Mercy Housing Veterans Village Project
Administrative Draft

CEQA Draft Environmental Impact Report
and
NEPA Environmental Assessment - Finding of No Significant Impact

SCH# 2016052068

August 2016

DOH
DEPARTMENT
OF HOUSING
COUNTY OF SAN MATEO

Mercy Housing Veterans Village Project

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TABLE OF CONTENTS

LIST OF TABLES

LIST OF FIGURES

LIST OF APPENDICES

CHAPTER ACRONYMS, ABBREVIATIONS, AND SYMBOLS

Acronym / Symbol	Full Phrase or Description
AB	Assembly Bill
ABAG	Association of Bay Area Governments
AMSL	Above Mean Sea Level
APN	Assessor's Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMPs	best management practices
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CHRIS	California Historical Resources Information System
CMA	Congestion Management Agency
CMP	Congestion Management Program
CRHR	California Register of Historic Resources
C/CAG	City/County Association of Governments for San Mateo County
DR	Design Review
DTSC	California Department of Toxic Substances Control
EIR	Environmental Impact Report
FAR	Floor to Area Ratio
GHG	Greenhouse Gas(es)
HCM	Highway Capacity Manual
HRI	Historical Resources Inventory
HUD	Housing and Urban Development
ITE	Institute of Transportation Engineers
LOS	Level of Services
MTC	Metropolitan Transportation Commission
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRHP	National Register of Historic Places
NWIC	Northwest Information Center
OHP	Office of Historic Preservation
OPR	Governor's Office of Planning and Research
PG&E	Pacific Gas and Electric Company
PRC	Public Resources Code
PUD	Planned Unit Development
ROW	Right-of-Way
RWQCB	Regional Water Quality Control Board
Sq. Ft.	Square Feet
SWPPP	Storm Water Pollution Prevention Plan
TIA	Transportation Impact Analysis
§	Section

SUMMARY

S.1 INTRODUCTION

The Town of Colma has received a Planned Development Permit Application from Mercy Housing for the development of a 66-unit low income housing project. The Town of Colma is the lead agency under the California Environmental Quality Act (CEQA) for the proposed project and is preparing an Environmental Impact Report (EIR) because the project may have the potential to result in one or more significant environmental effects.

Additionally, the Housing Authority of the County of San Mateo (Housing Authority) is preparing an Environmental Assessment – Finding of No Significant Impact (EA-FONSI) under the National Environmental Policy Act (NEPA) because the applicant, Mercy Housing, is seeking federal funding through the U.S. Department of Housing and Urban Development (HUD). The Housing Authority is the local agency responsible for implementing HUD's NEPA requirements.

This EIR/EA-FONSI evaluates the potentially significant environmental impacts that may result from the Mercy Housing Veterans Village Project.

The Applicant plans to develop the site with a two- to three-story apartment complex with associated features and rehabilitate an existing historic pump house building. The project site is located at 1670-1692 Mission Road, near the intersection El Camino Real and Mission Road in a commercially zoned area of the town. Figure 2-1 shows the regional location of the Town of Colma and the proposed Mercy Housing Veterans Village Project.

In general, this project would:

- Remove existing built features on-site including a concrete water storage reservoir and three other concrete structures which are considered historic resources;
- Rehabilitate the historic pump house building for use as a social hall/community space and/or storage;
- Remove most of the site's existing vegetation including 46 trees over 12-inches in diameter and other site vegetation;
- Construction of a 66-unit, two to three story apartment building containing laundry and fitness facilities;
- Construction of a single-story wing with offices; and
- On-site improvements including foundation, drainage, utility connections, minor circulation modifications, parking, and residential courtyard, landscaping, and garden spaces.

S.2 SIGNIFICANT IMPACTS AND MITIGATION MEASURES

Consistent with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, this EIR focuses on the potentially significant direct and indirect impacts that could result from implementation of the proposed project. This EIR identifies that the proposed Veterans Village Project could result in potentially significant environmental impacts in two different resource areas, as summarized in Table 2-1.

The inclusion of mitigation measures into the proposed project renders four of the six impacts listed in Table 2-1 less than significant; however, two cultural resources impacts were found to

be an unavoidable, significant impacts of the project, even with the application of feasible mitigation measures (Impact CUL-2A and Impact CUL-2B).

Standard Project Conditions and Best Management Practices included in the project are noted in Section 2.6.2.

Table 2-1 Summary of Veterans Village Project Significant Environmental Impacts and Mitigation Measures			
Environmental Impact	**Potentially Significant Impact?**	**Mitigation Measure**	**Level of Significance After Mitigation**
Biological Resources			
Impact BIO-1: If construction occurs during the bird nesting season (February 1 to August 31), removal of trees or other vegetation or construction in close proximity to such vegetation could impact nesting birds. This impact can be avoided if construction activities are planned for the non-nesting season (September 1 to January 31).	*Yes*	*Mitigation Measure BIO-1a: Preconstruction Survey for Nesting Birds* To avoid impacts to nesting birds and violation of state and federal laws pertaining to birds, all construction-related activities (including but not limited to mobilization and staging, clearing, grubbing, vegetation removal, fence installation, demolition, and grading) should occur outside the avian nesting season (that is, prior to February 1 or after August 31). If construction and construction noise occurs within the avian nesting season (from February 1 to August 31), all suitable habitats located within the project's area of disturbance including staging and storage areas plus a 250-foot (passerines) and 1,000-foot (raptor nests) buffer around these areas shall be thoroughly surveyed, as feasible, for the presence of active nests by a qualified biologist no more than five days before commencement of any site disturbance activities and equipment mobilization. If project activities are delayed by more than five days, an additional nesting bird survey shall be performed. Active nesting is present if a bird is sitting in a nest, a nest has eggs or chicks in it, or adults are observed carrying food to the nest. The results of the surveys shall be documented and submitted to the Town Planning/Building Department prior to its issuance of building/grading permits. If it is determined that birds are actively nesting within the survey area, Mitigation Measure BIO-1b shall apply. Conversely, if the survey area is found to be absent of nesting birds, Mitigation Measure BIO-1b shall not be required. *Mitigation Measure BIO-1b: Protection of Nesting Birds* If pre-construction nesting bird surveys result in the location of active nests, no site disturbance and mobilization of heavy equipment (including but not limited to equipment staging, fence installation, clearing, grubbing, vegetation removal, fence installation, demolition, and grading), shall take place within 250 feet of non-raptor nests and 1,000 feet of raptor nests, or as determined by a qualified biologist in consultation with the California Department of Fish and Wildlife, until the chicks have fledged. Monitoring shall be required to insure compliance with the MBTA and relevant California Fish and Game Code requirements. Monitoring dates and findings shall be documented and provided to the Planning/Building Department.	*Less than Significant*

Table 2-1 Summary of Veterans Village Project Significant Environmental Impacts and Mitigation Measures			
Environmental Impact	**Potentially Significant Impact?**	**Mitigation Measure**	**Level of Significance After Mitigation**
Impact BIO-2: Tree removal and/or demolition of the existing buildings could result in the removal or disturbance of bat roost habitat and may result in significant impacts to bat populations if an occupied or perennial (but unoccupied) maternity or colony roost is disturbed or removed.		*Mitigation Measure BIO-2: Protection of Roosting Bats* A preconstruction survey for maternity (March 1 to August 1) or colony bat roosts (year-round) shall be conducted by a qualified biologist within 7 days prior to activities that remove vegetation or structures. If an occupied maternity or colony roost is detected, CDFW shall be contacted about how to proceed. Typically, a buffer exclusion zone would be established around each occupied roost until bat activities have ceased. The size of the buffer would take into account: • Proximity and noise level of project activities; • Distance and amount of vegetation or screening between the roost and construction activities; • Species-specific needs, if known, such as sensitivity to disturbance. Due to restrictions of the California Health Department, direct contact by workers with any bat is not allowed. The qualified bat biologist shall be contacted immediately if a bat roost is discovered during project construction.	
Cultural Resources			
Impact CUL-1: Project construction could disturb unrecorded historical, archaeological, and tribal cultural resources and/or unrecorded human remains.	*Yes*	***Mitigation Measure CUL-1: Minimize and Avoid Impacts to Unrecorded Cultural Resources, Tribal Cultural Resources, and Human Remains*** In this area, the most common and recognizable evidence of prehistoric archaeological resources are deposits of marine shell (mussels, clams, abalone, crabs, etc.), usually in fragments and/or bones, usually in a darker fine-grained soil (called a "midden") containing evidence of the use of fire; obsidian, other stone flakes left from making stone tools, or the tools themselves (mortars, pestles, arrowheads, and spear points), and human burials, often as dislocated or fragmented bones. Prehistoric archaeological sites farther downstream along Colma Creek exhibit these characteristics. Historic materials 45 years and older, bottles, artifacts, structural remains, etc. may also have scientific and cultural significance and should be more readily identified. If during the proposed project construction any such evidence is uncovered or encountered, all excavations within 10 meters (30 feet) should be halted long enough to call a qualified archaeologist to assess the situation and propose appropriate measures. Any potential historic resources discovered should be mapped, recorded, and initially	*Less than Significant*

Table 2-1 Summary of Veterans Village Project Significant Environmental Impacts and Mitigation Measures			
Environmental Impact	**Potentially Significant Impact?**	**Mitigation Measure**	**Level of Significance After Mitigation**
		assumed to be eligible for the California Register of Historical Resources until a formal, in-field evaluation can be completed and substantiated. If human remains are accidently discovered during construction activities, the measures specified in Section 15064.5(e)(1) of the CEQA Guidelines shall be followed: • There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Mateo County coroner is contacted to determine that no investigation of the death is required. • If the coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98; or, if the NAHC cannot identify the most likely descendants (MLD), the MLD fails to make a recommendation, or the property owner rejects the MLD's recommendations, the property owner can rebury the remains and associated burial goods with appropriate dignity in an area not subject to ground disturbance.	

Impact CUL-2A: The proposed project would demolish four structures (reservoir, well houses and carpenter shop) which are a contributing structure and buildings associated with the Holy Cross Cemetery Historic District. The demolition of these structures is considered an adverse effect under 36 CFR Part 800.5(2)(i) and a substantial adverse change according to the Town's Criteria of Significance for a historic resource. Therefore, the impact is considered a significant impact under CEQA.	*Yes*	***Mitigation Measure CUL-2a: Salvage Buildings to be Removed*** Representatives of the Colma Planning Department, the Colma Historical Museum or representatives of local preservation or historical societies, Holy Cross Cemetery and other interested parties shall be contacted and given the opportunity to examine the building and salvage particular elements. ***Mitigation Measure CUL-2b: Photo Documentation*** Prior to demolishing or salvaging materials at the Holy Cross Cemetery, the water reservoir, the three associated buildings (two well houses and the carpenter's shop) and the site in general shall be documented according to the Outline Format described in the Photographic Specifications and The Guidelines for Preparing Written and Descriptive Data: Historic American Building Survey (HABS) published by the Pacific West Region Office of the National Park Service. The photo documentation should show the spatial relationships of the buildings and the water reservoir to each other. This documentation shall include archival quality, large format (minimum 4 by 5 inch) photographs of the exterior and interior views of the buildings and a view of their setting within the site. Archival negatives of the original construction drawings and historic views will be included in the documentation. Copies of the documentation, with original photo negatives and prints, shall be donated to the Colma Historical Association Museum, the San Mateo County Historical and others archives (as appropriate) accessible to the public. ***Mitigation Measure CUL-2c: Interpretive Exhibit*** A permanent, interpretive exhibit on the project site about the "water works lot" buildings, structures and history shall be created. The exhibit should incorporate information from the BART report and other sources about the history of the Holy Cross Cemetery, historic photographs, and HABS documentation or other recordation materials and should be located and designed so that it is accessible to the public and of a durable design. The interpretive exhibit should be developed and designed by a qualified team including an historian and a graphic designer or exhibit designer. If the exhibit cannot be accommodated in the new development, another appropriate public venue can also be considered such as the Colma Historical Association Museum.	***Significant and Unavoidable***

Table 2-1 Summary of Veterans Village Project Significant Environmental Impacts and Mitigation Measures			
Environmental Impact	**Potentially Significant Impact?**	**Mitigation Measure**	**Level of Significance After Mitigation**
Impact CUL-2B: The project would result in a significant change in the character of the use of the site.	*Yes*	*Same Mitigation Measures As Impact CUL-2A; Mitigation Measures CUL-2a, CUL-2b, and CUL-2c, as listed above.*	***Significant and Unavoidable***
Impact CUL-3: The project could impact potential tribal cultural resources	*Yes*	***Mitigation Measure CUL-3: Notify tribal representative of project construction schedule*** Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe shall be provided written notification of the entire construction schedule and the dates of ground disturbing activities taking place on the project site. Written notification shall be accomplished by certified mail and received no less than two weeks prior to the start of construction activities (even if they are not ground disturbing).	*Less than Significant*

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S.3 ALTERNATIVES TO THE PROPOSED PROJECT

S.3.1 Alternatives Considered and Rejected

The Town considered but rejected a total of two alternatives including an alternative that considers a non-housing use of the site and an alternative that considers less than 26 units of residential development. The site is included in the Town's Housing Element and identified for a minimum of 26-units of future housing. Therefore, these were not considered viable alternatives and were rejected from consideration.

S.3.2 No Project Alternative

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, the No Project Alternative provides a comparison between the environmental impacts of the proposed project in contrast to the environmental impacts that could result from not approving, or denying, the proposed project. Because the City Council has discretionary authority over a proposed project and could choose to deny it, the environmental impacts of that action must be disclosed. As a result of this potential decision, the project site could remain in its current state and condition for an undetermined period of time and not be the subject of any further development proposals.

While the No Project Alternative eliminates project impacts, it does not further the Town's implementation of the Housing Element and does not satisfy any of the project objectives. The No Project Alternative is the Environmentally Superior Alternative.

S.3.3 Reduced Project Alternative

Under the Reduced Project Alternative, the project could be redesigned to provide the minimum number of units specified in the Housing Element, which is 26 units. This reduced project alternative, may, or may not preserve the four historic buildings that are proposed to be removed by the proposed project. However, the placement of a 26-unit residential development and amenities in and amongst all existing historic structures could still result in a change in the historic use of the site as it represents a change in the character of the property's use from industrial to residential/industrial. The change in historic use could still be considered an adverse effect under 36 CFR Part 800.5(2)(iv) and could still remain a significant and unavoidable impact of the project.

A Reduced Project Alternative does not meet the Town's project objectives of using the full site, and maximizing the number of developable units at the site (Housing Element Policy 3, Program 3.1 and Program 3.2). A Reduced Project Alternative may also not be economically feasible for the project proponent. For these reasons, the Reduced Project Alternative is not considered the Environmentally Superior Alternative.

S.3.4 Revised Site Plan that Preserves Historic Structures Alternative

Under the Revised Site Plan that Preserves Historic Structures Alternative, the project would maintain the proposed 66 units and at the same time preserve all existing historic structures at the site. The applicant has developed a site plan to illustrate this alternative. In order to preserve the existing historic structures, the site plan:

- Breaks-up the residential buildings into two smaller structures (one on either side of the pump building) to fit the 66-units;
- The massing of this alternative reduces open space on the site and increases the visible mass of the structure from Mission Road;
- The massing of this alternative reduces outdoor living spaces for future project occupants;
- The placement of a building south of the pump building reduces historic views of the pump building from the north;
- The required placement of new structures to preserve historic structures changes historic views of these structures (they would not be readily visible due to the new construction); and
- The site plan changes site circulation and prohibits required emergency vehicle access around the site (driveway width is required to be reduced from 20 feet to 13 feet adjacent to the northernmost historic structure where 20 feet is required by the Colma Fire Protection District).

The placement of a 66-unit residential development and amenities in and amongst the proposed structures to be removed would still likely result in a change in the historic use of the site as it represents a change in the character of the property's use from industrial to residential/industrial. The change in historic use could still be considered an adverse effect under 36 CFR Part 800.5(2)(iv) and could still remain a significant and unavoidable impact of the project.

A Revised Site Plan that Preserves Historic Structures Alternative does not meet the Town's project objectives of using the full site and incorporating outside features. The Revised Site Plan Alternative is not considered the Environmentally Superior Alternative.

S.4 KNOWN AREAS OF CONTROVERSY / ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123(b) requires the EIR Summary to identify areas of controversy known to the Lead Agency, including issues raised by agencies and the public and issues to be resolved including choice among alternatives and whether and how to mitigate the significant effects of the project.

The following issues were most prominent during EIR scoping process:

- adequate parking,
- emergency access and response,
- accessibility and safety,
- hazardous materials, and
- recreation

The environmental analyses in this Draft EIR/EA-FONSI consider the issues and concerns raised during the scoping process in its identification of the scope of the EIR/EA-FONSI and the potential impacts resulting from implementation of the Veterans Village Project. The Draft EIR/EA-FONSI identifies that implementation of the project would result in significant and unavoidable impacts related to cultural resources.

CHAPTER 1 INTRODUCTION

This Draft Environmental Impact Report (Draft EIR) / Environmental Assessment – Finding of No Significant Impact (EA-FONSI) was prepared to evaluate the potentially significant environmental impacts that may result from a Planned Development Permit Application for the Mercy Housing Veterans Village Project.

The Town of Colma is the CEQA lead agency for the proposed project and is preparing an EIR because the project may have the potential to result in one or more significant environmental effects. Additionally, the Housing Authority of the County of San Mateo (Housing Authority) is preparing an EA-FONSI under the National Environmental Policy Act (NEPA) because the applicant, Mercy Housing, is seeking federal funding through the U.S. Department of Housing and Urban Development (HUD). The Housing Authority is the local agency responsible for implementing HUD's NEPA requirements. Thus, the Town of Colma is the lead agency under CEQA and the Housing Authority is the lead agency under NEPA and a joint EIR/EA-FONSI is being prepared.

The Applicant plans to develop the site with a two- to three-story apartment complex with associated features and rehabilitate an existing pump house building. The project site is located at 1670-1692 Mission Road, near the intersection El Camino Real and Mission Road in a commercially zoned area of the town.

1.1 PROJECT OVERVIEW AND BACKGROUND INFORMATION

The Applicant, Mercy Housing, has submitted a Planned Development Permit application to the Town of Colma for the development of a 66-unit affordable housing development and rehabilitation of an existing on site pump house building located at 1670-1692 Mission Road.

In general, this project would:

- Remove existing built features on-site including a concrete water storage reservoir and three other concrete structures which are considered historic resources;
- Rehabilitate the historic pump house building for use as a social hall/community space and/or storage;
- Remove most of the site's existing vegetation including 46 trees over 12-inches in diameter and other site vegetation;
- Construct a 66-unit, two to three story apartment building containing laundry, office and fitness facilities; and
- Construct on-site improvements including foundation, drainage, utility connections, minor circulation modifications, parking, residential courtyards, resident dog park, resident garden, replacement tree plantings/landscaping, and garden spaces.

1.2 CEQA LEAD AGENCY INFORMATION

CEQA establishes the Town as the Lead Agency for the project. The Lead Agency is defined in CEQA Guidelines Section 15367 as "the public agency which is responsible for preparing the appropriate environmental review documentation." As described below, the Town has determined an EIR is the appropriate CEQA document for the proposed project and has prepared this Draft EIR in accordance with the provisions of CEQA (PRC §21000 et seq.) and the CEQA Guidelines (14 CCR §15000 et seq.). The Applicant, Mercy Housing, is the project proponent.

The Town's City Council serves as the decision making body for the Town and is responsible for approving the proposed project and certifying the project's EIR.

1.3 NEPA LEAD AGENCY

Chapter 9 of this EIR/EA-FONSI contains HUD's EA checklist and presents the NEPA analysis required for this project. The Housing Authority is the NEPA lead agency and will use the EA to base its decision on whether to approve the authorization of federal grant funding for the project.

1.4 INTENDED USES OF THIS EIR

An EIR is an objective, informational document that informs governmental agency decision makers and the public of the potential for significant project effects, as well as possible ways to minimize those effects, and describes reasonable alternatives to the project (CEQA Guidelines §15121(a)). An EIR must be prepared with a sufficient degree of analysis to provide decision makers with information enabling them to make a decision that intelligently considers the project's potential direct and indirect environmental consequences. The evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible (CEQA Guidelines §15151).

This EIR evaluates the potential direct and indirect physical, environmental effects associated with construction and operation of the Mercy Housing Veterans Village Project, which is described in detail in Chapter 2 , Project Description.

1.4.1 Responsible, Trustee, and Interested Agencies

The information contained in this EIR will be used for all project-related discretionary approvals subject to environmental review, including approvals by responsible, trustee, and other agencies.

- CEQA Guidelines Section 15381 defines a responsible agency as "a public agency which proposes to carry out or approve a project for which a Lead Agency has prepared an EIR." Responsible Agencies for the proposed project may include the Housing Authority.
- CEQA Guidelines Section 15386 defines a trustee agency as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California." Trustee agencies with jurisdiction over the resources potentially affected by the proposed project may include the California Department of Fish and Wildlife.
- CEQA Guidelines Section 15379 excludes federal government agencies from the definition of a "public agency." Thus, the U.S. Fish and Wildlife Service and the U.S. Army Corps of Engineers is not a responsible agency or a trustee agency for the purposes of CEQA, but rather an interested agency concerned with the project and its potential effects on resources subject to these agencies' jurisdiction.

A complete list of the permits and approvals the proposed project may require is provided in Section 2.6.

1.5 EIR SCOPING INFORMATION

1.5.1 Notice of Preparation of an EIR

The Town prepared and filed or posted the Notice of Preparation (NOP) of an EIR with the San Mateo County Clerk's Office and three town bulletin boards on May 19, 2016 (SCH

2016052068). The NOP was also filed at the State Clearinghouse on May 24, 2016. The NOP is included in Appendix A to this EIR. The Town distributed the NOP to potential local responsible agencies and other interested organizations, as well as property owners within 300 feet of the project site and other individuals who have expressed interest in the project.

The Town provided a 30-day public review period for the NOP from May 19, 2016 to June 20, 2016. The State Clearinghouse comment period ran from May 24, 2016 to June 25, 2016. Written comments in response to the NOP were received from one Native American tribe, and no organizations, municipalities, or other interested individuals. These written comments are summarized in Section 3.2.1.

1.5.2 Public Scoping Meeting

The Town held a public scoping meeting for the EIR on May 25, 2016 at the Colma Community Center at 1520 Hillside Boulevard. The Town provided notice of this meeting in the NOP. The meeting presentation is included in Appendix A to this EIR. Three individuals along with two representatives with Mercy Housing attended the meeting. None of the individuals present at the meeting commented, however comments and questions were received from the Town Council members. These comments and questions generally focused on parking, emergency access and response, accessibility, safety, hazardous materials, and recreation. See section 3.2 for additional information.

The project proponent Mercy Housing also held three public outreach meetings prior to the Town's public scoping meeting. Areas of concern expressed by the attendants included:

- Proper screening of tenants, on site security and services. Based on other Veteran housing projects Mercy Housing has completed, they anticipate most of the residents will be seniors, over 55 years old.
- Concern about substance abuse, etc., by the residents.
- Concerns about ability of tenants to get to shopping and services with poor sidewalks on Mission Road and inability to cross El Camino Real to catch the bus in the southbound direction.
- Density of the project
- Parking and traffic. Mercy Housing has stated parking need is less than 1:1 based on a similar Veteran's project in El Monte. Concern was also expressed about the displacement of parking needed for auto repair businesses.
- Questions regarding the project benefit to the Town of Colma since the project proponent will not be paying property taxes.

1.5.3 Changes to Project since Distribution of the NOP in May 2016

Minor changes to the project description have occurred since the NOP distribution on May 19, 2016 including a slight reduction in the size of the one bedroom units and moving the social hall into the rehabilitated pump house building. These changes have resulted in an overall reduction in residential square footage, increased permeable area across the site, and a greater setback from the BART right of way (ROW).

1.5.4 EIR Scope and Content

In accordance with CEQA Guidelines Section 15126, this EIR identifies and focuses on the potentially significant environmental effects of the proposed project, as determined based on the project as described in this EIR, comments received at the public scoping meeting on May 25, 2016, and comments received during the public review period for the NOP (May 24, 2016 to June 25, 2016). Accordingly, this EIR focuses on one or more significant impacts to the following resource areas identified in Appendix G to the State CEQA Guidelines: Cultural Resources and Transportation. Sections 3.4 and 3.5 provide more information on the project's impacts found not to be significant.

CHAPTER 2 PROJECT DESCRIPTION

The Town of Colma has received an application from Mercy Housing (Applicant) for a 66-unit affordable housing development that would be permitted under a Planned Unit Development (PUD) permit and other entitlements. The proposed Mercy Housing Veterans Village Project is an affordable housing development involving construction of a 66-unit apartment complex (65 one-bedroom units and one 2-bedroom manager's unit) on a 2.23 acre site on Mission Road in the northwest corner of Holy Cross Cemetery in Colma, California. The site is referred to as the Holy Cross Site as it is adjacent to the Holy Cross Cemetery and is owned by the Archdiocese of San Francisco. Mercy Housing would enter into a long-term land lease of the parcel from the Archdiocese upon receiving all necessary project approvals and permits. The proposed project is intended to provide housing and support to Veterans within the San Francisco Bay Area.

In general, this project would:

- Remove existing built features on-site including a concrete water storage reservoir and three other concrete structures which are considered historic resources;
- Rehabilitate the historic pump house building for use as a social hall/community space and/or storage;
- Remove most of the site's existing vegetation including 46 trees over 12-inches in diameter and other site vegetation;
- Construct a 66-unit, two to three story apartment building containing laundry, office and fitness facilities; and
- Construct on-site improvements including foundation, drainage, utility connections, minor circulation modifications, parking, residential courtyards, resident dog park, resident garden, replacement tree plantings/landscaping, and garden spaces.

Construction of the project is anticipated to last approximately 14 to 16 months.

2.1 PROJECT LOCATION

2.1.1 Project Site

The proposed Mercy Housing Veterans Village Project would be located at 1670-1692 Mission Road, near the intersection of El Camino Real and Mission Road, in the Town of Colma, San Mateo County (37°40'18" north latitude and 122°27'07" west longitude) (see Figure 2-1). The project site is triangular shaped with frontage along Mission Road and is approximately 2.23 acres in size (Assessor's Parcel Number [APN] 011-370-220) (Figure 2-2). The project site currently contains vacant land, two unpaved areas used for automobile parking by nearby auto repair shops, five historic structures associated with the Holy Cross Cemetery pump station (only the pump station is in use as a machine shop), and unmanaged vegetated areas and numerous trees.

Access to the area is provided by Mission Road, El Camino Real, Junipero Serra Boulevard, Hickey Boulevard and Collins Avenue (Figure 2-2). Regional access to the project site is provided by State Route 280.

2.1.1.1 Land Use and Zoning Designations

The project site is zoned Commercial (C), Design Review (DR) and has a General Plan designation of Commercial Land Use – Mission Road North (Figure 2-2). The Commercial land

use and zoning allow for the present uses on site which are vehicle storage and a machine shop (Figure 2-3 and Figure 2-4) but it also allows for residential uses with the approval of a Planned Development Permit and Use Permit (A Planned Development rezoning is required for multi-family projects over 5 units). The Town's Housing Element Update identifies this site as a required residential development site to satisfy the Town's housing production requirements. In addition, the zoning ordinance includes a "no net loss" requirement which requires that designated housing sites, including this site, be developed for housing, and if not, that housing be developed elsewhere in the Town.

Holy Cross Cemetery Historic District

The project site is part of what is considered the Holy Cross Cemetery, although the site appears to be physically separate from the cemetery by an embankment and the BART access road. The site contains five small structures associated with the Holy Cross Cemetery irrigation system. The Holy Cross Catholic Cemetery was the first cemetery to be established in the town in 1886. The cemetery includes graves of persons exceptionally significant in California's economic and political history and contains a collection of historic buildings, grave monuments, and mausoleums for the period 1886-1945. Previous historic resources evaluations prepared in 1993-1994 for the BART San Francisco Airport Extension found that the cemetery is considered significant under National Historic Register Criteria B (association with significant persons) and C (significant design and architecture) at a state-wide significance level. Although determined to be eligible for designation as a historic district, the cemetery has not officially been designated at a state or federal level. Additional historical research and a field survey were conducted as part of the currently proposed Veterans Village Project to determine if the historic district still retains its historic integrity and if the project would result in potential adverse effects. This information is presented in further detail in Chapter 4 Cultural and Tribal Resources.

2.1.2 Surrounding Land Uses

The project is located within an area of the Town that contains a mix of land uses including cemetery (the Cypress Lawn and Holy Cross Cemeteries to the north and east), industrial (auto repair and light industrial uses), commercial and residential uses. The project site is in close proximity to an underground BART tunnel and maintenance road which form the project site's northern property boundary (Figure 2-5). An air vent associated with the BART tunnel is located near the northwest end of the project site (photos of the air vent are contained in Figure 2-3 and Figure 2-4).

In general, the project parcel is surrounded to the north and east by the Holy Cross and Cypress Lawn cemeteries and BART uses, and to the west and south by auto repair and commercial uses.

2.1.3 Existing Elevations and Topography

The project site is relatively flat, gently sloping in elevation from approximately 100 feet on the northern portion of the site to approximately 90 feet on the southern portion of the site. East of the project site beyond the BART corridor, the topography slopes upwards steeply and is heavily vegetated with mature trees. Areas surrounding the project site to the west and south are relatively flat. The areas to the north of the site are also generally flat but slope upwards moving east of the site.

With site topography being essentially flat, storm water runoff generally stays on site or drains to Mission Road. Additional information on the project site's hydrology can be found in Chapter 3 .

2.2 EXISTING SITE FEATURES

2.2.1 Buildings and Structures

There are five built structures on the site (Figure 2-5) all of which are associated with a historic pump station formerly used by Holy Cross Cemetery as part of their irrigation system. These structures include a main pump house building, a concrete water reservoir and associated above-ground piping, two concrete well houses (one with a wooden shed addition), and a carpenter's shop containing another well (Figure 2-3, Figure 2-4, and Figure 2-5). The structures were constructed around 1914-1915 and are located within a designated historic district which was evaluated for listing on the National and California Registers of Historic Places as part of this project. The buildings appear eligible for listing on both registers. Please see Chapter 4 - Cultural Resources for further discussion on these historic features.

2.2.2 Other Site Features

Other site features include perimeter chain link fencing and asphalt surfacing (Figure 2-3 and Figure 2-4). Portions of the site not covered with asphalt contain bare or vegetated soils. Approximately 46 trees (eucalyptus, fir, cedar, and others) on site measure 12 inches in diameter or more.

Easements and Right of Way

PG&E maintains a small easement containing an electrical vault at the southern-most tip of the project parcel (Figure 2-5). The Cypress Lawn Cemetery District also maintains a 10-foot wide storm drain easement along the project site's northern parcel boundary.

BART owns and maintains ROW along the eastern property boundary where a maintenance access road, underground tunnels and an above ground ventilation structure are located. BART protects the underground tunnels by requiring shoring for excavations within a "Zone of Influence" above and adjacent to the tunnels. The Zone of Influence is defined as the area above the Line of Influence (a line from the critical point of the substructure; base of the outer wall of the subway box) at a slope of 1.5 horizontal to 1 vertical (line sloping from the base of the tunnel up towards ground level). The project does not require excavations within the Zone of Influence.

BART also establishes a minimum 50-foot setback for structures as measured from the outer wall of the subway box. The project meets this minimum 50-foot setback. No structures are proposed within the 50-foot setback. The only project features proposed within the setback are landscape plantings and paved parking areas.

2.3 PROPOSED PROJECT FEATURES

The Project would involve the following components: construction of the new apartment complex, rehabilitation of the historic main pump house building, circulation and parking, utility connections, and other site improvements. These components are described below.

2.3.1 Residential Complex (Residential and Office Buildings)

The project proposes the construction of a residential building (Figure 2-6) consisting of 65 one-bedroom and one two-bedroom units and total approximately 56,376 square feet (39,400 square feet residential gross). The building would vary between two and three stories in height (maximum roof elevation of 36 feet, 4 inches in height) and would include a fitness center and laundry facilities. The complex includes a one-story extension containing offices attached to the residential building along Mission Road. Outdoor spaces include several landscaped courtyards,

a working garden area and a designated off-leash dog area for use by residents only (not available for general public use). Decorative fencing would be provided around the entire site except the southernmost tip of the parcel and where building effectively blocks access along the perimeter.

The materials and color palette would include a variety of exterior cladding material and muted colors to respond to both the historic pump building and light industrial context of Mission Road (Figure 2-7 and Figure 2-8). Alternating bays of cement plaster (in muted maroon and beige colors) and fiber cement siding (in pale green and beige colors) articulate the street frontage along Mission Road and are punctuated by a breezeway that provides a visual connection to the courtyard beyond. The third floor corridor unites the building elevation along Mission Road using corrugated metal siding (in gray). The residential building is articulated to step down to the single story pump house and office building. The office building and entry way would have a fiber cement board and batten siding with a decorative random pattern.

The new residential building would be located on the portion of the site that is north of the pump house. The residential building massing is articulated on the first floor by a breezeway that separates the building into two sections that are bridged by a corridor on the second and third floors. The residential building steps down along Mission Road both at the north end adjacent to the parking area (two stories) and at the south end at the office adjacent to the pump house.

The massing of the residential building wraps around two distinct courtyards for residents. The southern courtyard integrates the new and historic buildings with an entry trellis that curves around the office extension and leads to the main building lobby. The paved courtyard – with outdoor seating, barbeque, and a fire pit – also provides access to the pump house main entry. The northern courtyard is a more private secluded area and includes outdoor seating, a water feature, and a fire pit between the two building wings.

2.3.2 Green Building Features

The project would comply with 2013 Edition of the California Energy Code adopted by the Colma Municipal Code as the Colma Energy Conservation Code (contained in Part 6 of Title 24 of the California Code of Regulations). In addition, the project includes the following green building features:

- Solar thermal system on the roof
- Sunshades at select units based on orientation
- High efficiency HVAC system
- Energy efficient lighting including LED fixtures
- Energy Star appliances
- Energy efficient building envelope
- Water conserving plumbing fixtures

2.3.3 Pump House Rehabilitation

The historic Holy Cross Cemetery pump house will be rehabilitated as part of the project and used as a community space for the residents of Veterans Village. The rehabilitated pump house will include a social hall, workshop/ classrooms spaces, bicycle storage area, storage, and a maintenance shop (

Figure 2-9).

The rehabilitation of the pump house will include removing an existing modern metal roll up door on the west façade, removal of non-historic interior partition walls and removal of modern doors on the east façade. The existing multi-pane windows will be retained and repaired, or if too deteriorated to repair, will be replaced with windows matching in size and design of the existing windows. The concrete floor will be resurfaced to meet accessibility requirements. Existing exposed concrete interior structural features including wall, beams, and columns will remain. The rehabilitation of the pump house does not alter or destroy the significant character defining features of the building is therefore consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties.

2.3.4 Other Areas

The portion of the site south of the pump house will contain a paved patio, garden, and dog park spaces (Figure 2-6). Paved sidewalks will connect the development's outdoor spaces, buildings, and parking lots.

2.3.5 Parking

Parking for the development would be provided by a total of 69 parking spaces in two separate lots on the site (Figure 2-6). A lot on the north end of the site adjacent to the Cypress Lawn Cemetery is L-shaped with 34 spaces. A second lot will be located along the BART access road on the east side of the site and would provide 35 spaces. Mercy Housing would manage the parking on site through an allocation system and believes the parking provided is adequate given the target demographic (homeless Veterans and other low income populations; see Section 2.3.10.1 for additional information on the proposed resident population). The adequacy of the 69 parking spaces provided is evaluated in Chapter 5 , Traffic and Transportation.

2.3.6 Landscaping

Rows of new trees will be planted along each of the site's three sides (Figure 2-6). Tree plantings include street tree species along the east and west sides and evergreen species along the north boundary and around the northeast corner to screen views from the adjacent Cypress Lawn Cemetery and BART ventilation structure. The courtyards and garden spaces around the pump house would include accent trees to provide color and interest while retaining visibility.

The project will remove approximately 46 trees (12-inch or greater DBH). These trees would be fully replaced on site with the planting of more than 90 new trees.

Landscape and street tree species include scarlet maple, maidenhair tree, Brisbane box, ornamental pear, water gum, coast live oak and Chinese elm species. Accent trees include strawberry tree, flowering dogwood, and western redbud. Numerous other medium shrub, accent grasses, vines, and other groundcovers are planned as part of the project.

2.3.7 Floor and Lot Area

The Town's 2015 Housing Element allows for multi-family housing units at this location, within the General Plan density allowances.

The site's maximum allowable density is 22 units per acre (which equates to 49 units based on the 2.23 acre site size) and the project proposes 30 units per acre which includes a 35 percent density bonus. Mercy Housing is able to include this density bonus because the development includes all affordable housing units. Consistent with Government Code Section 69515 et seq., as referenced in the Colma Municipal Code, the developer of a proposed housing project of at

least five units must provide housing units affordable to income-qualified households to qualify for a density bonus, concessions or other incentives.

The floor to area ratio is limited to 1.0 and the project proposes an FAR of 0.64. The maximum lot coverage is 50 percent and the project proposes a lot coverage of 25 percent. The project meets all floor and lot area requirements.

2.3.8 Setbacks and Height Restrictions

The existing Commercial zoning at the site establishes five (5) foot setbacks for the front, side and rear property lines and a height limitation of 40 feet. The project proposes a front setback of more than nine feet, side setback of over 87 feet and rear setback of over 18 feet and therefore meet all the requirements of the commercial zoning district. The 2015 Housing Element identifies using the Planned Development rezoning process for permitting residential uses at the site. This rezoning process will allow for the most development flexibility in setting standards for height, setbacks, ingress, egress and landscaping due to the unique and physical constraints of the site.

The project also meets the setback requirements (50-feet at grade; and 1:1.5 below grade) from the BART underground tunnel.

The pump house is an existing feature at the site and is not proposed for relocation as part of the project. Therefore, it will remain an existing feature at the site (it should be noted that the pump building does not currently meet the 5 foot front setback requirement, but will become conforming as part of the rezoning process which allows for reduced setbacks).

2.3.9 Emergency Access

Figure 2-9 shows the proposed emergency access to the site. Complete perimeter (circular) access is provided around the site. The plans were reviewed by the Colma Fire Protection District and were revised to meet the District's requirements for lane width and turning radii. The site would be served by three existing fire hydrants along Mission Road and which are also shown on Figure 2-9

Figure 2-9. The project will be conditioned to add an additional fire hydrant along the BART driveway to provide coverage for the rear portions of the building.

2.3.10 Proposed Operations

2.3.10.1 Resident Population

Mercy Housing's intent is that this project will provide supportive housing to homeless, formally homeless, and extremely low income military Veterans of any age, living in San Mateo County and the San Francisco Bay Area. Mercy Housing receives funding from multiple sources, all with different income qualifications, but in general, all units would be restricted to Veterans with incomes at 60 percent of area median income (AMI) or below. First priority for placement is given to homeless Veterans, followed by non-Veteran homeless people, and finally low income residents. Regardless of the category, all must have incomes at 60 percent of area median income (AMI) or below.

The one-bedroom units are expected to be single or double occupancy, depending on the situation of the individual Veteran. HUD occupancy standards are 2 people per bedroom, plus 1 person. Therefore, the maximum occupancy for one bedroom unit is three people, and the maximum occupancy for a two bedroom unit is five people. Therefore the maximum occupancy of the proposed development would range between 66 and 198 residents.

Homeless Veterans are often times single, older men, and as a result, occupancy is likely to fall closer to the lower (66 residents) number (Michael Kaplan, Mercy Housing Project Manager, personal communication). This is especially the case because the development only have one bedroom units, therefore Veterans with families would likely look elsewhere for housing. Mercy Housing has a 40 unit Veteran's housing project in El Monte, and at that location only one unit is occupied by a couple, the remainder are single occupancy. Mercy Housing also recently began accepting applications for a new Veteran building in Sacramento and of the 22 residents that have signed up so far, only a few have cars.

2.3.10.2 Staffing and Programs

It is estimated that there will be approximately seven (7) staff members, generally working Monday through Friday, during normal business hours, although all seven may not be at the site at any given time. One staff member would live on-site.

Case management will be provided to the Veterans on-site through the Veteran Affairs Supportive Housing (VASH) program. A resident services coordinator will also be on-site, and provide programs such as educational workshops, health and wellness programs, holiday and cultural gatherings, and social events such as movie night and game night. Off-site activities are also possible, and there will be monthly tenant meetings.

2.3.11 On-Site Improvements

2.3.11.1 Site Grading

Much of the project site is relatively flat and therefore requires minimal grading. Preliminary grading estimates are approximately 3,260 cubic yards for gross cut and approximately 720 cubic yards for gross fill. This results net cut of approximately 2,540 cubic yards of material.

2.3.11.2 Utilities

The Applicant would extend existing electricity, sewer, water, and telecommunication utilities along Mission Road to the new development on site. Electrical power would be connected,

underground, from a nearby power infrastructure on Mission Road. All remaining utility connections would be installed underground. Adequate water and sewer capacity and infrastructure are available to suit the proposed development (see Utilities Section 3.17 for additional information).

2.3.11.3 Drainage and Stormwater Control

Existing drainage across the site generally flows from northeast to southwest. This general drainage pattern would be maintained by the project. A total of five bioretention planter features are planned along the parcel boundary with Mission Road (Figure 2-11 and Figure 2-12).

San Mateo County stormwater treatment design standards require a minimum treatment area equal to or greater than four percent of the total impervious area proposed. The project proposes a total of 67,877 square feet of impervious surfaces and is therefore required to provide a minimum of 2,715 square feet of treatment area. The project proposes to provide 2,889 square feet of treatment area and therefore meets and exceeds the treatment area required by San Mateo County.

