

TOWN OF COLMA

2040 General Plan Update

Final Environmental Impact Report



SCH No. 2020069005



MARCH 2022

City of Souls

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Town of Colma
2040 GENERAL PLAN UPDATE
Final ENVIRONMENTAL IMPACT REPORT

SCH# 202006905

Prepared for:



Town of Colma

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COLMA, CA 94014

Prepared by:



Employee-Owned

550 PILGRIM DRIVE
FOSTER CITY, CA 94404

MARCH 2022

1.0 INTRODUCTION

This Final Program Environmental Impact Report (Final PEIR; FPEIR; FEIR) has been prepared by the Town of Colma (Town; town) in accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines (Section §15132). This FEIR assesses the expected environmental impacts resulting from project approval and associated impacts from subsequent implementation of the proposed Town of Colma 2040 General Plan Update (2040 GPU) project, responds to comments received on the Draft Program Environmental Impact Report (Draft PEIR; DPEIR; DEIR), and includes revisions to the text in the Draft EIR made in response to comments. The Town, serving as the Lead Agency, prepared the Program EIR to provide the public and responsible and trustee agencies with information about the potential environmental effects of the 2040 GPU. As set forth in the provisions of the State CEQA guidelines, public agencies are charged with the duty to consider the environmental impacts of a proposed project and to minimize these impacts where feasible. The Draft EIR identified significant impacts associated with the Proposed Project and examined alternatives and recommended mitigation measures that could avoid or reduce potential impacts. This document, together with the Draft EIR and Mitigation Monitoring and Reporting Program (MMRP), will collectively constitute the Final EIR if the Town of Colma City Council certifies it as adequate and complete under CEQA.

The Town of Colma's 2040 General Plan Update will serve as a policy guide for how the Town will make important planning decisions in the future that will guide the town's future development. It is therefore the predominant policy document that will future land use, housing, circulation, open space and community services throughout the town for the next 20 years. The town's GPU includes the seven elements mandated by State law, though these have been consolidated into the following six elements in the GPU document:

- Community Safety and Services Element (which include Noise)
- Historic Resources Element
- Housing Element
- Land Use Element
- Mobility Element
- Open Space and Conservation Element

The 2040 GPU sets the goals and policies for the issue areas related to Community Safety and Services (including Noise), Historic Resources, Land Use, Mobility and Open Space and Conservation. The Housing Element was last updated and adopted on January 14, 2015 and was thus not updated under the 2040 GPU.

1.1 BACKGROUND AND PURPOSE OF THE EIR

Overview of CEQA Requirements for Preparation of an EIR

State CEQA Guidelines Section §15121(a) states that an EIR is an informational document for decision-makers and the general public to analyze the significant environmental effects of a proposed project, identify actions to minimize potential significant effects, and describe reasonable alternatives to the proposed project that could reduce or avoid its adverse environmental impacts. Public agencies with discretionary authority are therefore required to consider the information in the EIR, along with all other relevant information, in making decisions on the proposed project.

For the purposes of CEQA, the term "project" refers to the whole of an action, which has the potential for resulting in a direct physical change or a reasonably foreseeable indirect physical change in the environment (CEQA Guidelines Section 15378[a]). With respect to the Town of Colma 2040 GPU, the Town has determined that the proposed action is a "project" within the definition of CEQA.

1.0 INTRODUCTION

Environmental Review Process for the Proposed Project

The following is an overview of the environmental review process for the Town of Colma's 2040 GPU project that has led to the preparation of this FEIR:

Notice of Preparation

In accordance with Section §15082 of the State CEQA Guidelines, the Town prepared and released a Notice of Preparation (NOP) of this EIR on June 3, 2020. The NOP was sent to all applicable responsible and trustee agencies and the Office of Planning and Research's State Clearinghouse (SCH, Number 2020-069005). The NOP and full text of responses to the NOP has been presented in Appendix A and B of the DEIR. After filing the NOP, a public scoping session was held on June 24, 2020.

Draft Program EIR

The Draft PEIR was released for public and agency review from December 6, 2021 to January 25, 2022. The DPEIR contains a description of the project, description of the environmental setting, identification of project impacts, and mitigation measures for impacts found to be significant, as well as an analysis of project alternatives. A Notice of Completion (NOC) for the DEIR, was submitted to the SCH on December 3, 2021. The Town held a hearing during the public review period, on December 8, 2021, to take testimony on the 2040 GPU and Draft PEIR.

Final EIR

The Town did not receive any comment letters from agencies and interest groups regarding the Draft Program Environmental Impact Report (DPEIR). Therefore, no substantial changes were made to the DPEIR. This document and the DPEIR, as amended herein, constitute the FEIR.

Sections §15089 and §15132 of the State CEQA Guidelines require a lead agency to prepare a Final EIR before approving a project. Pursuant to CEQA Guidelines Section §15132, a Final EIR must contain the following:

- the Draft EIR or any revisions to the Draft EIR;
- a list of persons, organizations, and public agencies commenting on the Draft EIR;
- comments and recommendations received on the Draft EIR;
- responses to any comments and recommendations on the Draft EIR; and,
- any other information added by the Lead Agency since the public availability of the Draft EIR.

