stormwater treatment devices and GI features in the public right-of-way at least two times per year and sweep parking lots immediately prior to and once during storm season.
- b. The applicant shall pay a Pollution Prevention Inspection fee on a yearly basis for cost associated with, but not limited to, City inspection of the private stormwater treatment facilities, emergency maintenance needed to protect public health or watercourses, and facility replacement or repair in the event that the treatment facility is no longer able to meet performance standards or has deteriorated. The fee shall be based upon the Comprehensive Fee Schedule, established by the City Council, in effect at the time.
- c. Label new and redeveloped storm drain inlets with the phrase “No Dumping – Drains to Bay” plaques to alert the public to the destination of storm water and to prevent direct discharge of pollutants into the storm drain. Template ordering information is available from the Department of Public Works.

- d. All process equipment, oils fuels, solvents, coolants, fertilizers, pesticides, and similar chemical products, as well as petroleum-based wastes, tallow, and grease planned for storage outdoors shall be stored in covered containers at all times.

Adherence with Provision C.3 of the MRP, the City's Municipal Code, and the San Mateo Countywide Stormwater Management Plan would ensure that stormwater pollution is minimized, treated, and filtered prior to entering the storm drain system. Accordingly, operation of the project would not result in any significant effects to water quality.

*(e) The site can be adequately serviced by all required utilities and public services.*

#### *Utilities*

Utility services to the proposed project would be provided by the City of San Mateo (storm drain, sanitary sewer), the Cal Water Bayshore District (water service), and Pacific Gas & Electric (PG&E) (electricity). The project proposes to construct new laterals and electrical connections that would tie into existing utility lines located in 6<sup>th</sup> Avenue.

The City of San Mateo Public Works Department has confirmed, based on storm drain and sanitary sewer capacity studies, that the existing storm drain and sanitary sewer infrastructure can accommodate increases in flows generated by the proposed project. The proposed project falls below the 500-dwelling unit and 500,000 square foot thresholds for preparation of a water supply assessment by a local provider<sup>21</sup>, and the Cal Water Bayshore District determined in its most recent Urban Water Management Plan (UWMP) that the City will meet projected water demand through 2045 during normal, single-, and multiple-dry years. In addition, the City prepared a Sewer Capacity Study for the project (refer to Appendix H) that determined the city's sewer system has capacity to convey the project's flow to the treatment plant.

Therefore, sufficient water supplies would be available to the project. The project would coordinate with PG&E on connections between the existing power grid lines and the proposed building, and as discussed in Section 15300.2 – Exceptions above, the project's energy consumption would be minimal in comparison with county demand and would be accommodated by existing energy supplies. Accordingly, the project can be adequately serviced by all required utilities.

#### *Public Services*

The proposed project would intensify use of the site and may result in an increase in demand for fire and police protection services. However, the proposed project is consistent with the assumptions of the San Mateo 2030 General Plan EIR, which concluded that new development would have a less than significant impact on fire and police protection services with payment of building permit fees (as mandated by the City's General Plan and Municipal Code) that would help

---

<sup>21</sup> Pursuant to Senate Bill 610 and CEQA Guidelines Section 15155.

provide additional fire and police protection resources to the City as needed. Additionally, the project would be constructed in compliance with the most recent California Building Code and California Fire code to ensure the building is fire-safe, and with Implementation Program LU-4.29 and the City's Building Security Code, which requires proposed developments to be reviewed by the San Mateo Police Department to ensure appropriate safety features that minimize criminal activity are incorporated into the project design. For these reasons, fire and police protection services are adequate to service the proposed project.

Based on the San Mateo-Foster City School District's student generation rates of 0.04 student per multi-family residential unit for elementary schools and middle schools, the project's 48 residential units would generate approximately two new students at Sunnybrae Elementary School and Borel Middle School. Using the San Mateo Union High School District's student generation rate of 0.10 high school students per multi-family residential unit, the project would generate approximately five new students at San Mateo High School. Enrollment at Sunnybrae Elementary is 372 students with a capacity of 832 students, enrollment at Borel Middle is 1,002 students with a capacity of 1,134 students, and enrollment at San Mateo High is 1,671 students with a capacity of 1,941 students. Accordingly, Sunnybrae Elementary, Borel Middle, and San Mateo High can accommodate an additional 460, 132, and 270 students, respectively. Therefore, adequate capacity exists at the school facilities that serve the project site. The project would be required to pay statutory school impact fees to offset increased demands on school facilities resulting from the project.

Future residents and employees are expected to marginally increase demand on other public facilities, such as libraries and community centers. Additionally, the City is in process of updating its library services through the San Mateo Public Library Strategic Plan, which will build and expand existing library facilities and employ resources in new ways to ensure equitable access. Accordingly, libraries and community centers in San Mateo would be equipped to provide services to new residents of the proposed project. The project would also pay in-lieu fees under the Quimby Act to offset the demand generated by new residents and employees on parks and recreational facilities. For these reasons, the project would not result in a significant effect on public facilities such as libraries, community centers, parks, and recreation facilities.

## VI. Conclusion

As documented under Section E. Environmental Review, none of the exceptions listed in CEQA Guidelines Section 15300.2 apply to the project, and the project is eligible for a Categorical Exemption under CEQA Guidelines Section 15332, since it a) meets the definition of an in-fill development project; b) would occur within San Mateo city limits on a project site no more than five acres that is surrounded by urban uses; c) has no value as habitat for endangered, rare, or threatened species; d) would not result in any significant effects relating to traffic, noise, air quality, or water quality; and e) can be adequately served by all required utilities and public services. Therefore, the project is exempt from the provisions of CEQA under Class 32 of the CEQA Guidelines.



# APPENDICES

---

Appendix A: Greenhouse Gas Assessment

Appendix B: Geotechnical Report

Appendix C: Phase I Environmental Site Assessment

Appendix D: Historic Resource Evaluation Report

Appendix E: Traffic Impact Analysis

Appendix F: Noise and Vibration Report

Appendix G: Air Quality Report

Appendix H: Sewer Capacity Study