Best Management Practices (BMPs) included on preliminary plans provided by the Applicant to control erosion during construction are summarized below:

1. Contractor is responsible for all aspects of "erosion control" and shall install and maintain any devices and measures necessary to the satisfaction of the City Engineer, during the entire construction period.
2. Graded banks shall be hydroseeded, landscaped or sealed prior to October 1.
3. Contractor shall place coarse drain rock as a gravel roadway at each entrance to the site. Any mud tracked onto public streets shall be removed that day.
4. All erosion control measures shall be maintained until disturbed areas are stabilized.
5. During construction, all paved areas shall be kept clear of earth material and debris. The site shall be maintained to minimize sediment-laden runoff to any storm drain system.
6. The current plan covers only the first winter following grading. Plans are to be re-submitted for City approval prior to September 1 of each subsequent year until the site improvements are accepted by the City.
7. All erosion control facilities must be inspected and repaired at the end of each working day or daily during the entire construction period.
8. Any sediment basins shall be cleared out whenever sediment reaches the sediment cleanout level indicated on the plans.
9. Borrow areas and temporary stockpiles shall be protected with appropriate erosion control measures to the satisfaction of the Director of Public Works.
10. All cut and fill slopes are to be protected to prevent overback flow.
11. The plan my not cover all situations that arise during construction due to unanticipated field conditions. Variations may be made to the plan in the field, subject to the approval of the City.
12. Hydroseeding specifications are provided for slopes over 5%.

13. Fiber rolls, sandbags, earth berms, or other suitable materials shall be placed within all unpaved streets for the duration of construction. The rolls shall be placed at intervals of no more than 300 feet as required by the City Engineer.
14. Earth berms shall be constructed on each pad as it is graded. The earth berms shall be 1-foot minimum in height and placed so the storm water falling onto the pad area and the surrounding uphill banks will be trapped on the pad.
15. When temporary structures have served their intended purpose and the contributing drainage area has been properly stabilized, the embankment and resulting sediment deposits are to be leveled or otherwise disposed of as recommended by the geotechnical engineer.

2.4 PROPOSED CONSTRUCTION PHASING AND SCHEDULE

2.4.1 Removal of Existing Site Features

Project construction would begin with clearing the site and the removal of existing asphalt paving and four concrete structures and associated above ground piping (Figure 2-5). The site would be cleared of most on-site vegetation and trees. In all, approximately 46 trees (12-inches in diameter or greater) would be removed. The remaining vegetation on site would be removed as part of construction. The existing perimeter fencing would also be removed to allow full access to the site.

Currently, the existing site plans show the removal of two concrete well house buildings, a concrete water storage reservoir, above ground piping, and a concrete carpenter's/well house. The removal of these structures is necessary to accommodate the proposed residential building and associated improvements.

2.4.2 Construction Duration

The Applicant anticipates construction occurring over a 14 to 16 month period beginning in the fall of 2017. Table 2-1 lists the anticipated construction phases, duration, and the typical equipment used during construction of the project. Construction staging would occur on-site; construction workers would park on-site.

Table 2-1 Summary of Project Equipment Use and Duration

Quantity	Description	Hours/Day	Total Work Days
1	Excavator	8	16
1	Grader	8	4
1	Bore/Drill Rig	8	2
1	Tractor/Loader/Backhoe	8	8
1	Forklift	4	75
1	Cement and Mortar Mixers	8	18
1	Concrete Pump	16	2
2	Air Compressors	8	85
	Notes: The typical equipment list does not reflect all equipment that would be used during the construction phase. Source: Mercy Housing, 2015.		

2.5 PROJECT OBJECTIVES

The Applicant's objectives for the proposed Project are to:

- Provide approximately 60 to 70 units of housing for Veterans on a fixed income
- Provide housing for homeless Veterans
- Provide support services to Veterans
- Increase self-sufficiency for Veterans
- Increase Veteran access to VA medical facilities

Mercy Housing California (MHC) is a California-based non-profit corporation whose mission is to create stable, vibrant, and healthy communities by developing, financing, and operating affordable, program-enriched housing for families, seniors, and people with special needs who lack the economic resources to access quality, safe housing opportunities.

2.6 PERMITS AND APPROVALS REQUIRED BY THE PROJECT

The Town of Colma is the CEQA Lead Agency for this project, and the Housing Authority of the County of San Mateo would be the NEPA Lead Agency for the project.

2.6.1 Permits

A list of the potential permits and approvals that the project could be subject to is provided in Table 2-2.

Table 2-2 Potential Project Permits and Approvals

Agency	**Review, Authorization, or Approval**
State Water Resources Control Board (SWRCB)	General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ Applicant must file Notice of Intent and Provide Storm Water Pollution Prevention Plan to SWRCB
Town of Colma	Design Review Planned Development Rezoning Planned Development Use Permit Grading permit Tree Removal Permit Street Improvement Plans
Housing Authority of the County of San Mateo	NEPA approval and HUD Funding
BART	Use agreement for road access and parking Building plan review and approval
State Historic Preservation Officer	Letter of Concurrence for Finding of Effect

2.6.2 Standard Project Conditions and Best Management Practices (BMPs)

The project would be subject to Standard Project Conditions/BMPs. Standard Project Conditions/BMPs are generally applied to all projects permitted by the Town and includes but is not limited to preparation or inclusion of the following:

Aesthetics

The project is subject to the Design Review process by the Town and will ensure the project is consistent with General Plan policies and design guidelines. Initial review by the Town found the project compliant with relevant design guidelines and will be conditioned to underground all utilities.

Air Quality

Fugitive Dust Control BMPs

The Project shall implement the following BAAQMD Basic Construction Measures:

1) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
3) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4) All vehicle speeds on unpaved roads shall be limited to 15 mph.
5) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the *California Airborne Toxics Control Measure*, Title 13 § 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specification. All equipment shall be checked by a certified visible emissions evaluator.
8) Post a publicly visible sign with the telephone number and person to contact at the Town regarding dust complaints. The Town shall respond and take corrective action with 48 hours. The publicly visible sign shall also include the contact phone number the Bay Area Air Quality Management District to ensure compliance with applicable regulations.

Biological Resources

Per the Town's Tree Cutting and Removal Ordinance (Municipal Code Section 5.06), the applicant is required to obtain a tree removal permit and adhere to any permit restrictions imposed by the permit.

Geology and Soils

A Geotechnical Report was prepared for the project (included in Appendix E) and all recommendations contained in the report shall be included in the project plans and specifications.

GHG/Energy

The project shall comply with the 2013 California Building Energy Efficiency Standards (Title 24 of the California Code of Regulations and adopted by the Town as Colma Energy Conservation Code and shall include green building elements.

Hazards and Hazardous Materials

The project shall implement standard BMPs for the safe use, handling, storage of materials, spill prevention and response would be implemented during project construction which would include measures such as daily inspections of equipment for leaks and the on-site maintenance of adequate quantities of absorbent materials to clean up the largest foreseeable leak and contingencies in the event unknown hazardous materials are encountered during construction. The project shall also incorporate the findings of the Hazardous Materials Surveys performed by SCA Environmental, Inc. (May 2016, included in Appendix F) into project plans and specifications.

Hydrology and Water Quality

Notice of Intent/Stormwater Pollution Prevention Plan (NOI/SWPPP)

The project is required to file a Notice of Intent with the State Water Resources Control Board to obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) and prepare and implement a Stormwater Pollution Prevention Plan (SWPPP).

Stormwater Management

The project incorporates site design and post construction stormwater management consistent with regulatory requirements. The applicant will also be required to enter into a maintenance agreement for the implemented stormwater treatment measures.

Erosion and Sediment Control Plan

An Erosion and Sediment Control Plan shall be prepared to include BMPs to prevent stormwater pollution during construction.

Noise

Interior Noise

The project is required to prepare an interior noise level assessment to assure interior noise level standards are met.

Construction Hours Limitations

Construction shall be conducted in accordance with Section 5.04.220 of the Town Code, construction activities shall be limited to Monday through Friday between 7 AM and 7 PM, and Saturday, Sundays and Colma-observed holidays between 9 AM and 5 PM.

Construction

Traffic Control Plan

A traffic control plan shall be prepared and should include measures to specify how the contractor will route construction traffic in the vicinity of the project, specify construction traffic management/control measures to ensure vehicular safety, the use of flag persons, etc.

Construction and Demolition Recycling

The Town requires a minimum 50% recycling of construction and demolition materials.

2.6.3 Preliminary Conditions of Approval

The Town's Public Works Department has determined the project would require the following conditions of approval:

- Sidewalk: Most sections of the existing sidewalk along Mission Road are uneven from tree roots and settlement and exceed cross slope requirements for American's with Disability Act (ADA) access. These sections that do not meet ADA standards will need to be replaced along the project frontage. The sidewalk is 4 feet wide, and the frontage roughly 425 feet. Where street sign or street lights occur, the sidewalk may need to be widened
- Driveway cut/fill-in: New sidewalks and curbs will be required where existing driveways exist.
- Streetlights: Five (5) Town standard streetlights are required along Mission Road; one every 100 feet, beginning at the driveway entrance at the south end.
- Enhanced Crosswalk: An enhanced cross-walk in the location of the existing crosswalk is required. Crosswalk design will include a bulb-out on both sides of the street and flashing light and sign improvements.
- Striping: New curb striping and parking zone signage will be required upon completion. A 25-foot red zone will occur on either side of both driveways.

Allied Waste Services, the refuse disposal company that will be handling the off-haul of trash from the proposed development also offered the following requirements that the Town anticipates incorporating into the project as conditions of approval:

- Allied Waste Services indicated that they would service the trash room for pick-up. Based on the size limits of the room and limits of a one-man crew to push the bins out, the bins will need to be limited to 3 yards each. Mercy Housing will be required to provide Allied Waste Services with a way to access the room.
- Trash pick-up will likely need to be more than once per week due to size of containers.
- A trash chute cut-off will be necessary so that trash is not allowed to spill on floor during bin servicing.
- Construct a gentle ramp down from the floor level of the trash room to the parking lot level so that the bins can be wheeled out to the truck.
- A bollard on each side of the ramp is necessary to prevent the bin from hitting a parked car while being rolled out.
- A bumper/guard rail system will need to be installed on the walls where the bins will be stored and the back wall. Corner guards will be necessary on either side of the rollup door to prevent damage from rolling bins.

A request has also been made by a local Native American tribe which shall be incorporated into the project as a mitigation / condition of approval:

- Chief Tony Cerda of the Costanoan Rumsen Carmel Tribe shall be informed prior to any and all ground disturbance planned for project; including but not limited to clearing, coring, trenching, earthmoving, grading, sub-excavations and excavation.

The above listed conditions contained in this section are preliminary in nature and could be subject to change, deletion, additions, or other modification.

2.7 REFERENCES

Town of Colma. 1999. General Plan – Historical Resources Element.

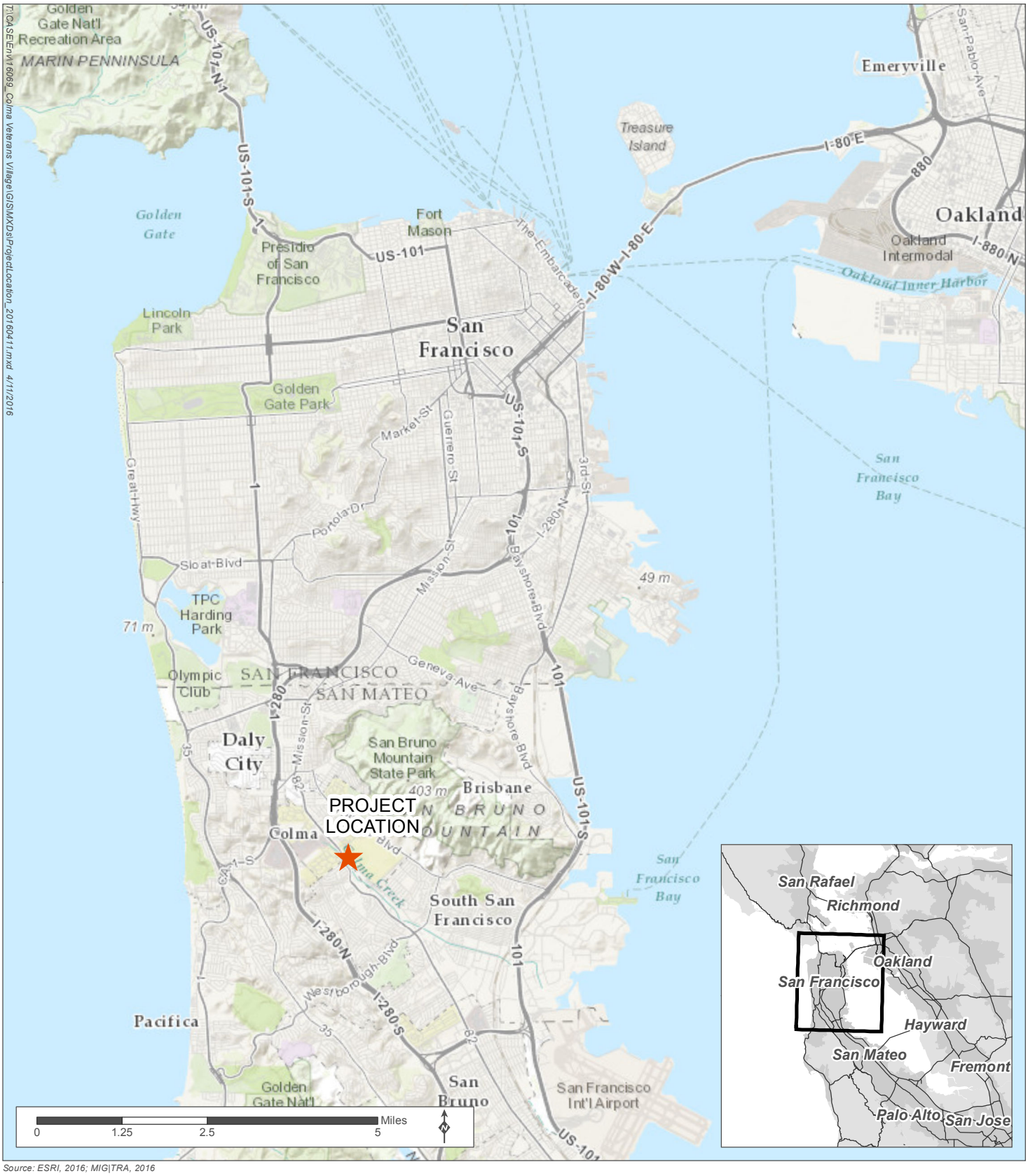
Project Plans, Van Meter Williams Pollack LLP, June 2016

Personal Communication. Email from Michael Laughlin to Michael Kaplan. May 4, 2016, 9:52 AM. Subject: Veterans Village Frontage Improvements.

Personal Communication. Email from Michael Laughlin to Michael Kaplan. May 3, 2016, 4:34 PM. Subject: Allied Waste Services Plan Check comments.

Personal Communication. Email from Tony Cerda of the Costanoan Rumsen Carmel Tribe to Michael Laughlin. May 24, 2016, 11:39 AM. Subject: RE: Town of Colma project – Mercy Housing affordable housing for Veterans.

Placeworks. 2016. *Carmax Project Environmental Review IS/MND.* Public Review Draft for the Town of Colma. February 2016.



Source: ESRI, 2016; MIG|TRA, 2016

★ Project Location

Figure 2-1 Regional Project Location

Source: ESRI, 2016; MIG|TRA, 2016

Project Site

Figure 2-2 Project Vicinity

Veterans Village Project

4 A-0.3 VIEW TO BART STRUCTURE

3 A-0.3 VIEW OF PUMP BUILDING

2 A-0.3 VIEW FROM MISSION ROAD

1 A-0.3 VIEW OF MISSION ROAD

5 A-0.3 VIEW TO MISSION ROAD

6 A-0.3 VIEW FROM BART ACCESS ROAD

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Figure 2-3 Existing Site Conditions

Veterans Village Project

Figure 2-4: Additional Site Photos

Photo 1: Existing vehicle storage, asphalt paving, chain link fencing and trees on site. View from Mission looking east to BART ventilation structure.

Photo 2: BART maintenance road looking north. Project site is to the left of this maintenance road.

Figure 2-4 Continued, Additional Site Photos

Photo 3: Off-site BART ventilation structure and maintenance road.

Photo 4: View of concrete water storage reservoir and above ground piping.

Photo 5: Concrete well house just north of existing pump house.

Photo 6: Concrete sided carpenters shop.

Photo 7: Existing indoor view of pump house.

Photo 8: On site vegetation near the middle of the site looking north.

Photo 9: Mission Road looking north.

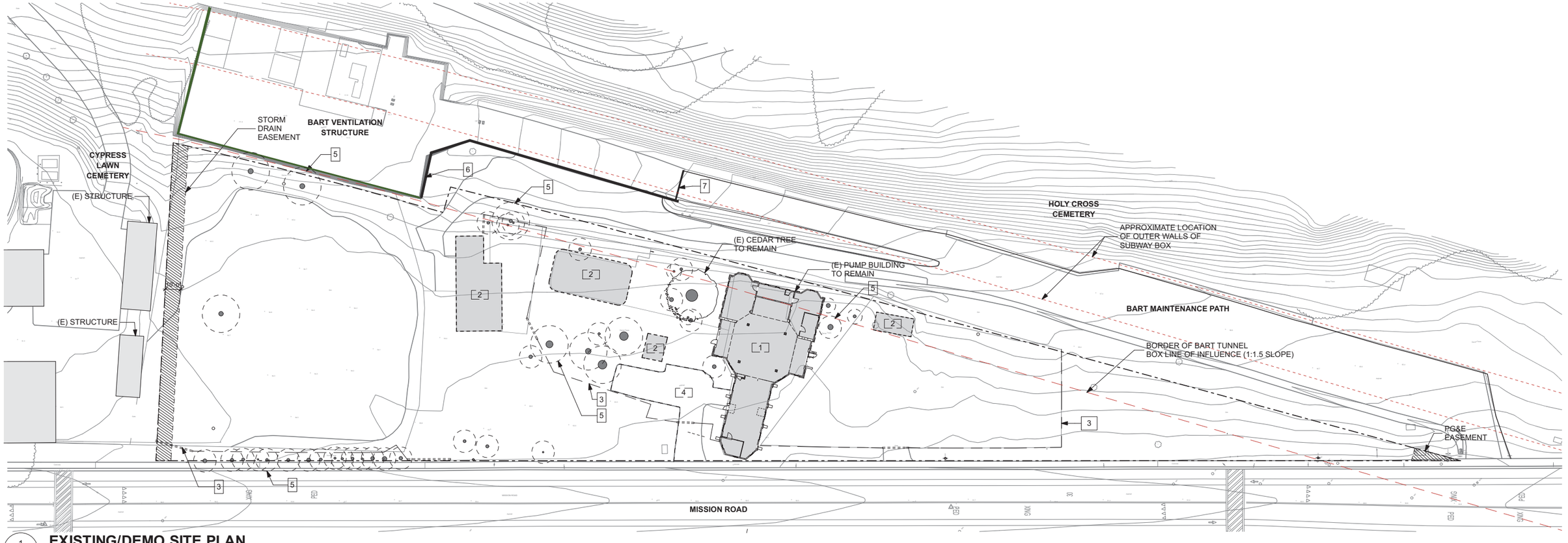
Photo 10: Mission Road looking south.

SHEET NOTES

1. (E) PUMP BUILDING TO REMAIN
2. (E) STRUCTURES TO BE DEMOLISHED
3. (E) FENCES & GATES TO BE DEMOLISHED
4. ASPHALT PARKING AREA TO BE DEMOLISHED
5. ALL TREES TO BE DEMOLISHED UNLESS OTHERWISE NOTED
6. (E) CONCRETE WALL
7. (E) BART MAINTENANCE ACCESS GATE

LEGEND

- PROPERTY LINE
- BART TUNNEL LINE OF INFLUENCE
- OUTER WALLS OF SUBWAY BOX
- (E) TREE TO BE REMOVED
- (E) TREE TO REMAIN, S.L.D.
- EASEMENT, SEE SURVEY



1 A-1.1 **EXISTING/DEMO SITE PLAN**

SCALE: 1" = 30'

0 15' 30' 60'

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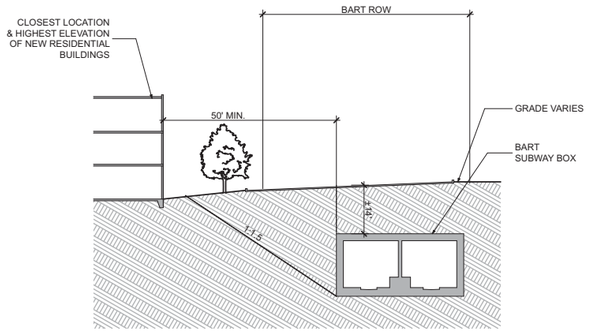
Figure 2-5 Demolition Site Plan

Veterans Village Project



BUILDING AREA

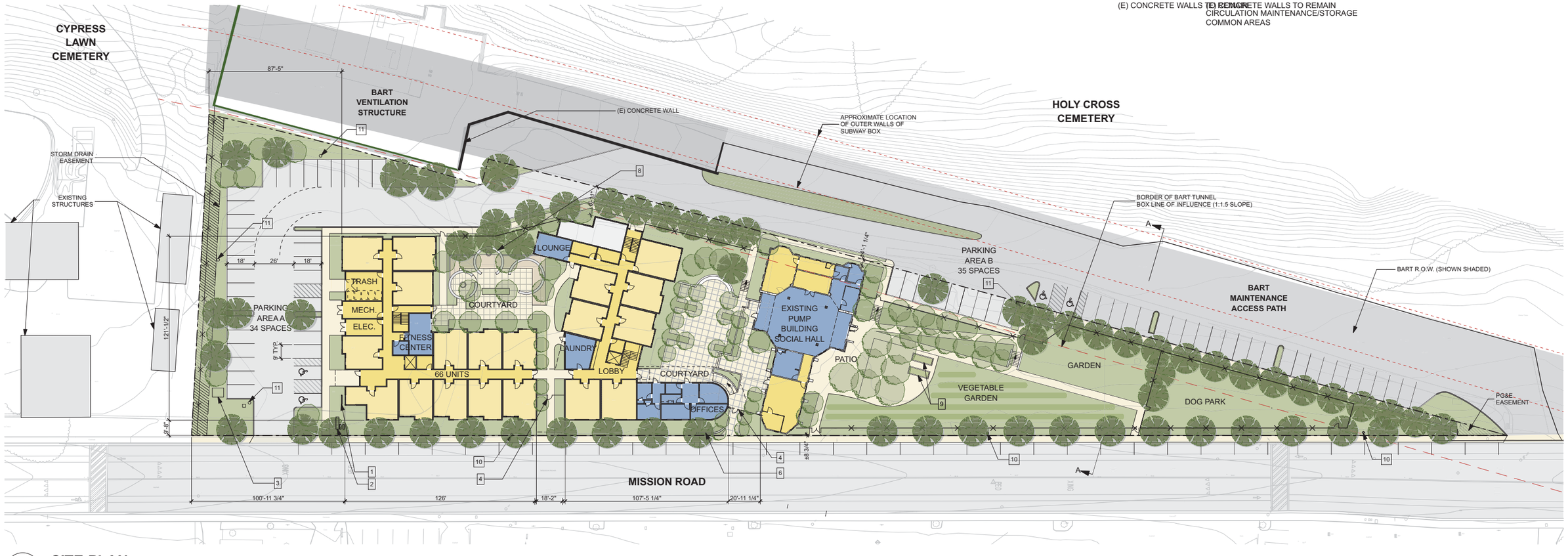
	NUMBER OF UNITS			SQUARE FOOTAGE				
	BUILDING A			BUILDING A				PUMP BUILDING
	STUDIOS	1 BEDROOMS	2 BEDROOMS	RESIDENTIAL GROSS	COMMON	CIRCULATION/ UTILITY*	TOTAL BLDG. A	COMMON
	0.0%	98.5%	1.5%					
3RD FLOOR		22	1	13,771	195	4,256	18,222	
2ND FLOOR		24		14,386	0	4,452	18,838	
GROUND FLOOR		19		11,243	2,737	5,336	19,316	5,106
SUBTOTAL	0	65	1					
TOTALS		**66**		**39,400**	**2,932**	**14,044**	**56,376**	**5,106**

SHEET NOTES

1. GAS METER
2. BACK FLOW PREVENTERS
3. PAD MOUNTED TRANSFORMER
4. ENTRY GATE W/ PERFORATED ALUMINUM PANEL
5a. NOT USED
5a. NOT USED
6. LOW CONCRETE WALL WITH BUILDING SIGNAGE, SEE A5.1
7. CONCRETE RETAINING WALL, SEE CIVIL DRAWINGS
8. CONCRETE SEAT WALLS, SEE LANDSCAPE DRAWINGS
9. RAISED ACCESSIBLE PLANTERS
10. EXISTING HYDRANT
11. PARKING POLE LIGHT FIXTURE, SEE A5.1. SEE LANDSCAPE DRAWINGS FOR SITE FIXTURES & A2.1 FOR EXTERIOR BUILDING FIXTURES

LEGEND

- PROPERTY LINE
- BART TUNNEL LINE OF INFLUENCE
- OUTER WALLS OF SUBWAY BOX
- (N) METAL FENCE, S.L.D.
- ACCESSIBLE PARKING SPACE
- EASEMENT, SEE SURVEY
- RESIDENTIAL
- CIRCULATION/MAINTENANCE
- COMMON AREAS



(E) CONCRETE WALLS TO REMAIN
CIRCULATION MAINTENANCE/STORAGE
COMMON AREAS

1 A-1.0 **SITE PLAN**

SCALE: 1" = 30'

0 15' 30' 60'

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Figure 2-6 Proposed Site Plan

Veterans Village Project

2
A-0.1
VIEW NORTH ON MISSION ROAD

1
A-0.1
VIEW SOUTH ON MISSION ROAD

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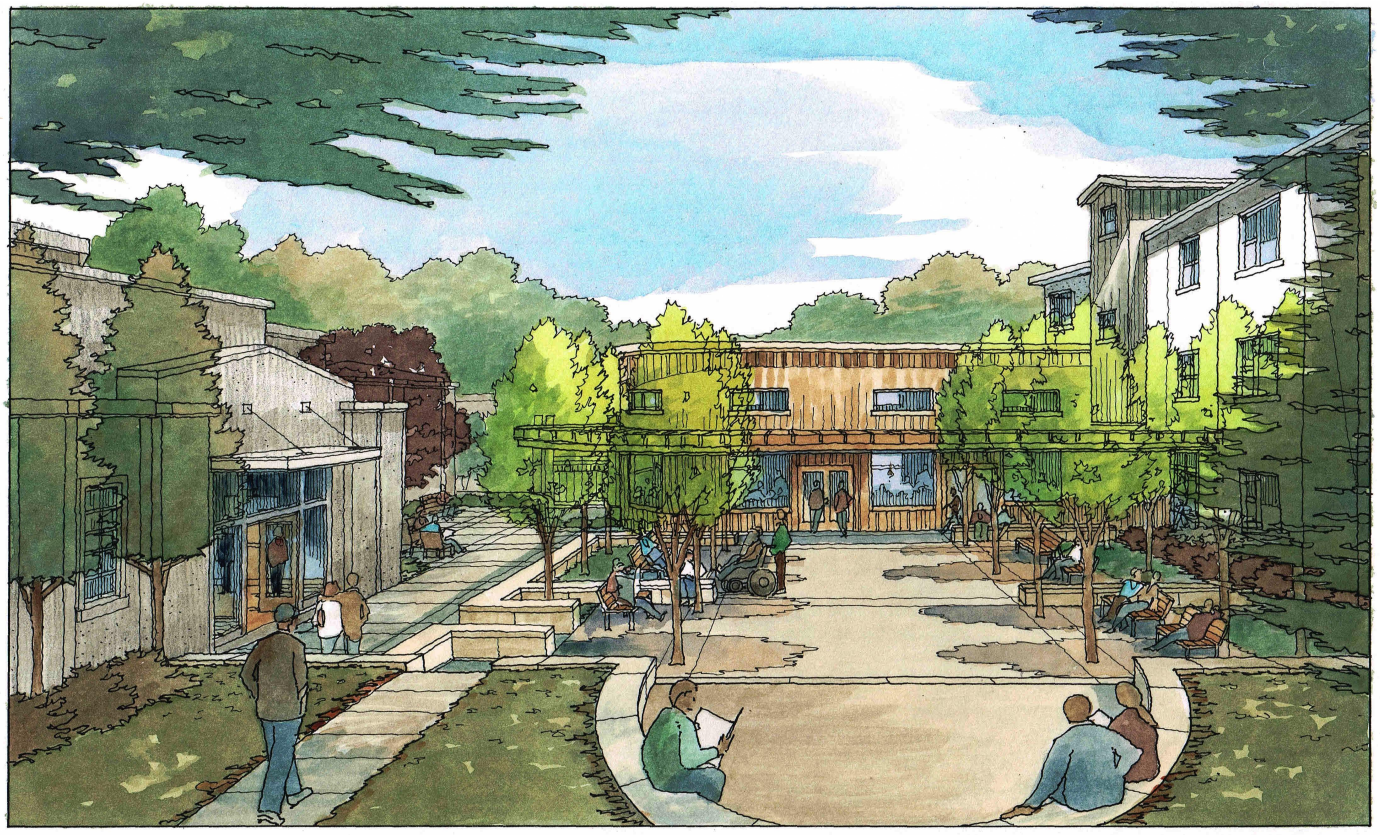
Figure 2-7 Plan Elevations (Page 1 of 2)

2
A-0.2
VIEW OF MAIN ENTRANCE FROM MISSION ROAD



1
A-0.2
VIEW OF COURTYARD AT PUMP BUILDING & SOCIAL HALL

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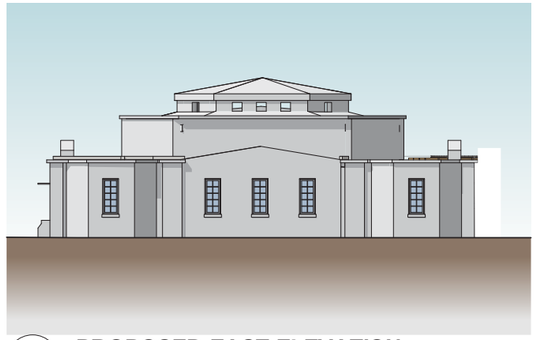
Figure 2-8 Plan Elevations (Page 2 of 2)

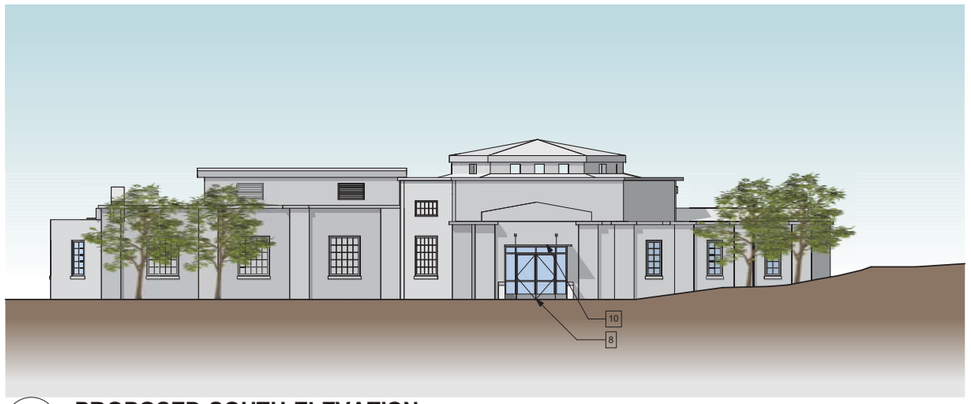
6 A-2.02 **PROPOSED WEST ELEVATION**

SCALE: 3/32" = 1'-0"



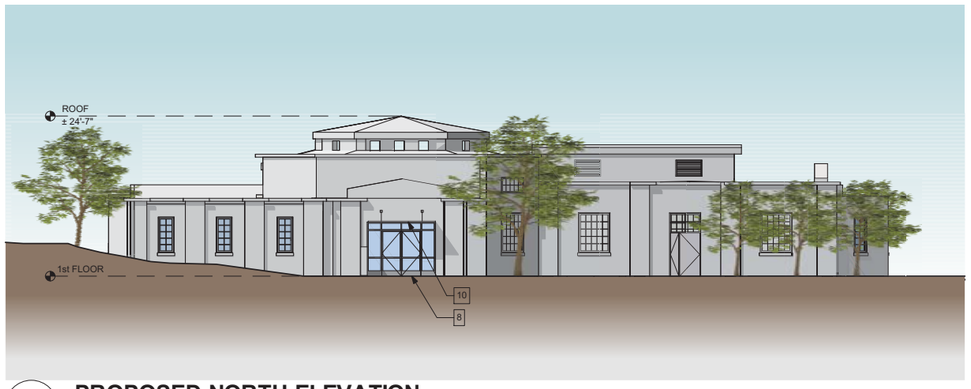
5 A-2.02 **PROPOSED EAST ELEVATION**

SCALE: 3/32" = 1'-0"



4 A-2.02 **PROPOSED SOUTH ELEVATION**

SCALE: 3/32" = 1'-0"



3 A-2.02 **PROPOSED NORTH ELEVATION**

SCALE: 3/32" = 1'-0"

GENERAL NOTES

1. WINDOWS TO BE REPLACED AS DEEMED NECESSARY BASED ON EXISTING CONDITION

2. VOLUNTARY STRUCTURAL IMPROVEMENTS TO BE BASED ON SEISMIC ANALYSIS.

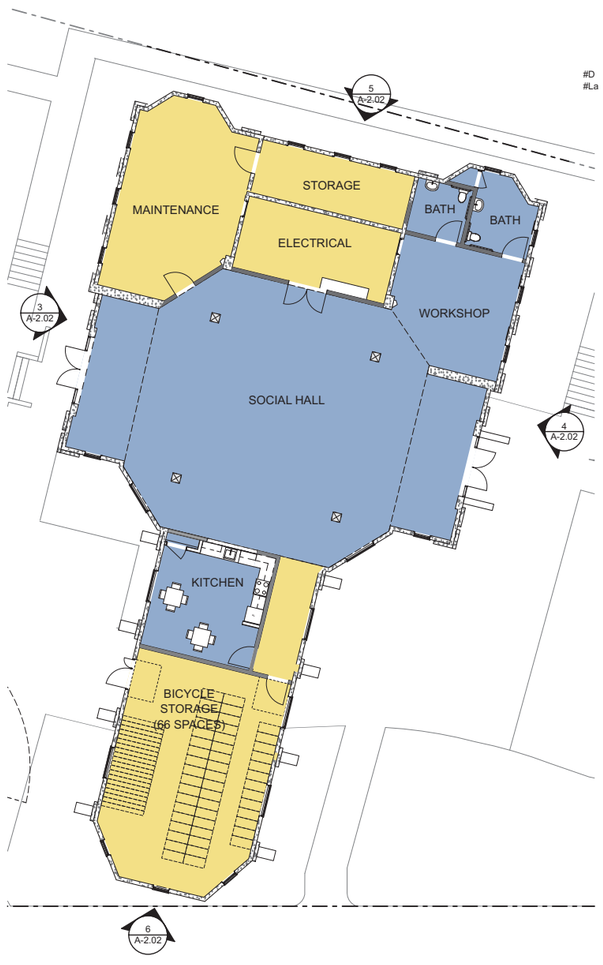
3. CONCRETE FLOOR TO BE RESURFACED TO MEET ACCESSIBILITY REQUIREMENTS

LEGEND

- (N) WALLS
- (E) CONCRETE WALLS TO REMAIN
- CIRCULATION MAINTENANCE/STORAGE
- COMMON AREAS

MATERIALS & SYSTEMS

1. CEMENT PLASTER
2. HORIZONTAL CEMENT BOARD SIDING
3a. FIBER CEMENT BOARD & BATTEN SIDING, BATTENS EVENLY SPACED
3b. FIBER CEMENT BOARD & BATTEN SIDING, BATTENS RANDOMLY SPACED
4. FIBER CEMENT PANEL
5. CORRUGATED SIDING
6. CORRUGATED METAL ROOF
7. FIBERGLASS COMPOSITION SHINGLE ROOF
8. ALUMINUM STOREFRONT SYSTEM
9. WOOD TRELLIS
10. ALUMINUM WINDOW
11. EXPOSED CONCRETE BASE
12. COVERED ENTRY STRUCTURE W/ STEEL POST
13. CONCRETE SEAT WALLS
14. METAL GATE WITH ALUMINUM PERFO PANEL
15. WOOD SLAT WALL WITH BENCH
16. SCUPPER AND DOWNSPOUT
17. GUTTER AND DOWNSPOUT
18. ALUMINUM SUNSHADE
19. PTAC (HVAC) LOUVER
20. CONCRETE LOW WALL W/ ENTRY SIG SEE A5.1



1 A-2.02 **PUMP BUILDING PLAN**

SCALE: 3/32" = 1'-0"

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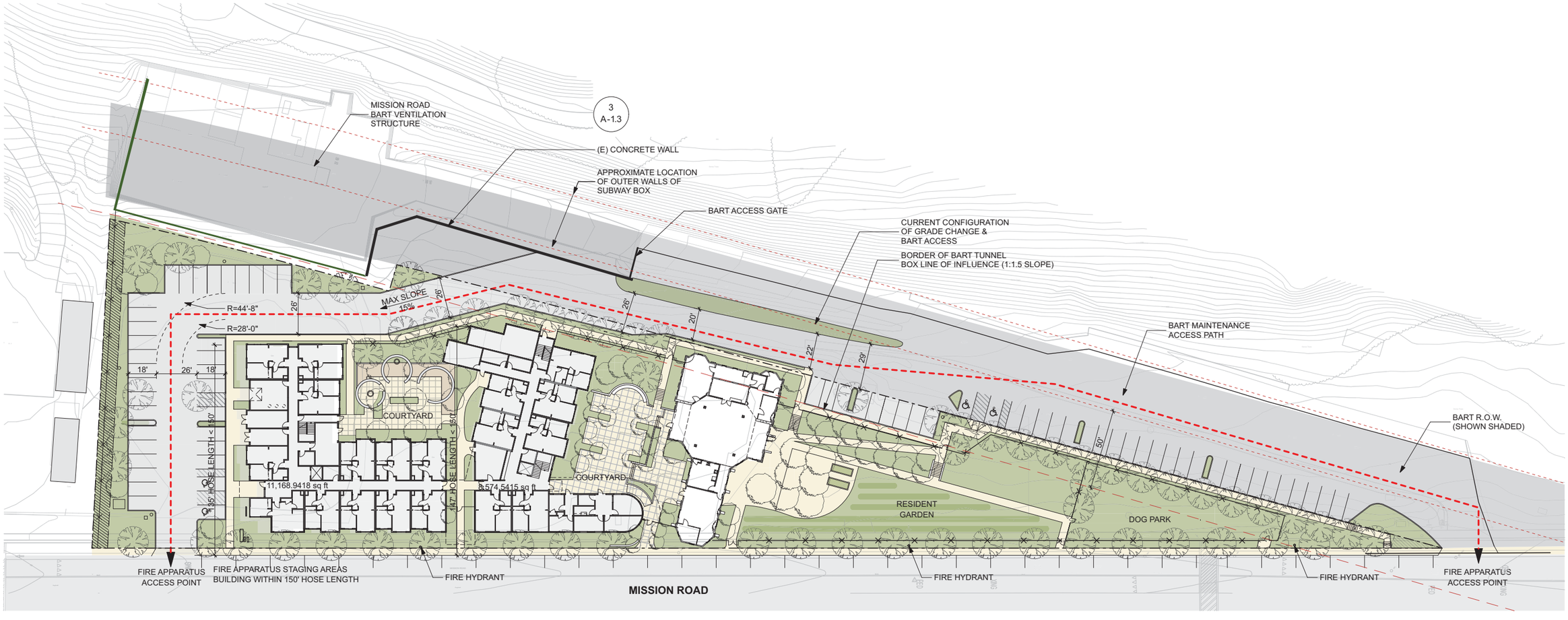
Figure 2-9 Proposed Pump Building

Veterans Village Project



1
A-1.3 **FIRE APPARATUS ACCESS DIAGRAM**

SCALE: 1" = 30'

0 5.33' 10.67' 21.33'

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Figure 2-10 Emergency Access Route
Veterans Village Project

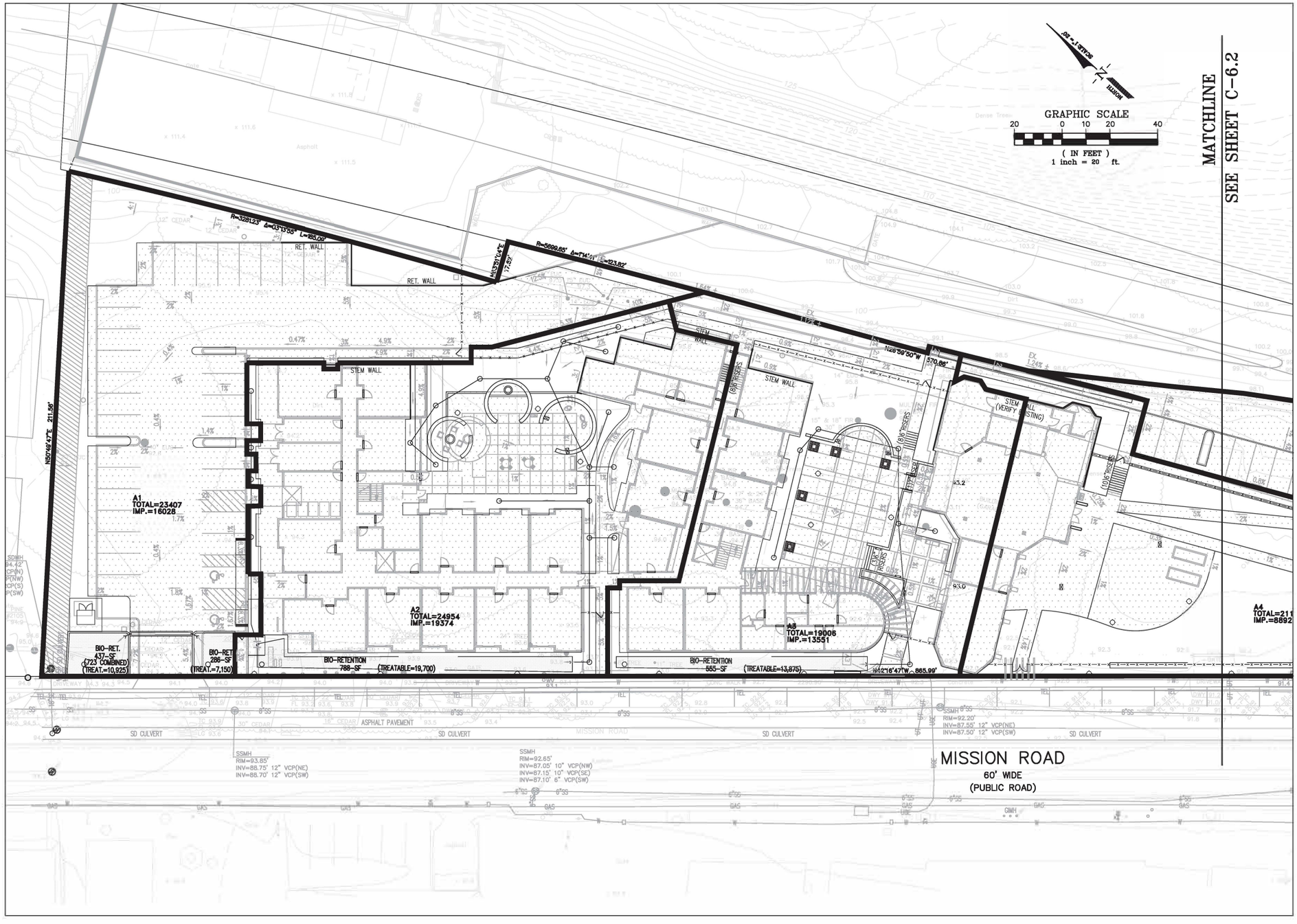

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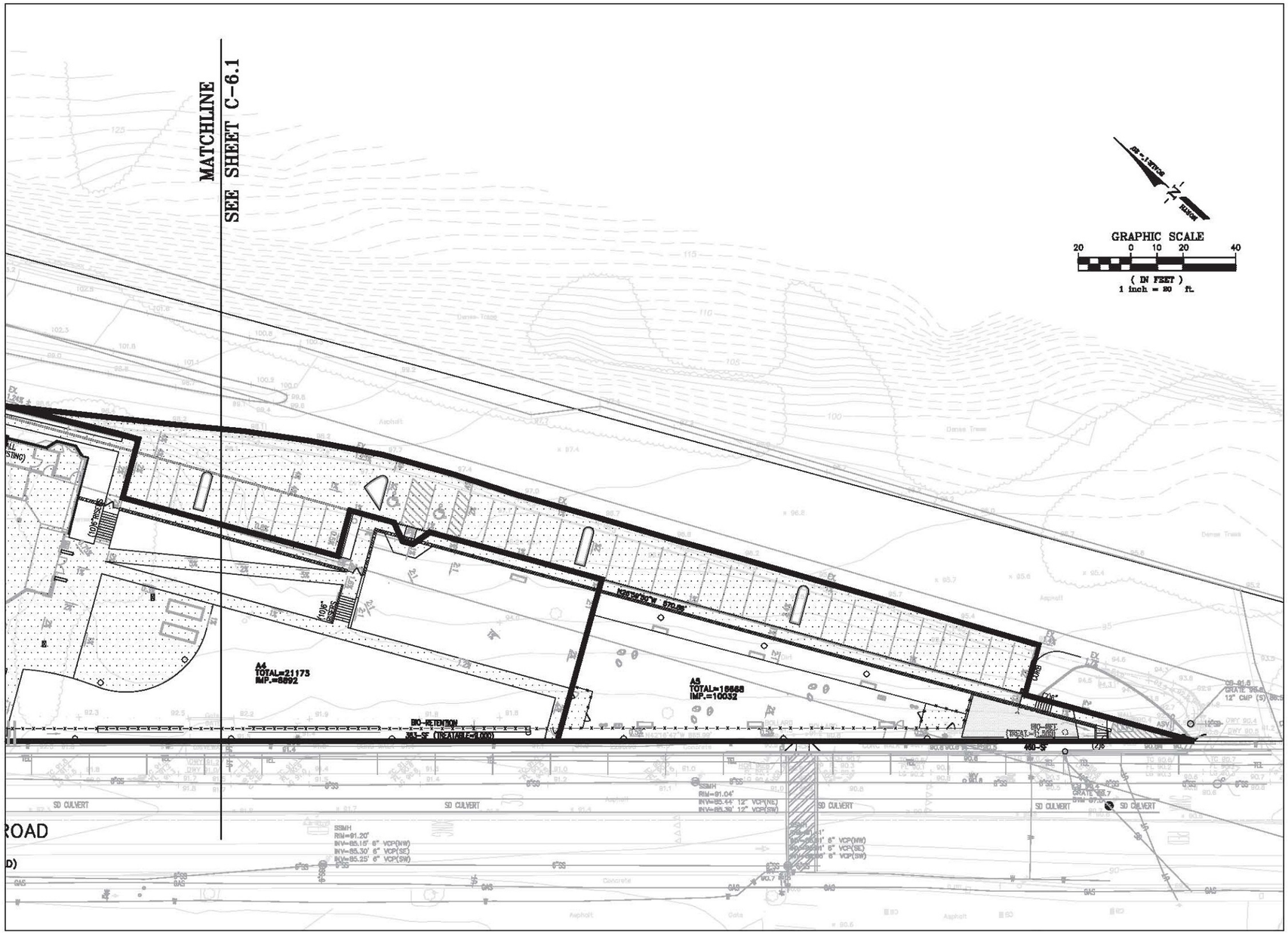
Figure 2-11

Storm Water Treatment Plan (Page 1 of 2)

Veterans Village Project



STORM TREATMENT DESIGN (PER SAN MATEO COUNTY)						
AREA NAME	TREATMENT TYPE	SIZING FACTOR	SURFACE AREAS (S.F.)	RUNOFF SURFACE TYPE	MIN. SIZE (S.F.)	PLANNED SIZE (S.F.)
A1	BIO-RETENTION PLANTER	0.04	7379	PERVIOUS	841	723
			18028	IMPERVIOUS		
A2	BIO-RETENTION PLANTER	0.04	5580	PERVIOUS	775	788
			18374	IMPERVIOUS		
A3	BIO-RETENTION PLANTER	0.04	5455	PERVIOUS	542	555
			13551	IMPERVIOUS		
A4	BIO-RETENTION PLANTER	0.04	12281	PERVIOUS	356	363
			8892	IMPERVIOUS		
A5	BIO-RETENTION PLANTER	0.04	6436	PERVIOUS	401	460
			10032	IMPERVIOUS		
TOTAL			37,331	PERVIOUS		
			87,677	IMPERVIOUS		
			105,208	COMBINED* (SITE AREA)		

* (97,272 ONSITE & 7,936 OFFSITE)

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Figure 2-12

Storm Water Treatment Plan (Page 2 of 2)

Veterans Village Project

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CHAPTER 3 ENVIRONMENTAL IMPACT ANALYSIS

This chapter describes the analytical methodology used, and EIR scoping information considered, in the preparation of the environmental analyses contained in Chapters 4 – 8 of this EIR. This chapter also partially addresses project effects found not to be significant.

3.1 ANALYTICAL METHODOLOGY

In evaluating the proposed project's potential impacts the Town of Colma employed the following analytical methodology:

Step 1: Incorporation of Standard Project Conditions. The EIR incorporates Standard Project Conditions into the proposed project activities that are designed to minimize impacts to the existing environment. The application of Standard Project Conditions is presumed and therefore not considered mitigation measures that are part of the proposed project. Thus, the application of these requirements is considered prior to making a finding of significance for project impacts.

Step 2: Compliance with Applicable Laws, Ordinances, Statutes and Regulations. The EIR presumes, unless specifically noted, that the project would be designed, constructed, operated and maintained in accordance with the applicable requirements described in the regulatory setting discussion. The regulatory setting is not intended to be exhaustive; rather, it is intended to provide a summary of key regulatory requirements that materially affect the relationship between the project's design, construction, operation and maintenance and potential environmental impacts. In addition, the regulatory setting does not summarize regulations that do not apply to the proposed project.

Stem 3: Identification of Existing Physical Conditions. The EIR identifies the existing physical environmental conditions that exist in the project area and which could change as a result of the proposed project. The environmental setting generally reflects the physical environmental conditions of the project area as they existed at the time the Town published its Notice of Preparation for this EIR (May 2016). This setting constitutes the baseline physical conditions by which the Town is determining whether the physical change that occurs to the environment as a result of the proposed project is significant. In accordance with CEQA Guidelines Section 15125(a), the environmental setting describes only those physical environmental conditions necessary to understand the significant effects of the project and its alternatives.

Step 4: Analysis of Project Impacts. The EIR evaluates the significance of the project's potential impacts, i.e., the change to the physical environmental conditions that could result from implementation of the project, on the full range of resources identified in Appendix G to the CEQA guidelines. Pursuant to CEQA Guidelines Section 15126, this EIR analyzes the potential environmental impacts stemming from all phases of the proposed project. This examination is based on the incremental change to the existing physical conditions that would result from the implementation of the proposed project and considers the public comments submitted by agencies and interested individuals during the 30-day public review period for the 2016 NOP. The EIR's impact analyses consider the direct, indirect and cumulative impacts of the proposed project, as well as the short-term and long-term impacts of the project, and enable the Town to determine if

the proposed project would have a beneficial impact, no impact, a less than significant impact, a potentially significant impact, or a significant and unavoidable impact to the environment.

Step 5: Inclusion of Mitigation Measures. The EIR describes the feasible mitigation measures proposed to avoid or minimize the project's significant impacts. Project mitigation measures are in addition to the Standard Project Requirements incorporated into the project, and generally require the project to avoid, prevent, or minimize impacts to resources, or, if impacts do occur, to rehabilitate, restore, or compensate for the impact in a manner that is proportional to the project impact.

Step 6: Alternatives. The EIR describes potentially feasible alternatives that would avoid or reduce the project's significant impacts.

3.2 SUMMARY OF EIR SCOPING COMMENTS

As described in Section 1.5, the Town filed an NOP for this EIR with the County Clerk and State Clearinghouse on May 19, 2016 and provided a 30-day public review period for the NOP from May 19, to June 20, 2016. The Town held a public scoping meeting on May 25, 2016 at the Town's Community Center at 1850 Hillsdale Boulevard. The Town provided notice of this meeting in the NOP, by posting on the Town's three bulletin boards, and by direct mailing to surrounding property owners and others who had previously expressed interest in the project. The meeting presentation is included in Appendix A to this EIR.

3.2.1 Written Comments Received by the Town

The Town received two written comments during the NOP public review period from the California Department of Transportation (Caltrans)(provided in Appendix A) and a Native American Tribe (Tony Cerda of the Costanoan Rumsen Carmel Tribe) requesting notification prior to any ground disturbance at the site. No other written comments were received during the scoping period.

3.2.2 Oral Comments Heard at the Scoping Meeting

No members of the public made comments at the public scoping meeting. Oral comments and questions from the Town's Council generally focused on parking, access, accessibility, safety, hazardous materials, and recreation.

3.3 PUBLIC AGENCY AND OTHER PROJECT COORDINATION

3.3.1 Native American Consultation

The Town prepared and filed a Notice of Preparation (NOP) of an EIR with the San Mateo County Clerk-Recorder on May 19, 2016 and subsequently recorded at the State Clearinghouse on May 24, 2016 (SCH 2016052068). The NOP, scoping meeting presentation, and NOP distribution list are included as Appendix A to this EIR. The Town distributed the NOP to potential local responsible agencies and other interested organizations, including adjacent cities, San Mateo County, the Housing Authority, U.S. Department of Housing and Development (HUD), as well as Native American tribes. One Native American tribe (Tony Cerda, of the Costanoan Rumsen Carmel Tribe) responded to the NOP and requested notification prior to any ground disturbing activities at the site. The Town did not receive a notice from any Native American tribe requesting consultation pursuant to AB 52.

3.4 SUMMARY OF INITIAL STUDY FINDINGS

An Initial Study was completed for the project using the Environmental Checklist Form contained in Appendix G of to the CEQA Guidelines in order to:

- Identify potentially significant project-related impacts;
- Determine which resource areas should be included in the EIR; and
- Provide substantiation for why the project would have no impact or a less than significant impact on many resource areas.

As listed in Project Description, the project would be subject to Standard Project Conditions which have been considered in determining the project's potentially significant impacts.

The findings of the Initial Study are summarized below, and the Initial Study Environmental Checklist is included in its entirety in Appendix B of this EIR:

3.4.1 Aesthetics

All potential project-related impacts to aesthetics would be less than significant. The proposed project would not adversely affect a scenic vista since there are no officially designated scenic vistas which include the project site. The project site is not within the viewshed of a state scenic highway. The project would not substantially degrade the visual character or quality of the site or its surroundings because it would conform to all applicable Town of Colma General Plan policies regarding building materials, landscaping and undergrounding of utilities; and it is subject to design review by the City Council to ensure compatibility with the historic pump house on the site as well as surrounding land uses, such as the historic Holy Cross Cemetery. The project has undergone preliminary review to determine conformance with the design review district requirements and it has been found to be in compliance with all relevant design guidelines. The proposed exterior lighting is not expected to adversely affect day or nighttime views of the area as sensitive residential receptors are not within the immediate vicinity of the proposed project site, and the project site is in an urban area that already has street lights and other exterior building lights. Additional substantiation can be found in Section 1.1 Aesthetics of Appendix B to this EIR.

3.4.2 Agricultural and Forest Resources

The project would have no impacts to agricultural and forest resources. The project would not impact Prime Farmland, Unique Farmland or Farmland of Statewide Importance (Farmland) because there is no Farmland mapped on or near the project site. The project site is not zoned for agricultural or forestry use and the site is not under a Williamson Act contract. The project would not convert farmland or forestland to a non-agricultural or non-forest use because there is no farmland or forestland on or near the project site. Additional substantiation can be found in Section 1.2 Agricultural and Forest Resources of Appendix B to this EIR.

3.4.3 Air Quality

All potential project-related impacts to air quality would be less than significant. The proposed project could conflict with or obstruct implementation of the BAAQMD's *2010 Clean Air Plan*. Project construction and operation would be consistent with all BAAQMD CEQA Guidelines screening criteria and would therefore not violate air quality standards, contribute to an air quality violation, or result in a significant air quality impact from project construction and operation emissions. Since the proposed project would not individually exceed any BAAQMD

CEQA significance thresholds the proposed project would result in less than significant cumulative air quality impacts. The project would not expose sensitive receptors to substantial pollutant concentrations since emissions would be limited to the short-term construction period, would be below BAAQMD screening criteria, and would be subject to regulations limiting engine idling time and ensuring construction equipment is well maintained. The proposed project construction activities could generate typical construction odors (fuels, solvents, etc.); however, such odors would quickly dissipate and would not affect a substantial number of people. Additional substantiation can be found in Section 1.3 Air Quality of Appendix B to this EIR.

3.4.4 Biological Resources

The proposed project could have potentially significant impacts to nesting birds (Impact BIO-1) and/or roosting bats (Impact BIO-2) due to habitat loss from removal of vegetation and structures; direct mortality during tree removal and demolition of structures; or nesting failure due to disturbance from construction activity. Impacts BIO-1 and BIO-2 would be reduced to less than significant levels with planting of the more than 90 trees and other vegetation in the landscape plan for the project to prevent permanent habitat loss, and implementation of Mitigation Measures BIO-1 and BIO-2 to prevent construction-related impacts to nesting birds and roosting bats (see Table 2-1 and Section 1.4 Biological Resources of Appendix B).

All other potential project-related impacts to biological resources would be less than significant. No special-status species have the potential to occur within or in the vicinity of the project site and no sensitive habitats or wetlands occur on or adjacent to the site. Therefore, the project would not impact special-status species, sensitive habitats or wetlands. The project would not impact wildlife movement corridors or nursery sites because there are no known migration corridors or native wildlife nursery sites within or adjacent to the project site. The project would not conflict with local policies or ordinances protecting biological resources. The project applicant would obtain a tree removal permit from the Town for the removal of forty-six trees, as required by the Town's Tree Cutting and Removal Ordinance (Municipal Code Section 5.06). No habitat conservation or natural community conservation plan applies to the project site. Additional substantiation can be found in Section 1.4 Biological Resources of Appendix B to this EIR.

3.4.5 Cultural Resources

The proposed project was found to have potentially significant impacts to cultural resources (see Section 1.5 Cultural Resources of Appendix B to this EIR). Potentially significant project-related impacts to cultural resources are analyzed in detail in Chapter 4 of this EIR.

3.4.6 Geology and Soils

All potential project-related impacts to geology and soils would be less than significant. The site is not within an Earthquake Fault Zone, as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site. The project site is not subject to landslides, lateral spreading or subsidence and the project does not include septic tanks or alternative wastewater systems. However, the project site is in a seismically active region and could be subject to strong seismic ground shaking; is within a zone of high liquefaction susceptibility; and may contain expansive soils. The project would be designed and constructed in accordance with the recommendations in the geotechnical report and the seismic design provisions in the current California Building Code. The project would not exacerbate seismic ground shaking, liquefaction or expansive soil conditions on the project site or increase the risk of loss, injury, or death from seismic event. An Erosion and Sediment

Control Plan and a Stormwater Pollution Prevention Plan (SWPPP) would be prepared and implemented for the project to prevent soil erosion and loss of topsoil during construction. Additional substantiation can be found in Section 1.6 Geology and Soils of Appendix B to this EIR.

3.4.7 Greenhouse Gas Emissions

All potential project-related impacts to greenhouse gas emissions would be less than significant. The proposed project would not generate greenhouse gas emissions that would have a significant impact on the environment because the proposed 66-unit residential building is below BAAQMD's operational GHG screening size of 78 dwelling units for apartment, low-rise / condo/townhouse, general land use type. The proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions because the project would meet or exceed all applicable California and Colma energy efficiency standards. Additional substantiation can be found in Section 1.7 Greenhouse Gas Emissions of Appendix B to this EIR.

3.4.8 Hazards and Hazardous Materials

All potential project-related impacts to hazards and hazardous materials would be less than significant. The proposed project would not include the routine transport, use or disposal of hazardous materials; is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; would not impair implementation of or physically interfere with the Town of Colma's Standardized Emergency Management System, its Emergency Management Plan or its designated evacuation routes; and would not expose people or structures to a significant risk of loss, injury or death involving wild land fires. However, the project could result in the accidental release of construction fuels or fluids and/or exposure of workers or the environment to hazardous building materials such as asbestos containing materials, lead-based paint and polychlorinated biphenyls. Hazardous materials BMPs would be incorporated into the project for the safe use, handling and storage of hazardous materials and the proposed project would comply with all applicable regulations regarding testing, abatement, worker protection and disposal of hazardous building materials (lead based paint and asbestos).

San Francisco International (SFO) is located approximately 5 miles southeast of the project site and is within SFO airport's Airport Influence Area A (all of San Mateo County) and Airport Influence Area B (all of the Town of Colma). The project site is not located within a safety compatibility zone in the airport land use plan. On July 28th, 2016, the Airport Land Use Commission recommended that the City/County Association of Governments (C/CAG) of San Mateo County Board determine the project is consistent with the SFO Airport Land Use Compatibility Plan (ALUCP). Subsequent C/CAG Board approval is expected. The project site will not be affected by airport hazards. Additional substantiation can be found in Section 1.8 Hazards and Hazardous Materials of Appendix B to this EIR.

3.4.9 Hydrology and Water Quality

All potential project-related impacts to hydrology and water quality would be less than significant. Potential project construction-related impacts to hydrology and water quality including erosion and siltation or the release of hazardous materials would be prevented by the preparation and implementation of a NOI/SWPPP and an Erosion and Sediment Control Plan. Potential project operational-related impacts to hydrology and water quality including a potential increase in polluted runoff water would be prevented through incorporation of adequately-sized bio-retention areas, provision of covered trash and recycling receptacles, and compliance with

measures for storm water pollution prevention consistent with Subchapter 3.10 of the Town's Municipal Code. The proposed project would not impact groundwater, be subject to flood-related hazards, or be at risk of inundation by seiche, tsunami or mudflow. Additional substantiation can be found in Section 1.9 Hydrology and Water Quality of Appendix B to this EIR.

3.4.10 Land Use and Planning

All potential project-related impacts to land use and planning would be less than significant. The proposed project would not physically divide an established community because it does not include major barriers such as new roadways and it is adjacent to mostly non-residential land uses (cemeteries and commercial land uses). The project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project. The project site is zoned Commercial (C), Design Review (DR) and has a General Plan designation of Commercial Land Use – Mission Road North. The Commercial land use and zoning allow for the present uses on site which are vehicle storage and a machine shop but it also allows for residential uses with the approval of a Use Permit. The Town's Housing Element Update identifies this site as a required residential development site to satisfy the Town's housing production requirements. The Housing Element also identifies using the Planned Development rezoning process for permitting residential uses at the site. The project is located within the Design Review overlay area and preliminary review by the Town under Design Review standards determined that the project architectural plans demonstrated compliance with all stated standards. The project meets all setback requirements. No habitat conservation or natural community conservation plan applies to the project site. Additional substantiation can be found in Section 1.10 Land Use and Planning of Appendix B to this EIR.

3.4.11 Mineral Resources

The proposed project would not impact mineral resources. No locally important mineral resources are designated in the project area by either the Town of Colma General Plan or the San Mateo County General Plan or Zoning District. Therefore, the project would not result in the loss of availability of known mineral resources or affect a locally important mineral resource recovery site. Additional substantiation can be found in Section 1.11 Mineral Resources of Appendix B to this EIR.

3.4.12 Noise

Noise monitoring indicated that ambient noise levels at parts of the site are above the "conditionally acceptable" level of 60 community noise equivalent level (CNEL) / day/night average sound level (Ldn) for Residential – Multi-Family designated land uses. However, a detailed acoustic report would be prepared for the project as required by state law and the Town's General Plan for multi-family dwellings proposed in areas exposed to exterior noise levels of 60 Ldn or higher. The report will be prepared by an acoustical engineer holding a degree in engineering, architecture, or physics and set forth measures that would reduce exterior noise levels to 60 Ldn and control the amount of exterior noise reaching interior spaces to 45 Ldn or less. The applicant's preparation of a detailed acoustical report and the Town's review and approval of the report prior to the issuance of a building permit would ensure the project does not expose persons to noise levels that exceed applicable standards.

All potential project-related noise impacts would be less than significant. Project construction equipment would not produce excessive groundborne vibration at sensitive residential receptor locations or excessively impact adjacent businesses. Future residents at the project site would not be significantly impacted by vibration from the nearby underground BART service because

BART has included mitigation measures to decrease groundborne vibration to less than significant levels.

The project would not result in a substantial permanent increase in ambient noise levels because noise from the proposed residential land use (e.g., car doors closing, landscaping equipment, and human speech) would be highest during the daytime and would likely not be noticeable or discernible above existing ambient noise levels from traffic on El Camino Real. Construction noise from the project is considered a less than significant impact because of the temporary nature of the noise and because the hours of construction are limited by the Town's Municipal Code.

San Francisco International (SFO) is located approximately 5 miles southeast of the project site. The project site is within SFO airport's Airport Influence Area A (all of San Mateo County) and Airport Influence Area B (all of the Town of Colma). The projected 2020 CNEL noise contour map from the Draft Environmental Assessment for the Proposed Runway Safety Area Program shows the project site is within a noise compatible zone and thus would not expose future residents at the site to excessive noise levels from an airport. The project site is not located within a safety compatibility zone in the airport land use plan. On July 28th, 2016, the Airport Land Use Commission recommended that the City/County Association of Governments (C/CAG) of San Mateo County Board determine the project is consistent with the SFO ALUCP. Subsequent C/CAG Board approval is expected. Additional substantiation can be found in Section 1.12 Noise of Appendix B to this EIR.

3.4.13 Population and Housing

All potential project-related impacts to population and housing would be less than significant. The project would not displace any existing housing or people, or necessitate any replacement housing elsewhere. The project would induce population growth with the construction of 66 new housing units. However, the proposed project would not induce population growth beyond that projected in the Town's General Plan and would help to meet the need for 250 additional housing units projected by the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC). Additional substantiation can be found in Section 1.13 Population and Housing of Appendix B to this EIR.

3.4.14 Public Services

All potential project-related impacts to public services would be less than significant. The proposed project would result in a slight increase of population, however, it would not lead to a substantial increase in calls for emergency medical, fire suppression or police services. The proposed project would not create a need for new or physically altered facilities to maintain adequate service ratios, response times, or other performance objectives according to personal communications with the Town's Fire Department and Chief of Police.

The project would not significantly impact school facilities because it is not expected to generate measurable numbers of new students. Additionally, the applicant is required to pay school impact fees of $3.48 per square foot to the local school district.

The project would not significantly impact parks or recreational facilities because the project includes on-site recreational facilities for use by the building residents including a social hall, community garden space and dog park; and the Town has determined that it is likely that the new adult and senior residents at the site would merely increase participation in existing recreational

program offerings. Additional substantiation can be found in Section 1.14 Public Services of Appendix B to this EIR.

3.4.15 Recreation

All potential project-related impacts to recreation would be less than significant. The proposed project would not increase the use of recreational facilities or create new demand for recreational facilities because the Town has determined that it is likely that the new adult and senior residents at the site would merely increase participation in existing program offerings. The project also includes on-site recreational facilities for use by the building residents including a social hall, community garden space and dog park. Additional analysis of the project's affect on existing recreational services can be found in Section 1.15 Recreation of Appendix B to this EIR.

3.4.16 Traffic and Transportation

The proposed project was found to have potentially significant impacts to traffic and transportation. Potentially significant project-related impacts to traffic and transportation are analyzed in detail in Chapter 5 of this EIR.

3.4.17 Utilities and Service Systems

All potential project-related impacts to utilities and service systems would be less than significant. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities or exceed the capacity of the wastewater treatment provider because Colma is currently contributing only half of its permissible daily flow of wastewater to the South San Francisco / San Bruno Water Quality Control Plant.

The project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities because on-site bio-retention areas large enough for the treatment and retention of storm water runoff from the project would be constructed as part of the project.

Cal Water has sufficient capacity to provide water to the project from existing entitlements and resources.

The project is served by a landfill (Ox Mountain) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The proposed project would comply with all federal, state and local statutes related to solid waste. Additional substantiation can be found in Section 1.17 Utilities and Service Systems of Appendix B to this EIR.

3.5 PROJECT IMPACTS FOUND NOT TO BE SIGNIFICANT

The Town has determined, using the Environmental Checklist Form contained in Appendix G of to the CEQA Guidelines, that implementation of the proposed project would clearly result in no impact or a less than significant impact to the resources listed below:

- Aesthetics (Section 1.1 of Appendix B)
- Agricultural and Forestry Resources (Section 1.2 of Appendix B)
- Air Quality (Section 1.3 of Appendix B)
- Geology and Soils (Section 1.6 of Appendix B)
- Greenhouse Gas Emissions (Section 1.7 of Appendix B)

- Hazards and Hazardous Materials (Section 1.8 of Appendix B)
- Hydrology and Water Quality (Section 1.9 of Appendix B)
- Land Use and Planning (Section 1.10 of Appendix B)
- Mineral Resources (Section 1.11 of Appendix B)
- Noise (Section 1.12 of Appendix B)
- Population and Housing (Section 1.13 of Appendix B)
- Public Services (Section 1.14 of Appendix B)
- Recreation (Section 1.15 of Appendix B)
- Utilities and Service Systems (Section 1.17 of Appendix B)

Full responses to the questions regarding these resources in the Environmental Checklist Form can be found attached in Appendix B of this EIR and are summarized in Section 3.4 above.

CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful and unnecessary consumption of energy (PRC Section 21100(b)(3) and CEQA Guidelines Appendix F). The potential energy impacts of the proposed project are described in Section 3.5.1 below.

3.5.1 Energy

This section provides information on the environmental and regulatory energy setting of the project and its energy impacts. The analysis shows that the project does not require additional mitigation to meet CEQA thresholds and that there will be no significant impacts related to energy use.

3.5.1.1 Environmental Setting

According to the California Energy Commission's (CEC) 2013 Integrated Energy Policy Report, Californians consumed about 280,561 gigawatt hours (GWh) of electricity, and more than 12,700 million British thermal units (BTU) of natural gas in 2012. The U.S. Energy Information Administration estimates that by 2024, California's electricity consumption will reach between 308,277 GWh and 337,713 GWh, an annual average growth rate of 0.79 to 1.56 percent (CEC 2013), and natural gas consumption is expected to reach between 13,773 million and 14,175 million BTU by 2022, an average annual growth rate of 0.7 to 0.94 percent (CEC 2013).

Three large investor-owned utility companies supply energy to California: Pacific Gas and Electric (PG&E), San Diego Gas and Electric, and Southern California Edison (CPUC 2013). Approximately 70 percent of California's electricity is generated from power plants located within the state and from plants that are outside of the state but owned by California utilities. About 10 percent is imported from the Pacific Northwest and 20 percent from the American Southwest (CEC 2011). In-state power is attained from 61.1 percent natural gas, 17.1 renewable energy and 11.7 percent large hydropower. A small portion of the state's local energy, 0.8 percent, is generated from coal (CPUC 2013).

Due in part to the state's emphasis on renewable energy, California is second leading the nation when it comes to net electricity generation from renewable resources. A top producer of electricity from conventional hydroelectric power, California is also a leader in net electricity generation from several other renewable energy sources. In 2010, California generated 58,881

GWh in renewable electricity, accounting for 22.7 percent of the state's overall electricity sales. Municipal solid waste (MSW) and landfill gas (LFG) contributed 1,812 GWh, accounting for 0.9 percent of the state's electricity generation (CEC 2011).

In 2014, residential use accounted for 36 percent of electricity use across four major consuming sectors including commercial (35 percent), industrial (28 percent), and transportation (0.2 percent) (U. S. Energy Information Administration (EIA) 2016a). In 2014, the average monthly electricity consumption for a California residential utility customer was 562 kilowatthours (kWh) (U.S. EIA 2016b). The largest single use of electricity in the U.S. residential sector is for air conditioning (cooling), followed by space heating, lighting, water heating, refrigeration and televisions and related electronic equipment. (U.S. EIA 2016a)

According to the California Energy Commission's (CEC), total electricity use in San Mateo County was 4,443 million kilowat hours (kWh) in 2014, including 1,495 kWh from residential uses. Natural gas consumption was 193 million therms (a unit of heat equivalent to 100,000 BTUs) in 2014, including 105 million therms from residential uses (CEC 2016).

3.5.1.2 Regulatory Setting

State and local energy policies relevant to the proposed project are described below. The Town of Colma Climate Action Plan and the San Mateo County Energy Efficiency Climate Action Plan, which also contain policies related to energy efficiency, are described in Section 1.7 Greenhouse Gas Emissions of Appendix B of this EIR.

The Clean Energy and Pollution Reduction Act of 2015 (SB350)

On April 29, 2015, Governor Edmund G. Brown Jr. signed Executive Order B-30-15, establishing a new statewide goal to reduce greenhouse gas emissions 40 percent below 1990 levels by 2030. The Clean Energy and Pollution Reduction Act of 2015 (Senate Bill 350, DeLeon, Chapter 547, Statutes of 2015) (SB 350) subsequently codified two of the Governor's goals for reducing carbon emissions: increasing renewable electricity procurement to 50 percent by 2030, and doubling energy efficiency savings by 2030. The state currently uses renewable energy to serve about 25 percent of its electricity consumption (CEC 2015).

California Building Standards Code

The California Building Standards Code (Title 24 of the California Code of Regulations) was enacted in 1978 to ensure that all new construction meets a minimum level of energy efficiency standards. California's Building Energy Efficiency Standards are updated on an approximate three-year cycle. The current 2013 Standards went into effect July 1, 2014. Subchapters 7 and 8 of Title 24, Part 6 contain mandatory standards for new low rise residential buildings related to insulation, heating and cooling, lighting, shading and roofing.

Colma General Plan

The following goal, policy and programs from the Colma General Plan Housing Element (Town of Colma, 2015) relate to energy efficiency in the design and construction of new housing.

Goal G: Encourage sustainable residential development that is energy efficient and consistent with existing and future Town values and policies related to reducing greenhouse gas emissions.

Policy 6: Recommended and promote energy conservation in existing and new housing.

Program 6.1 Green Building Regulations for Residential Uses: Colma Planning Department will study the appropriateness and effectiveness of adopting green building and green landscaping

ordinances, as part of a Town effort to address global climate change and energy conservation. The study will include consideration of energy efficient design, use of renewable resources in building and interior design materials, and the incorporation of solar and wind energy infrastructure.

Program 6.2 Encourage use of cool roofing systems and other energy conservation measures to reduce a building's energy usage: The Town will provide information to the public on programs to assist in the provision of energy efficiency measures during new construction or as a residential retrofit.

In addition, the following policy from the Colma General Plan Safety Element (1999) is applicable to compliance with Title 24 (described above):

Policy 5.07.434: The Town should continue to have the Colma Fire Protection District review development plans for conformity with the Uniform Fire Code and Title 24 of the California Building Code.

Colma Municipal Code

Section 5.04.120 of the Colma Municipal Code adopts the 2013 Edition of the California Energy Code contained in Part 6 of Title 24 of the California Code of Regulations by reference as the Colma Energy Conservation Code.

Division 5: Recycling and Diversion of Construction and Demolition Debris of Chapter 5 Buildings and Construction, of the Colma Municipal Code (Construction Demolition and Debris Ordinance) requires up to fifty percent of waste from demolition, re-roofing of homes, construction and remodeling to be reused, recycled or diverted from landfills (Municipal Code Section 5.04.290). This ordinance reduces the amount of materials sent to landfills and conserves energy through the reuse and recycling of materials. Town staff monitors and enforces the program, which diverts more than 50 percent of materials from landfill.

3.5.1.3 Thresholds of Significance

For the purposes of this EIR, an energy impact is significant if the proposed project would:

- Result in a substantial increase in net energy demand; or:
- Result in the use of fuel or energy in a wasteful manner.

3.5.1.4 Impact Analysis

Energy use for the project was estimated using the California Emissions Estimator Model™ (CalEEMod). CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions associated with both construction and operations from a variety of land use projects, and it can also be used to estimate annual energy use. The model allows for the inclusion of energy saving features to reduce energy use. Based on CalEEMod estimates (MIG 2016), the proposed project would use approximately 267,374 kWh/year with the inclusion of planned project design features to reduce energy use. A kWh, or 1,000 Watt hours, is equivalent to the energy required to power a standard 100 watt light bulb for 10 hours (100 Watts * 10 hours = 1,000 Wh, or 1 kWh). The model also estimated natural gas use at approximately 555,557 kBTU/year (162,818 kWh/year)(MIG 2016).

Based on Appendix F, Energy Conservation, of the CEQA Guidelines, a project would result in significant impacts related to energy if construction or operation of the proposed facilities would

result in the wasteful, unnecessary, or inefficient use of energy resources. The project would not result in a substantial increase in net energy demand or result in the use of fuel or energy in a wasteful manner because the project would comply with 2013 Edition of the California Energy Code adopted by the Colma Municipal Code as the Colma Energy Conservation Code (contained in Part 6 of Title 24 of the California Code of Regulations). In addition the project includes the following green building features:

- Solar thermal system on the roof
- Sunshades at select units based on orientation.
- High efficiency HVAC system
- Energy efficient lighting including LED fixtures
- Energy Star appliances
- Energy efficient building envelope
- Water conserving plumbing fixtures

The impact is considered **Less than Significant**.

3.5.1.5 Energy Impact Analysis References

MIG. 2016. CalEEMod Run for Veterans Village Project, San Mateo County. August 4, 2016.

U. S. Energy Information Administration. 2016a. Electricity Explained – Use of Electricity. Accessed at http://www.eia.gov/energyexplained/index.cfm?page=electricity_use, on June 24, 2016.

U. S. Energy Information Administration. 2016b. Average monthly residential electricity consumption, prices, and bills by state (Excel). Accessed at: http://www.eia.gov/electricity/sales_revenue_price/xls/table5_a.xls, on June 24, 2016.

3.6 PROJECT CONSISTENCY WITH LOCAL PLANS AND POLICIES

The local plans and policies applicable to the proposed project include the Colma General Plan and the Colma Municipal Code. The relevant goals, policies and regulations from the Town's General Plan and Municipal Code are described in the sections below, and the project's consistency with the goals, policies and regulations is evaluated. Applicable goals, policies and regulations from the Town's General Plan and Municipal Code are also included in Chapter 4 Cultural Resources and Chapter 5 Traffic and Transportation, as well as in many sections of the Initial Study (Appendix B), as they apply to each resource area.

3.6.1 Colma General Plan

The Colma General Plan is the principal policy document for City Council reference and guidance on development matters. The location and overall orientation of land uses are designated in the General Plan. The Town's General Plan includes the following Elements: Land Use (1999), Circulation (2014), Open Space and Conservation (2000), Housing (2015), Noise (1999), Safety (1999) and Historical Resources (1999).

The goals, policies and guidelines in each element relevant to the proposed project are described in the Sections below, and the project's consistency with the relevant goals and policies is evaluated. The proposed project is generally consistent with the Town's General Plan, with the exception of a few polices related to historic resources, as noted in the sections below.

3.6.1.1 Land Use Element

The Land Use Element of the Town's General Plan (1999) is intended to describe the general distribution and intensity of present and planned future use of all land areas within the Town's jurisdiction. The Land Use designation for the project site is Commercial Land Use – Mission Road North. The Commercial land use designation allows for the present uses on site which are vehicle storage and a machine shop but it also allows for residential uses with the approval of a Use Permit.

The proposed project is consistent with all applicable policies from the Colma General Plan Land Use Element. The General Plan Land Use Policies relevant to the proposed project are listed below, and are also addressed in the Initial Study in Appendix B of this EIR or the applicable EIR Chapter, as indicated in parentheses after each listed policy.

- *Policy 5.02.311:* In any proposed development the Town shall balance the use judgement in reviewing the visual effects and the potential impacts of the proposed development, facilitating the tranquil atmosphere required for the Town's memorial parks. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.02.312:* The Town should take action to improve civic beauty including tree planting, road median landscaping, and enforcement of conditions related to private development projects. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.02.317:* No new metal clad buildings should be permitted in the Town of Colma, other than agriculturally-related. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.02.318:* The Town should condition the approval of permits for all site building improvement projects where such projects involve the public street frontage to require the installation of street trees along the public street frontage of the affected property. Spacing of the trees should be in accordance with an adopted tree planting plan, or if no plan exists, trees should be installed at a minimum spacing of one tree each 25 feet parallel to the public roadway. Exceptions should be made if this approach would clash with an established landscape scheme of merit. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.02.321:* Residential developments having ten or more units should be required to provide park and recreation facilities or contribute to the improvement of community-wide facilities. (Appendix B Section 1.15 Recreation)
- *Policy 5.02.324:* It is intended that new buildings in design review districts should be reviewed to ensure that exterior building design, materials and colors are appropriate for the setting where the new buildings are located. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.02.352:* Sufficient off-street parking should be required for all new construction, in amounts varying with the type of use. (Chapter 5 Traffic and Transportation)
- *Policy 5.02.353:* The City Council should condition the approval of permits for all site and building improvement projects where such projects involve the public street frontage to require the installation of a public sidewalk, if one does not already exist. (Chapter 5 Traffic and Transportation)
- *Policy 5.02.361:* The Town should require all new construction projects to place power, telephone and cable TV lines underground. Utility boxes and transformers should also be undergrounded if possible. If there is no reasonable alternative than above ground

placement, then these facilities should be screened by fencing and/or landscaping. (Appendix B Section 1.1 Aesthetics)

- *Policy 5.02.362:* The Town should require all new construction projects to hook up to public water and sewer systems. (Appendix B Section 1.17 Utilities and Service Systems)

3.6.1.2 Circulation Element

The goals of the Circulation Element of the Town's General Plan (2014) are to identify facilities for the safe, efficient, and environmentally responsible movement of people and goods through the Town, ensure these facilities reflect the land uses contemplated by the Land Use Element, and ensure a range of transportation options are available throughout the Town.

The proposed project is consistent with all applicable policies from the Colma General Plan Circulation Element. The General Plan Circulation Policies relevant to the proposed project are listed below, and are also addressed in Chapter 5 Traffic and Transportation or in the Initial Study in Appendix B of this EIR, as indicated in parentheses after each listed policy.

- *Policy 5.03.721:* Private off-street parking should be developed in all of Colma's commercial areas to minimize traffic congestion. Private off-street parking should be developed in conjunction with residential development projects. (Chapter 5 Traffic and Transportation)
- *Policy 5.03.722:* Pedestrian sidewalks or walkways should be constructed typically along all streets. These should be done as a requirement of private development, where possible. (Chapter 5 Traffic and Transportation)
- *Policy 5.03.725:* Facilities for disabled persons should be constructed in Colma including specified parking spaces, curb ramps at street crossings, sidewalk clearance around obstacles and sidewalk transitions at driveway crossings. (Chapter 5 Traffic and Transportation)
- *Policy 5.03.729:* The Town should strive to maintain a Level of Service D or better for all intersections. Levels of E or F should be tolerated during peak periods. (Chapter 5 Traffic and Transportation)
- *Policy 5.03.732:* Street trees should be planted along Colma's street system. Trees should be selected from a plant list approved by the City Council in order to create a unifying theme. Street trees should be planted as a requirement of private development, where such developments involve the public street frontage. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.03.732:* A utility undergrounding/street beautification program should be carried out for Mission Road in conjunction with the provision of additional off-street parking to improve visual appearance and traffic safety. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.03.733:* Overhead transmission lines should be placed underground in order to improve the visual quality of all roadways. (Appendix B Section 1.1 Aesthetics)

3.6.1.3 Open Space and Conservation Element

The Open Space and Conservation Element of the Town's General Plan (2000) identifies land which, for one reason or another, is not subject to urban development; and it identifies plant, animal and land resources to be conserved.

The proposed project is consistent with most applicable policies from the Colma General Plan Open Space and Conservation Element. The General Plan Open Space and Conservation Policies relevant to the proposed project are listed below, and are also addressed in the Initial Study in Appendix B of this EIR or the applicable EIR Chapter, as indicated in parentheses after each listed policy.

- *Policy 5.04.311:* The Town should encourage use of water-saving plumbing fixtures in new construction. (Appendix B Section 1.17 Utilities and Service Systems)
- *Policy 5.04.312:* The Town should encourage but not mandate the use of drought-tolerant plants in the project landscape schemes. (Appendix B Section 1.17 Utilities and Service Systems)
- *Policy 5.04.315*: The Town should support the use of public/mass transit by encouraging pedestrian-friendly street design and mixed-use development near transit hubs. (Appendix B Section 1.3 Air Quality)
- *Policy 5.04.316:* The Town should minimize the water supply and beneficial use impacts of new development and construction activities the maximum extent possible. (Appendix B Section 1.9 Hydrology and Water Quality)
- *Policy 5.04.331:* Significant tree masses and other vegetative cover, as indicated on the Open Space Map (Exhibit OS-1), should be recognized as natural resources to be managed and preserved. Tree removal, if necessary, should follow the guidelines of the Tree Ordinance. Any vegetation removed as part of a development process should be subject to a landscaping replacement. As a general rule, a one-for-one replacement should be required. (Appendix B Section 1.4 Biological Resources)
- *Policy 5.04.332:* The Town should encourage use of the representative plant list and landscape criteria set forth in Tables OS-2 and OS-3. (Appendix B Section 1.4 Biological Resources)
- *Policy 5.04.333:* Street trees should be planted along Colma's street system. Trees should be selected from a plant list approved by the City Council in order to create a unifying theme. Trees should be planted as a requirement of private development, with spacing 20-30 feet apart. (Appendix B Section 1.4 Biological Resources)
- *Policy 5.04.334:* The Town should encourage property owners to eliminate invasive plants wherever they occur. (Appendix B Section 1.4 Biological Resources)
- *Policy 5.04.341:* On-site storm water detention facilities should be constructed for new developments (over ½ acre) which contribute runoff to Colma Creek to store the difference in runoff between the 10-year predevelopment storm (original natural state) and the 100-year post development storm, with storm water released at the 10-year predevelopment rate. Property owners should be required to enter into agreements for maintenance. (Appendix B Section 1.9 Hydrology and Water Quality)
- *Policy 5.04.351:* The Town should encourage the preservation, care and maintenance of memorial parks and cemeteries. (Chapter 4 Cultural Resources)
- *Policy 5.04.352:* Uncommitted cemetery lands should be encouraged to be used for agricultural purposes. Industrial uses should be prohibited. Conversion of uncommitted

cemetery lands to commercial or residential uses should be discouraged unless there is a demonstrated public need for such change. (Chapter 4 Cultural Resources)

- *Policy 5.04.361:* The Town should maintain a visual and physical distinction from its surrounding cities. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.04.362:* A Spanish-Mediterranean architectural theme should be utilized for new buildings and major remodeling projects unless an established architectural theme of merit exists. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.04.364:* The Town should promote the image of Colma as a flower town by encouraging the continuation of flower growing in agricultural areas, by requiring the use of flowering trees, shrubs and ground cover in project landscaping and by installing seasonal flowers in publicly-owned properties. (Appendix B Section 1.1 Aesthetics)
- *Policy 5.04.382:* Tree removal requests should be subject to an investigation of the presence of active raptor nests. (Appendix B Section 1.4 Biological Resources)

The proposed project is potentially inconsistent with Policies 5.04.351 and 5.04.352 because it would have significant and unavoidable impacts to historic buildings associated with the Holy Cross Cemetery Historic District and would result in a change of the "character of the use" of the water works lot at Holy Cross Cemetery. However, the Town's Housing Element specifically identifies this parcel for residential development so the project is not inconsistent with Policy 5.04.352.

3.6.1.4 Housing Element

The purpose of the 2015 Housing Element of the Town of Colma General Plan is to plan for the Town's housing needs and establish the housing-related goals, objectives and programs necessary to allow for and encourage the development and maintenance of housing for all economic segments of the community over the 2015 – 2023 planning period.

The Town's Housing Element identifies the project site as a required residential development site to satisfy the Town's housing production requirements. It allows for multi-family housing units at this location, within the General Plan density allowances. The Housing Element also identifies using the Planned Development rezoning process for permitting residential uses at the site. This rezoning process will allow for the most flexibility in setting development standards for height, setbacks, ingress, egress and landscaping due to the unique and physical constraints of the site.

The site's maximum allowable density is 22 units per acre (which equates to 49 units based on the 2.23 acre site size) and the project proposes 30 units per acre which includes a 35 percent density bonus. Mercy Housing is able to include this density bonus because the development includes all affordable housing units. Consistent with Government Code Section 69515 et seq., as referenced in the Colma Municipal Code, the developer of a proposed housing project of at least five units must provide housing units affordable to income-qualified households to qualify for a density bonus, concessions or other incentives.

The proposed project is consistent with all applicable goals and policies from the Colma General Plan Housing Element. The General Plan Housing Goals and Policies relevant to the proposed project are listed below, and are also addressed in Section 1.13 Population and Housing of the Initial Study in Appendix B of this EIR or in Section 3.5.1 Energy of this Chapter, as indicated in parentheses after each listed policy.

- *Goal A:* Identify adequate sites, with appropriate zoning and development standards and services to accommodate Colma's share of the regional housing needs for each income level. (Appendix B Section 1.13 Population and Housing)
- *Goal B:* Assist in making available adequate housing to meet the needs of extremely low, very low, low and moderate income households. (Appendix B Section 1.13 Population and Housing)
- *Goal C:* Address, and where possible, remove governmental constraints to the maintenance, improvement and development of housing, including housing for all income levels and housing for persons with disabilities. (Appendix B Section 1.13 Population and Housing)
- *Goal F*: Promote equal housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status or disability. (Appendix B Section 1.13 Population and Housing)
- *Goal G*: Encourage sustainable residential development that is energy efficient and consistent with existing and future Town values and policies related to reducing greenhouse gas emissions. (Section 3.5.1 Energy of this Chapter)
- *Policy 3*: Provide incentives that encourage affordable high-density residential uses near major regional transportation facilities. (Appendix B Section 1.13 Population and Housing)
- *Policy 4*: Provide Housing accessible to persons with special needs, including seniors, persons with disabilities, and homeless persons. (Appendix B Section 1.13 Population and Housing)
- *Policy 5*: Assist citizens in locating and retaining affordable housing and promote equal housing opportunity and fair housing. (Appendix B Section 1.13 Population and Housing)
- *Policy 6:* Recommend and promote energy conservation in existing and new housing. (Section 3.5.1 Energy of this Chapter)

3.6.1.5 Noise Element

The goal of the Noise Element in the Town's General Plan (1999) is to protect, maintain, and improve the tranquil environment within the Town. Table 1.12-4 of Section 1.12 of the Initial Study (Appendix B) shows the Town land use compatibility standards for 24-hour ambient noise levels (Ldn). Ambient noise levels observed during noise monitoring at the site were consistent with multi-family residential use shown in the table (see Section 1.12 Noise of Appendix B).

The proposed project is consistent with all applicable policies from the Colma General Plan Noise Element. The General Plan Noise Policies relevant to the proposed project are listed below, and are also addressed in Section 1.12 Noise of the Initial Study in Appendix B of this EIR.

- *Policy 5.06.311:* The Town should review proposed development with regard to potential noise generation impacts, to ensure that the tranquil atmosphere for the Town's memorial parks is maintained.
- *Policy 5.06.312*: Land use decisions should include consideration of the noise compatibility chart and acoustic reports required for all development in locations where

noise levels exceed the "normal acceptable" range for specified land use types. Mitigation measures should be required if recommended in the acoustic report.

- *Policy 5.06.313*: A detailed acoustic report should be required in all cases where hotels, motels, and multiple-family dwellings are proposed in areas exposed to exterior noise levels of 60 Ldn or greater. Mitigation measures should be required if recommended in the report.
- *Policy 5.06.315*: An ordinance should be adopted limiting days and hours of construction to provide quiet time.

3.6.1.6 Safety Element

The Safety Element of the Town's General Plan (1999) is intended to reduce the risks of harm to the public resulting from geologic and other hazards.

The proposed project is consistent with all applicable policies from the Colma General Plan Safety Element. The General Plan Safety Policies relevant to the proposed project are listed below, and are also addressed in the Initial Study in Appendix B of this EIR or the applicable EIR Chapter, as indicated in parentheses after each listed policy.

- *Policy 5.07.411:* The Town should continue to investigate the potential for seismic and geologic hazards as part of the development review process and maintain this information for the public record. (Appendix B Section 1.6 Geology and Soils)
- *Policy 5.07.412:* The Town should require geotechnical, soils and foundation reports for proposed projects which warrant them according to the Safety Element and its geologic and Hazards Maps, the County's Seismic and Safety Element; and the Town's Building Official and Building Codes. (Appendix B Section 1.6 Geology and Soils)
- *Policy 5.07.413:* Colma should prohibit development in geologically hazardous zones, including any land alteration, grading for roads and structural development. (Appendix B Section 1.6 Geology and Soils)
- *Policy 5.07.423:* On-site storm water detention facilities should be constructed for new developments (over ½ acre) which contribute runoff to Colma Creek to store the difference in runoff between the 10-year predevelopment storm (original natural state) and the 100-year post development storm, with storm water released at the 10-year predevelopment rate. Property owners should be required to enter into agreements for maintenance. (Appendix B Section 1.9 Hydrology and Water Quality)
- *Policy 5.07.432:* Colma should ensure that all buildings have visible street numbers and are accessible to fire vehicles and equipment. A minimum 20 foot wide fire land should be provided to all commercial and large scale residential facilities. (Chapter 5 Traffic and Transportation)
- *Policy 5.07.433:* Colma should assist the Fire Protection District in efforts to continue to maintain an average response time of two to four minutes to all locations in Colma. (Appendix B Section 1.14 Public Services)
- *Policy 5.07.434:* The Town should continue to have the Colma Fire Protection District review development plans for conformity with the Uniform Fire Code and Title 24 of the California Building Code. (Appendix B Section 1.14 Public Services and Section 3.51 of this Chapter)

- *Policy 5.07.443:* Measures aimed at significantly decreasing solid waste generation should be promoted. Recycled materials storage and collection areas should be required throughout the Town and in all new developments. (Appendix B Section 1.17 Utilities and Service Systems)
- *Policy 5.07.452:* Colma should continue to analyze significant seismic, geologic and community wide hazards as part of the environmental review process, and require that mitigation measures be made conditions of project approval. (Appendix B Section 1.6 Geology and Soils)
- *Policy 5.07.453:* Emergency evacuation routes should be determined by the Police Chief and City Engineer. Evacuation routes should follow the major roadways as set forth in the Circulation Element. (Appendix B Section 1.8 Hazards and Hazardous Materials)

3.6.1.7 Historical Resources Element

The Historical Resources Element of the Town's General Plan (1999) is designed to link the Town's past with the present by establishing goals and policies to preserve, protect, and enhance the Town's historic resources.

The proposed project is consistent with most applicable policies from the Colma General Plan Historical Resources Element. The General Plan Historical Resources Policies relevant to the proposed project are listed below, and are also addressed in Chapter 4 Cultural Resources.

- *Policy 5.08.211*: Encourage the rehabilitation and continued use or reuse of designated historic buildings or sites
- *Policy 5.08.212*: Protect important historic resources through designation.
- *Policy 5.08.221*: A Historic Preservation Ordinance and Historic District Resource (HR) combining zone should be used to identify historic resources. Protection of the historic resources should be provided by use of design review procedure.
- *Policy 5.08.222*: The Colma Historical Association should be consulted whenever a proposed development project involves a designated historic resource in Colma.
- *Policy 5.08.223*: Colma should use the nationally established Rehabilitation Standards and Guidelines for the Restoration and Rehabilitation of Historic Structures.
- *Policy 5.08.224*: Colma should use the California State Historical Building Code (SHBC) for designated buildings to encourage historic rehabilitation.
- *Policy 5.08.226*: The Town should utilize its Design Review procedure for review of development in historic districts and adjacent to designated historic landmarks.
- *Policy 5.08.231*: The Town should provide information to the public concerning the location of historic resources and their value to the community, State and Nation.
- *Policy 5.05.233*: Colma should maintain communication with the State Office of Historic Preservation, California Register of Historical Resources, and San Mateo County Planning Department to disseminate information about historical resources in Colma.

The proposed project is inconsistent with Policy 5.08.211 because it would include the demolition of four historic buildings, rather than rehabilitation and reuse of the buildings.

3.6.2 Colma Municipal Code

The proposed project would comply with all applicable parts of the Town of Colma Municipal Code. Applicable subchapters of the Town's Municipal Code are summarized below.

3.6.2.1 Subchapter 2.05 Noise Limitations

Noise emissions within the Town of Colma area regulated by Section 2.05 of the Town Municipal Code. The Town of Colma Municipal Code Chapter 2.05.010 limits noise in residential areas to protect and promote public health, safety, and welfare. The Code does not list quantitative noise thresholds for interior or exterior noise standards. Rather, the Noise Limitations focus on subjective traits for community noise, such as annoyance, disturbance, and offensiveness. In particular, Section 2.05.020 (Colma 2013) states:

(a) It shall be unlawful for any person to willfully make or continue, or cause to be made or continued, any loud and unnecessary noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. The standards which may be considered in determining whether a violation of the provisions of this section exists may include, but not be limited to, the following:
    (1) The levels of the noise;
    (2) Whether the nature of the noise is usual or unusual;
    (3) Whether the origin of the noise is natural or unnatural;
    (4) The level and intensity of the background noise, if any;
    (5) The proximity of the noise to residential sleeping facilities;
    (6) The nature and zoning of the area within which the noise emanates;
    (7) The time of the day and night the noise occurs;
    (8) The duration of the noise; and
    (9) Whether the noise is recurrent, intermittent, or constant.

As stated in Section 5.04.220 of the Town Code, construction activities within a 500-foot radius of any residential zone, including Planned Developments that include residential uses, may only conduct construction or repair work that generates noise in excess of 85 decibels, as measured by the property line, on Monday through Friday between 7 AM and 7 PM, and Saturday, Sundays and Colma-observed holidays between 9 AM and 5 PM. The Building Official may grant an exception for special conditions when requested in writing and approved by the Building Official. The above requirements do not apply to emergency repair work, work for public utility and street repair, street sweeping, garbage collection, and emergency response warning systems (Colma 2015).

3.6.2.2 Subchapter 3.04 Regulation of Sewers and Restrictions on Discharge of Water and Waste

Subchapter 3.04 of the Town's Municipal Code prohibits the unsanitary disposal of human or animal excrement, garbage or other objectionable waste on public or private property (Section 3.04.020) and prohibits the discharge of sewage, industrial waste or polluted waters to any stream or watercourse without treatment (Section 3.04.030). The ordinance also regulates connections with sewer mains (Section 3.04.080) and sets forth the fees for connecting to the public sewer system (Sections 3.04.130 through 3.04.190), among other things.

3.6.2.3 Subchapter 3.05 Collection and Disposal of Solid Waste

The purpose of this ordinance is to comply with the recycling and reporting requirements of the California Integrated Waste Management Act of 1989 (hereafter, the "Waste Management Act"). as amended from time to time, including amendments made by AB 939, SB 1016 and AB 341 Specifically, but without limitation, this ordinance was adopted to:

(1) Increase recycling participation rates;
(2) Improve Recyclable material recovery rates;
(3) Improve reporting capabilities to CalRecycle;
(4) Comply with state recycling laws;
(5) Reduce waste to landfill; and
(6) Maintain a cost effective, garbage and recycling collection program for the residents, businesses and institutions of the Town.

The ordinance prohibits illegal dumping (Section 3.05.050), requires proper storage and disposal of solid waste (Section 3.05.060), requires subscription to a solid waste collection service (Section 3.05.070), requires developments to be designed for proper solid waste storage (Section 3.05.080), governs the maintenance and use of solid waste containers (Section 3.05.090), governs the disposal of special waste (Section 3.05.110), regulates recycling (Sections 3.05.130 through 3.05.170), and solid waste collectors (Division Three).

3.6.2.4 Subchapter 3.08: Water Quality Control – South San Francisco System

The purpose and intent of Subchapter 3.08 is to comply with the standard laws and regulations of South San Francisco, as the Town of Colma has contractual arrangement because they have sewer facilities connected to or affecting South San Francisco sewer facilities. This subchapter sets forth uniform requirements established by South San Francisco for direct and indirect contributors into the wastewater collection and treatment system for the City of South San Francisco and enables South San Francisco to comply with all applicable State of California laws (Water Code Section 1300 et seq.) and Federal laws required by the Clean Water Act of 1977 (33 U.S.C. Section 1251 et seq.) and the General Pretreatment Regulations (40 CFR, Part 403).

3.6.2.5 Subchapter 3.10: Town of Colma Stormwater Management and Discharge Control Code

The purpose and intent of Subchapter 3.10 is to ensure the future health, safety, and general welfare of Town citizens by eliminating non-stormwater discharges to the municipal separate storm sewer; controlling the discharge to municipal separate storm sewers from spills, dumping or disposal of materials other than stormwater; and reducing pollutants in stormwater discharges to the maximum extent practicable. The intent of Subchapter 3.10 is also to protect and enhance the water quality of the watercourses, water bodies, and wetlands in a manner pursuant to and consistent with the CWA.

The discharge of non-storm water discharges to the Town of Colma storm sewer system is prohibited (Municipal Code Section 3.10.080), although discharges regulated under an NPDES permit and certain other discharges are exempted from this prohibition. Municipal Code Section 3.10.110 states that "Any person engaged in activities which will or may result in pollutants entering the town storm sewer system shall undertake all practicable measures to reduce such pollutants." Pollution prevention measures include litter prevention, frequent cleaning of parking lots, and best management practices for new developments and redevelopments.

3.6.2.6 Subchapter 5.03 Zoning

The existing Commercial zoning at the site establishes five (5) foot setbacks for the front, side and rear property lines and a height limitation of 40 feet. The project proposes a front setback of more than nine feet, side setback of over 87 feet and rear setback of over 18 feet and therefore meet all the requirements of the commercial zoning district. The floor to area ratio is limited to 1.0 and the project proposes an FAR of 0.64. The maximum lot coverage is 50 percent and the project proposes a lot coverage of 25 percent. The project meets all commercial zoning floor and lot area requirements. The pump house is an existing feature at the site and is not proposed for relocation as part of the project. Therefore, it will remain an existing feature at the site (it should be noted that the pump building does not currently meet the 5 foot front setback requirement, but will become conforming as part of the rezoning process which allows for reduced setbacks).

Section 5.03.300 Restrictions and Procedures Applicable to the "DR" Design Review Zone of contains guidelines for building design, materials and architectural style and landscaping to ensure compatibility with surrounding buildings and land uses and the Town's visual character. The project site is on Mission Road, which is within the Design Review Zone. Projects within the Design Review Zone require City Council approval of project design whenever the project also requires approval of a Use Permit, Subdivision Map, Planned Unit Development, or other action by the City Council, as the proposed project does. The Town has found that the project's architectural plans meets all applicable DR Design review requirements (M. Laughlin, pers. comm. 2016).

In addition, the Zoning Ordinance, Chapter 5.03.345, includes a "no net loss" requirement which requires that designated housing sites, including the proposed project site, be developed for housing, and if not, that housing be developed elsewhere in the Town.

3.6.2.7 Subchapter 5.04 Buildings and Construction

Subchapter 5.04, Division II, of the Town's municipal code adopts the California and Uniform building codes by reference with some amendments applicable within the Town, including the California Building Code (Sections 5.04.050 and 5.040.060); the California Residential Code (Sections 5.04.070 and 5.040.080); the California Electrical Code (Section 5.04.090); the California Mechanical Code (Section 5.04.100); the California Plumbing Code (Section 5.04.110); the California Energy Conservation Code (Section 5.04.120); the California Historic Buildings Code (Section 5.04.130); the California Fire Code (Section 5.04.140); , the California Existing Buildings Code (Section 5.04.150); the California Green Building Standards Code (Section 5.04.160); the California Referenced Standards Code (Section 5.04.170); the Uniform Housing Code (Section 5.04.180); and the Uniform Code for the Abatement of Dangerous Buildings (Section 5.04.190).

Division III of the subchapter prohibits construction in residential zones between the hours of 7:00 pm and 7:00 am Monday through Friday and between 5:00 pm and 9:00 am on Saturdays, Sundays and holidays (Section 5.04.220).

Division V of the subchapter requires 50 percent demolition debris that includes concrete and asphalt waste, 15 percent of demolition debris that does not include concrete and asphalt waste, and 50 percent of construction and remodeling debris to be diverted from landfills through recycling reuse and diversion programs (Section 5.04.290). Division V also requires that structures to be demolished be made available for salvage and recovery prior to their demolition (Section 5.04.280).

3.6.2.8 Subchapter 5.06 Tree Cutting and Removal

Subchapter 5.06 of the Town's Municipal Code prohibits any person from removing or altering any tree on private property in the Town without a permit. "Alteration" means any action which would significantly damage a tree, whether (1) by cutting of its trunk or branches, or (2) by filling or surfacing or changing the drainage of the soil around the tree, or (3) by other damaging acts; this definition excludes routine pruning and shaping, removal of dead wood, or other maintenance of a tree to improve its health, facilitate its growth, or maintain its configuration to protect an existing view (Section 5.06.020). "Tree" is defined as any live woody plant having a single perennial stem of 12 inches or more in diameter or multi-stemmed perennial plant having an aggregate diameter of 40 inches or more measured 4 feet above the natural grade; or any woody plant that has been placed by the City, or required by permit of the City, that has not yet obtained the stated size (Section 5.06.020). A tree removal application is required to remove or alter such trees, and permit approval may include conditions such as protection of retained trees during construction and tree replacement.

3.6.2.9 Subchapter 5.07: Grading and Erosion and Sediment Control

Subchapter 5.07 of the Town's Municipal Code prohibits grading, fill, excavation, clearing and grubbing without first obtaining a permit (Section 5.07.070). According to Section 5.07.100, the permit application requires a site map and grading plan, Erosion and Sediment Control Plan, work schedule and drainage calculations and stormwater detention calculations, among other requirements, and sometimes requires a Soils Engineering Report and/or a Geology Engineering Report (when required by the City Engineer). The Erosion and Sediment Control Plan must be consistent with the Guidelines set forth in the State Regional Water Quality Control Board (SRWQCB) Field Manual, with specific attention to both off-site and on-site impacts.

3.6.2.10 Subchapter 5.11: Water Efficient Landscape Regulations

Subchapter 5.11: Water Efficient Landscape Regulations of the Colma Municipal Code requires new development proposals to submit a Landscape Documentation Package to the City Engineer for review and approval prior to issuance of any permits. The Landscape Documentation Package must include project information, a Water Efficient Landscape Worksheet, a soil management report, a landscape design plan, an irrigation design plan and a grading design plan. The Subchapter also includes provisions for post installation irrigation and maintenance and a section which prohibits runoff caused by inefficient irrigation from occurring on any parcel within the Town of Colma (Section 5.11.220).

3.6.2.11 Subchapter 5.12 Inclusionary Housing

The purposes of this Subchapter are to:

(1) Encourage the development and availability of housing affordable to a broad range of Households with varying income levels within the City as mandated by State Law, California Government Code Sections 65580;

(2) Promote the City's goal to add affordable housing units to the City's housing Stock;

(3) Provide housing to all income categories through the encouragement of higher densities near major regional transportation facilities;

(4) Offset the demand on housing that is created by new development and mitigate environmental and other impacts that accompany new residential and Commercial Development by protecting the economic diversity of the City's housing stock, reducing traffic, transit and

related air quality impacts, promoting jobs/housing balance and reducing the demands placed on transportation infrastructure in the region;

(5) Provide housing accessible to persons with special needs and the elderly; and

(6) Assist citizens in locating and retaining affordable housing and promote equal housing opportunity and Fair Housing.

The ordinance requires all residential developments of five or more units to provide at least twenty percent of Inclusionary Units restricted for occupancy by moderate-, low- or very low-income households (Section 5.12.040). Section 5.12.100 allows for a density bonus for residential developments that include: (1) Ten percent of the total units are affordable to low income households; (2) Five percent of the total units are affordable to very-low income households; (3) Ten percent of the total units in a for-sale project are affordable to moderate income households; (4) Senior citizen housing, as defined in Sections 51.3 and 51.12 of the Civil Code; or (5) A child-care facility, subject to the criteria identified in Government Code Section 69515. Section 5.12.140 sets standards for Inclusionary rental units in terms of income eligibility, etc.

3.6.2.12 Subchapter 5.13 Parkland Dedication

Subchapter 5.13 of the Town's Municipal Code requires dedication of land for park, trail or recreational purposes, payment of a fee instead, or a combination of both, as a condition of approval of a tentative map or parcel map of land zoned or planned for residential use by one or more dwelling units (Section 5.13.020). The ordinance contains guidelines for the amount of land to be dedicated, the amount of fees to be paid, and the amount of each in combination.

3.6.2.13 Subchapter 5.14 Development Processing Fees

The purpose of this subchapter is to ensure that the City is reimbursed for its costs of providing services to applicants for development projects and to the extent advisable, provide uniformity with respect to such provisions (Section 5.14.010). The provisions of this subchapter apply to all applications for entitlements or permits for development projects, and to the preparation or review of CEQA documents in connection with development projects, with certain exceptions (Section 5.14.020). The remainder of the ordinance establishes the costs to the applicants and use of required fees.

3.6.2.14 Subchapter 5.17 Procedures and Requirements for Consideration of Development Agreements

This subchapter includes the application requirements for a Development Agreement (Section 5.17.010), the application review process (Section 5.17.020), and the Development Agreement contents (Section 5.17.040), term (Section 5.17.050), public hearing (Section 5.17.060), and findings for approval (Section 5.17.070), among other things.

3.7 REFERENCES

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CHAPTER 4 CULTURAL/TRIBAL CULTURAL RESOURCES

This chapter describes the cultural and tribal cultural resources that occur or have the potential to occur at the proposed project site and summarizes the applicable regulations and policies that govern these resources. This chapter also evaluates the project's potential adverse effects on these resources and identifies mitigation measures to avoid or reduce potential impacts. The evaluation of the project's potential effects is primarily based on an Archaeological Resources Reconnaissance Report prepared for the project by Holman and Associates (December 2015, attached as Appendix D) and a Finding of Effect document prepared by Ward Hill and Denise Bradley (February 2016, also attached in Appendix D).

4.1 ENVIRONMENTAL SETTING

The project site is located on the floodplain of Colma Creek which runs southeastward about 55 meters (180 feet) west of the northwest corner of the project site. The creek has been channelized or undergrounded in most stretches, but in the nearest vicinity of the project site, the creek maintains or is very near to its historic alignment. The site gently slopes down from east to west, but the majority of the site has been artificially leveled. The area is underlain by recent alluvial fan and fluvial sandy deposits from Colma Creek, interbedded layers of sand, clayey sand, and silty sand that are highly erosive. Open surface soil at the south end of the site is a very fine-grained light grey brown sandy silt, gravelly and rocky due to the inclusion of imported materials.

It was noted that a majority of the site is currently fenced. Much of the ground surface visibility is mostly poor to invisible across all but the small southerly open (unfenced) triangle of the project site.

4.1.1 Historical Background

The project site was part of the 1820s Mexican "Rancho Buri Buri" land grant. There is no record of specific rancho activities within the project site but the vicinity is known to have been used as pasture land, except for the old wagon trail that became El Camino Real. The Colma Creek corridor has been the primary travel corridor through the region prehistorically, during the Hispanic area, during early American development of the Peninsula and now. The original route of El Camino Real, now Mission Road adjacent to the project site, probably meandered through Colma more than it does now. The first railroad down the Peninsula also ran through the same corridor as meandering Colma Creek. By 1810, private ranches along El Camino had introduced the cattle and sheep that denuded the hillsides, contributing to erosion in Colma creek. By the 1850s the region had been settled by farmers growing potato and cole (cabbage and mustard family) crops. Farming continued until the 1870s when potato blight decimated crops and many smaller lots were consolidated into cemeteries. Industry then shifted to monument making and stone carvings which remain prevalent in the Town today.

Development along the Peninsula in the mid-nineteenth century concentrated at the junction of main roads and along the San Francisco – San Jose Railroad corridor which was built in the 1860s. The Holy Cross Catholic Cemetery was the first cemetery to be established in the town in 1886 and the first internment there occurred in 1887. The City of San Francisco prohibited internments and required the relocation of burials to locations outside the City limits in 1902, which is how the Town came to be developed with cemeteries and supporting businesses.

4.1.2 Prehistoric/Ethnographic Background

The Ohlones Native Americans inhabited the project area prior to invasion by the Spanish in 1769. The Ohlones were hunters and gatherers, living in "tribelets" – small independent groups of usually related families occupying a specific territory and speaking the same language or dialect. The presence of numerous prehistoric archaeological sites along upper and lower San Mateo Creek indicates this region was used over a period of thousands of years by prehistoric Native Americans. Both the population density and continuous occupation of these places for literally thousands of years indicate a stable and productive living environment, allowing the development of semi-permanent villages of "collectors" and where others were less abundant, a more "forager" way of life. Littoral (shoreline) and riparian environments tended to be more productive and therefore more sought out, intensively used and occupied, most jealously defined and guarded.

Research indicates the Urebure tribelet were very likely the owners of the Project Area vicinity at the time of Spanish arrival. A unique settlement pattern was in place at the time in which the same group would own a strip across the peninsula from the ocean to the Bay, based on drainages. These water courses formed natural routes across the spine of the peninsula and the divides between drainages formed natural boundaries for cultural areas. Colma Creek has archaeological sites along its banks far downstream from the project site. This is likely due to the upper creek having been highly disturbed in more recent historic times, including the diversion of Colma Creek to purposefully erode the sandy upstream deposits to fill the marsh and above and into what is now South San Francisco, which essentially swept away the near surface soils through the project area vicinity.

The project area vicinity was permanently if sparsely occupied with both small permanent and seasonal occupied villages. One main and perhaps several smaller villages were located in the territory of the Urebure when the Spanish arrived, including locations along Colma Creek. One location is at the foot of San Bruno Mountain, just north of the creek and two habitation middens are recorded on the creek downstream of the project site and another on the ocean at the western end of the route up Colma Creek. The Colma Creek corridor is therefore sensitive for prehistoric deposits.

4.1.3 Record Search Results

The California Historical Resources Information System (CHRIS) lists potentially significant historical resources and makes determinations as to their eligibility for the National Register. The CHRIS includes the statewide Historical Resources Inventory (HRI) database maintained by the State Office of Historic Preservation (OHP) and the records maintained and managed by twelve independent regional Information Centers. The Northwest Information Center (NWIC) at Sonoma State University maintains records for the region that includes the Town of Colma.

A literature review and records search of the CHRIS for potential cultural resources at the proposed project site was performed for the project by Holman and Associates in October 2015 (see Appendix D). This records search indicated:

- The project site was included in two surveys for the BART extension through Colma and South San Francisco which focused on historic architectural resources and do not address archaeological resources.

- Twelve other survey and/or subsurface reconnaissance reports were found within 400 m of the project site and none recorded prehistoric archaeological resources within this area (400m of the project site).
- Previous studies looking for indications of archaeological resources did not locate or record archaeological resources in the upper Colma Creek and included studies utilizing subsurface reconnaissance.
- The nearest recorded prehistoric site is over 2,000 m downstream from the project area along the west bank of Colma Creek. It was initially recorded as destroyed and later subsurface reconnaissance failed to find archaeological indications at the recorded location.

4.1.4 Pedestrian Field Survey

A general pedestrian field survey for archaeological resources was conducted on the project site. Field conditions were noted as poor to nonexistent over the majority the Holy Cross Cemetery area and the nearly entirely paved BART area. Wherever open surface could be found, an intensive survey was conducted, however this amounted to only a small portion of the project site. The majority of the site was unsurveyable due to pavement and or gravel covering the north and south parking areas, historic structures, thick vegetation and duff from the densely spaced trees, and the miscellany of dumped, discarded, trash, auto, and auto body parts, and trailers, etc. It was apparent the entire surface of the project site has been highly altered during historic land use.

4.1.5 Native American Consultation

Native American Consultation per Section 106 regulations (see below in Regulatory Setting) require consultation with Native American tribes that might be concerned about the potential effects to historic properties. Native American tribes and representatives recognized by California's Native American Heritage Commission (NAHC) were solicited for information and comments on the Mercy Housing Project.

The NAHC responded that a search of the sacred land file failed to indicate the presence of Native American cultural resources in the project area. A list of eight Native American representative individuals and groups affiliated with the Ohlone/Costanoan Native Americans for San Mateo County was provided. All eight representatives were solicited for input on the proposed project.

One response was received via email on 24 May 2016 by Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe who requested notification prior to any ground disturbing activities taking place on the project site.

4.1.6 Holy Cross Cemetery Historic District.

A previous report for the BART extension concluded that the Holy Cross Cemetery Historic District appeared to qualify for listing on the National Register of Historic Places under Criteria A, B, and C, at a state level of significance. The period of significance was 1886-1945. At the time, the California State Historic Preservation Officer concurred with the BART report findings that the Holy Cross Cemetery is a National Register-eligible Historic District.

Given that 22 years had passed since the field survey for the BART report was conducted, a field review of current existing conditions within the Holy Cross Historic District was undertaken to determine if the district still retained its historic integrity.

Holy Cross Cemetery at 1500 Mission Road in Colma, California occupies approximately 215 acres of land between Mission Road to the west, Lawndale Boulevard to the south, Hillside Boulevard to the east, and the East Gardens of the Cypress Lawn Memorial Park (Cypress Lawn East) to the north. (Finding of Effects, 2016). See Figure 4-1 Plan of Holy Cross Cemetery Historic District, for a plan of the cemetery.

It is a large and verdant development that features a remarkable collection of elite as well as typical cemetery art. Although several buildings (particularly community mausoleum) have been created at the site in the post-war period, the cemetery remains an excellent example of cemetery design from the late 1880s through 1945. The cemetery is primarily laid out as a grid with a central axis running from the Gates on Mission Road to the large [Holy Cross] Mausoleum at the other of the cemetery. (BART Report, 1994) The layout of the cemetery is largely based on an orderly rectilinear system, the vegetation having been planted and arranged to conform to this pattern. Where there is deviation from this, in sections H, K, U, and V (see Figure 4-1) the outer grave markers are aligned to the diagonal path.

There are numerous historic monuments (mausoleums, headstones, etc.) within the cemetery; the exact number is uncertain but is well into the hundreds of thousands. There are a number of larger, predominantly family, mausoleums; examples of which are described and listed in the 1993 Historic Resources Inventory (HRI). These include a wide range of grave marker types and symbolic imagery and art from the late 19th and pre WWII 20th centuries. These have not been individually listed due to the scale of the project. Instead, 15 'major' features that contribute to the historic character of the cemetery have been identified. 13 were identified in the BART Report, and a further 2 in the Finding of Effect (FOE). See Appendix B of the FOE Report (contained within this EIR as Appendix D) for a detailed list. The five buildings within the project site detailed in Section 4.1.7.1 are considered one feature as identified by the FOE Report.

The cemetery also contains more modern structures which do not add to the historic character. 9 were identified by the BART Report, and an additional 3 have been added since the completion of the BART Report. These non-historic buildings have varying degrees of visibility and impact to the character of the cemetery (see the NOE Report, Appendix D).

Additionally, the cemetery contains numerous new grave markers which are routinely added both within the historic and non-historic sections of the cemetery. These are typical of modern trends and aesthetics, but are laid out using a linear arrangement that is consistent with the majority of the historic grave markers.

The character of Holy Cross Cemetery Historic District has not been substantially altered since the BART Report in 1994 and would appear to retain its integrity. It meets the National Register Criteria A, B and C, and continues to meet Criteria Consideration D (see Appendix B of the NOE Report, Appendix D of this EIR for a detailed discussion of how the cemetery meets the criteria). It therefore continues to be significant and eligible for listing under the National Register.

4.1.7 Historic Architecture

The existing built structures at the project site are part of a historic irrigation system associated with the Holy Cross Cemetery. These features and the entire subject property are located within the Holy Cross Cemetery Historic District.

4.1.7.1 Buildings and Structures Description

The five Holy Cross Cemetery buildings on the project site were constructed in circa 1914-1915 as part of the cemetery's extensive water and irrigation system. The buildings are arranged on the middle of the triangular shaped project parcel with the main building, the large pump house, located on the south side of the building complex. North of the pump house are a well house, a concrete, above ground, water reservoir and a carpenter's shop/well house. An additional well house is adjacent to and south of the pump house.

Photographs of the buildings are included in Figure 2-4 of the Project Description. The numbered photographs in the section below are contained in Appendix A of the FOE Report included in this EIR as Appendix D.

The Pump House

The reinforced concrete pump house has a T-shaped plan with 45 degree angle bays on the east and west (Photos 25-28). The walls connect to the "head" of the T also at 45 degree angles (the width is 25 feet on the south, the building width increases to 45 feet on the north); the overall length of the building is 110 feet). The twelve inch thick concrete walls are covered with smooth stucco and the building has a flat roof. The middle of the single-story pump house has a two-story octagonal rotunda in the center, likely providing ventilation for the original high pressure water pumps located here. A series of simple pilasters (architectural elements used to give the appearance of supporting columns but only have an ornamental function) divide the north and south facades into window bays. The building has a variety of multi-pane wood-sash windows. The main north façade has three 15 light windows east of the garage opening and three (larger) 25 light windows to the west. The same arrangements of windows flank the entrance on the south. The east and west facades have primarily narrow, vertical windows with ten lights. The garage opening on the west has a modern metal roll-up door below a plain pediment. Much of the eastern half of the south façade is not visible because of dense foliage.

Inside the largely open space has exposed roof beams and structural columns (Photo 29). The thick columns supporting the octagonal rotunda are sixteen inches square. A small office has several storage rooms, a large electrical panel and a restroom. A door in the southeastern area of the interior opens out to the south side of the building. There are openings in the floor still where the original wells were located.

The Water Reservoir

The reinforced concrete, above ground, water reservoir has a rectangular shape (about 50 feet by 28 feet) with rounded corners (Photos 30-32). The walls are covered with smooth stucco. The top rim of the reservoir has a projecting fascia. A chain link fence is now around the perimeter of the top of the reservoir. According to the 1923 "water works lot" site plan of this area, the reservoir has an 110,000 gallon capacity. The original February 1914 water reservoir plans and elevations (on file at Holy Cross Cemetery) indicate the reservoir is 15 feet deep and that it has internal walls for stability (not visible because the structure is still filled with dark water). The interior also had baffles for sifting sand from the water. Water stored in the reservoir was piped to the pump house where it was pumped to the cemetery area to the southeast.

Well Houses

The two well houses north and south of the pump house are both concrete structure with the same dimensions (12 by 16 feet). The well house on the north has double wooden hinged door on the east façade (Photos 33-34). A concrete beam runs the width of the open interior space. The well house adjacent to pump house on the southeast has a shed-roof plywood addition on the east, which is probably used for storage (Photos 37-38). The exterior walls are eight inches thick and the roof is flat. The building has double wooden hinged doors on the west. The pilasters flanking the door are similar to the pilasters on the pump house.

Carpenter's Shop (Well House)

The carpentry shop northeast of the water reservoir is an L-shaped wood-frame building (the overall dimensions are 30 by 60 feet; the building narrows to 20 feet on the east) (Photos 35-36). Much of the building's exterior is not visible because of dense foliage. The exterior walls are covered with stucco. The gable roof is covered with corrugated metal. The building has a garage sliding wooden tongue and groove doors on the east and two single hinged doors on the south flanking a central window. Other windows are boarded over. According to the 1923 "water works lot" site plan, this building included a well inside on the west.

4.2 REGULATORY SETTING

4.2.1 The California Environmental Quality Act (CEQA)

CEQA establishes statutory requirements for the formal review and analysis of projects. CEQA recognizes archaeological resources as part of the environment. A project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment (PRC §21084.1).

A record search to determine whether any previously identified resources exist within the project boundary is the first step in determining whether archaeological resources may be present. A record search is conducted at the applicable CHRIS.

4.2.1.1 Historical Resources

Pursuant to CEQA Guidelines Section 15064.5 (a) the term "historical resources" includes the following:

- A resource listed, or determined to be eligible by the State Historical Resources Commission for listing, in the CRHR (PRC §5024.1, 14 CCR, §4850 et seq.).
- A resource included in a local register of historical resources, as defined in Public Resources Code Section 5020.1 (k) or identified as significant in a historical resource survey meeting the requirements of Public Resources Code Section 5024.1 (g), shall be presumed historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.
- Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be a historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically

significant" if the resource meets the criteria for listing on the CRHR (PRC §5024.1, Title 14 CCR, §4852) including the following:

a. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

b. Is associated with the lives of persons important in our past;

c. Embodies the distinctive characteristics of type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

d. Has yielded, or may be likely to yield, information important in prehistory or history.

- The fact that a resource is not listed in, or determined to be eligible for listing in the CRHR, not included in a local register of historical resources (pursuant to PRC §5020.1(k)), or identified in a historical resources survey (meeting the criteria in PRC §5024.1(g)) does not preclude a lead agency from determining that the resource may be a historical resource as defined by Public Resources Code Section 5020.1(j) or 5024.1.

4.2.1.2 Unique Archaeological Resources

Pursuant to CEQA Guidelines Section 21083.2(g), a unique archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information

2) Has a special and particular quality such as being the oldest of its type or the best available example of its type

3) Is directly associated with a scientifically recognized important prehistoric or historic event or person

The resource must also be at least 100 years old, possess "substantial stratigraphic integrity" (i.e., is substantially undisturbed); and the resource involves "important research questions that historical research has shown can be answered only with archaeological methods."

To the extent that unique archaeological resources are not preserved in place or not left in an undisturbed state, mitigation measures shall be required (PRC §21083.2(c)). If it is proven that an archaeological resource is neither a unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment, and no further CEQA review is required (14 CCR §15064.5(d)).

4.2.1.3 Assembly Bill 52 / Cultural Tribal Resources

Assembly Bill (AB) 52, approved in September 2014, creates a formal role for California Native American tribes by creating a formal consultation process and establishing that a substantial adverse change to a tribal cultural resource has a significant effect on the environment. Tribal cultural resources are defined as:

1) Sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

A) Included or determined to be eligible for inclusion in the CRHR

B) Included in a local register of historical resources as defined in PRC Section 5020.1(k)

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in PRC Section 5024.1 (c). In applying the criteria set forth in PRC Section 5024.1 (c) the lead agency shall consider the significance of the resource to a California Native American tribe.

A cultural landscape that meets the criteria above is also a tribal cultural resource to the extent that the landscape is geographically defined in terms of the size and scope of the landscape. In addition, a historical resource described in PRC Section 21084.1, a unique archaeological resource as defined in PRC Section 21083.2(g), or a "non-unique archaeological resource" as defined in PRC Section 21083.2(h) may also be a tribal cultural resource if it conforms with above criteria.

AB 52 requires a lead agency, prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project, to begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project if: (1) the California Native American tribe requested to the lead agency, in writing, to be informed by the lead agency through formal notification of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe, and (2) the California Native American tribe responds, in writing, within 30 days of receipt of the formal notification, and requests the consultation. AB 52 states: "To expedite the requirements of this section, the Native American Heritage Commission shall assist the lead agency in identifying the California Native American tribes that are traditionally and culturally affiliated with the project area."

The requirements of AB 52 apply only to a project that has a notice of preparation or a notice of negative declaration or mitigated negative declaration filed on or after July 1, 2015.

4.2.2 National Historic Preservation Act

Section 106 of the National Historic Preservation Act of 1966 (NHPA) requires Federal agencies to take into account the effects of their undertakings on historic properties, and afford the Advisory Council on Historic Preservation a reasonable opportunity to comment. The historic preservation review process mandated by Section 106 is outlined in regulations issued by ACHP. Revised regulations, "Protection of Historic Properties" (36 CFR Part 800), became effective August 5, 2004. For more information about the Section 106 process and findings, please see Chapter 9 NEPA Environmental Assessment.

4.2.2.1 National Register of Historic Places Criteria

The criteria for determining whether a property is eligible for listing in the National Register of Historic Places (NRHP) are found in Title 36 of the Code of Federal Regulations, Section 60.4 and are reproduced below:

> The quality of significance in American history, architecture, archaeology, engineering, and culture is present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and

a. That are associated with events that have made a significant contribution to the broad patterns of our history; or

b. That are associated with the lives of persons significant in our past; or

c. That embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinctions; or

d. That have yielded, or may be likely to yield, information important in prehistory or history.

For a property to qualify for the NRHP, it must meet at least one of the above National Register Criteria for Evaluation by being associated with an important context and retaining historic integrity of those features necessary to convey its significance.

4.2.3 California Register of Historical Resources

The OHP administers CRHR, which was established in 1992 though amendments to the Public Resources Code, as an authoritative guide to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected from substantial adverse change. The CRHR includes resources that have been formally determined eligible for, or listed in, the NRHP, State Historical Landmark Number 770 or higher, Points of Historical Interest recommended for listing by the State Historical Resources Commission, resources nominated for listing and determined eligible in accordance with criteria and procedures adopted by the State Historical Resources Commission, and resources and districts designated as city or county landmarks when the designation criteria are consistent with CRHR criteria.

A resource also has to be at least 50 years old and must possess several of the seven aspects of integrity to be eligible for listing in the NRHP and/or the CRHR. Integrity is defined as "…the authenticity of an historical resource's physical identity evidenced by the survival of characteristics that existed during the resource's period of significance" (OHP 2006). The seven levels of integrity are location, design, setting, materials, workmanship, feeling, and association. Resources that are listed in the NRHP are automatically eligible for the CRHR (PRC §5024.1(c)).

Both NRHP and CRHR evaluations must be made within an appropriate historic context. A historic context includes three components: a time period, place, and event. A historic context is developed through one or more research themes to help identify the resources' significance at the local, state, or national level. A resources' integrity is based on its ability to convey its significance through data requirements. Data requirements can best be described as evidence found within the archaeological record that conveys the resources' historical significance. If the appropriate data requirements are lacking, the resource arguably lacks significance and is therefore not an eligible resource.

4.2.4 Public Resources Code Section 5097.5

Public Resources Code Section 5097.5 states, "it is illegal for any person to knowingly and willfully excavate or remove, destroy, injure, or deface cultural resources." Furthermore, the crime is a misdemeanor punishable by a fine not to exceed $10,000 and/or county jail time for up to one year. In addition to a fine and/or jail time, the court can order restitution, and restitution will be granted of the commercial and archaeological value of the property.

4.2.5 California Health and Safety Code

Health and Safety Code Section 7050.5 regulates procedures in the event of human remains discovery. Pursuant to Public Resources Code Section 5097.98, in the event of human remains discovery, no further disturbance is allowed until the County Coroner has made the necessary findings regarding the origin and disposition of the remains. If the remains are determined to be Native American, the County Coroner is required to contact the Native American Heritage Commission (NAHC). The NAHC is responsible for contacting the most likely Native American descendent, who would consult with the local agency regarding how to proceed with the remains.

4.2.6 Town of Colma General Plan

Relevant cultural resources policies included in the Town's General Plan include the following.

Open Space and Conservation Element

Policy 5.04.351: The City should encourage the preservation, care and maintenance of memorial parks and cemeteries.

Policy 5.04.352: Uncommitted cemetery lands should be encouraged to be used for agricultural purposes. Industrial uses should be prohibited. Conversion of uncommitted cemetery lands to commercial or residential uses should be discouraged unless there is a demonstrated public need for such change.

Historical Resources Element

Chapter 5 of the Town's General Plan contains the Historical Resources Element. The element notes the uniqueness and importance of the Town's cemeteries which comprise nearly three-quarters of the land area within the Town limits. Buildings, monuments, and residences associated with the cemetery are noted as the most prominent historical resources within the Town.

The Town's Historical Resources Element establishes Mission Road in the vicinity of the project site as a "historic route." The historic route was established to provide the public an easy route that travels past some of Colma's key historical sites in an effort to educate the public about the Town's historic buildings, monuments, and sites.

The two closest cemeteries to the project site, the Holy Cross Cemetery and the Cypress Lawn Cemetery, are both listed as Historic Districts in the Historical Resources Element and are noted as eligible for listing in the National Register.

The Town's Historical Resources Element establishes a "substantial adverse change" in the significance of a historical resource as "demolition, destruction, relocation or alteration activities which would entail historical significance". Relevant policies included in the Town's Historical Resources Element include:

- Policy 5.08.211 – Encourage the rehabilitation and continued use or reuse of designated historic buildings or sites
- Policy 5.08.212 – Protect important historic resources through designation
- Policy 5.08.221 – A Historic Preservation Ordinance and Historic District Resource (HR) combining zone should be used to identify historic resources. Protection of the historic resources should be provided by use of design review procedure

- Policy 5.08.222 – The Colma Historical Association should be consulted whenever a proposed development project involves a designated historic resource in Colma
- Policy 5.08.223 – Colma should use the nationally established Rehabilitation Standards and Guidelines for the Restoration and Rehabilitation of Historic Structures
- Policy 5.08.224 – Colma should use the California State Historical Building Code (SHBC) for designated buildings to encourage historic rehabilitation
- Policy 5.08.226 – The Town should utilize its Design Review procedure for review of development in historic districts and adjacent to designated historic landmarks.
- Policy 5.08.231 – The Town should provide information to the public concerning the location of historic resources and their value to the community, State and Nation.
- Policy 5.05.233 – Colma should maintain communication with the State Office of Historic Preservation, California Register of Historical Resources, and San Mateo County Planning Department to disseminate information about historical resources in Colma.

4.3 PROJECT IMPACTS AND MITIGATION MEASURES

Consistent with CEQA and the CEQA Guidelines Appendix G, this EIR focuses on the potentially significant direct and indirect impacts that could result from implementation of the proposed Veterans Village Project, as described in Chapter 2 of this EIR. Thresholds of Significance

Based on CEQA Guidelines Appendix G, the implementation of the project would have a significant environmental impact related to cultural or tribal cultural resources if it would:

- Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5;
- Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5(b). Pursuant to Section 15064.5(b), substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings in a manner that adversely affects those physical characteristics of an historical resource that convey its historical significance and justify its inclusion in the California Register or a local register.
- Directly or indirectly destroy a unique paleontological resource;
- Disturb any human remains, including those interred outside of formal cemeteries; or
- Cause a substantial adverse change in the significance of a tribal cultural resource.

4.3.1 Potential Impacts to Archaeological Resources, Human Remains, and/or Tribal Cultural Resources

Portions of the project site are developed with pavement and features associated with irrigation facilities once used by Holy Cross Cemetery. The Archaeological Reconnaissance Report noted the Project site appears to have been highly disturbed during historic and recent land uses including clearing, grading, construction of existing structures and features (Holman 2015). According to the geotechnical report, the site is underlain by 20 to 34 feet of sand, clayey sand, and silty sand interbedded with some thin zones of sandy clay and silt.

No evidence of archaeological resources, either historic or prehistoric was found at the project site (Holman 2015). Other archaeological surveys within 400 meters of the project site, including those employing subsurface reconnaissance, also did not find archaeological resources. Although the lower Colma Creek corridor is known to be archaeologically sensitive, the upper portion from at least 1.5 kilometers upstream and downstream from the project site has been subjected to subsurface reconnaissance with negative results. The section of the immediate creek corridor within the vicinity of the project site is of low archaeological sensitivity (Holman 2015).

Local tribes were notified of the project and none provided indication that the site contains tribal cultural resources.

Although no archaeological resources were found on the project site, it is possible to encounter previously unknown subsurface archaeological resources, human remains, or tribal cultural resources. Archaeological resources, human remains and tribal resources are protected from unauthorized disturbance by State law, so supervisory and construction personnel should be made aware of the possibility of encountering unknown/unrecorded archaeological materials at the project site.

The destruction, significant alteration, or other substantial adverse change to historical, archaeological, and tribal cultural resources and/or human remains during construction of the project is considered a potentially significant impact. To reduce the potential for project construction to disturb these resources, the Applicant shall implement Standard Mitigation Measure CUL-1.

Impact CUL-1: Project construction could disturb unrecorded historical, archaeological, and tribal cultural resources and/or unrecorded human remains.

Mitigation Measure CUL-1: Minimize and Avoid Impacts to Unrecorded Cultural Resources, Tribal Cultural Resources, and Human Remains

In this area, the most common and recognizable evidence of prehistoric archaeological resources are deposits of marine shell (mussels, clams, abalone, crabs, etc.), usually in fragments and/or bones, usually in a darker fine-grained soil (called a “midden”) containing evidence of the use of fire; obsidian, other stone flakes left from making stone tools, or the tools themselves (mortars, pestles, arrowheads, and spear points), and human burials, often as dislocated or fragmented bones. Prehistoric archaeological sites farther downstream along Colma Creek exhibit these characteristics. Historic materials 45 years and older, bottles, artifacts, structural remains, etc. may also have scientific and cultural significance and should be more readily identified.

If during the proposed project construction any such evidence is uncovered or encountered, all excavations within 10 meters (30 feet) should be halted long enough to call a qualified archaeologist to assess the situation and propose appropriate measures. Any potential historic resources discovered should be mapped, recorded, and initially assumed to be eligible for the California Register of Historical Resources until a formal, in-field evaluation can be completed and substantiated.

If human remains are accidently discovered during construction activities, the measures specified in Section 15064.5(e)(1) of the CEQA Guidelines shall be followed:

- There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Mateo County coroner is contacted to determine that no investigation of the death is required.

- If the coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods as provided in Public Resources Code Section 5097.98; or, if the NAHC cannot identify the most likely descendants (MLD), the MLD fails to make a recommendation, or the property owner rejects the MLD's recommendations, the property owner can rebury the remains and associated burial goods with appropriate dignity in an area not subject to ground disturbance.

Conclusion for Impact CUL-1:

Mitigation Measure CUL-1 would avoid or reduce potentially significant effects on unrecorded historic or archaeological cultural resources, tribal cultural resources, and human remains, by stopping work and ensuring unrecorded resources are appropriately evaluated and handled by qualified personnel. Thus, with this measure, Impact CUL-1 would be rendered **a less than significant impact** of the project.

4.3.2 Potential Impacts to Paleontological Resources and Unique Geological Resources

Paleontological resources are the fossilized evidence of past life found in the geologic record. The project site is within alluvial fan or fluvial deposits from the Holocene (10,000 years BP and younger). Because, by definition, an object must be more than 10,000 years old to be considered a fossil, project activities in these deposits would not have an impact on paleontological resources.

The Town of Colma General Plan does not identify any paleontological or unique geologic features at the Project site or within its immediate vicinity. Further, the Project site has been highly altered during historic land use and therefore it is unlikely that construction activities related to the redevelopment of the site would discover or disturb paleontological or unique geological resources. The impact is considered **less than significant**.

4.3.3 Potential Impacts to Historical Resources

Pursuant to CEQA Guidelines Section 15064.5(b), a substantial adverse change in the significance of an historical resource because of a project is defined as "the demolition, destruction, relocation, or alteration of a resource or its immediate surroundings such that its significance is materially impaired". In general, a historical resource's significance is materially impaired when it can no longer convey its historical significance and therefore can no longer justify its inclusion in, or eligibility for, inclusion in the CRHR, the local register of historical resources pursuant to Public Resources Code Section 5020.1(k), or its identification in an historical resources survey meeting the requirements of Public Resources Code Section 5024.1(g).

4.3.3.1 Historic Districts

Cultural Landscape

The Finding of Effect (Hill 2016) found that the circulation features (entrances to the three fenced areas at the site), the existing vegetation and other miscellaneous objects across the site (mainly chain link fencing) all appear to be non-historic features added after 1945 (the end of the

period of significance) and their removal would have no adverse effect on the cultural landscape of the Holy Cross Cemetery District. Some trees appear to have been planted prior to 1945, however the loss of these trees would not alter the cultural landscape that contribute to the significance of the Holy Cross Cemetery District and thus would have no effect on the historic property. The removal of circulation features, existing vegetation and other miscellaneous objects across the site does not represent a substantial adverse change in the significance of a historical resource, therefore, these actions are considered **less than significant impacts** under CEQA.

Holy Cross Cemetery Historic District

The project site is not visible from most of the areas throughout the Holy Cross Cemetery Historic District due to its location in the northwest corner of the cemetery and to the wooded hillside (just east of the project site). The limited views of the project site from the lower (western) portion of the Holy Cross Cemetery Historic District (south of the project site adjacent to Mission Road) would consist of the renovated pump house, project landscaping and proposed buildings (exterior building materials have been chosen in response to the character of the historic pump building) and screening vegetation result in a view that would have no adverse effect on the Holy Cross Cemetery Historic District. Views of the proposed community garden, dog park and street trees would also have similar character as the existing view and would have no adverse effect on the Holy Cross Cemetery Historic District. In addition, demolition of the water reservoir, two well houses, and carpenter's shop would not so adversely affect those physical characteristics of the Holy Cross Cemetery Historic District that convey its historical significance that the cemetery would no longer be eligible for listing in the National Register of Historic Places. The cemetery art, grid layout with central axis, historic monument features including mausoleums and headstones and other historically significant character defining features of the district (see Section 4.1.6 above) would remain unchanged. The proposed building removal, therefore, would not affect the overall character or integrity of the cemetery. As such the impact on the historic district itself is considered a **less than significant impact** under CEQA.

Cypress Lawn Memorial Park Historic District

While the project would be visible from multiple locations in the Cypress Lawn Memorial Park Historic District, it was determined that the exterior building materials and muted colors of the new buildings, and the evergreen species of trees that would be planted would all lessen the visibility of the project from vantage points within the Cypress Lawn Memorial Park District. It was determined the project views would not alter the historic characteristics of the cemetery and the project would have no adverse effects on the Cypress Lawn Memorial Park District (Hill and Bradley 2016) and is therefore considered a **less than significant impact** under CEQA.

4.3.3.2 Buildings

The Pump House

The rehabilitation of the pump house includes the removal of an existing modern metal roll up door on the north façade, removal of non-historic interior partition walls, and removal of modern doors on the south façade. The existing multi-pane windows will be retained and repaired, or if too deteriorated to repair, will be replaced with windows of matching size and design of the existing windows. The concrete floor will be refinished to meet accessibility requirements. Existing exposed concrete interior structural features including wall, beams and columns will remain. The Finding of Effect determined the rehabilitation proposed for the pump house would

not alter or destroy significant character-defining features of the building and is thus consistent with the Secretary of the Interior's Standards for the Treatment of Historic Properties. The SHPO concurred with the conclusions contained in the Finding of Effect and as such the rehabilitation proposed is not considered an adverse effect as per 36 CFR Part 800.5(2)(ii) and is considered a **less than significant impact** under CEQA.

The Water Reservoir, the Well Houses and the Carpenter's Shop

The water reservoir and associated buildings are significant as part of the early irrigation system at Holy Cross Cemetery; thus they contribute to the Holy Cross Cemetery Historic District. The Holy Cross Cemetery would not have existed without the "water works lot" building to maintain the landscape. The buildings and the reservoir are contributing "characteristics" of the Holy Cross Cemetery Historic District that would be "directly altered" by the project. The removal of these features will diminish the integrity of design, setting and materials of the Holy Cross Cemetery Historic District, but not to such an extent that the district would no longer be eligible for listing in the National Register. Nonetheless, the demolition of the water reservoir and the three associated buildings (two well houses and the carpenter's shop), a contributing structure and buildings to the Holy Cross Cemetery Historic District, is considered to be an Adverse Effect under 36 CFR Part 800.5(2)(i) and is considered a **significant impact** under CEQA.

The Veterans Village Building

The proposed project will replace four contributing structures on the site of the original "water works lot" that historically provided irrigation water for the Holy Cross Cemetery landscape with a three-story, 66-unit residential building and related uses. The change in the character of the use of this part of the Holy Cross Cemetery Historic District to multi-unit residential use constitutes an adverse effect under 36 CFR Part 800.5(2)(iv) because of the proposed "change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance."

In the 1970s, Holy Cross Cemetery built a new pump house in another part of the cemetery and Baca's Machine Shop (auto engine repair) became the tenant of the pump house. The two well houses and the carpentry building have been used for storage. The change from the "water works" use related to the cemetery to a light industrial use did not substantially change "the character of use of the property" (Hill and Bradley 2016). Baca's Machine Shop confined their use to the existing pump house and they did not add any major new buildings related to their use of the site. A small paved parking area was added, which was not a major change is the "character" of use. The spatial relations of the cemetery water works lot buildings to each other and their setting have not changed. Like the later Baca's Machine Shop, the pump house and related structures also represented an essentially "industrial" type of use, i.e., the pumps and related equipment are essentially "machines" associated with the operation of the cemetery. The pump house housed pumping equipment and the complex-related plumbing system (pipes, valves, etc.), other related support structures (like a large electrical panel), and machines related to repairing maintaining the "machinery". Thus, the similar light industrial use associated with Baca's Machine Shop does not represent a substantial change in the character of the property's original use. The main change to the water works lot since the period of significance (1886-1945) is the addition of a concrete structure built for the San Francisco Airport BART extension at the northwest corner of the lot. The addition of this structure has not changed historic character of the water works lot so dramatically that it is no longer contributing to the historic district.

In conclusion, the Finding of Effect (Hill 2016) determined that the Veterans Village building represents a significant change in the "character of the use" of the water works lot at Holy Cross Cemetery from what was essentially a light industrial use associated with the cemetery (a character retained by its later use by Baca's Machine Shop) to new a multi-unit residential use. This change in use from its historic light industrial use to a multi-unit residential use constitutes an adverse effect under 36 CFR Part 800.5(2)(iv) and is considered a **significant impact** under CEQA.

The destruction, significant alteration, or other substantial adverse change to historical resources as a result of the project are considered significant impacts.

Impact CUL-2A: The proposed project would demolish four structures (reservoir, well houses and carpenter shop) which are a contributing structure and buildings associated with the Holy Cross Cemetery Historic District. The demolition of these structures is considered an adverse effect under 36 CFR Part 800.5(2)(i) and a substantial adverse change according to the Town's Criteria of Significance for a historic resource. Therefore, the impact is considered a significant impact under CEQA.

In addition, the construction of the proposed Veterans Village building represents a significant change in the "character of the use" of the water works lot at Holy Cross Cemetery from what was essentially a light industrial use associated with the cemetery (a character retained by its later use by Baca's Machine Shop) to new a multi-unit residential use. This change in use from its historic light industrial use to a multi-unit residential use constitutes an adverse effect under 36 CFR Part 800.5(2)(iv) and a substantial adverse change according to the Town's Criteria of Significance for a historic resource. Therefore, it is considered a significant impact under CEQA.

Impact CUL-2B: The project would result in a significant change in the character of the use of the site.

The following Mitigation Measures are recommended to reduce the impact of Impact CUL-2A, CUL-2B, and CUL-2C.

Mitigation Measure CUL-2a: Salvage Buildings to be Removed

Representatives of the Colma Planning Department, the Colma Historical Museum or representatives of local preservation or historical societies, Holy Cross Cemetery and other interested parties shall be contacted and given the opportunity to examine the building and salvage particular elements.

Mitigation Measure CUL-2b: Photo Documentation

Prior to demolishing or salvaging materials at the Holy Cross Cemetery, the water reservoir, the three associated buildings (two well houses and the carpenter's shop) and the site in general shall be documented according to the Outline Format described in the *Photographic Specifications* and *The Guidelines for Preparing Written and Descriptive Data: Historic American Building Survey* (HABS) published by the Pacific West Region Office of the National Park Service. The photo documentation should show the spatial relationships of the buildings and the water reservoir to each other. This documentation shall include archival quality, large format (minimum 4 by 5 inch) photographs of the exterior and interior views of the buildings and a view of their setting within the site. Archival negatives of the original construction drawings and historic views will be included in the documentation. Copies of the documentation, with original

photo negatives and prints, shall be donated to the Colma Historical Association Museum, the San Mateo County Historical and others archives (as appropriate) accessible to the public.

Mitigation Measure CUL-2c: Interpretive Exhibit

A permanent, interpretive exhibit on the project site about the "water works lot" buildings, structures and history shall be created. The exhibit should incorporate information from the BART report and other sources about the history of the Holy Cross Cemetery, historic photographs, and HABS documentation or other recordation materials and should be located and designed so that it is accessible to the public and of a durable design. The interpretive exhibit should be developed and designed by a qualified team including an historian and a graphic designer or exhibit designer. If the exhibit cannot be accommodated in the new development, another appropriate public venue can also be considered such as the Colma Historical Association Museum.

Conclusions for Impacts CUL-2A and CUL-2B:

Despite the implementation of Mitigation Measures CUL-2a, CUL-2b, and CUL-2c, Impacts CUL-2a and CUL-2b would remain **significant. The removal of the four historic structures (Impact CUL-2A) and the change in character in the use of the site (Impact CUL-2B) are considered Significant and Unavoidable Impacts of the project.**

4.3.4 Impacts to Tribal Cultural Resources

The applicant, Mercy Housing, initiated contact with the Native American Tribes during the NEPA Section 106 process (see Chapter 9 for additional detail). No Native American Tribes have approached the Town to initiate AB 52 consultation, however the Town sent the NOP to area Native American Tribes during the EIR NOP process for comment.

No Native American Tribes have indicated there are Tribal Cultural Resources present at the project site; however, in response to the NOP, Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe requested notification prior to any ground disturbing activities taking place on the project site. This request shall be implemented as a mitigation measure for the project to protect potential Tribal Cultural Resources:

Impact CUL-3: The project could impact potential tribal cultural resources

Mitigation Measure CUL-3: Notify tribal representative of project construction schedule

Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe shall be provided written notification of the entire construction schedule and the dates of ground disturbing activities taking place on the project site. Written notification shall be accomplished by certified mail and received no less than two weeks prior to the start of construction activities (even if they are not ground disturbing).

Conclusion for Impact CUL-3:

Implementation of Mitigation Measure CUL-3 would ensure the project is consistent with CEQA requirements regarding tribal notification and protection of tribal resources. The project would not impact known tribal resources and its impacts to tribal resources are considered **Less than Significant with Mitigation**.

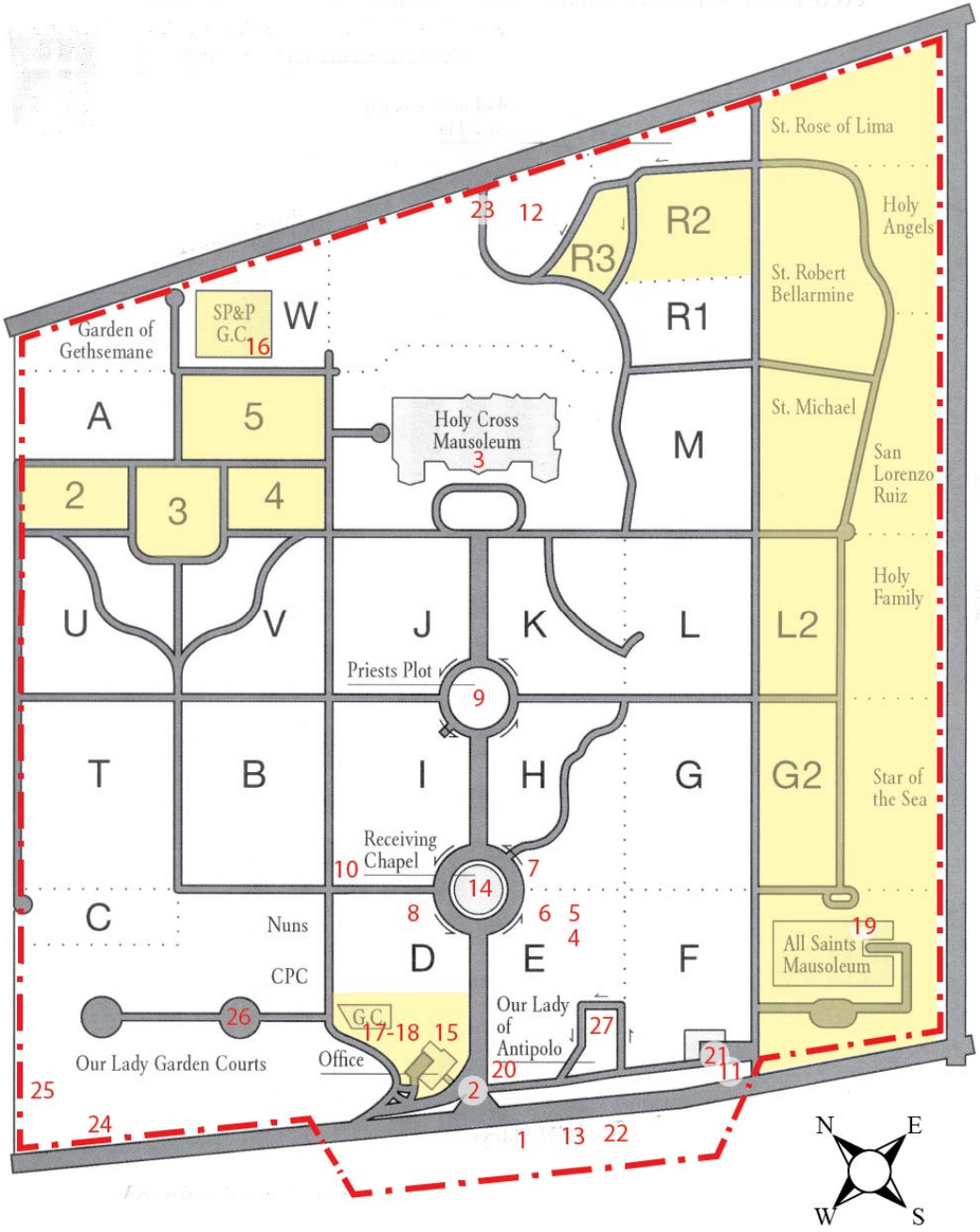
4.4 REFERENCES

Hill and Bradley. 2016. Finding of Effect. Colma Veterans Village – 1690 Mission Road, Colma, California. February.

Holman and Associates Archaeological Consultants. 2015. Archaeological Reconnaissance of a Proposed Mercy Housing Project at 1670-1692 Mission Road, Town of Colma, San Mateo County, California and Finding of no Historic Properties Affected. San Francisco. December.

Rockridge Geotechnical. 2015. Draft Geotechnical Investigation – Proposed Residential Development, 1670-1692 Mission Road, Colma, California. March 24.

Personal Communication. 2016. Email from Tony Cerda to Michael Laughlin. May 24, 2016, 11:39 AM. Subject: RE: Town of Colma project – Mercy Housing affordable housing for Veterans.



Representative Examples of Contributing Features in BART Report:

1. Old Lodge/Office Building
2. Main Entrance Gate
3. Holy Cross Mausoleum
4. McGuire Mausoleum
5. Kitterman Mausoleum
6. Governor Downey Monument
7. Fair Family Mausoleum
8. Phelan Mausoleum
9. Priest's Circle
10. Dunphy-Burnett Mausoleum
11. Caretaker's House
12. Caretaker's House and Reservoirs
13. Native Son Florist

Representative Examples of Non-Contributing Features in BART Report:

14. Interment Chapel (Receiving Chapel)
15. Main Office Building
16. Garden Court Mausoleum
17. Our Lady of Peace Chapel
18. St. Ann, St. Joseph, St. Theresa, St. Francis, and St. Patrick Mausoleums
19. All Saints Mausoleum
20. Rest Rooms
21. Post-[World] War [II] Utility Buildings
22. Rose and Leona Flowers

Major Contributing Features Not Shown in BART Report:

23. Hillside Boulevard Gate
24. Water Lot Features (Pump House, 2 Well Houses, Reservoir, and Caretaker's House)

Major Non-Contributing Features Added since BART Report:

25. BART Structure and Road
26. Our Lady of Garden Courts
27. Our Lady of Antipolis

Key from BART Report:

Historic District Boundaries

Area of Post-1945 Development

Figure 4-1 Plan of Holy Cross Cemetery Historic District

Veterans Village Project

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CHAPTER 5 TRAFFIC AND TRANSPORTATION

This chapter describes the transportation and roadway system in the vicinity of the Veterans Village Project, summarizes applicable regulations and policies, and evaluates potential impacts on the roadway system, public transit, pedestrian and bicycle facilities. The evaluation of the project's potential effects is primarily based on a Transportation Impact Analysis (TIA) prepared by Hexagon Transportation Consultants, Inc., a qualified traffic engineering firm (Hexagon 2016, attached as Appendix H). This chapter summarizes key findings of the analysis.

5.1 ENVIRONMENTAL SETTING

The project site is located in the Town of Colma near the intersection of Mission Road and El Camino Real (State Route 82). Figure 2-1 provides an overview of the transportation network within the vicinity of the proposed project and Figure 2-2 provides the local street configuration in the project vicinity.

5.1.1 Existing Regional Roadway Network

Regional access to the project site is provided by I-280, El Camino Real, and Hickey Boulevard. Local access is provided by Mission Road and Lawndale Boulevard/McClellan Drive. These facilities are described below:

Interstate 280 (I-280) is a north/south freeway that extends from San Francisco to San Jose. In the vicinity of the project, I-280 has four lanes in each direction and has a posted speed limit of 65 miles per hour. The project is served by an interchange at Hickey Boulevard. The Hickey Boulevard interchange provides full access with on- and off-ramps to both northbound and southbound I-280.

El Camino Real (State Route 82) is four- to six-lane, north/south road that extends between San Francisco and San Jose. The posted speed limit of this roadway is 40 miles per hour near the project site. El Camino Real intersection Mission Road just north of the project site. Parking is permitted in some locations on both sides of the street north of Mission Road.

Hickey Boulevard is a four-lane, east-west road with a posted speed limit of 35 miles per hour. Hickey Boulevard primarily serves as a connection between major facilities to the west (I-280, Junipero Serra Boulevard, and El Camino Real) and residential land uses to the east.

Mission Road is a two-lane, north-south road that extends between El Camino Real at the north end in Colma, to Chestnut Avenue at the south end in South San Francisco. The posted speed limit on this roadway is 30 miles per hour near the project site. Mission Road would provide direct access to the project site via two driveways. Parking is permitted on both sides of the street along most of Mission Road between El Camino Real and Lawndale Boulevard, but there are several sections designated as no parking. Most of the parking is limited to 4-hours in duration. There are also a few 30-minue duration parking spaces.

Lawndale Boulevard is a two-lane, east-west road that extends between Mission Road and Hillside Boulevard. The posted speed limit on this roadway is 35 miles per hour. Lawndale Boulevard continues west of Mission Road as McLellan Drive, which is four lanes wide, with a posted speed limit of 25 miles per hour and metered parking on street over some sections.

5.1.2 Existing Bicycle and Pedestrian Facilities

Bicycle facilities in the immediate vicinity of the site include an existing Class II bike lane on Mission Road from El Camino Real to Lawndale Boulevard, which passes directly along the site

frontage, and an existing Class II bike lane on Lawndale Boulevard from Mission Road to Hillside Boulevard.

Existing pedestrian facilities in the project area consist of sidewalks found along most previously-described roadways in the study area near the site, with the following exceptions. El Camino Real south and west of the intersection of Mission Road does not have sidewalks and there are no crosswalks at the intersection of El Camino Real and Mission Road. There are no sidewalks on the north side of McLellan Drive immediately west of Mission Road. There is no sidewalk on the east side of Mission Road from the main entrance of Holy Cross cemetery south to Lawndale Boulevard, south of the project site.

There are two existing mid-block crosswalks located on Mission Road within 150 feet of the planned project driveway locations. The signalized intersection at Mission Road and Lawndale Boulevard/McLellan Drive has pedestrian crosswalks, curb ramps, and pedestrian-actuated crossing phases.

5.1.3 Existing Transit Services

Existing transit service in the area includes Bay Area Rapid Transit (BART) and SamTrans, the San Mateo County bus system. The South San Francisco BART Station is located one-half mile south of the project site near the intersection of Mission Road and McLellan Drive. BART trains operate from 4:00 AM to midnight on weekdays with 7- to 8-minute headways during peak hours. The SamTrans ECR Line operates between the Daly City BART station and the Palo Alto Transit Center between 4:00 AM and 2:00 AM on weekdays with 15-minute headways during peak hours. It also provides weekend service. The nearest bus stops are located on El Camino Real just north of the entrance to Cypress Lawn east, 850 feet north of the project site.

Besides the SamTrans ECR Line, the nearest SamTrans bus services are provided at the South San Francisco BART station or across the street from the BART station at the El Camino High School. Line 35 provides service between El Camino High School and the intersection of Warwick Street and Christen Avenue west of I-280. It operates on school days only, arriving at El Camino High School twice just before the start of school and departing three times just after the end of school. Line 122 provides service between the South San Francisco BART Station and the Stonestown Shopping Center/San Francisco State University on 20- to 30-minute headways between 5:00 AM and 11:00 PM on weekdays. Line 122 also provides weekend service. Line 131 provides service between the Serramonte Center and Airport Boulevard and Linden Avenue in South San Francisco, with an intermediate stop at the South San Francisco BART Station. Line 131 operates on 15-minute headways between 5:00 AM and 11:00 PM on weekdays. Line 131 also provides weekend service.

The South City Shuttle (SCS) provides free shuttle service between 7:00 AM and 7:00 PM on a loop route through South San Francisco with headways between 40 and 70 minutes. It has a stop at the South San Francisco BART Station.

5.1.4 Project Site Access and Circulation

The existing project site can be accessed by two driveways off of Mission Road, one near the northern part of the site and the other near Baca's Machine Shop/Pump House. The site is partially paved with asphalt and gravel which allows the on-site parking and storage of vehicles. Because the site is relatively undeveloped there is no formal circulation pattern on the site. A third vehicular access point is located on the east side of the project site near the BART maintenance road and ventilation structure (see Figure 2-3).

5.1.5 Field Observations

Traffic conditions in the field were observed to identify existing operational deficiencies and to confirm the accuracy of calculated levels of services. The field observations revealed the following:

Mission Road and Lawndale Boulevard/McLellan Drive (AM peak hour) - Field observations indicate that traffic conditions operate well during the AM peak hour except during the 15-minute period preceding the first bell (8:10 AM) at El Camino High School. During this period, the increase in vehicular traffic and pedestrian traffic significantly increases congestion at the intersection, causing increased vehicle queues and increased delays. During this period, the high volume of pedestrians traveling eastbound across Mission Road from the BART side to the High School side impede eastbound right turning vehicles, causing frequent vehicle backups on McLellan Drive back to and through the adjacent signalized BART intersection west of Mission Road.

There is also pedestrian traffic across McLellan Drive from the north to the south. The volume of pedestrian traffic adds pedestrian phases to the signal cycle, thus increasing the cycle length and, accordingly, increasing the vehicle queues. The vehicle queues northbound on Mission Road back up from Lawndale Boulevard to the location of the first BART driveway and the main driveway into the High School, a queue of about 300 feet.

Mission Road and Lawndale Boulevard/McLellan Drive (PM peak hour) - As in the AM peak hour, during the PM peak hour, the vehicle queues northbound on Mission Road occasionally back up from Lawndale Boulevard to the location of the first BART driveway and the main driveway into the High School. Occasionally during the PM peak hour, westbound vehicle queues extend from the adjacent signalized BART intersection back to Mission Road. This is because vehicles are queued back from the driveway into the Trader Joe's parking lot.

Mission Road Parking - On the weekday that conditions were observed, by the end of the AM peak hour, the on-street parking spaces on Mission Road were about two-thirds occupied from the project site northward to El Camino Real. South of the project site, the on-street spaces were mostly vacant, except for the 10 on-street spaces just north of Lawndale Boulevard adjacent to the condominiums. During the mid-afternoon and the beginning of the PM peak hour, virtually all of the on-street parking spaces were occupied on Mission Road between the project site and El Camino Real. By the end of the PM peak hour, half of these on-street parking spaces were vacant.

5.2 REGULATORY SETTING

5.2.1 California Department of Transportation

The California Department of Transportation (Caltrans) has jurisdiction over state highway facilities. The state is divided into 12 districts; San Mateo County is located in Caltrans District 4. Caltrans requires that a traffic impact study be conducted for a project if it:

- Generates over 100 peak-hour trips on a state highway facility;
- Generates 50 to 100 peak-hour trips on a state highway facility experiencing noticeable delay, approaching unstable traffic flow conditions, (Level of Service (LOS) C or D conditions); or

- Generates 1 to 49 peak-hour trips on a state highway facility experiencing significant delay and unstable traffic flow conditions (LOS E or F conditions), or that significantly increases the potential risk for a traffic accident, or that changes local circulation networks that impact a state highway facility (Caltrans 2002)

5.2.2 San Mateo County Congestion Management Program

The City/County Association of Governments (C/CAG) of San Mateo County serves as the Congestion Management Agency (CMA) for San Mateo County and maintains the county's Congestion Management Program (CMP). The C/CAG is required to prepare and adopt a CMP on a biennial basis. The purpose of the CMP is to identify strategies to respond to future transportation needs, develop procedures to alleviate and control congestion, and promote countywide solutions. The 2013 CMP was developed to be consistent with Metropolitan Transportation Commission's Plan Bay Area and provides updated program information and performance monitoring results for the CMP roadway system.

Projects that result in 100 or more peak-hour trips are required to prepare a CMA analysis.

5.2.3 Senate Bill 743 / California Environmental Quality Act

Senate Bill 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines (14 CCR §15000 et seq.) to develop alternative methods of measuring transportation impacts under CEQA. At a minimum, the new methods must apply within areas that are served by transit; however, OPR may extend the new methods statewide. Once the new transportation guidelines are adopted by OPR, automobile delay may no longer be considered to be an environmental impact under CEQA for some projects.

5.2.4 Town of Colma

Significance criteria are used to establish what constitutes an impact. The 2014 Town of Colma General Plan specifies that all intersections should seek to achieve Level of Service D or better and Levels of Service E and F should be tolerated during peak demand periods.

The following transportation and traffic policies from the Town's General Plan are relevant to the proposed project:

<u>Land Use Element</u>

Policy 5.02.352: Sufficient off-street parking should be required for all new construction, in amounts varying with the type of use.

Policy 5.02.353: The City Council should condition the approval of permits for all site and building improvement projects where such projects involve the public street frontage to require the installation of a public sidewalk, if one does not already exist.

<u>Circulation Element</u>

Policy 5.03.721: Private off-street parking should be developed in all of Colma's commercial areas to minimize traffic congestion. Private off-street parking should be developed in conjunction with residential development projects.

Policy 5.03.722: Pedestrian sidewalks or walkways should be constructed typically along all streets. These should be done as a requirement of private development, where possible.

Policy 5.03.725: Facilities for disabled persons should be constructed in Colma including specified parking spaces, curb ramps at street crossings, sidewalk clearance around obstacles and sidewalk transitions at driveway crossings.

Policy 5.03.729: The Town should strive to maintain a Level of Service D or better for all intersections. Levels of E or F should be tolerated during peak periods.

Safety Element

Policy 5.07.432: Colma should ensure that all buildings have visible street numbers and are accessible to fire vehicles and equipment. A minimum 20 foot wide fire land should be provided to all commercial and large scale residential facilities.

5.3 TRANSPORTATION IMPACT ANALYSIS METHODOLOGY

The TIA prepared for the Veterans Village Project was done in accordance with the procedures and guidelines specified by the Town of Colma.

5.3.1 Transportation Impact Analysis Scope

The purpose of the Transportation Impact Analysis is to evaluate AM and PM peak hour traffic conditions at the two site driveways on Mission Road and two intersections near the site: Mission Road/El Camino Real and Mission Road/Lawndale Boulevard. The study intersections are shown on Figure 5-1.

The AM peak hour of traffic is the 60-minute peak period between 7:00 AM and 9:00 AM, and the PM peak hour is the 60-minute peak period between 4:00 PM and 6:00 PM. It is during these periods that the most congested traffic conditions occur on an average weekday. Traffic conditions were evaluated for the following scenarios:

- Scenario 1: Existing Conditions. Existing conditions are represented by existing peak-hour traffic volumes on the existing roadway network. Existing traffic volumes were obtained from recent traffic counts conducted in March 2016.
- Scenario 2: Existing Plus Project Conditions. Project-generated traffic volumes were added to existing traffic volumes to estimate existing plus project conditions. Existing plus project conditions were evaluated relative to existing conditions in order to determine potential project impacts.
- Scenario 3: Cumulative Conditions. Cumulative traffic volumes without the project were estimated based on previous forecasts of traffic volumes in the study area. No improvements to the roadway network were assumed within the study area.
- Scenario 4: Cumulative Plus Project Conditions. Project-generated traffic volumes were added to Cumulative traffic volumes without the project to estimate cumulative plus project conditions. Cumulative plus project conditions were evaluated relative to cumulative conditions without the project in order to determine potential project impacts.

A Congestion Management Agency (CMA) analysis was not required because the project is estimated to generate fewer than 100 peak-hour trips.

Intersection operations were evaluated using the 2000 Highway Capacity Manual (HCM) level of service methodology for signalized and unsignalized intersections during the peak hours. Vehicle queuing was evaluated for the project's site access driveways.

5.3.2 Intersection Level of Service Analysis

Traffic conditions at the study intersections were evaluated using Level of Service (LOS). Level of Service is a qualitative description of operating conditions ranging from LOS A, or free-flow conditions with little or no delay, to LOS F, or jammed conditions with excessive delays. The Town of Colma utilizes SYNCHRO software and the Highway Capacity Manual (HCM) 2000 methodology to evaluate intersection operations. The HCM methodology evaluates and reports level of service at signalized intersections on the basis of average control delay time for all vehicles at the intersection. The HCM 2000 methodology reports level of service at the unsignalized, two-way stop-controlled intersections based on both the overall average delay and for the worst movement on the side street at the intersection.

5.3.3 Project Trip Generation and Distribution

The amount of traffic produced by a new development is estimated using a three-step process: (1) trip generation, (2) trip distribution, and (3) trip assignment. In determining project trip generation, the magnitude of traffic entering and exiting the site was estimated for the AM and PM peak hours. As part of the project trip distribution step, an estimate was made of the directions to and from which the project trips would travel. In the project trip assignment step, the project trips were assigned to specific streets and intersections in the study area. These procedures are described further in the following paragraphs.

The trip generation estimates for the proposed project are based on rates obtained from the Institute of Transportation Engineers' (ITE) publication Trip Generation, 9th Edition. Based on the likely demographics of the residents, the vehicle trip generating characteristics of an affordable housing development for Veterans was estimated to be most closely approximated by the trip generation rates applicable to senior attached housing. Based on the ITE rates, it is estimated that the project would generate 227 vehicle trips per day, with 13 trips occurring during the AM peak hour and 17 trips occurring during the PM peak hour. The project trip generation estimates are presented in Table 5-1.

Table 5-3 Veterans Village Project Vehicle Trip Generation Estimates

Land Use	Size Unit	Land Use Code	Daily Trips	AM Peak Hour (7 AM to 9 AM)				PM Peak Hour (4 PM to 6 PM)			
				Rate	Total	In	Out	Rate	Total	In	Out
Veteran Housing	66 d.u.	252	227	0.20	13	4	9	0.26	17	9	8

Source: Hexagon 2016 (See Appendix H, Table 1), All rates based on ITE *Trip Generation*, 9th Edition, for Senior Adult Housing-Attached Use.

The trip distribution pattern for the proposed project was based on existing travel patterns in the area. Trips were assigned to the roadway network in accordance with the trip distribution. The project trip distribution and assignment are shown on Figure 6 of the TIA (Appendix H).

5.3.4 Existing Conditions Level of Service

Based on the Town of Colma's level of service standards, under existing conditions without the proposed project, the two study intersections operate at LOS C or better during the AM and PM peak hours. No peak hour traffic volumes were observed at the two project driveways.

5.4 PROJECT IMPACTS AND MITIGATION MEASURES

Consistent with CEQA and the CEQA Guidelines Appendix G, this EIR focuses on the potentially significant direct and indirect impacts that could result from implementation of the proposed Veterans Village Project, as described in Chapter 2 of this EIR. The Town has determined that one of the thresholds related to air traffic patterns and substantial safety risks does not apply to the project. Based on the characteristics of the project and the environmental conditions described in Chapter 2 , that:

- The project does not have the potential to result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. The closest airport to the site is the San Francisco International Airport, located approximately 4.3 miles southeast of the project site and the proposed project would not involve the construction of structures that could pose a risk to air travel and navigation (all proposed structures would be three stories and below).

For these reasons, these issues are not discussed further in this EIR. The potentially significant impacts that could result from implementation of the project are described in Section 5.4.2 below.

5.4.1 Thresholds of Significance

Based on CEQA Guidelines Appendix G, the proposed project would have a significant environmental impact related to transportation if it would:

- Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, ways and freeways, pedestrian and bicycle paths and mass transit;
- Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
- Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities;
- Substantially increase hazards due to a design feature (e.g. sharp curves or dangerous intersections) or incompatible uses (e.g. farm equipment); or
- Result in inadequate emergency access.

In evaluating whether the implementation of the Veterans Village Project would have a significant impact on the effectiveness and performance of the circulation system, the Town has applied the definition of significance for intersection impacts as stated in the 2014 Town of Colma General Plan which specifies that all intersections should seek to achieve Level of Service D or better and Levels of Service E and F should be tolerated during peak demand periods.

5.4.2 Potential Impacts from Conflicts with an Applicable Transportation-Related Plan, Ordinance or Policy

The TIA prepared for the Veterans Village Project found that under the existing plus project condition, the two study intersections (Mission Road at El Camino Real and Mission Road at McLellan Drive/Lawndale Boulevard) would operate at LOS C or better (same as under existing

conditions) and the two project site driveways would operate at an overall LOS A with the worst movement (outbound out of the site driveway) operating at LOS B. The projected LOS for the study intersections meet or exceed the standards set by the Town's General Plan; thus the project would be consistent with applicable transportation related plans and policies

Vehicle queuing under project conditions was also evaluated. Because there are no left-turn pockets on Mission Road, any time a left turn needs to be made into the site, the through traffic would have to wait behind the left-turning vehicle until the left-turn movement is completed. Figure 6 in the TIA shows a minimal volume of trips making the turn movement: four (4) to five (5) total outbound and two (2) inbound left-turn peak hour trips at each project driveway. The queuing analysis accordingly showed minimal queuing and delays: two (2) to three (3) vehicles could queue on southbound Mission Road behind a vehicle waiting to turn left into the site at one of the driveways. The occurrence would be infrequent and the delay is expected to be brief; approximately five (5) to ten (10) seconds. A vehicle queuing analysis was also conducted for outbound vehicles exiting the site to Mission Road. The analysis showed that the outbound vehicle queue would rarely exceed one (1) vehicle and the average delay would be about 15 seconds.

The impacts to intersection LOS and vehicle queuing are considered **Less than Significant**.

5.4.3 Potential Impacts from Conflicts with an Applicable Congestion Management Program

A Congestion Management Agency (CMA) analysis was not required because the project is estimated to generate fewer than 100 peak-hour trips. Therefore, the project is presumed consistent with the applicable Congestion Management Program. The impact is considered **Less than Significant**.

5.4.4 Potential Impacts from Conflicts with Adopted Policies, Plans or Ordinances Regarding Public Transit, Bicycle or Pedestrian Facilities

Generally, a project would create an impact on transit service if it 1) causes vehicular congestion that would significantly degrade transit operations, 2) causes a ridership increase that would exceed existing transit capacity, or 3) conflicts with existing transit services plans or precludes future transit service to the project area.

The TIA found that based on these criteria, the proposed project would not cause a significant impact to transit operations in the study area.

Pedestrians and Bicycles

The anticipated volume of pedestrian and bike trips generated by the project would not exceed the carrying capacity of existing sidewalks, crosswalks, and bike facilities on streets surrounding the sites. Therefore, the project would not create an adverse impact to the bike/pedestrian circulation in the area.

To accommodate pedestrians, the project provides walkways between the building entrances, parking areas, and existing sidewalks on Mission Road. The project also proposes to provide bicycle storage for 66 enclosed bicycle parking units on-site near the pump house building. This complies with and exceeds the Town's current requirements, which are applied through the building code.

Public Transit

According to the U.S. Census, bus trips account for approximately nine (9) percent of the total commute mode share in the Town of Colma. For the proposed project, assuming nine (9) percent of total commute trips would be bus trips, which would equate to one bus trip during the AM peak hour and two bus trips during the PM peak hour. In addition to commute trips, there will be additional bus trips to nearby parks, shopping areas, and BART. The volume of bus trips generated by the project would not exceed the carrying capacity of the existing bus serving the site. Therefore, no improvements to existing bus service frequencies would be necessary in conjunction with the proposed project.

According to the U.S. Census, BART trips comprise approximately 9 percent of the total commute share in the Town of Colma. For the proposed project, this would equate to one new BART trip during the AM peak hour and two new BART trips during the PM peak hour. To access BART, future residents could walk, bike or drive. Project trips on BART would comprise an extremely small fraction of the total BART ridership, and therefore, would not cause any meaningful changes in BART service.

Parking

The project proposes to provide 69 total parking spaces on-site, including four handicapped accessible parking spaces. The site plan shows the breakdown as 34 spaces in Parking Area A in the north part of the site and 35 spaces in Parking Area B in the south part of the site. Each area would have two handicapped accessible spaces. The supply of parking proposed by the project was compared to the projected parking demand. Applying to the proposed 66-unit development the ITE 85th-percentile peak parking demand rate of 0.66 vehicles per dwelling unit applicable to the senior attached housing use yields an estimated peak parking demand of 44 parking spaces. The proposed parking supply of 69 greatly exceeds the estimated maximum demand. The proposed parking supply should therefore be satisfactory.

The impacts from conflicts with adopted policies, plans, or ordinances regarding public transit, bicycle or pedestrian facilities or otherwise decrease the performance or safety of such facilities is considered **Less than Significant**.

5.4.5 Potential Impacts Due to Hazardous Design Features

The TIA noted two potential hazardous design features (circulation) of the project. These features and recommended improvement measures are presented below.

The project has two full-access site driveways on Mission Road: one at the north end and one at the south end. The two driveways are approximately 840 feet apart. The south driveway provides access to the site by means of the existing BART maintenance roadway, which has minimum existing traffic solely associated with BART maintenance activities. The south driveway would provide access to an on-site road along the east border of the site within BART right-of-way. As the site plan shows, near the north end of the site, the east road veers out of the BART right-of-way and into the site, then loops around to connect to the north site driveway. The site therefore has two ways in and two ways out, and large vehicles can pass through without having to turn around.

Approximately 85 feet from the intersection of the south site driveway and Mission Road, the project would add ninety-degree parking within the BART maintenance road right-of-way. This section of the BART maintenance road travel way is approximately 40 feet wide. Approximately 350 feet from Mission Road, the cross section of the BART right-of-way is split by an existing grass median, and the 90 degree parking in the BART right of way is transitioned onto the

project site. Nine more parking spaces are provided along this 90-foot section of the "east road." North of there, the east road narrows to 20 feet wide and continues parallel to the site. The on-site drive aisle onto which the east road transitions is 26 feet wide, the latter half of the section providing 90-degree parking on the east side. The aisle loops westward approximately 140 feet to meet the north site driveway at Mission Road. This latter section is 26 feet wide with 90-degree parking on both sides.

On the east road where the BART right-of-way is split by a grass median, there is an abrupt transition between where the 90-degree parking on the BART maintenance road stops and where parking on the east road begins. The site plan shows this transition as a small "pie shaped" island. Although the traffic volumes through this area will be very low, the alignment is unusual and provides only minimal channelization for drivers. As a result, drivers may have a tendency to drive down the center of the east road, rather than within their respective lanes. In addition, there is no traffic control is shown where the BART right-of-way splits by the grass median. Because (1) project traffic would exceed that of BART maintenance traffic and (2) the upper approach from the maintenance facility is at a higher elevation than the east road (which makes for better visibility), vehicles on the upper BART maintenance road should yield to traffic on the east road.

Corner sight distance was also reviewed at each of the project access points on Mission Road. Currently, on-street parking on Mission Road obstructs the sight distance for vehicles exiting the existing BART access driveway at Mission Road, because vehicles park too close to the driveway. To reduce the potential for unsafe traffic circulation conditions, the Applicant could implement Improvement Measures TRAF-1a and TRAF-1b.

Impact TRAF-1: The project could result in potentially unsafe traffic circulation conditions (Less Than Significant Impact).

Improvement Measure TRAF-1a: Additional Traffic Control and Improved Roadway Alignment

Additional traffic control and an improved roadway realignment could be considered where the east road meets the BART maintenance Road. There are two options for the realignment. The first option for realigning the east road would involve eliminating several of the parking spaces at the north end of the "on-street" parking section in Parking Area B. The elimination of the spaces would allow for a gradual, 50-foot taper of the roadway on the west side. The second option for realigning the east road would entail realigning the on-street parking so that what begins as on-street parking at the south end gradually transitions to parking entirely on-site at the north end near the transition area. This option would eliminate most roadway curvature and horizontal transitions. In addition, a yield sign is recommended on the upper BART maintenance Road at its intersection with the east road.

Improvement Measure TRAF-1b: Adequate Site Distance (Less Than Significant Impact)

In order to ensure that adequate sight distance is provided, the Town will prohibit parking on Mission Road over a distance of 25 feet on either side of both the north and south site driveways.

Conclusion for Impact TRAF-1:

With the implementation of Improvement Measures TRAF-1a and TRAF-1b above, the project would avoid the less than significant unsafe traffic circulation conditions.

5.4.6 Potential Impacts Due to Inadequate Emergency Access

Complete perimeter (circular) emergency vehicle access is provided around the site. The site has two ways in and two ways out, and large vehicles can pass through without having to turn around. The site plans were reviewed by the Colma Fire Protection District and were revised to meet the Colma Fire Protection District's minimum requirements for lane width and turning radii. The impact is considered **Less than Significant**.

5.5 REFERENCES

Hexagon Transportation Consultants. 2016. Transportation Impact Analysis Report for the Veterans Village Affordable Housing Project in Colma, California. April 25.

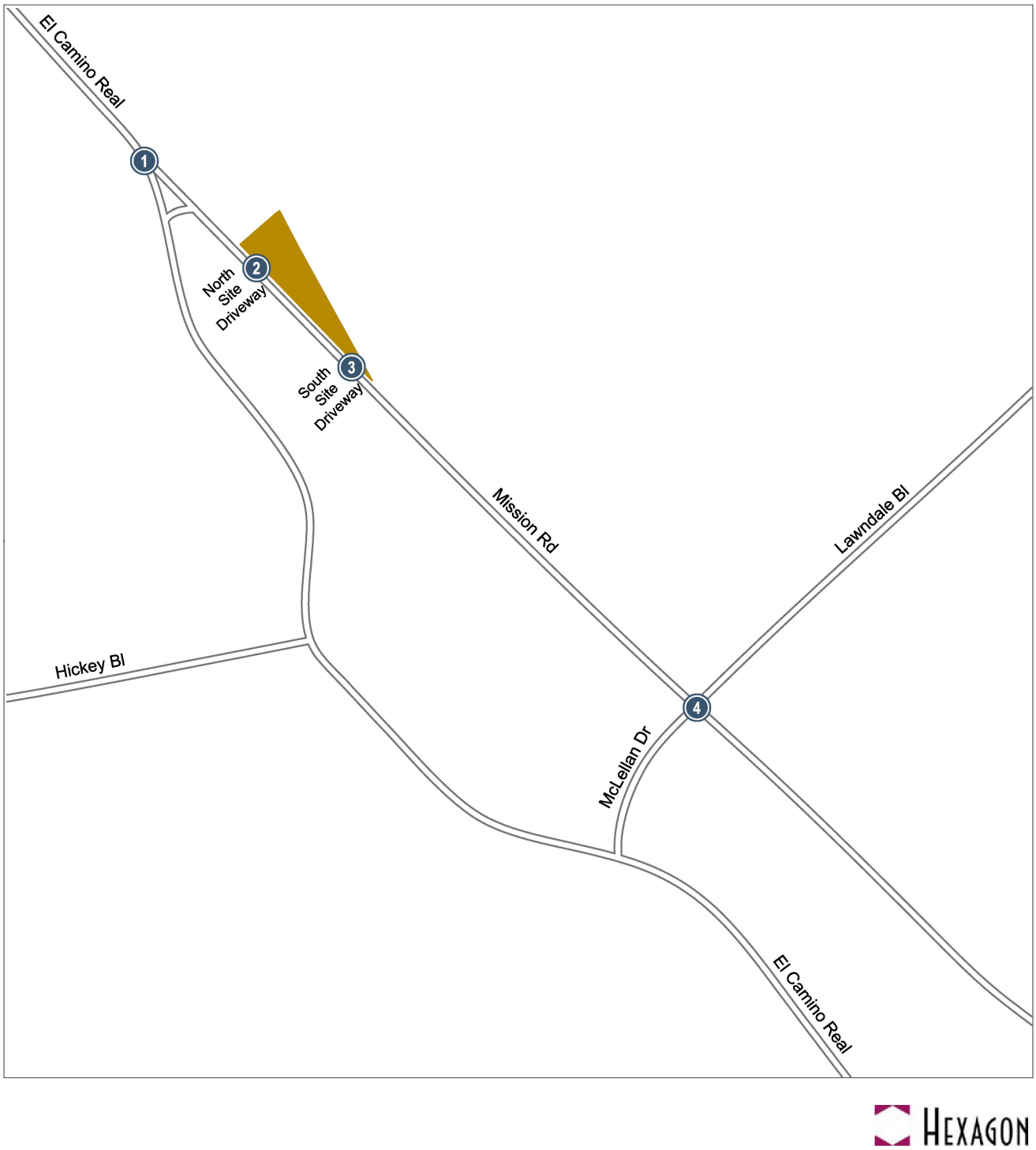


Figure 5-1 Veterans Village Traffic Study Intersections

CHAPTER 6 CUMULATIVE IMPACTS

CEQA requires that an EIR evaluate a project's cumulative impacts. Cumulative impacts are the project's impacts combined with the impacts of other related past, present, and reasonably foreseeable future projects. As set forth in the CEQA Guidelines, the discussion of cumulative impacts must reflect the severity of the impacts, as well as the likelihood of their occurrence; however, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. As stated in CEQA, "a project may have a significant effect on the environment if the possible effects of a project are individually limited but cumulatively considerable" (PRC §21083(b)).

6.1 METHODOLOGY

Consistent with CEQA Guidelines Section 15130, this EIR evaluates potential cumulative impacts using a list of past, present, and probable future projects producing related or cumulative impacts in the vicinity of the project site. This list was compiled using publicly available data from past and ongoing projects in the Town of Colma, City of South San Francisco, and the City of Daly City. Sources of past, present, and probable future projects included the Town of Colma Planning Department and the websites for the planning departments of Town of Colma, City of South San Francisco, and the City of Daly City.

The geographic scope of the area under consideration for potential cumulative impacts generally varies by type of impact and the nature of the project. To ensure consideration of all projects that could contribute to a cumulatively considerable impact of the Veterans Village project, projects within a mile radius of the Veterans Village site were considered.

6.2 ANALYSIS OF CUMULATIVE IMPACTS

The cumulative impact analysis considers the combined impacts of the proposed project and the past, present, and probable future projects listed in Table 6-1 and shown on Figure 6-1. In accordance with CEQA Guidelines Section 15130(b), the discussion of cumulative impacts describes the likelihood and severity of impacts associated with the projects identified in Table 6-1 and shown on Figure 6-1 and in accordance with CEQA Guidelines 15130(a), determines whether the Project's incremental effect is cumulatively considerable when assessed in conjunction with these other projects. In addition, as stated in CEQA Guidelines, it should be noted that:

"The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable (14 CCR §15064(h)(4))."

As described in Chapter 4 Cultural Resources of this EIR/EA-FONSI, implementation of the proposed project would have the following significant and unavoidable impacts, despite the implementation of mitigation measures:

- **Impact CUL-2A:** The proposed project would demolish four structures (reservoir, well houses and carpenter shop) which are contributing structures and buildings associated with the Holy Cross Cemetery Historic District. The demolition of these structures is considered an adverse effect under 36 CFR Part 800.5(2)(i) and a significant impact under CEQA.

- **Impact CUL-2B**: In addition, the construction of the proposed Veterans Village building represents a significant change in the "character of the use" of the water works lot at Holy Cross Cemetery from what was essentially a light industrial use associated with the cemetery (a character retained by its later use by Baca's Machine Shop) to new a multi-unit residential use. This change in use from its historic light industrial use to a multi-unit residential use constitutes an adverse effect under 36 CFR Part 800.5(2)(iv) and a significant impact under CEQA. As mitigation proposed in this EIR/EA-FONSI would not preserve the historic structures slated for removal or reduce the impacts to the change in the "character of the use" the project impacts to historic resources is considered significant and unavoidable.

Implementation of the proposed project would result in less than significant impacts or potentially significant impacts that would be mitigated to less than significant levels on all other resource areas considered in this EIR. Impacts that are individually or incrementally minor may become significant when combined with impacts associated with past and present approved projects and other anticipated future projects. The potential cumulative impacts in each resource area of concern are described below.

6.2.1 Aesthetics

The proposed project was found to have less than significant aesthetic impacts and no mitigation is required (see Chapter 3 and Appendix B Section 1.1 Aesthetics). For these reasons the project would not contribute to cumulative aesthetics impacts. All of the projects listed in **Error! Reference source not found.** are 0.4 mile or more away from the project site and are not within the viewshed of the site, nor is the site visible from any of the other project locations. Thus, the proposed project does not have the potential to result in combined aesthetic impacts with any of the projects listed in **Error! Reference source not found.**. In addition, land surrounding the project site is already developed or is occupied by cemeteries; therefore, substantial future development within the viewshed of the project site is unlikely.

6.2.2 Agriculture and Forestry Resources

Implementation of the proposed project would have no impact to agriculture and forestry resources (see Chapter 3 and Appendix B Section 1.2 Agricultural and Forest Resources) and, therefore, would not contribute to cumulative impacts on these resources.

6.2.3 Air Quality

As discussed in Chapter 3 and Appendix B Section 1.2 Air Quality, implementation of the proposed project would not result in construction or operational emissions that exceed BAAQMD thresholds of significance. In developing its CEQA significance thresholds, the BAAQMD considered the emission levels at which a project's individual emissions would be cumulatively considerable. The BAAQMD considers project's that result in emissions that exceed its CEQA significance thresholds to result in individual impacts that are cumulatively considerable and significant. Since the proposed project would not individually exceed any BAAQMD CEQA significance thresholds the proposed project would result in less than significant cumulative air quality impacts.

Table 6-1 List of Past, Present and Probable Future Projects within a One Mile Radius of the Project Site			
Project Name	**Project Location**	**Distance / Direction from Site**	**Brief Project Description**
Town Hall Renovation & Addition Project	1198 El Camino Real, Colma	0.4 mile north	This project consists of the renovation and addition to the Colma Town Hall to create a "one-roof" workplace for staff and City Council who were spread between inadequate, temporary buildings.
CarMax Project	435-455 Serramonte Boulevard, Colma	0.4 mile northeast	The proposed project includes demolition of existing structures and trees and construction of a single structure for vehicle presentation, sales, and service, as well as a freestanding nonpublic carwash that would be located south of the main building, and an associated parking lot and landscaping.
El Camino Real / Chestnut Avenue Area Plan	98 acres along El Camino Real, from Southwood Dr. to Sequoia Ave., South San Francisco	0.6 mile south	Plan for a new walkable mixed-use district at the geographic center of South San Francisco, including new housing, commercial uses, civic uses, parks, plazas and walkways.
Serramonte Shopping Center Expansion Project	80-acre site bounded by Southgate Ave., I-280, Serramonte Blvd. & Callan Blvd., Daly City	0.8 mile west	The proposed project is the expansion of the existing Serramonte Shopping Center to a maximum of 328,600 additional square feet of retail, entertainment, and restaurant space; a new 65,000-square-foot medical building; a new 75,000-square-foot hotel; and amaximum 348,000-square-foot aboveground parking garage with up to 1,080 parking spaces.
Tealdi Subdivision Project	442-468 B Street, Colma	1 mile northwest	Subdivision of an existing 0.7 acre site into 9 lots for a housing development.
7733 El Camino Real Project	7733 El Camino Real, Colma	1 mile northwest	Thirteen unit housing development; currently on hold.
Land Use Amendment	Town of Colma	N/A	An amendment to the Colma General Plan Land Use Element removing the limit of 50 new housing units per year.

6.2.4 Biological Resources

The project site is occupied by a machine shop, parked vehicles and is surrounded by urban development including roads, buildings and cemeteries. Vegetation on site primarily consists of ruderal vegetation and mature trees. There are no sensitive habitats or wetlands on or adjacent to the site and special-status species are not expected to occur on or near the site. However, the proposed project could result in impacts to nesting birds and roosting bats from removal of vegetation and structures. All other projects listed in Table 6-1 are also in an urban area and are unlikely to impact sensitive habitats, wetlands or special-status species, but could have construction-related impacts to nesting birds and roosting bats similar to the proposed project. Therefore, the potential exists for biological impacts from implementation of the proposed project to combine with impacts from the projects listed in Table 6-1, resulting in cumulative impacts to nesting birds and roosting bats. However, potential project-related impacts to nesting birds and roosting bats would be reduced to less than significant levels with implementation of the landscape plan for the project, which includes the planting of over 90 trees, and Mitigation Measures BIO-1 and BIO-2, which require preconstruction surveys for nesting birds and roosting bats (see Chapter 3 and Appendix B Section 1.4 Biological Resources). With implementation of the landscape plan and mitigation measures, the proposed project's contribution to impacts on biological resources would not be cumulatively considerable.

6.2.5 Cultural / Tribal Cultural Resources

Historic Resources

As described in Chapter 4, the proposed project would have significant and unavoidable impacts on historic buildings through the demolition of four historic buildings which are part of the Holy Cross Cemetery Historic District and a change in use within the Historic District from its historic light industrial use to a multi-unit residential use (Impact CUL-2). Mitigation Measures CUL-2a through CUL-2c would help to lessen Impact CUL-2, but it would still remain significant and unavoidable even with the mitigation measures. The project would have a less than significant impact on the historical significance of the Holy Cross Cemetery Historic District and its cultural landscape features and the Cypress Lawn Memorial Park Historic District.

None of the projects listed in Table 6-1 would have significant and unavoidable impacts to historic resources, and all potential impacts to historic resources from those projects are expected to be less than significant. The majority of the projects listed in the table are redevelopment, expansion or renovation projects on existing developed lots and are located away from Colma's historic cemeteries and structures. Only the CarMax Project is also adjacent to cemeteries, located in between the Salem Cemetery to the north and the Home of Peace Cemetery/Hills of Eternity Cemetery to the south. However, the CarMax Project is the redevelopment of privately-owned lots which do not contain any historic structures and the CarMax project would not directly impact any cemetery lands or related historic structures. The only project listed in Table 6-1 that would develop vacant, unpaved land is the El Camino Real / Chestnut Avenue Area Plan. The vacant lands that would be develop as part of the plan do not contain any structures and are not part of a historic district.

Although the proposed project would have a significant and unavoidable impact on historic resources, no other projects listed in Table 6-1 would impact either a historic district or historic structures. Therefore, because the project's impacts would not combine with other projects there is no cumulative impact to historic resources.

Archaeological Resources, Tribal Resources and Human Remains

There are no known archaeological resources, tribal resources or human remains on the project site, and potential construction-related impacts to unrecorded historical, archaeological, and tribal cultural resources and/or unrecorded human remains (Impact CUL-1) would be reduced to a less than significant level with implementation of Mitigation Measure CUL-1 (see Chapter 4 Cultural Resources).

The projects listed in Table 6-1 could have potentially significant impacts to unrecorded historical, archaeological, and tribal cultural resources and/or unrecorded human remains similar to the proposed project, which could result in cumulative impacts to such resources when combined with the proposed project. However, these projects also have or will have CEQA documents with mitigation measures to protect undiscovered cultural resources similar to the proposed project. Therefore, the proposed project is not expected to result in cumulatively considerable impacts to undiscovered cultural resources when combined with other projects in the area.

Paleontological Resources and Unique Geologic Features

The project is not expected to impact paleontological resources or unique geological features because they are unlikely to occur on the site (see Chapter 4 Cultural Resources). Since the proposed project is not expected to impact paleontological or unique geological resources, the project would not contribute to cumulative impacts on these resources.

6.2.6 Geology and Soils

The proposed project's contribution to geology and soils impacts would not be cumulatively considerable. All potential project-related impacts to geology and soils are less than significant (see Chapter 3 and Appendix B Section 1.6 Geology and Soils). The proposed project would be designed and constructed according to the Uniform Building Code and the recommendations in the Geotechnical Report prepared for the project (Rockridge Geotechnical, 2015) to ensure it is able to withstand anticipated seismic ground shaking, liquefaction and expansive soils. Under a recent court decision (CBIA v. BAAQMD 2015), CEQA no longer requires a Lead Agency to consider the impact of existing geologic hazards on a project, but only the project's potential effect on geology and soils. The proposed project would not exacerbate geologic hazard conditions on the site and thus would not contribute to cumulative geologic hazard impacts.

The project does have the potential to cause soil erosion and loss of topsoil during construction which could combine with similar construction-related impacts from other projects in the area. However, the project includes the preparation of an Erosion and Sediment Control Plan and a Storm Water Pollution Prevention Plan (SWPPP) which would contain best management practices (BMPs) to prevent soil erosion and loss of top soil. With implementation of these BMPs, the proposed project's contribution to erosion and loss of topsoil would not be cumulatively considerable.

6.2.7 Greenhouse Gases and Energy

Unlike air quality, which is influenced by local and regional factors and is therefore considered on the local or regional scale, the effects of global climate change are the result of greenhouse gas (GHG) emissions worldwide; individual projects do not generate enough GHG emissions to influence global climate change. Thus, the analysis of GHG emissions is by nature a cumulative analysis focused on whether an individual project's contribution to global climate change is

cumulatively considerable. As described in Chapter 3 and Appendix B Section 1.7 Greenhouse Gas Emissions, the proposed project would not result in direct or indirect GHG emissions that have a significant effect on the environment or conflict with an applicable GHG reduction plan, policy, or regulation and, therefore, would not result in cumulative considerable GHG impacts.

6.2.8 Hazards and Hazardous Materials

All potential project-related impacts to hazards and hazardous materials are less than significant (see Chapter 3 and Appendix B Section 1.8 Hazards and Hazardous Materials). The proposed project would not include the routine transport, use or disposal of hazardous materials; is not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5; is not within ¼ mile of an existing school or within 2 miles of a public or private airport; would not impair implementation of or physically interfere with the Town of Colma's Standardized Emergency Management System, its Emergency Management Plan or its designated evacuation routes; and would not expose people or structures to a significant risk of loss, injury or death involving wild land fires.

The project could result in the accidental release of construction fuels or fluids and/or exposure of workers or the environment to hazardous building materials such as asbestos containing materials and lead-based paint. All of the projects listed in Table 6-1 are 0.4 mile or more away from the project site and are not expected to result in accidental releases of hazardous materials or other hazards or hazardous materials impacts that could combine with the proposed project to create cumulatively considerable hazard impacts. In addition, a spill prevention and response plan would be prepared for the project and the proposed project would comply with all applicable regulations regarding testing, abatement, worker protection and disposal of such materials. With implementation of the spill prevention and response plan and compliance with all applicable hazardous materials regulations, the proposed project's contribution to hazards and hazardous materials impacts would not be cumulatively considerable.

6.2.9 Hydrology and Water Quality

All potential project-related impacts to hydrology and water quality are less than significant (see Chapter 3 and Appendix B Section 1.9 Hydrology and Water Quality). Potential project construction-related impacts to hydrology and water quality including erosion and siltation or the release of hazardous materials would be prevented by the preparation and implementation of a SWPPP and an Erosion and Sediment Control Plan. Potential project operational-related impacts to hydrology and water quality, including a potential increase in storm water runoff would be prevented through incorporation of adequately-sized bio-retention areas, and compliance with measures for storm water pollution prevention consistent with Subchapter 3.10 of the Town's Municipal Code. The proposed project would not impact groundwater, be subject to flood-related hazards, or be at risk of inundation by seiche, tsunami or mudflow.

Although the proposed projects listed in Table 6-1 could have similar potential construction- and operation-related impacts to hydrology and water quality, these projects would be required to comply with the same regulations as the proposed project to prevent water pollution or increases in storm water run-off per the requirements of the National Pollutant Discharge Elimination System (NPDES) permits issued to San Mateo County and its member towns and cities. This could include the preparation and implementation of a SWPPP or Erosion and Sediment Control Plan or similar measures as applicable to the individual project. In addition, the project sites of the projects listed in **Error! Reference source not found.** are generally already developed with existing buildings and largely covered with existing impervious surface area. Therefore, the

cumulative increase in impervious surface area from all the projects is not expected to be substantial and would be mitigated through on-site design measures consistent with regulatory requirements. Thus, the proposed project is not expected to result in cumulatively considerable impacts to hydrology and water quality when combined with the other projects listed in Table 6-1.

6.2.10 Land Use and Planning

All potential project-related impacts to land use and planning would be less than significant (see Chapter 3 and Appendix B Section 1.10 Land Use and Planning). The Town's Housing Element Update identifies this site as a required residential development site to satisfy the Town's housing production requirements. The proposed project would not conflict with the zoning or General Plan land use designations for the site. The proposed project would not physically divide an established community or conflict with any Habitat Conservation Plan or Natural Community Conservation Plan. As such, the proposed project would not have any impacts to land use and planning that could be cumulatively considerable.

6.2.11 Mineral Resources

Implementation of the proposed project would have no impact to mineral resources (see Chapter 3 and Appendix B Section 1.11 Mineral Resources) and, therefore, would not contribute to cumulative impacts on these resources.

6.2.12 Noise

All potential project-related noise impacts would be less than significant (see Chapter 3 and Appendix B Section 1.12 Noise). A detailed acoustic report would be prepared for the project as required by state law and the Town's General Plan for multi-family dwellings proposed in areas exposed to exterior noise levels of 60 Ldn or higher, which would ensure the project does not expose persons to noise levels that exceed applicable standards.

Project construction equipment would not produce excessive groundborne vibration at sensitive residential receptor locations or excessively impact adjacent businesses. Future residents at the project site would not be significantly impacted by vibration from the nearby underground BART service because BART has included mitigation measures to decrease groundborne vibration to less than significant levels. The project would not result in a substantial permanent increase in ambient noise levels because noise from the proposed residential land use (e.g., car doors closing, landscaping equipment, and human speech) would be highest during the daytime and would likely not be noticeable or discernible above existing high ambient noise levels from traffic on El Camino Real. Construction noise from the project is considered a less than significant impact because of the temporary nature of the noise and because the hours of construction are limited. The proposed project is not located within an airport land use plan area, within two miles of a public use airport, or in the vicinity of a private air strip and thus would not expose future residents at the site to excessive noise levels from an airport.

All of the projects listed in Table 6-1 are 0.4 mile or more away from the project site and construction and operational noise at the site would not be audible at the locations of the other projects, and construction and operational noise from the other projects would not be audible at the project site. Due to the distance of the site from the other projects and because all project-related noise impacts would be less than significant, the project's contribution to the noise environment in the project area would not be cumulatively considerable.

6.2.13 Population and Housing

All potential project-related impacts to population and housing would be less than significant (see Chapter 3 and Appendix B Section 1.13 Population and Housing). The project would not displace any existing housing or people, or necessitate any replacement housing elsewhere. However, the project would induce population growth with the construction of 66 new housing units. The El Camino Real / Chestnut Avenue Area Plan, the Tealdi Subdivision Project, the 7733 El Camino Real Project and the General Plan Land Use Amendment removing the limit of 50 housing units per year (Table 6-1) could result in additional housing and population growth in the project area beyond that induced by the proposed project. However, the proposed project would not induce population growth beyond that projected in the Town's General Plan and would help to meet the need for 250 additional housing units projected by the Association of Bay Area Governments (ABAG) and Metropolitan Transportation Commission (MTC). Therefore, the proposed project's contribution to population and housing impacts would not be cumulatively considerable.

6.2.14 Public Services

All project-related impacts to public services would be less than significant (see Chapter 3 and Appendix B Section 1.14 Public Services). The proposed project would result in an increase of population, however, it would not lead to a substantial increase in calls for emergency medical, fire suppression or police services. The proposed project would not create a need for new or physically altered facilities to maintain adequate service ratios, response times, or other performance objectives according to personal communications with the Town's Fire Department and Chief of Police.

The project would not significantly impact school facilities because the applicant is required to pay school impact fees of $3.48 per square foot to the local school district. The project would not significantly impact parks or recreational facilities because the project includes on-site recreational facilities for use by the building residents including a social hall, community garden space and dog park; and the Town has determined that it is likely that the new adult and senior residents at the site would merely increase participation in existing recreational program offerings.

The projects listed in Table 6-1 include or may result in new housing and commercial development which could lead to an increase in the demand for public services in the project area. However, the largest development projects in the table are the El Camino Real / Chestnut Avenue Area Plan and the Serramonte Shopping Center Expansion Project which are outside of the Town of Colma and thus rely on different fire protection, emergency services and police protection providers than the proposed project and possibly other different public service providers or facilities as well. Thus, the potential impacts to fire protection, emergency services, police protection and possibly other public services or facilities from the proposed project would not combine with these large projects. The impacts to public services from the smaller projects in Table 6-1 located within the Town would most likely be less than significant. In any case, the project's contribution to public services impacts would not be cumulatively considerable since all project-related impacts to public services would be less than significant.

6.2.15 Recreation

The proposed project would not increase the use of recreational facilities or create new demand for recreational facilities as the Town has determined that it is likely that the new adult and senior residents at the site would merely increase participation in existing program offerings (see

Chapter 3 and Appendix B Section 1.15 Recreation). The project also includes on-site recreational facilities for use by the building residents including a social hall, community garden space and dog park.

The El Camino Real / Chestnut Avenue Area Plan, the Tealdi Subdivision Project, the 7733 El Camino Real Project and the General Plan Land Use Amendment removing the limit of 50 housing units per year (Table 6-1) include or may result in new housing development which could lead to an increase in the use of existing recreational facilities in the project area. The El Camino Real / Chestnut Avenue Area Plan is likely the only project listed in the table which may include recreational facilities whose construction could have an adverse impact on the physical environment. Nevertheless, the proposed project's contribution to recreation impacts would not be cumulatively considerable since all project-related impacts to recreation would be less than significant.

6.2.16 Traffic/Transportation

As described in Chapter 5 , Traffic and Transportation, Mitigation Measures TRAF-1a and TRAF-1b would prevent unsafe traffic circulation conditions on the project site (IMPACT TRAF-1). All other potential project-related impacts to traffic and transportation would be less than significant.

The proposed project would not conflict with an applicable transportation-related plan, ordinance or policy because the transportation impact analysis (TIA) prepared for the project found that under the existing plus project condition, the two study intersections and site driveways would operate at an acceptable Level of Service (LOS) and meet or exceed the standards set by the Town's General Plan. The project is presumed consistent with the applicable Congestion Management Program because the project is estimated to generate fewer than 100 peak-hour trips and thus does not require a Congestion Management Agency analysis. The project would not conflict with adopted policies, plans, or ordinances regarding public transit, bicycle or pedestrian facilities because it would not exceed the capacity of such facilities and it would include on-site pedestrian walkways and bicycle storage consistent with Town regulations. The project would not result in inadequate emergency access because complete perimeter (circular) emergency vehicle access is provided around the site.

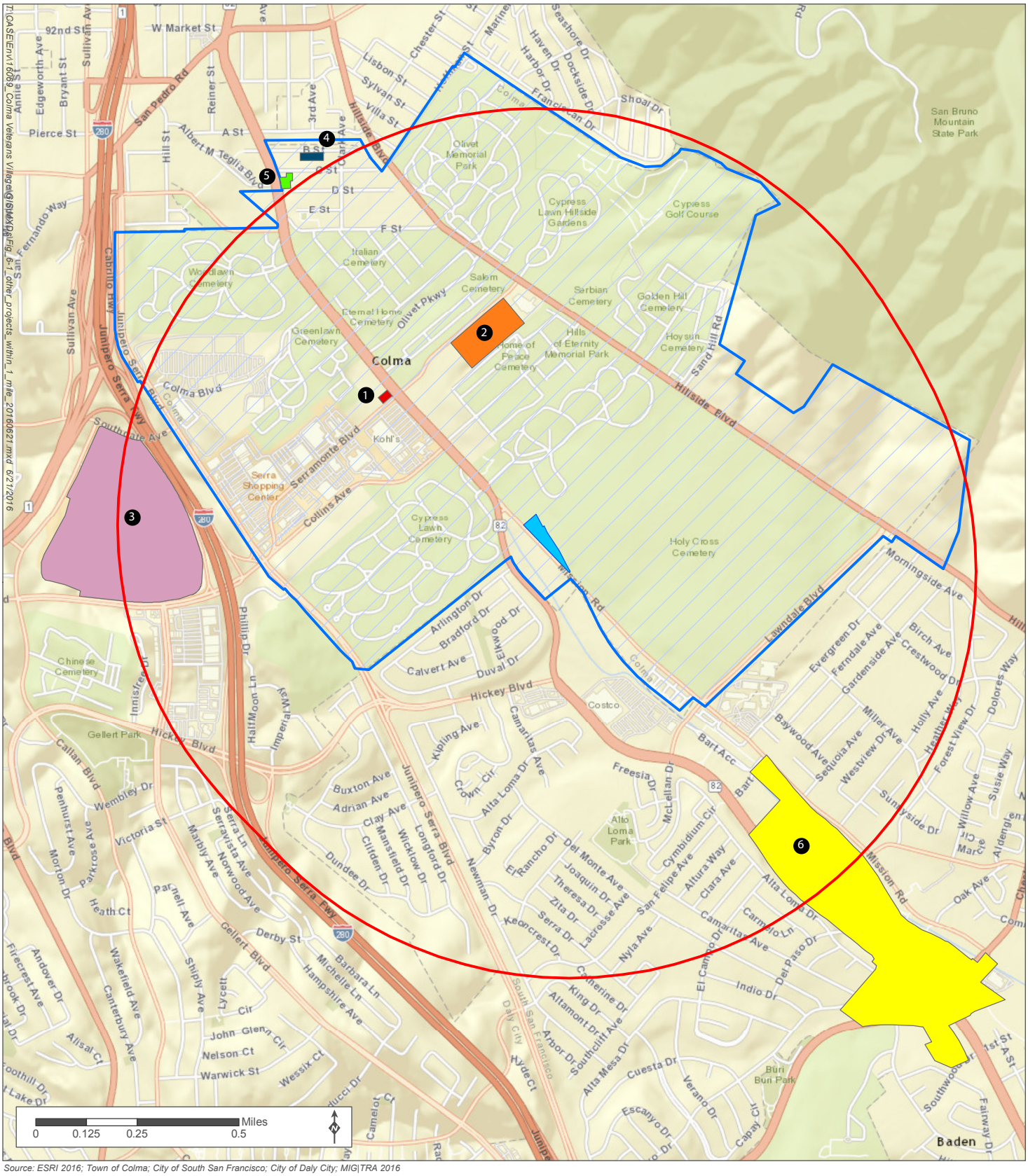
The TIA included an analysis of cumulative traffic volumes. Cumulative volumes were estimated based on previous forecasts of traffic volumes in the study area from the *CarMax Transportation Impact Analysis* dated November 19, 2015. Cumulative plus project traffic volumes are represented by cumulative traffic volumes plus project trips. Under cumulative conditions both without and with the project, the intersection of El Camino Real and Mission Road would operate at LOS C or better for all movements during both peak hours. The intersection of Mission Road and Lawndale Boulevard would operate at an acceptable LOS D during both the AM and PM peak hours under cumulative conditions both without and with the project. Under cumulative conditions with the project, the project site driveways would operate at an overall LOS A, with the worst movement (outbound out of the site driveway) operating at LOS B during both peak hours. Therefore, the project's contribution to traffic volumes would not be cumulatively considerable.

6.2.17 Utilities and Service Systems

All potential project-related impacts to utilities and service systems would be less than significant (see Chapter 3 and Appendix B Section 1.17 Utilities and Service Systems). The

project would not exceed the wastewater treatment requirements of the San Francisco Regional Water Quality Control Board (RWQCB) because it would not substantially increase pollutant loads, as there is neither heavy industrial use nor agricultural processing where loads and wastewater volumes are heavy. The project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities or exceed the capacity of the wastewater treatment provider because Colma is currently contributing only half of its permissible daily flow of wastewater to the South San Francisco / San Bruno Water Quality Control Plant. The project would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities because on-site bio-retention areas large enough for the treatment and retention of storm water runoff from the project would be constructed as part of the project. Cal Water has sufficient capacity to provide water to the project from existing entitlements and resources. The project is served by a landfill (Ox Mountain) with sufficient permitted capacity to accommodate the project's solid waste disposal needs. The proposed project would comply with all federal, state and local statutes related to solid waste.

The projects listed in Table 6-1 include or may result in new housing and commercial development which could lead to an increase in the demand for utilities and service systems in the project area. However, the largest development projects in the table are the El Camino Real / Chestnut Avenue Area Plan and the Serramonte Shopping Center Expansion Project which are outside of the Town of Colma and thus may have at least some different utility and service systems providers. Thus, the potential impacts to utilities and service systems from the proposed project may not combine with these large projects for some utilities and service systems. The impacts to utilities and service systems from the smaller projects in Table 6-1 located within the Town would most likely be less than significant. In any case, the project's contribution to public services impacts would not be cumulatively considerable since all project-related impacts to utilities and service systems would be less than significant.



Source: ESRI 2016; Town of Colma; City of South San Francisco; City of Daly City; MIG|TRA 2016

- Project Site
- One Mile Buffer around Project Site
- Land Use Amendment: Town of Colma
- 1 Town Hall Renovation and Addition Project
- 2 CarMax Project
- 3 Serramonte Center Project
- 4 Tealdi Subdivision Project
- 5 7733 El Camino Real Housing Development Project
- 6 El Camino Real Chestnut Avenue Area Plan

Figure 6-1
Cumulative Projects Within a One Mile Radius of the Project Site

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CHAPTER 7 ALTERNATIVES

CEQA Guidelines Section 15126.6 states that an EIR shall describe a range of reasonable alternatives to a project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. An EIR does not need to consider every conceivable alternative, but must foster informed decision making and public participation. CEQA intends for the alternatives discussion to focus on alternatives that are capable of avoiding or substantially reducing any significant effects of the project, even if these alternatives would impede to some degree attaining the objectives of the project. The significant impacts of the project are summarized in Table 2-1.

This EIR identifies potential alternatives that could feasibly attain the basic objectives of the project and potentially avoid or substantially lessen the project's significant effects. The EIR considers alternative locations, and alternative project designs and components. The EIR also considers the No Project Alternative as required by CEQA (CEQA Guidelines Section 15126.6 (e). The selection of these alternatives was informed by written comments received during the EIR scoping process. In total, five alternatives were identified, two of which were rejected and not discussed in detail and three are presented as alternatives to the proposed project. The project objectives, significant impacts to be avoided or lessened, and all of the alternatives are discussed in this chapter.

7.1 ALTERNATIVES SELECTION

As mentioned above, the alternatives selected for analysis need to feasibly attain the basic objectives of the project and avoid or substantially lessen any of the significant effects of the project. The project objectives and significant effects, and feasibility constraints are explained in this section.

7.1.1 Summary of Project Objectives

The Applicant's objectives for the project are to:

- Provide approximately 60 to 70 units of housing for Veterans on a fixed income
- Provide housing for homeless Veterans
- Provide support services to Veterans
- Increase self-sufficiency for Veterans
- Increase Veteran access to VA medical facilities

Mercy Housing California (MHC) is a California-based non-profit corporation whose mission is to create stable, vibrant, and healthy communities by developing, financing, and operating affordable, program-enriched housing for families, seniors, and people with special needs who lack the economic resources to access quality, safe housing opportunities.

The project meets the Town's Housing Element goals and policies as described in the Land Use section of Appendix B (Initial Study) and includes the following City Goals and policies:

The Housing Element Update identifies this site as a required residential development site to satisfy the Town's housing production requirements. In addition, the zoning ordinance includes a "no net loss" requirement which requires that designated housing sites, including this site, be developed for housing, and if not, that housing be developed elsewhere in the Town.

Colma's long term housing goal is to facilitate and encourage housing that fulfills the diverse needs of the community (Housing Element 2015, page 106).

- Goal A: Identify adequate sites, with appropriate zoning and development standards and services to accommodate Colma's share of the regional housing needs for each income level.
- Goal B: Assist in making available adequate housing to meet the needs of extremely low, very low, low and moderate income households.
- Goal C: Address, and where possible, remove governmental constraints to the maintenance, improvement and development of housing, including housing for all income levels and housing for persons with disabilities.
- Goal F: Promote equal housing opportunities for all persons regardless of race, religion, sex, marital status, ancestry, national origin, color, familial status, or disability.
- Goal G: Encourage sustainable residential development that is energy efficient and consistent with existing and future Town values and policies related to reducing greenhouse gas emissions.

Policy 3: Provide incentives that encourage affordable high-density residential uses near major regional transportation facilities (forwards Goals A, B, and C).

Program 3.1 – Planned Development Districts

Pursuant to Colma Zoning Ordinance, parcels zoned as "Planned Development (PD)" permit a mix of uses, including both residential and commercial. Higher density mulita-unit residential developments are permitted in PD zones. PD districts may be established in any R or C zone upon application or upon the initiative of the City Council.

Objectives: 1) to optimize the use of developable land to maximize the General Plan density of each developable site, and 2) to allow for implementation of Density Bonus provisions when appropriate

Program 3.2 – Density Bonus for Affordable Housing

In December 2005, the Town adopted a Density Bonus Ordinance that provides for granting an increase in density for qualifying residential projects, consistent with State Law.

Objectives – To increase the supply of housing units through the use of density bonus provisions.

Program 3.4 – Planner Responsibility to Promote Affordable Housing and Mixed-Use.

At the time first contact is made with Town staff, developers are alerted by the City Planner of the Town's desire to provide a wide range of housing, including units affordable to lower income households. The Planner informs prospective developers of the numerous alternatives for financing the construction of

affordable housing units, including available incentives such as density bonuses, and provides them with a list of vacant and underutilized properties in Colma. Provide development community with HCD "Financial Assistance Program Directory".

Objectives: To assist in the development of affordable housing units

Program 3.6 – Ensure No Net Loss of Required Units.

For each of the three sites identified to accommodate housing for lower income households approved for development at a realistic capacity lower than that identified in the Housing Element, the Town shall identify a site with available infrastructure, without site constraints that would impair achieving maximum densities, and rezone the identified site with a maximum density of 30 units per acre. The rezoned site shall be of sufficient size to accommodate the equivalent realistic capacity of the underdeveloped site so that there is no net loss of capacity in zoning for lower income households. In May of 2013, the Town added to the Colma Municipal Code the provision that there be no net loss of housing at designated housing sites, pursuant to Govt. Code Section 65863.

Objective: To assure that all units identified in the Housing Element will be built on designated sites or alternative sites.

7.1.2 Summary of Significant Impacts

As described in Chapter 3 of this EIR, the Veterans Village Project would result in a significant and unavoidable impact to historical resources. Additionally, the project would have impacts to biological resources that are mitigated to less than significant levels with mitigation recommended in this EIR. A list of the significant and potentially significant impacts associated with the project is presented below in Table 2-1. All potentially significant impacts identified for the proposed project can be mitigated to less than significant levels, with the exception of substantial adverse impacts to historical resources (Impacts CUL-2A and CUL-2B as identified in Chapter 4).

7.2 ALTERNATIVES CONSIDERED BUT REJECTED

CEQA Guidelines establish that an EIR should identify alternatives considered but rejected by the Lead Agency and briefly explain the reasons the Lead Agency rejected the alternatives. Factors that may be taken into account when eliminating an alternative from detailed consideration include failure to meet most of the basic project objectives, infeasibility, or inability to avoid significant environmental impacts. Furthermore, factors affecting project feasibility include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the project proponent can reasonably acquire, control, or otherwise have access to an alternative site.

7.2.1 Non-Housing Use of the Site

The project site cannot be used for any use other than housing. The project site is identified in the Town's Housing Element as a proposed housing development with a 26-unit minimum size. Per Government Code 65589.5 a residential project must be constructed at this location because the site has been identified as being suitable for residential development to meet the Town's

housing requirement in the Housing Element. Therefore, non-housing related development at the site is considered infeasible and cannot be considered as it would be inconsistent with the Housing Element.

7.2.2 Less than 26-Unit Residential Development

As stated above, the minimum number of residential units that can be contemplated at the site is 26-units to meet the Housing Element requirement. Therefore, any alternative scenario with less than 26-units is considered infeasible and rejected from further consideration because it would be inconsistent with the Housing Element.

7.3 NO PROJECT ALTERNATIVE

In accordance with the CEQA Guidelines, the No Project/No Build Alternative for a development project on an identifiable property consists of the circumstance under which the project does not proceed. Section 15126.6(e)(3)(B) of the Guidelines states that, "In certain instances, the no project alternative means 'no build' wherein the existing environmental setting is maintained." Accordingly, the No Project Alternative provides a comparison between the environmental impacts of the proposed project in contrast to the environmental impacts that could result from not approving, or denying, the proposed project. Because the City Council has discretionary authority over a proposed project and could choose to deny it, the environmental impacts of that action must be disclosed. As a result of this potential decision, the project site could remain in its current state and condition for an undetermined period of time and not be the subject of any further development proposals. Evaluation of this alternative will determine if any significant impacts identified with the proposed project would be eliminated or if any less than significant impacts would be further reduced.

The No Project Alternative would leave the property in its existing condition, so there would be no potential impacts as follows:

- No grading or tree removal would occur under this alternative and there would be no potential impacts to migratory birds that may be present on the project site. Therefore, selection of the No Project Alternative would avoid all site disturbances on the property and the project's impacts to biological resources would not occur.
- No grading or soil disturbance would occur under this alternative and there would be no potential impacts to unrecorded cultural resources. Therefore, selection of the No Project Alternative would avoid all site disturbances on the property and the project's impacts to cultural resources would not occur.
- No removal of structures would occur under this alternative and there would be no potential impacts to historical resources that may be present on the project site. Therefore, selection of the No Project Alternative would avoid all site disturbances on the property and the project's impacts to historical resources would not occur.

While the No Project Alternative eliminates project impacts, it does not further the Town's implementation of the Housing Element and does not satisfy any of the project objectives. The No Project Alternative is the Environmentally Superior Alternative.

7.4 REDUCED PROJECT ALTERNATIVE

Under the Reduced Project Alternative, the project could be redesigned to provide the minimum number of units specified in the Housing Element, which is 26 units. This reduced project alternative, may, or may not preserve the four historic buildings that are proposed to be removed by the proposed project. However, the placement of a 26-unit residential development and amenities in and amongst all existing historic structures could still result in a change in the historic use of the site as it represents a change in the character of the property's use from industrial to residential/industrial. The change in historic use could still be considered an adverse effect under 36 CFR Part 800.5(2)(iv) and could still remain a significant and unavoidable impact of the project.

The Reduced Project Alternative would still require grading, tree removal, and construction activity on the property so there would be potential impacts as follows:

- Grading and tree removal would occur under this alternative and similar impacts to the project would apply for biological resources.
- Grading would occur under this alternative and similar impacts to the project would apply for cultural resources.
- It is unknown if this alternative would require removal of any existing structures. There may be an impact to historical resources that may be present on the project site.

A Reduced Project Alternative does not meet the Town's project objectives of using the full site, and maximizing the number of developable units at the site (Housing Element Policy 3, Program 3.1 and Program 3.2). A Reduced Project Alternative renders the project infeasible since the project size would be too small to support management and support services necessary for the residents. For these reasons, the Reduced Project Alternative is not considered the Environmentally Superior Alternative.

7.5 REVISED SITE PLAN THAT PRESERVES HISTORIC STRUCTURES ALTERNATIVE

Under the Revised Site Plan that Preserves Historic Structures Alternative, the project would maintain the proposed 66 units and at the same time preserve all existing historic structures at the site. The applicant has developed a site plan to illustrate this alternative, as shown in Figure 7-1. In order to preserve the existing historic structures, the site plan:

- Breaks-up the residential buildings into two smaller structures (one on either side of the pump building) to fit the 66-units;
- The massing of this alternative reduces open space on the site and increases the visible mass of the structure from Mission Road;
- The massing of this alternative reduces outdoor living spaces for future project occupants;
- The placement of a building south of the pump building reduces historic views of the pump building from the north;
- The required placement of new structures to preserve historic structures changes historic views of these structures (they would not be readily visible due to the new construction); and

- The site plan changes site circulation and prohibits required emergency vehicle access around the site (driveway width is required to be reduced from 20 feet to 13 feet adjacent to the northernmost historic structure where 20 feet is required by the Colma Fire Protection District)

The Revised Site Plan Alternative would still require grading, tree removal, and construction activity on the property so there would be potential impacts as follows:

- Grading and tree removal would occur under this alternative and similar impacts to the project would apply for biological resources.
- Grading would occur under this alternative and similar impacts to the project would apply for cultural resources.
- The placement of a 66-unit residential development and amenities in and amongst the existing structures would still likely result in a change in the historic use of the site as it represents a change in the character of the property's use from industrial to residential/industrial. The change in historic use could still be considered an adverse effect under 36 CFR Part 800.5(2)(iv) and could still remain a significant and unavoidable impact of the project.
- The placement of a 66-unit residential development and amenities in and amongst the existing structures would result in a change in the historic and visual character of the site as it makes historic structures, especially the pump house building, less visually prominent from Mission Road and could be a significant and unavoidable impact of the project.
- This alternative would create new impacts with respect to public safety since there is insufficient driveway width for emergency vehicles to navigate around the site.

A Revised Site Plan that Preserves Historic Structures Alternative does not meet the Town's project objectives of using the full site and incorporating outside features. The Revised Site Plan Alternative is not considered the Environmentally Superior Alternative

LEGEND

- PROPERTY LINE
- BART TUNNEL LINE OF INFLUENCE
- OUTER WALLS OF SUBWAY BOX
- (N) METAL FENCE, S.L.D.
- ACCESSIBLE PARKING SPACE
- EASEMENT, SEE SURVEY
- RESIDENTIAL
- CIRCULATION/MAINTENANCE
- COMMON AREAS
- EXISTING STRUCTURE TO REMAIN

1 **SITE PLAN**

SCALE: 1" = 30'

0 15' 30' 60'

VAN METER WILLIAMS POLLACK LLP

MIG | TRA ENVIRONMENTAL SCIENCES

Figure 7-1 Revised Site Plan that Preserves Historic Structures Alternative

CHAPTER 8 CEQA REQUIRED ASSESSMENTS

8.1 SIGNIFICANT AND UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126(a) and (b) require an EIR to discuss the significant environmental effects of the proposed project and the significant environmental effects which cannot be avoided if the proposed project is implemented.

All potentially significant impacts of the project are identified in Chapters 3 – 7 of this EIR, along with mitigation measures to reduce or avoid these impacts.

Significant Environmental Effects:

The significant environmental effects of the proposed project are listed in Table 2-1. Significant effects of the project include impacts on biological resources from tree removal (nesting birds and bats), and impacts from construction on buried cultural resources.

Significant Environmental Effects Which Cannot be Avoided:

Even with the application of mitigation measures, the proposed Veterans Village Project, if implemented, would result in two unavoidable, significant impacts:

Impact CUL-2A: The proposed project would demolish four structures (reservoir, well houses and carpenter shop) which are contributing structures and buildings associated with the Holy Cross Cemetery Historic District. The demolition of these structures is considered an adverse effect under 36 CFR Part 800.5(2)(i) and a substantial adverse change according to the Town's Criteria of Significance for a historic resource. Therefore, it is considered a significant impact under CEQA.

Impact CUL-2B: In addition, the construction of the proposed Veterans Village building represents a significant change in the "character of the use" of the water works lot at Holy Cross Cemetery from what was essentially a light industrial use associated with the cemetery (a character retained by its later use by Baca's Machine Shop) to new a multi-unit residential use. This change in use from its historic light industrial use to a multi-unit residential use constitutes an adverse effect under 36 CFR Part 800.5(2)(iv) and a substantial adverse change according to the Town's Criteria of Significance for a historic resource. Therefore, it is considered a significant impact under CEQA.

The mitigation measures CUL-2A and CUL-2B presented in Chapter 4 and Table 2-1 are proposed to minimize project impacts.

Despite the implementation of Mitigation Measures CUL-2a, CUL-2b, and CUL-2c, Impacts CUL-2A and CUL-2B would remain **significant. Therefore, the removal of the four historic structures (Impact CUL-2A) and the change in character in the use of the site (Impact CUL-2B) are considered significant and unavoidable effects of the project.**

8.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126(c) and 15126.2(c) require an EIR to discuss significant irreversible changes which would be caused by implementation of the proposed Veterans Village Project.

Site clearing activities, by their very nature, result in irreversible changes. The removal of existing trees and shrubs from the project area, removal of some existing historic structures, and the corresponding construction of new facilities, would result in irreversible environmental changes. The proposed project would also result in the use of non-renewable energy resources such as fuel (gasoline and diesel) and oil for construction equipment and resident/employee vehicle trips; however, the incremental increase in the use of these resources would not interfere with regional supplies and availability of these resources. In addition, while the proposed project would result in a change in land use, this change (i.e., a new residential building) would serve the community in which it is located and would not increase access to a previously inaccessible area. Finally, the proposed project would not involve the use of large quantities of flammable or hazardous substances, which if accidentally released, could cause irreversible environmental damage.

8.3 GROWTH INDUCING IMPACTS

CEQA Guidelines Section 15126(d) requires an EIR to discuss the growth-inducing impact of the proposed project.

While the Veterans Village Project would result in approximately 66 -198 new residents in Colma, the project is not considered growth inducing because the project is consistent with the Town's General Plan and Housing Element which specifically identifies this site for residential development and which have considered the resulting increase in the Town's population.

The project does not provide new infrastructure to an area not already served by utilities, thereby supporting new development in currently undeveloped areas. The project will connect to existing utility providers with existing facilities (water, sewer, storm drain, electrical, etc.) accessible adjacent to the site at Mission Road.

The proposed Project does not contain any other potential activity or component that would induce growth.

CHAPTER 9 NEPA ENVIRONMENTAL ASSESSMENT

U.S. Department of Housing and Urban Development

451 Seventh Street, SW

Washington, DC 20410

www.hud.gov

espanol.hud.gov

Environmental Assessment

Determinations and Compliance Findings for HUD-assisted Projects

24 CFR Part 58

Project Information

Project Name:	Mercy Housing Veterans Village
Responsible Entity:	Housing Authority County of San Mateo Department of Housing 264 Harbor Boulevard, Building A Belmont, California 94002
Grant Recipient:	Mercy Housing California 66, LP 1360 Mission Street San Francisco, California 94103
State/Local Identifier:	16069
Preparer:	MIG, Inc. 2635 North First Street, Suite 149 San Jose, California 95134
Certifying Officer Name and Title:	Kenneth Cole, Executive Director
Grant Recipient:	Doug Shoemaker, President
Consultant (if applicable):	Christopher Brown, Director, MIG, Inc.
Direct Comments to:	Francisco Gomez, HCD Specialist III County of San Mateo Department of Housing 264 Harbor Blvd., Bldg. A Belmont, CA 94002MIG, Inc. Fax: 650-802-3373 FGomez@smchousing.org

Project Location:

The proposed Mercy Housing Veterans Village Project would be located at 1670-1692 Mission Road near the intersection of El Camino Real and Mission Road in the Town of Colma, San Mateo County (37°40'18" North Latitude,122°27'07" West Longitude). The project site forms a portion of the northwest corner of Holy Cross Cemetery in the Town of Colma, San Mateo County, California.

Description of the Proposed Project [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

Mercy Housing California 66, LP has received preliminary approval for federal funding through the United States Department of Housing and Urban Development (HUD) Veterans Affairs Supportive Housing (VASH), Section 8, and HOME programs for a 66-unit affordable housing development. The 66-unit apartment complex would consist of 65 one-bedroom units and one 2-bedroom manager's unit on a 2.23-acre project site. The project site is owned by the Archdiocese of San Francisco whereby Mercy Housing would enter into a long-term land lease with the Archdiocese to develop and operate in the property under presumption of securing entitlement and permits as required by federal, state, and local regulations.

The project includes the construction of a 56,376 square foot building. The building would vary between two and three stories in height with a maximum roof elevation of approximately 36 feet. Amenities would include a fitness center, laundry facilities, and offices. Passive recreation opportunities would include several landscaped courtyards, a working garden area and a "residents -only", designated off-leash dog area. Decorative fencing would be provided around the project site except the southernmost tip of the parcel and where the building effectively blocks access along the perimeter. The materials and color palette would include a variety of exterior cladding material and muted colors to respond to both the historic pump building and light industrial context of Mission Road. The existing pump house is proposed to be integrated into the project as a community area.

The project would comply with 2013 Edition of the California Energy Code adopted by the Colma Municipal Code as the Colma Energy Conservation Code (contained in Part 6 of Title 24 of the California Code of Regulations). Additionally, the project includes the following green building features:

- Solar thermal system on the roof
- Sunshades at select units based on orientation.
- High efficiency HVAC system
- Energy efficient lighting including LED fixtures
- Energy Star appliances
- Energy efficient building envelope
- Water conserving plumbing fixtures

The proposed project includes 69 parking spaces and landscaping that include approximately 90 new trees. Landscape and street tree species include scarlet maple, maidenhair tree, Brisbane box, ornamental pear, water gum, coast live oak and Chinese elm species. Accent trees include strawberry tree, flowering dogwood, and western redbud. Numerous other medium shrub, accent grasses, vines, and other groundcovers are planned as part of the project.

Construction of the project would include:

- Demolition of the existing irrigation structures, paving, fencings, and other structures
- Clearing and grubbing of the site
- Grading of dwelling unit pads and establishment of improvements bases
- Construction of the building and amenities, including landscaping
- Paving of asphalt areas
- Application of architectural coatings as exterior and interior paints, carpet and other flooring adhesives, and any clear-coating or sealants used in paved or other areas of the development

Statement of Purpose and Need for the Proposal [40 CFR 1508.9(b)]:

The proposed project is intended to provide housing and support to Veterans within the San Mateo County and the San Francisco Bay Area. Regarding construction and physical development of the project site, the purpose of the project is to:

- Remove existing built features on-site including a concrete water storage reservoir and three other concrete structures which are considered historic resources;
- Rehabilitate the historic pump house building for use as a social hall/community space and/or storage;
- Remove most of the site's existing vegetation including 46 trees over 12-inches in diameter and other site vegetation;
- Construct a 66-unit, two to three story apartment building containing laundry, office and fitness facilities; and
- Construct on-site improvements including foundation, drainage, utility connections, minor circulation modifications, parking, residential courtyards, resident dog park, resident garden, replacement tree plantings/landscaping, and garden spaces.

Operationally and socially, the objectives of the Grantee in establishing a purpose for the project are to:

- Provide housing for veterans on a fixed income
- Provide housing for homeless Veterans
- Provide support services to Veterans
- Increase self-sufficiency for Veterans
- Increase veteran access to VA medical facilities

The Mercy Housing Veterans Village is needed to meet one of the primary goals of the Town of Colma and County of San Mateo General Plan Housing Elements in providing affordable housing for lower- and fixed-income individuals. The Mercy Housing Veterans Village project is further needed to advance the HUD mission of providing quality affordable homes for all.

Existing Conditions and Trends [24 CFR 58.40(a)]:

The project site forms a portion of the northwest corner of the Holy Cross Catholic Cemetery with the Commercial (C) and Design Review (DR) zoning districts applied through the Town of Colma's local land use authority. A General Plan designation of *Commercial Land Use – Mission Road North* has also been adopted and applied to the project site. Access to the area is provided by Mission Road, El Camino Real, Junipero Serra Boulevard, Hickey Boulevard and Collins Avenue. Regional access to the project site is provided by State Route 280.

The existing cemetery includes graves of persons exceptionally significant in California's economic and political history and contains a collection of historic buildings, grave monuments, and mausoleums for the period 1886-1945. Previous historic resources evaluations prepared in 1993-1994 for the Bay Area Rapid Transit (BART) San Francisco Airport Extension found that the cemetery is considered significant under National Historic Register Criteria B (association with significant persons) and C (significant design and architecture) at a state-wide significance level. The project site and vicinity were identified as eligible as a historic district 1993 but have not been officially listed since then. The project site is located amongst a variety of development types including cemeteries to the north and east and light industrial and automotive repair businesses located to the west and south. The project site is bound to the north by an underground BART tunnel and maintenance road. An air vent from the tunnel is located near the northwest portion of the project site.

The project site is relatively flat, sloping in elevation from approximately 100 feet at the northern portion of the project site to approximately 90 feet at the southern portion of the site. East of the project site beyond the BART corridor, the topography slopes upwards steeply and is vegetated with mature trees. Areas surrounding the project site to the west, north, and south are relatively flat. Storm water runoff drains to Mission Road.

There are five structures on the project site associated with a historic pump station formerly used by Holy Cross Cemetery as part of their irrigation system. These structures include a main pump house building, a concrete water reservoir and associated above-ground piping, two concrete well houses (one with a wooden shed addition), and a carpenter's shop containing another well, each estimated to have been constructed around 1914-1915 and are located within a designated historic district which was evaluated for listing on the National and California Registers of Historic Places as part of this project.

Other project site features include perimeter chain link fencing and asphalt. Portions of the project site that are not paved are barren or vegetated. Approximately 46 trees including eucalyptus, fir, and cedar are located on the project site measure twelve inches in diameter or more.

Funding Information

The Grantee has received preliminary approval for funding through the HUD Section 8 Project-Based Voucher (PBV) program (DOH, 2015) and the Veterans Affairs Supportive Housing (VASH) program, issued by the Housing Authority of the County of San Mateo (DOH, 2015). The Grantee has been approved for thirty PBVs through Section 8 funding and for 35 vouchers through the VASH funding. Voucher amounts change yearly with fluctuations in the fair market rent values they are based. Approximately $1,260,000 and $1,470,000 in PBVs and VASH funding, respectively, is estimated and subject to change upon issuance of the vouchers.

Grant Number	HUD Program	Funding Amount
Unknown	VASH-PBA	$1,460,000
Unknown	Section 8-PBV	$1,260,000
Unknown	HOME	$1,196,467

Estimated Total HUD Funded Amount:

$3,916,467

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]**:**

$36,000,000

Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes ☐ No ☒	San Francisco International (SFO) is located approximately 5 miles southeast of the project site.[1] The project site is within SFO airport's Airport Influence Area A (all of San Mateo County) and Airport Influence Area B (all of the Town of Colma). The projected 2020 CNEL noise contour map from the Draft Environmental Assessment for the Proposed Runway Safety Area Program shows the project site is within a noise compatible zone.[2] The project site is not located within a safety compatibility zone in the airport land use plan. On July 28th, 2016, the Airport Land Use Commission recommended that the

[1] Google Earth Pro [June 30, 2016].

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

		City/County Association of Governments (C/CAG) of San Mateo County Board determine the project is consistent with the SFO ALUCP. Subsequent C/CAG Board approval is expected. The project site will not be affected by airport hazards.
Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes ☐ No ☒	There are no coastal barrier resources in Region IX.[3]
Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes ☐ No ☒	The project site is located in Zone X (Area of Minimal Flood Hazard) of the Federal Emergency Management Agency (FEMA) flood mapping program. The project is not located in a floodplain, floodway, or coastal high hazard zone.[4] In addition, the project site is not within a dam failure inundation zone according to the Dam Inundation Areas- San Mateo County map.[5] The project would not place housing or other structures within an existing 100-year flood hazard area or expose people or structures to a significant risk of loss, injury or death involving flooding.
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5		
Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes ☐ No ☒	The project is located in the San Francisco Bay Area Air Basin managed by the Bay Area Air Quality Management District (AQMD). The area is designated nonattainment for the federal 1997 and 2008 8-hour ozone standard (classified Marginal) and the 2006 Particulate Matter 2.5 (PM2.5) standard (classified Moderate).[6]

[3] United States Fish and Wildlife Service. Coastal Barrier Resources System Mapper. http://www.fws.gov/cbra/Maps/Mapper.html [June 30, 2016].

[4] Federal Emergency Management Agency. Flood Insurance Rate Maps. Map No. 06081C0037E. October 16, 2012. https://msc.fema.gov/portal/search?AddressQuery=1670%20mission%20road%2C%20colma%2C%20CA#searchresultsanchor [June 30, 2016].

[5] San Mateo County. *Damn Inundation Areas – San Mateo County*. 2005. http://planning.smcgov.org/sites/planning.smcgov.org/files/documents/files/Dam_Failure_Inundation.pdf [June 30, 2016]

[6] United States Environmental Protection Agency. Green Book. Current Nonattainment Counties for All Criteria Pollutants. http://www.epa.gov/oaqps001/greenbk/ancl.html [June 30, 2016]

		The AQMD developed the *BAAQMD CEQA Guidelines* for use in assessing air quality impacts in environmental documents.[7] Based on the threshold established in the Guidelines, a project can be considered consistent with the Clean Air Plan (CAP), and subsequently the State Implementation Plan (SIP), if it supports the primary goals of the CAP by not resulting in any significant and unavoidable air quality impacts. The Guidelines provide a screening table that identifies those projects that typically will not exceed AQMD thresholds and contribute to possible significant and unavoidable air quality impacts. Based on the currently adopted thresholds from the 2011 Guidelines, the project will not result in significant and unavoidable air quality impacts because it will have less than 451 dwelling units. The project does not involve any changes to any planning documents and is consistent with the Town of Colman General Plan as a multi-family residential development. The project is consistent with the local General Plan and thus is consistent with the AQMD/SIP.
Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)	Yes ☐ No ☒	The project is not located in a Coastal Zone and therefore does not involve the placement, erection or removal of materials, or an increase in the intensity of use in the designated coastal zone per the California Coastal Commission. [8]
Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)	Yes ☐ No ☒	Langan Treadwell Rollo prepared a Phase I Environmental Site Assessment (ESA) in general conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Practice E 1527-13 and the U.S. Environmental Protection Agency's Rule for 40 CFR 312 for Veterans Village project located at 1670-1692 Mission Road in Colma, California[9].

[7] Bay Area Air Quality Management District. CEQA Guidelines. May 2011

[8] San Francisco Bay Conservation and Development Commission. San Francisco Bay Plan. Plan Map 5: Central Bay. January 2012

[9] Langan Treadwell Rollo, 2014. Phase I Environmental Site Assessment, 1670-1692 Mission Road, Colma, California. Prepared for Mercy Housing California, San Francisco, California. December 3, 2014.

		The purpose of the Phase I ESA was to evaluate the possible presence of recognized environmental conditions at the site. A recognized environmental condition is the presence or likely presence of hazardous substances or petroleum products in, on, or at a property: (1) due to a release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of future release to the environment (ASTM, 2013). A search of environmental regulatory agency databases for the site and vicinity was prepared by Environmental Data Resources Inc. (EDR). Where appropriate, additional information was obtained from telephone interviews, online databases, or file reviews at the respective regulatory agencies. A summary of the findings is discussed below. <u>Site – 1670-1692 Mission Road</u> Of the addresses searched by EDR for the 1670-1692 Mission Road property, 1690 Mission Road was the only address listed in the EDR database. Online databases operated by the California Department of Toxic Substances Control (DTSC) and California Regional Water Quality Control Board (RWQCB) were researched for the site. In addition, inquiries were made in regard to files held at the San Mateo County Environmental Health (SMCEH) and the City of Colma Fire Department (CFD). Files related to hazardous materials for 1690 Mission Road were available at the SMCEH and reviewed for the report. 1690 Mission Road was listed on the EDR US Historic Auto Station database and identified as Baca's Racing Engines & Machine Shop for the years 2007, 2008, and 2011. Files reviewed at the SMCEH indicate that the hazardous materials have been stored at the Site: Cutting oil, iron shavings, cleaning solvent, honing oil, waste oil, degreaser, alkaline cleaner, and metal sludge. No records of a release of hazardous materials at 1690 Mission Road were found during the agency file reviews. <u>Off-Site Database Listings</u> The Phase I ESA focused on off-site facilities with known contamination in soil and groundwater that were most likely to represent potential

		environmental concerns at the Site. These areas include nearby properties or locations that were in the near vicinity and/or hydraulically up gradient of the Site. The estimated direction of groundwater flow is to the south within the immediate site vicinity. Based the off-site database, all of the nearby listings had no violations, were closed by the regulatory agency, were hydrologically cross gradient or down gradient, or were determined to be a significant distance (greater than a 1/4 mile) from the site. Based on a review of regulatory files, the site history, and site reconnaissance, the Phase I ESA revealed *no evidence of a recognized adverse environmental condition in connection with the project site*. SCA Environmental, Inc. performed a hazardous materials investigation in May of 2016 on five historic structures on the site that will be demolished under the project. The investigation included[10]: • An inspection and survey of the five structures. • Non-destructive sampling and testing for lead-containing coatings, polychlorinated biphenyls (PCBs) in building materials, asbestos-containing materials (ACMs), and asbestos-containing construction materials (ACCMs). • Visual quantification of potential PCB-containing lighting ballasts and mercury-containing fluorescent lighting fixtures. The black roofing mastic on the metal roofing panels on Pump Building roof was found to be positive for asbestos. In addition, the pump building, two sheds and water tank were assumed to contain asbestos in the water pipe insulation or gaskets, waterproofing membrane below the

[10] SCA Environmental, Inc., 2016. Summary Report of Limited Hazardous Materials Surveys.

1670-1690 Mission Road, Colma, CA. SCA Project No.: F12039. Prepared for Mr. Michael Kaplan, Real Estate Developer.

		concrete pad, base rock, window putty, roofing material and/or electrical wiring. These materials are required to be tested prior to demolition of the buildings to determine proper handling and disposal methods. Lead was detected in the building paints at concentrations from 23 milligrams per kilogram (mg/kg) to 74,000 mg/kg, and in ceramic floor tile at 14 mg/kg. As lead was identified in some paints and a detailed inventory of paints was not performed for the project for the purpose of complying with the Cal/OSHA lead in construction regulation (8 CCR 1532.1), all coated surfaces were considered to contain some lead *and require demolition dust control procedures for compliance with Cal/OSHA's Construction Lead Standard under 8 CCR 1532.1.* The aforementioned regulation contains requirements for lead air monitoring, work practices, respiratory protection, etc., that are triggered by the presence of even very low levels of lead. The investigation also identified lighting ballasts which may contain PCBs, window putty in the Pump Building which contains PCBs, window putty in one of the sheds which was assumed to contain PCBs, and Mercury-containing fluorescent tubes in the Pump Building. Demolition debris would be handled according to applicable state and federal regulations for the control of toxic or hazardous materials.
Endangered Species Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes ☐ No ☒	The project area is located within an existing urbanized area that has been previously disturbed by development and human activity. A biological resources review was prepared by MIG | TRA biologists for the project that did not identify native and/or non-native habitat on the property that would provide habitat for any unique, rare, or endangered plant or animal species, including those identified in the *Official Species List* generated by the United States Fish and Wildlife Service (USFWS) through the Information for

		Planning and Conservation (IPaC) system. See Appendix C of the EIR/EA-FONSI.[11] The project site is not located in Critical Habitat for any species as noted on the USFWS Critical Habitat Portal. <u>Recommendations</u> In order to ensure that nesting birds subject to the MBTA are not impacted during construction activities, mitigation is incorporated into the project requiring a nesting bird survey be performed within three days of commencement of construction, including tree removal activities. If any nests are found, a buffer zone would be established around the nest in consultation with the California Department of Fish and Wildlife (CDFW) and/or the USFWS, as appropriate, until the young have fledged. Nest buffers vary by species and circumstance but CDFW guidelines are generally 250 feet for passerines, 500 feet for small raptors (e.g. accipiter) and 1,000 feet for large raptors (e.g. red-tailed hawk).
Explosive and Flammable Hazards 24 CFR Part 51 Subpart C	Yes ☐ No ☒	According to the Phase 1 Environmental Site Assessment prepared by Langan Treadwell Rollo, there are no aboveground storage tanks (ASTs) located on the site. Additionally, the Phase I report did not identified any ASTs within a one-mile radius of the project site. 1690 Mission Road was listed on the EDR US Historic Auto Station database and identified as Baca's Racing Engines & Machine Shop for the years 2007, 2008, and 2011. Files reviewed at the SMCEH indicate that hazardous materials have been stored at the site consisting of cutting oil, iron shavings, cleaning solvent, honing oil, waste oil, degreaser, alkaline cleaner, and metal sludge. No records of a release of hazardous materials at 1690 Mission Road were found during the agency file reviews. While some of these materials used by Baca's Racing shop could be explosive or flammable, this business will be relocated off-site with the

[11] MIG|TRA, Inc., 2016. Biological Resources Review, Veteran's Village Affordable Housing Project. Letter Report. MIG|TRA Project No. 16069. Prepared for Mr. Francisco Gomez, HCD Specialist III, San Mateo County Housing Authority

		development of the proposed project. All materials and fluids associated with the business will be removed from the site by Baca's as they vacate their lease on the site.
Farmlands Protection Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes ☐ No ☒	The project site is located in a fully developed, commercial and residential area that does not contain agriculture or forest resources. The map of Important Farmland in California prepared the State Department of Conservation does not identify the project site as being Prime Farmland, Unique Farmland or Farmland of Statewide Importance.[12] In addition, no Williamson Act contracts are active for the project site.[13] The project site is located in an area committed to urban uses and is therefore unsuitable for commercial-level agricultural activities.
Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes ☐ No ☒	The project site is located in Zone X (Areas Determined to be Outside the 500-Year Flood Plain) as indicated on Flood Insurance Rate Map (FIRM) 06081C0037E last revised on October 16, 2012. The project does not involve property acquisition, management, construction or improvements within a 100-floodplain (Zones A or V) and does not involve a "critical action" (e.g., emergency facilities, facility for mobility impaired persons, etc.) within a 500-year floodplain (Zone B).[14]
Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes ☒ No ☐	<u>Historic Resources</u> The potential for historic properties and cultural resources was evaluated in consultation with the State Historic Preservation Officer (SHPO), the Town of Colma, the Housing Authority County of San Mateo, and the community at large. The Area of Potential Effects (APE) is defined as the project location and all the adjacent properties from which the new development is visible (SHPO, 2016).

[12] California Department of Conservation. Farmland Mapping and Monitoring Program. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/sbd10_so.pdf [June 30, 2016].

[13] California Department of Conservation. Williamson Act Program. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/sanbernardino_so_12_13_WA.pdf [June 30, 2016].

[14] Federal Emergency Management Agency. Flood Insurance Rate Maps. Map No. 06081C0037E. October 16, 2012. https://msc.fema.gov/portal/search?AddressQuery=1670%20mission%20road%2C%20colma%2C%20CA#searchresultsanchor [June 30, 2016].

		The project site contains five structures that were constructed during the founding of Holy Cross Cemetery and have been found to have historical significance. The project includes demolition and removal of four of the structures and the preservation, rehabilitation, and incorporation of the main Holy Cross Cemetery pump house building into the project. A variety of studies have been prepared that evaluate the historical significance of these structures and were considered during the analysis of project-effects. A historic architecture report was prepared for the project (Hill & Bradley, 2016). The results indicate a Finding of Adverse Effect is warranted, as summarized below. Application of the criteria for adverse impacts pursuant to 36 CFR 800.5 et al found no adverse effects regarding the following: • Circulation Features (Historic Landscapes) • Holy Cross Cemetery District • Cypress Lawn Memorial Park Historic District • The Pump House Findings of Adverse Effects were made pursuant to 36 500.5 et al: • Water Reservoir • Well House • Carpenter's Shop The project is required to comply with Section 106 of the National Historic Preservation Act because the project is applying for HUD funding. Section 106 of the National Historic Preservation Act requires consultation with the State Historic Preservation Officer which will be completed before the project can be approved by the Town and the Housing Authority County of San Mateo. In conclusion, the Finding of Effect (Hill 2016) determined that the Veterans Village building represents a significant change in the "character of the use" of the water works lot at Holy Cross Cemetery from what was essentially a light

		industrial use associated with the cemetery (a character retained by its later use by Baca's Machine Shop) to a new a multi-unit residential use. This change in use from its historic light industrial use to a multi-unit residential use constitutes an adverse effect under 36 CFR Part 800.5(2)(iv). To reduce this impact the following mitigation measures are incorporated into the project: **Mitigation Measures:** ***Salvage Buildings to be Removed:*** The project's impacts could be reduced by salvaging particular elements and moving them to a location not on the project site (such as in a museum display at the Colma Historical Association or in another historic building). However, it would be preferable to have any salvaged features preserved in their historic location in the Holy Cross Cemetery. Representatives of the Colma Planning Department, the Colma Historical Museum or representatives of local preservation or historical societies, and other interested parties shall be contacted and given the opportunity to examine the building and provide suggestions for salvaging particular elements. ***Photo Documentation:*** Prior to demolishing or salvaging materials at the Holy Cross Cemetery, the water reservoir, the three associated buildings (two well houses and the carpenter's shop) and the site in general shall be documented according to the Outline Format described in the *Photographic Specifications* and *The Guidelines for Preparing Written and Descriptive Data: Historic American Building Survey* (HABS) published by the Pacific West Region Office of the National Park Service. The photo documentation should show the spatial relationships of the buildings and the water reservoir to each other. This documentation shall include archival quality, large format (minimum 4 by 5 inch) photographs of the exterior and interior views of the buildings and a view of their setting within the site. Archival negatives of the original construction drawings and historic views will be included in the documentation. Copies of the documentation, with original photo negatives and prints, shall be donated to the Colma Historical

		Association Museum, the San Mateo County Historical and others archives (as appropriate) accessible to the public. ***Interpretive Exhibit:*** A permanent, interpretive exhibit on the project site about the "water works lot" buildings, structures and history shall be created. The exhibit should incorporate information from the BART report and other sources about the history of the Holy Cross Cemetery, historic photographs, and HABS documentation or other recordation materials and should be located and designed so that it is accessible to the public and of a durable design. The interpretive exhibit should be developed and designed by a qualified team including an historian and a graphic designer or exhibit designer. If the exhibit cannot be accommodated in the new development, another appropriate public venue can also be considered such as the Colma Historical Association Museum. <u>Cultural Resources</u> An archaeological reconnaissance report was prepared by Mr. Matthew Clark of Holman & Associates Archaeological Consultants (Clark, 2015) that investigates the project's potential project impacts to archaeological resources. The report notes no known archaeological resources at the site but recommends a *standard mitigation* in the event that unrecorded buried historical resources are uncovered during construction.[15] <u>Tribal Resources</u> Native American Consultation per Section 106 regulations require consultation with Native American tribes that might be concerned about the potential effects to historic properties. Native American tribes and representatives recognized by California's Native American Heritage Commission (NAHC) were solicited for information and comments on the Mercy Housing Project.

[15] Holman and Associates Archaeological Consultants. 2015. Archaeological Reconnaissance of a Proposed Mercy Housing Project at 1670-1692 Mission Road, Town of Colma, San Mateo County, California and Finding of no Historic Properties Affected. San Francisco. December.

		The Native American Heritage Commission (NAHC) responded that a search of the sacred land file failed to indicate the presence of Native American cultural resources in the project area. A list of eight Native American representative individuals and groups affiliated with the Ohlone / Costanoan Native Americans for San Mateo County was provided. All eight representatives were solicited for input on the proposed project. One response was received via email on 24 May 2016 by Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe who requested notification prior to any ground disturbing activities taking place on the project site. **Mitigation Measures** All excavations within 10 meters (30 feet) shall be halted if potential historic or archaeological evidence is inadvertently uncovered or encountered during construction activities and a qualified archaeologist shall be contacted to assess the find and propose appropriate measures that may include leaving the find in place or excavating, evaluating, and preserving the find. Common known evidence in the vicinity of the project site include deposits of whole or fragmented marine shell (e.g. mussels, clams, abalone, crabs), whole or fragmented bone, dark, fine-grained soils known as middens that display the use of fire, obsidian, stone tools (e.g. mortars, pestles, arrowheads, spear points) or stone flaked generated in the making of tools, and human burials. Historic materials 45 years and older including bottles, artifacts, and structural remains may also have scientific and cultural significance and shall not be disturbed until evaluated and measures identified (if necessary) by a qualified archaeologist. Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe shall be provided written notification of the entire construction schedule and the dates of ground disturbing activities taking place on the project site. Written notification shall be accomplished by certified mail and received no less than two weeks prior to the start of construction activities.

		Any potential historic resources discovered shall be mapped, recorded, and initially assumed to be eligible for the National Register of Historic Resources until a formal, in-field evaluation can be completed and substantiated.
Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B	Yes ☐ No ☒	HUD's interior noise goal is 45 DNL and exterior noise goal is 65 DNL. Aircraft: The noise abatement and control analysis prepared for the project includes assessment of airports within 15 miles of the project site pursuant to the guidance provided in the *Noise Assessment Guidelines* (NAG) chapter of *The Noise Guidebook*. San Francisco International (SFO) airport is located approximately five miles southeast of the project site.[16] The project site and San Mateo County as a whole are within SFO's Airport Influence Area A (as is all of San Mateo County) and Airport Influence Area B includes all of the Town of Colma). The projected 2020 CNEL noise contour map from the Draft Environmental Assessment for the Proposed Runway Safety Area Program shows the project site is within a noise compatible zone.[17] **Roadways:** The noise abatement and control analysis evaluates major roadways within 1,000 feet of the project site. The only roadway of consequence is Mission Road that forms the western boundary of the project site and serves as the primary source of ambient noise in the project vicinity. Noise impacts related to vehicular traffic were modeled using HUD's Day/Night Noise Level (DNL) Calculator Electronic Assessment Tool. Opening year traffic volumes under the *existing plus project plus cumulative* scenario totaling 1,703 morning and afternoon peak hour vehicles were used (Hexagon Transportation Consultants, 2016). It was assumed that morning and afternoon peak hour volumes represented 20 percent of the average daily trips on Mission Road and were increased accordingly to approximate ADT at 8,515 trips. Daily trips were further

[16] Google Earth Pro [June 30, 2016].

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

		increased to 9,405 ADT using a one percent annual growth factor over a ten year period pursuant to HUD guidelines. Railways: There are no railways within 3,000 feet of the project site. Loud Impulsive Noises: Based on a review of aerial photographs and existing lands uses, there are no sources of loud impulsive sounds in the project vicinity. Exterior Noise Assessment: The Site DNL Calculator was utilized to model noise impacts at the site. Input assumptions are listed here. Pursuant to the Colma General Plan Circulation Element, Mission Road is not a designated truck route; therefore, truck trips were not included in the model. The effective distance to 6.5 feet from the exterior façade on the east side of the apartment structure is 39 feet. There is a stop sign located at the intersection of El Camino Real and Mission Road approximately 470 feet west pf the project site. The speed limit on Mission Road is 30 mph, for an average cruise speed of 27 mph. The night fraction of ADT was set at 15 percent pursuant to the Guidelines. Road gradient was set at zero considering the roadway is flat. Using this data, day-night noise levels (LDN) were estimated at 62.5 dBA. These noise levels do not exceed the 65 dBA (acceptable) exterior standards established by CFR 51 B; therefore, noise levels are acceptable and mitigation is not required to reduce exterior noise levels. Interior Noise Assessment: Interior noise levels must meet or exceed the 45 dBA standard. Interior noise levels were evaluated using the Sound Transmission Classification Assessment Tool (STraCAT) based on the procedures found in The Noise Guidebook. The project architect indicates that wall materials will be constructed primarily of 5/8-inch gypsum, 1/-inch plywood, and 7/8-inch cement plaster on 2-inch by 6-inch wood studs with batt insulation. Each unit facing Mission Road includes two dual-pane, thermally broken aluminum window systems and no patio or other outdoor area. Windows account for approximately 20.8 percent of each unit's frontage on Mission Road. STraCAT does

		not include input option for the construction details specified by the project architect. The *"2x4" studs with 24" "o.c"* (A-11-1) was used as an alternate selection and results in the same attenuation rating of 46 dBA. Similarly, the *3x4ft awning* option was used for the two windows with a reduced attenuation rating of 24 dBA. According to the STraCAT Assessment Tool, combined attenuation will result in 30.11 dBA noise reduction, exceeding the 21.4 dBA reduction needed to meet the 45 dBA standard and thus resulting in compliance with HUD interior noise regulations.
Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes ☐ No ☒	The project is not located within a designated sole source aquifer (SSA) watershed area.[18] The nearest program designated SSA is Santa Margarita Aquifer in Scott's Valley, approximately 50 miles south of the project site.
Wetlands Protection Executive Order 11990, particularly sections 2 and 5	Yes ☐ No ☒	According to the National Wetlands Inventory the project site does not contain any wetlands.[19] The project does not involve new construction within or immediately adjacent to wetlands, marshes, wet meadows, mud flats or natural ponds as identified on in the National Wetlands inventory. MIG|TRA prepared a biological survey report for the project (MIG|TRA 2016) and determined that there are two wetland features shown in the National Wetlands Inventory and verified in the field in the vicinity of the site. These include a pond at the Cypress Lawn Cemetery, approximately 70 feet north of the northern border of the site, and an open concrete-lined channelized section of Colma Creek across the street from the site, approximately 225 feet west of the western border of the site. The project would not impact these two wetland features.
Wild and Scenic Rivers	Yes No	There are no National Wild and Scenic Rivers located is within one mile of the proposed project site.[20]

[18] United State Environmental Protection Agency. Ground Water: Sole Source Aquifer)SSA) Program. http://www.epa.gov/region09/water/groundwater/ssa.html [June 30, 2016].

[19] United State Fish and Wildlife Service. National Wetlands Inventory. http://107.20.228.18/Wetlands/WetlandsMapper.html# [September 18, 2015]

[20] United States Fish and Wildlife Service. National Wild and Scenic Rivers System. September 2009

Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	☐ ☒	
ENVIRONMENTAL JUSTICE		
Environmental Justice Executive Order 12898	Yes No ☐ ☒	The Environmental Assessment prepared pursuant to the National Environmental Policy Act (NEPA) for the proposed affordable housing project will not result in any adverse effects or environmental impacts that cannot be mitigated; therefore, the project will not cause impacts that could impact minority and/or low-income individuals, disproportionately or otherwise.[21] The EPA's *Environmental Justice Screening and Mapping Tool* (EJSCREEN) was used to determine if existing conditions at the project site and surrounding properties within one mile are disproportionately adverse or characterized by low-income and/or minority populations when compared to conditions throughout the state, the EPA Region 9 area, and the nation.[22] The EJSCREEN data indicates that the project location is not characterized by low-income or minority populations but is subject to potentially greater impacts related to air quality, hazardous materials/wastes, and water pollution indicators when compared to the nation. The project location is similar with respect to the state and EPA Region 9 to environmental indicators. Based on the data queried through EJSCREEN and the analysis documented in the project Environmental Assessment, the project will not result in disproportionate health or environmental impacts to low-income or minority populations.

[21] MIG | TRA Environmental Sciences. Environmental Justice Worksheet. September 2015

[22] United States Environmental Protection Agency. EJSCREEN Report for 1 mile Ring Centered around 37.768276, -122.237507, California, EPA Region 9. September 18, 2015

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 &1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

Impact Codes: Use an impact code from the following list to make the determination of impact for each factor.

(1) Minor beneficial impact

(2) No impact anticipated

(3) Minor Adverse Impact – May require mitigation

(4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	1	*Conformance with Plans:* The proposed project site is zoned Commercial (C), Design Review (DR) and has a General Plan designation of Commercial Land Use – Mission Road North. The commercial land use and zoning allow for residential land uses with the approval of a Use Permit.[23] Based on the current General Plan the proposed project will conform to adopted local plans. *Compatible Land Use and Zoning:* The project site is currently zoned Commercial (C), Design Review (DR).[24] The project site currently contains vacant land, two unpaved areas used for automobile parking by nearby auto repair shops, five historic structures associated with the Holy Cross Cemetery pump station (only the pump station is in use as a machine shop), and unmanaged vegetated areas and numerous trees. The project is

[23] City of Colma. *City of Colma General Plan Land Use Element*. Figure LU-2, General Plan Land Use Map. Page 5.02.7. 1999.

[24] City of Colma. *City of Colma Zoning Map*. July 2009.

		located within an area of the Town that contains a mix of land uses including cemetery (the Cypress Lawn and Holy Cross Cemeteries to the north and east), industrial (auto repair and light industrial uses), commercial and residential uses. The project site is in close proximity to an underground BART tunnel and maintenance road which form the project site's northern property boundary. In general**,** the project parcel is surrounded to the north and east by the Holy Cross and Cypress Lawn cemeteries and BART uses, and to the west and south by auto repair and commercial uses. The Town's Housing Element identifies this site as a required residential development site to satisfy the Town's housing production requirements. It allows for multi-family housing units at this location, within the General Plan density allowances. The Housing Element also identifies the Planned Development rezoning process for permitting residential uses at the site. This rezoning process will allow for the most development flexibility in setting standards for height, setbacks, ingress, egress and landscaping due to the unique and physical constraints of the site. The site's maximum allowable density is 22 units per acre (that equates to 49 units based on a 2.23-acre site) and the project proposes 30 units per acre that includes a 35 percent density bonus. Mercy Housing is able to include this density bonus because the development includes all affordable housing units. Consistent with Government Code Section 69515 et seq., as referenced in the Colma Municipal Code, the developer of a proposed housing project of at least five units must provide housing units affordable to income-qualified households to qualify for a density bonus, concessions or other incentives. The existing Commercial zoning at the site establishes five (5) foot setbacks for the front, side and rear property lines and a height limitation of 40 feet. The project proposes a front setback of more than nine feet, side setback of over 87 feet and rear setback of over 18 feet and therefore meet all the requirements of the commercial zoning district. The floor to area ratio is limited to 1.0 and the project proposes an FAR of 0.64. The maximum lot coverage is 50 percent and the project proposes a lot coverage of 25 percent. The project meets all commercial zoning floor and lot area requirements.

		The pump house is an existing non-conforming feature at the site and is not proposed for relocation as part of the project. Therefore, it will remain an existing non-conforming feature at the site. *Scale and Urban Design:* Chapter 5.03.300 of the Town's Zoning Ordinance describes the restrictions and procedures applicable to the "DR" Design Review Zone. The Town has found that the project's architectural plans meets all applicable DR Design review requirements. In addition, the Zoning Ordinance, Chapter 5.03.345, includes a "no net loss" requirement which requires that designated housing sites, including the proposed project site, be developed for housing, and if not, that housing be developed elsewhere in the Town. The property is not in a Spanish Mediterranean "S" overlay area, therefore, Housing Element Policy 5.02.324 that indicates ". . . is intended that new buildings in design review districts should be reviewed to ensure that exterior building design, materials and colors are appropriate for the setting where the new buildings are located" is applicable to the project.

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	2	As an affordable housing apartment complex, the project will generate several hundred temporary construction jobs as well as two permanent staff/case manager jobs associated with the affordable housing component of the project. The affordable housing units are intended to be occupied by low-income veterans, many of who have physical and mental disabilities and will not be actively seeking employment. As such, the project will not significantly contribute to the local employment base. For those tenants seeking part-time or full-time employment opportunities, the site is located in close proximity to diverse employment opportunities, including retail, dining, entertainment, and civic jobs (e.g. museum, post office, cemetery, etc.).[25]

[25] Google Earth Pro [July 1, 2016].

Demographic Character Changes, Displacement	2	The proposed project site contains vacant land, two unpaved areas used for automobile parking by nearby auto repair shops, five historic structures associated with the Holy Cross Cemetery pump station (only the pump station is in use as a machine shop), and unmanaged vegetated areas and numerous trees. As such, the proposed project will not displace any persons. Future tenants of the proposed development will be low-income veterans of varying racial and ethnic backgrounds. According to the United States Census Bureau, the local population of Colma is comprised of 9.3% White, 51.9% Asian, 33.5% Hispanic or Latino, and 2.9% Black or African American persons.[26] According to the 2014 American Community Survey, the veteran population of Colma is approximately 2.39% of the population and is comprised of 39.4% White, 35.9% Asian, 11.0% Hispanic or Latino, and 13.3% Black or African American persons.[27] Since the future tenants of the proposed project would likely come from the San Mateo County population, it is unlikely to significantly alter the racial or ethnic composition of the community. Therefore, the proposed project would support this local population by providing affordable housing.

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	Jefferson Elementary School District and Jefferson Union High School District provide public education for Brisbane, Daly City, Pacifica and the Town of Colma. There are two pre-schools, eleven elementary schools, and three middle schools in the Jefferson Elementary

[26] United States Census Bureau. American Fact Finder: ACS Demographic and Housing Estimates (DP05). http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_DP05&prodType=table [July 1, 2016].

[27] United States Census Bureau. American Fact Finder: Veteran Status (S2101). http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_S2101&prodType=table [July 1, 2016].

		School District for a total enrollment of approximately 7,137 for the 2015-2016 year. The student population is diverse including Latino (34 percent), Filipino (28 percent), Asian (18 percent), and White (11 percent) students. There are five high schools in the Jefferson Union High School District with a total enrollment of approximately 4,926 students for the 2015-2016 school year.[28] The proposed project will be inhabited by low-income and retired veterans. It is unlikely that the project will generate substantial numbers of students since most tenants will be retired veterans. Therefore, the School District will not be impacted by substantial numbers of students generated by the proposed project.
Commercial Facilities	2	The proposed project is located in close proximity to services such as pharmacies, a movie theatre, major retail and dining options.[29] The project does not include the demolition or closure of any commercial facility. Development of the project will not require construction of new commercial facilities for project residents and surrounding uses.
Health Care and Social Services	1	The project is located in a fully urbanized area with access to health care and social services. The project will include supportive services for veterans with mental and physical disabilities. Common disabilities among veterans include war-related physical disabilities such as traumatic brain injury, mental health conditions such as Post Traumatic Stress Disorder (PTSD), bipolar disorder, HIV/AIDS, and chronic substance abuse issues. It is estimated that there will be approximately seven (7) staff members, generally working Monday through Friday, during normal business hours, although all seven may not be at the site at any given time. One staff member would live on-site. Case management will be provided to the veterans on-site through the Veteran Affairs Supportive Housing (VASH) program. A resident services coordinator will also be on-site, and provide programs such as educational workshops, health and wellness programs, holiday and cultural gatherings, and social events such as movie night and game night. Off-

[28] Jefferson Union High School District. District Website: "Our District". http://www.juhsd.net/Page/231 [July 5, 2016.

[29] Google Earth Pro [July 5, 2016].

		site activities are also possible, and there will be monthly tenant meetings. San Mateo County also provides a variety of health and social services through the County of San Mateo Health System. The County of San Mateo Health System includes services specifically for aging adults and seniors. Social services include In-Home Supportive Services (IHSS), elder and dependent abuse intervention, nutrition programs, stress management, and general assistance services. [30] A Kaiser Permanente Hospital is located approximately 1.05 miles from the project site at 1200 El Camino Real, South San Francisco, and is accessible via both automobile and public transit. This facility provides medical and dental health care, behavioral health services, substance abuse treatment, health and education, and support services.[31]
Solid Waste Disposal / Recycling	2	Solid waste disposal and recycling in the Town of Colma is provided by three service providers: Allied Waste of Daly City, South San Francisco Scavenger Company, and Recology San Bruno.[32] The project site has been previously developed and mostly used for automobile storage. Site clearing will result in the generation of building waste, asphalt waste, and green waste due to demolition activities and clearing of vegetation. Disposal of construction waste and debris will occur in accordance with State and Federal standards for construction waste recycling. Because the project includes five or more dwelling units, it is required to recycle a minimum of fifty percent of its solid waste pursuant to the California Mandatory Recycling Regulation.[33] Compliance with existing regulations will reduce solid waste disposal demand from the project by a minimum of fifty percent. The majority of solid waste collected in the Town of Colma is transported to the Corinda Los Trancos Landfill

[30] County of San Mateo Health System. Website. http://www.smchealth.org/ [July 5, 2016].

[31] Kaiser Permanente. South San Francisco Medical Center: Services and Amenities. https://thrive.kaiserpermanente.org/care-near-you/northern-california/southsanfrancisco/ [July 5, 2016].

[32] Town of Colma. For-Residents: Waste Reduction for Residents. http://www.colma.ca.gov/index.php/for-residents/recycling-and-waste-reduction [July 5, 2016].

[33] California Department of Resources Recycling and Recovery. Mandatory Commercial Recycling. http://www.calrecycle.ca.gov/Recycle/Commercial/ [July 5, 2016].

		and the Recology Hay Road Landfill.[34] Together, these facilities have a combined permitted capacity of 5,998 tons per day and a combined remaining capacity of 52,613,000 tons.[35] [36] It is estimated that Corinda Los Trancos will reach final capacity by 2018 and Recology Hay Road by 2077. Adequate solid waste and recycling services are available to serve the project.
Waste Water / Sanitary Sewers	2	New development in the Town of Colma is required to install wastewater infrastructure concurrent with project development. The sanitary sewer system in Colma is operated and maintained by the Town of Colma Public Works Maintenance Division. The South San Francisco / San Bruno Water Quality Control Plan (WQCP) provides secondary wastewater treatment for the cities of South San Francisco, San Bruno, and the Town of Colma. The average dry weather flow through the facility is approximately nine million gallons per day and the average peak wet weather flows can exceed 60 million gallons per day (gpd). All wastewater generated by the interior plumbing system of the proposed project would be discharged into the local sewer main and conveyed to sewage treatment plants operated by the South Bayside System Authority. Through an agreement with South San Francisco and City of San Bruno, the Town of Colma can contribute maximum flows of up to 450,000 gpd to the WQCP for treatment and disposal. On average, the Town of Colma contributes around 225,000 gpd, which is half of its permissible capacity. The proposed project would be connected to an existing eight-inch sanitary sewer main along the east side of Mission Road. The Town of Colma anticipates it would have adequate capacity to serve the proposed project. The amount of wastewater that is anticipated by the project is incremental and would not be expected to exceed the wastewater treatment requirements of the San Francisco Bay Regional Water Quality Control Board. Wastewater effluent associated with this land use would

[34] CalRecycle. Jurisdiction Disposal by Facility. City of Colma Reporting Information. http://www.calrecycle.ca.gov/LGCentral/Reports/DRS/Destination/JurDspFa.aspx [Accessed July, 5 2016].

[35] CalRecycle. Facility/Site Summary Details: Recology Hay Road Landfill (48-AA-0002) http://www.calrecycle.ca.gov/SWFacilities/Directory/48-AA-0002/ [Accessed July 1, 2016].

[36] CalRecycle. Facility/Site Summary Details: Corinda Los Trancos Landfill (Ox Mtn.) (41-AA-0002) http://www.calrecycle.ca.gov/SWFacilities/Directory/41-AA-0002/ [Accessed July 1, 2016].

		not substantially increase pollutant loads, as there is neither heavy industrial use nor agricultural processing where loads and wastewater volumes are heavy. Since Colma is currently contributing half of its permissible daily flow, it is not expected that the Project would conflict with wastewater treatment requirements or exceed the discharge limits established by the San Francisco Bay Regional Water Quality Control Board (RWQCB).
Water Supply	1	The Town of Colma gets its water from California Water Service. The City is located within the Company's Bayshore service district. The District's service area encompasses the Cities of San Carlos, San Mateo, South San Francisco, and Colma. Water for customers in Colma is purchased from the City and County of San Francisco (SFPUC), and additional water is provided by five groundwater wells. The south San Francisco/Colma system includes 144 miles of pipeline, 12 storage tanks, one collecting tank, and 21 booster pumps.[37] Annual daily per capita water use within City's service area remained fairly steady between 1995 and 2007. Water demand within the city ranged from 8,226 AFY to 9,738 AFY during that period. In 2015, the service area had a gross water use of 7,064 AFY. The reduction in use from 2007 to 2015 can be attributed to water conservation measures that have been recently implemented.[38] The proposed project would result in an incremental increase in demand for potable water. This increase would be supplied by existing entitlements. The IS/MND for the Town of Colma's Housing Element (2012) states there is sufficient capacity within the Cal Water SSFD to provide 63 new dwelling units. Specifically, based on the Cal Water 2010 Urban Water Management Plan for SSFD, there is sufficient water supply during years of average and above average precipitation and the adopted Water Shortage Contingency Plan to manage water resources during a drought emergency. The proposed project is for 66 units and not 63 dwelling units; however, 65 of the 66 units are one-bedroom apartments and would likely use less water than 63 average-sized dwelling units. New residential development would comply with California's

[37] California Water Service. District Information: Bayshore District. https://www.calwater.com/about/district-information/bay/ [Accessed July 5, 2016].

[38] California Water Service. *2015 Urban Water Management Plan: South San Francisco District*. June 2016.

		Green Building Code requirements for low-flow plumbing fixtures, and landscaping would comply with State requirements for water conserving landscaping. Colma has adopted these regulations in Colma Municipal Code (CMC § 5.11.010 et seq). Therefore, newly constructed units would be more water efficient.
Public Safety - Police, Fire and Emergency Medical	2	*Police:* Police services within the Town of Colma will be provided by the Colma Police Department. The Colma City Police Department, located at 1199 El Camino Real in the City of Colma, is approximately 0.55 miles to the northwest of the project site. The project is expected to result in a slight increase in service calls but the potential increase in calls for service is not expected to impact police protection services that would result in the construction of a new police station. Additionally, given the close proximity between the proposed project and CPD station, it is unlikely that response times for police protection services would be adversely affected to the point of requiring a new police station. The proposed project would note create a need for new or physically altered facilities to maintain adequate service ratios, response times, or other performance objectives *Fire and Emergency Medical:* Fire services will be provided by the Town of Colma Fire Department. The project is served by the Colma Fire Department Station 85, located at 50 Reiner Street. The station is approximately 1.35 miles northwest of the project site. The construction of the 66-unit apartment complex would comply with standard fire code requirements administered by the Town of Colma Building Division and specified in the California Building Code and California Fire Code. The proposed project would result in a slight increase of population and would result in an increase in calls for emergency medical services and fire suppression services over existing conditions at the site. However, this increase in emergency service calls would not create a need for new or physically altered facilities or equipment to maintain adequate service ratios, response times, or other performance objectives.
Parks, Open Space and Recreation	1	The nearest parks to the project site are the numerous cemeteries located in the vicinity of the project site.[39] Winston Manner Park is a 2.2-acre community park

[39] Google Earth Pro [July 5, 2016].

		located approximately 0.2-miles to the southwest of the project site. These facilities offer a variety recreational amenities and opportunities. In addition to publicly available parks and recreation services, the project includes on-site recreational facilities. The project represents a beneficial use for tenants because it includes several landscaped courtyards, a working garden area, and a dog park. The project is subject to the City's Impact Fee to offset incremental impacts to parks and recreation services. Considering the availability of parks and recreation services, the provision of on-site recreation services, and the payment of fees, adequate parks and recreation services are available to serve the project and the project will not substantially deteriorate any facility.
Transportation and Accessibility	2	The project will provide ingress and egress to the site via a 36-foot driveway on Mission Road (See Exhibit 2, Site Plan). This width is adequate to receive emergency vehicles. Mission Road is a two-lane, undivided roadway that connects from El Camino Real in Colma to Chestnut in South San Francisco. Mission Road is used as an alternate to El Camino from many sections of South San Francisco.[40] Based on the Institute of Traffic Engineers 9th Edition *Trip Generation Manual*, the project will generate 227 new daily trips.[41] This trip generation rate would not increase traffic volumes on local roadways above Bay Area Air Quality Management District (BAAQMD) carbon monoxide screening levels of 44,000 vehicles per hour or 24,000 vehicles per hour where features such as tunnels, garages, underpasses, canyons, and below grade roadways restrict airflow and mixing. Parking for the development would be provided by a total of 69 parking spaces in two separate lots on the site. A lot on the north end of the site adjacent to the Cypress Lawn Cemetery is L-shaped with 34 spaces. A second lot will be located along the BART access road on the east side of the site and would provide 35 spaces. Mercy Housing would manage the parking on site through an allocation system and believes the parking provided is adequate given the target demographic (homeless veterans and other low income populations). The Colma Municipal

[40] Town of Colma. *General Plan: Circulation Element*. September, 2014.

[41] Hexagon Transportation Consultants. *Traffic Impact Analysis: Veterans Village Affordable Housing Project in Colma, California*. April, 2016.

		Code only regulates parking on City Streets and does not provide minimum parking requirements; therefore, as the proposed project includes on-site parking, adequate parking has been provided. The project site has access to Samtrans bus services within one mile. The project will connect to the existing sidewalk system in the project vicinity to facilitate pedestrian movement. According to the Town of Colma General Plan Circulation Element Bicycle and Transit Facilities Map, there is an existing Class II bicycle facilities along Hillside Boulevard to the east. According to the Town of Colma General Plan Circulation Element Bicycle and Transit Facilities Map, there is a Class III Bicycle Route that is planned along Mission Road and a Class I Bike Path along El Camino Real. The proposed project has adequate access to alternative transportation options. The project is required to meet all applicable American's with Disabilities Act (ADA) access requirements, including adequate path of travel.

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	*Unique Natural Features:* There are no unique natural features located on the project site (MIG, 2016). There are no such features in the vicinity of the project that could be destroyed or have public access hindered due to the development of the project site. *Water Resources:* There are no water resources located on the project site including surface water bodies or groundwater recharge basins. The project will result in pollutant discharges into the local storm water conveyance and flood control systems during construction and operational activities caused by ground disturbance and increases in impervious surfaces. The project is subject to the federal regulations of the National Pollutant Discharge Elimination System (NPDES) requiring incorporation of standard discharge control measures for temporary construction activities and long-term operation and maintenance of the project.

		The project proponent is required to adhere to the requirements of the NPDES General Construction Permit issued statewide by the California State Water Resources Control Board (SWRCB) that identifies illicit and prohibited activities that can pollute downstream waters and requires incorporation of Best Management Practices (BMPs) to eliminate pollutant discharges into the storm drain system. Completion and operation of the project will require additional control measures to prevent long-term pollutant discharges that may include educational efforts, non-structural BMPs such as periodic parking lot sweeping, and structural BMPs such as catch basin filters. Surface waters will not be substantially impacted assuming compliance with NPDES regulations.
Vegetation, Wildlife	3	*Vegetation:* Bartlet Tree Experts (Bartlet Tree Experts, 2016) compiled a tree inventory for the project resulting in an inventory of 45 trees twelve inches or larger in diameter at breast height (DBH) including Monterey cypress, eucalyptus, and deodor cedar. The arborists and biologists who surveyed the project site also noted other non-native shrubs, vines, and herbs. Project biologists conducted a field survey (MIG, 2016) to identify any rare endemic plants or sensitive habitat. The project will result in the removal of all existing, on-site vegetation including the 45 existing trees. The proposed landscape plan for the project includes planting of 90 trees; therefore, an approximate 2:1 tree replacement ratio will result as part of the project. Tree replacement shall be conducted in accordance with City of Colma Municipal Code Section 5.06 (Tree Cutting and Removal) require issuance of permits for retention and/or replacement of on-site trees. *Wildlife:* The project biological survey found no occurrences of listed species or habitat pursuant to the federal Endangered Species Act (ESA). A biological resources review was prepared by MIG | TRA biologists for the project and did not identify native and/or non-native habitat on the property that would provide habitat for any unique, rare, or endangered plant or animal species, including those identified in the *Official Species List* generated by the United States Fish and Wildlife Service

		(USFWS) through the Information for Planning and Conservation (IPaC) system.[42] The project site is not located in designated Critical Habitat for any species as noted on the USFWS Critical Habitat Portal.
Other Factors	2	No other concerns related to impacts on the environment or environmental impacts on the proposed project have been identified.

Additional Studies Performed:

1. Biological Resources Review
2. Archaeological and Historical Reconnaissance
3. Finding of No Effect
4. Traffic Impact Analysis
5. Geotechnical Investigation
6. Phase I Environmental Site Assessment
7. Hazardous Materials Survey
8. Environmental Noise Calculation v1.0 (STraCAT)
9. DNL Calculator

Field Inspection (Date and completed by)**:**

April 30, 2016 - Christina Lau, Project Manager, MIG, Inc.

List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]:

List of Permits Obtained/Will Obtain:

- California State Water Resources Control Board
- General Permit for Discharges of Storm Water Associated with Construction Activity Construction General Permit Order 2009-0009-DWQ
- Notice of Intent and Provide Storm Water Pollution Prevention Plan to SWRCB
- Town of Colma
- Design Review
- Planned Development Rezoning
- Planned Development Use Permit
- Grading permit
- Tree Removal Permit

[42] MIG|TRA, Inc., 2016. Biological Resources Review, Veteran's Village Affordable Housing Project. Letter Report. MIG|TRA Project No. 16069. Prepared for Mr. Francisco Gomez, HCD Specialist III, San Mateo County Housing Authority

- Street Improvement Plans
- Bay Area Rapid Transit
- Use agreement for road access and parking
- Building plan review and approval

Public Outreach [24 CFR 50.23 & 58.43]:

- Finding of No Significant Impact – 07/08/2016
- Notice of Intent to Request Release of Funds – 08/22/2016

Cumulative Impact Analysis [24 CFR 58.32]:

The project is a single-phased development project for a 66-unit affordable housing apartment complex. No other construction, operational, or improvement or geographically connected activities that would require cumulative analysis under project aggregation. The project site was identified in the Town of Colma General Plan Housing Element as necessary for development of housing to accommodate the Town's portion of regional housing and thus is functionally connected to the other housing opportunity sites identified therein. The Housing Element is not funded by nor does it require federal funding to have been adopted or to be implemented.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]:
The purpose of the project is to provide affordable housing and foster self-sufficiency for United States military veterans whose welfare is constrained by a fixed income and who are in need of social and medical services provided by the United States Office of Veterans Affairs (VA). The proposed housing development is needed to fulfill the goals of the Town of Colma General Plan Housing Element and the mission of HUD "to create strong, sustainable, inclusive communities and quality affordable homes for all."

Alternatives to the proposed Veterans Village Project were considered to reduce the effects of the development on historical resources and the effects of noise on future tenants of the development. Locations could be considered to reduce effects on future tenants from geotechnical hazards and potential environmental effects to migratory birds. All reasonable alternatives to the project that could reduce or avoid negative impacts to the human environment were considered including (1) alternative land uses, (2) alternative locations, (3) a reduction in housing units and modification of the site design, (4) revised site plan that preserves historic structures, and the required (5) *No Action* alternative pursuant to 24 CFR 58.40(e).

Alternative Land Uses: The project site cannot be used for any use but housing. The project site is identified in the Town's Housing Element as a proposed housing development with a 26-unit minimum size. A residential project must be constructed at this location because the project site has been identified in the Town of Colma's General Plan Housing Elements as being suitable for residential development in meeting the State of California housing needs pursuant to California Government Code 65589.5. The project site is not on public lands administered by the federal government and was not found to harbor natural resources that would serve the national interest, as such, it is in the prevue of the state and local governments to identify appropriate land uses within their respective jurisdiction. Therefore, non-housing related development at the site cannot be considered a viable alternative to the project.

Alternative Location: The Town of Colma is an urbanized community and substantially developed with residential units and an extensive network of cemeteries. Few vacant parcels or assemblages of parcels that could support an affordable housing project are available within the

Town. If a project site could be found in an area that is not developed with historical structures, then impacts to such resources could be avoided. If a project site could be found that is devoid of trees or other vegetation that could support nesting birds or that were devoid of structures that could accommodate roosting bats, then no potential for occurrences of nesting birds or roosting bats would exit and pre-construction surveys would not be required. Given these narrow conditions for avoiding impacts to the human environment, it is unlikely that a property of adequate size, zoning, infrastructure, and conditions that would negate the need for mitigation can be found in Colma or surrounding areas and relocation of the project would simply transfer similar impacts to another area.

Reduced Housing Units and Modified Site Design: The project site is identified in the Town's Housing Element as a proposed housing development with a 26-unit minimum size; therefore, development of the project site with less than 26-units is not considered a viable alternative to the proposed project. The project could be redesigned to provide the minimum 26 units specified in the Housing Element. Redesign of the project site could potentially preserve the four historical buildings that will be removed as a result of constructing the project; however, the placement of a 26-unit residential development amongst the existing historical structures would result in a change in the historical character of the site from industrial to residential/industrial. Changing the context by which the existing, on-site structures garner their historical character is considered a negative effect on the resource. Furthermore, a development proposal of 26 units does not meet the Town of Colma's objectives of maximizing the number of housing units that can adequately be accommodated by the project site (see General Plan Housing Element Policy 3, Program 3.1 and Program 3.2). Finally, a 61 percent reduction in housing units would likely render the project infeasible and thus the project proponent would have to abandon the endeavor.

Revised Site Plan that Preserves Historic Structures Alternative. Under the Revised Site Plan that Preserves Historic Structures Alternative, the project would maintain the proposed 66 units and at the same time preserve all existing historic structures at the site. The applicant has developed a site plan to illustrate this alternative. In order to preserve the existing historic structures, the site plan:

- Breaks-up the residential buildings into two smaller structures (one on either side of the pump building) to fit the 66-units;
- The massing of this alternative reduces open space on the site and increases the visible mass of the structure from Mission Road;
- The massing of this alternative reduces outdoor living spaces for future project occupants;
- The placement of a building south of the pump building reduces historic views of the pump building from the north;
- The required placement of new structures to preserve historic structures changes historic views of these structures (they would not be readily visible due to the new construction); and
- The site plan changes site circulation and prohibits required emergency vehicle access around the site (driveway width is required to be reduced from 20 feet to 13 feet adjacent to the northernmost historic structure where 20 feet is required by the Colma Fire Protection District).

The placement of a 66-unit residential development and amenities in and amongst the proposed structures to be removed would still likely result in a change in the historic use of the site as it represents a change in the character of the property's use from industrial to residential/industrial. The change in historic use could still be considered an adverse effect under 36 CFR Part 800.5(2)(iv) and could still remain a significant and unavoidable impact of the project.A Revised Site Plan that Preserves Historic Structures Alternative does not meet the Town's project objectives of using the full site and incorporating outside features.

No Action Alternative [24 CFR 58.40(e)]:

This property could be sold to another developer for other uses. Based on the current housing and rental market, it can be assumed that the property would either remain vacant or be developed with housing at current market rates. This action, however, would not meet the stated need of providing affordable housing options to United State military veterans in need of quality affordable housing.

Summary of Findings and Conclusions:

Construction and operation of the project will not result in any permanent adverse impacts to the human environment and future residents, and vendors at the facility will not be subject to substantial adverse impacts that may be caused by the environment. Mitigation is required to ensure that impacts related to historical resources, hazardous materials, noise, and geology does not substantially impact the project. Mitigation is also required to ensure that impacts to sensitive species do not occur (nesting birds/bats). A Finding of No Significant Impact will be made.

Mitigation Measures and Conditions [40 CFR 1505.2(c)]

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Historical and Archaeological Finds, Notification	All excavations within 10 meters (30 feet) shall be halted if potential historic or archaeological evidence is inadvertently uncovered or encountered during construction activities and a qualified archaeologist shall be contacted to assess the find and propose appropriate measures that may include leaving the find in place or excavating, evaluating, and preserving the find. Common known evidence in the vicinity of the project site include deposits of whole or fragmented marine shell (e.g. mussels, clams, abalone, crabs), whole or fragmented bone, dark, fine-grained soils known as *middens* that display the use of fire, obsidian, stone tools

	(e.g. mortars, pestles, arrowheads, spear points) or stone flaked generated in the making of tools, and human burials. Historic materials 45 years and older including bottles, artifacts, and structural remains may also have scientific and cultural significance and shall not be disturbed until evaluated and measures identified (if necessary) by a qualified archaeologist. Chief Tony Cerda, of the Costanoan Rumsen Carmel Tribe shall be provided written notification of the entire construction schedule and the dates of ground disturbing activities taking place on the project site. Written notification shall be accomplished by certified mail and received no less than two weeks prior to the start of construction activities. Any potential historic resources discovered shall be mapped, recorded, and initially assumed to be eligible for the National Register of Historic Resources until a formal, in-field evaluation can be completed and substantiated.
Human Remains	If human remains are inadvertently discovered during construction activities, the following processes shall commence: 1. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the San Mateo County coroner is contacted to determine that no investigation of the death is required. 2. If the coroner determines the remains to be Native American, the Coroner shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall identify the person or persons it believes to be most likely descended from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods or, if the NAHC cannot identify the most likely descendants (MLD), the MLD fails to make a recommendation, or the property owner rejects the MLD's commendations, the property owner can rebury the remains and

	associated burial goods with appropriate dignity in an area not subject to ground disturbance
Historical Resources, Archival Photographic Survey	Prior to demolishing or salvaging materials at the Holy Cross Cemetery, the water reservoir, the three associated buildings (two well houses and the carpenter's shop) and the site in general shall be documented according to the Outline Format described in the Photographic Specifications and *The Guidelines for Preparing Written and Descriptive Data: Historic American Building Survey* (HABS) published by the Pacific West Region Office of the National Park Service. This documentation shall include archival quality photographs of the exterior and interior views of the buildings and a view of their setting within the site. Archival negatives of the original construction drawings and historic views will be included in the documentation. Copies of the documentation, with original photo negatives and prints, shall be donated to the Colma Historical Association Museum, the San Mateo County Historical and others archives (as appropriate) accessible to the public.
Historical Resources, Interpretive Exhibit	A permanent, interpretive exhibit on the project site about the *water works lot* buildings, structures, and history shall be created. The exhibit should incorporate information from the BART report and other sources about the history of the Holy Cross Cemetery, historic photographs, and HABS documentation or other recordation materials and should be located and designed so that it is accessible to the public and of a durable design. The interpretive exhibit should be developed and designed by a qualified team including an historian and a graphic designer or exhibit designer. If the exhibit cannot be accommodated in the new development, another appropriate public venue can also be considered such as the Colma Historical Association Museum.
Wildlife, Nesting Birds	Prior to commencement of vegetation clearing activities, a nesting bird survey shall be performed under the direction of a qualified biologist. The survey shall occur within three days of commencing vegetation clearing activities. If nesting birds are found, the recommendations of the biologist shall be implemented, depending on the type of bird and/or the presence of eggs and/or younglings.

Determination:

☒ **Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]

The project will not result in a significant impact on the quality of the human environment.

☐ **Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]

The project may significantly affect the quality of the human environment.

Preparer Signature: _____ Date: 07/08/16

Name/Title/Organization: Christopher Brown, Director, MIG, Inc.

Certifying Officer Signature: _____ Date: 8-16-2016

Name/Title: DIRECTOR, DEPT. OF HOUSING, SAN MATEO COUNTY

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

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10.0 AUTHORS AND CONSULTANTS

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