Public Resources Code Section §21081.6 also requires lead agencies to adopt a mitigation monitoring and reporting program describing measures to be adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. Therefore, this FEIR also includes a mitigation monitoring and reporting program for the project, which is included as Section 5.0.

Certification of the Final EIR

The Town of Colma will review and consider the FEIR and if it finds that the FEIR is "adequate and complete", the Towns may certify the FEIR. The EIR can be certified if: 1) it shows a good faith effort at full disclosure of environmental information; and 2) provides sufficient analysis to allow decisions to be made regarding the project regarding its environmental consequences.

1.0 INTRODUCTION

Upon review and consideration of the FEIR, the Town of Colma may take action to approve, revise, or reject the proposed 2040 GPU and EIR. If approved, the FEIR will be supplemented with written findings in accordance with State CEQA Guidelines Section §15091 and a Statement of Overriding Considerations in accordance with State CEQA Guidelines Section §15093.

1.2 TYPE OF DOCUMENT

This document has been prepared as a Program EIR in order to address the actions proposed for the Town of Colma 2040 GPU project. A Program EIR (State CEQA Guidelines Section §15168) is appropriate for land use decision-making at a broad level that contemplates further project-level review of subsequent individual development proposals. Since the Town is not processing any specific development requests as part of this environmental analysis, pursuant to State CEQA Guidelines Section §15168, the DPEIR and FPEIR evaluate future development to be allowed under the proposed General Plan Update, at a program-level. Any future subsequent development in this area will require project applicants to conduct a site-specific analysis for each development project's potential impacts, particularly with respect to that project's compliance with the analysis set forth in this GPU EIR (State CEQA Guidelines Section §15168 and §15183).

1.3 INTENDED USES OF THE EIR

The EIR is intended to evaluate the environmental impacts of the project and is to be used to modify, approve, or deny the proposed project based on the analysis in the EIR. In accordance with State CEQA Guidelines Section §15126, this EIR should be used as the primary environmental document to evaluate all subsequent planning and permitting actions associated with the 2040 General Plan Update.

1.4 ORGANIZATION AND SCOPE OF THE FINAL EIR

This document is organized in the following manner:

SECTION 1.0—INTRODUCTION

Section 1.0 provides an overview of the EIR process to date and the required contents for the FEIR.

SECTION 2.0—COMMENTS AND REVISIONS

Section 2.0 includes the comments received and the DPEIR as revised by this FEIR. As noted previously, there were no comments submitted on the Draft EIR. The revisions to the Draft EIR consists of response to comments as well as minor staff edits. The revisions do not change the intent or content of the analysis or mitigation.

SECTION 3.0—REPORT PREPARERS

Section 3.0 provides a list of authors and agencies that assisted in the preparation of the EIR, by name, title, and company or agency affiliation.

SECTION 4.0—MITIGATION MONITORING AND REPORTING PROGRAM

Section 4.0 is the Mitigation Monitoring and Reporting Program (MMRP) used to ensure compliance with the mitigation measures adopted for the 2040 General Plan Update. The MMRP includes the responsible parties, implementation, reporting and timing of each mitigation measure.

2.0 COMMENTS AND REVISIONS TO THE DEIR

No new significant environmental impacts or issues, beyond those already covered in the Draft Program Environmental Impact Report (Draft PEIR; DPEIR; DEIR) for the proposed project were raised during the public review period for the DEIR. Responses to comments received during the comment period do not involve any new significant impacts or “significant new information” that would require recirculation of the DEIR pursuant to the California Environmental Quality Act (CEQA) Guidelines Section §15088.5.

2.1 COMMENTS ON THE DEIR AND RESPONSES

Requirements for Responding to Comments on a Draft EIR

State CEQA Guidelines Section §15088 requires that lead agencies evaluate all comments on environmental issues received on the DEIR and prepare a written response. The written response must address the significant environmental issue raised and must provide a detailed response, especially when specific comments or suggestions (e.g., additional mitigation measures) are not accepted. In addition, there must be a good faith and reasoned analysis in the written response, if required. However, lead agencies need only respond to significant environmental issues associated with the project and do not need to provide all the information requested by commenters, as long as a good faith effort at full disclosure is made in the EIR (State CEQA Guidelines §15204).

State CEQA Guidelines Section §15204 recommends that commenters provide detailed comments, with relevant explanation and evidence, that focus on the sufficiency of the DEIR in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Pursuant to State CEQA Guidelines Section §15064, an effect shall not be considered significant in the absence of substantial evidence supporting such a conclusion.

State CEQA Guidelines Section §15088 also recommends that where a response to comments results in revisions to the DEIR, that those revisions be incorporated as a revision to the DEIR or as a separate section of the Final EIR.

Summary of Comments Received

The Draft EIR was circulated for a 50-day public review period that began on December 6, 2021 and ended on January 25, 2022. The city extended the period until January 28, 2022 to ensure that mail post-marked by January 25, 2022 would be received. The city received no written comment letters during this period. Therefore, there are no comments to list or responses to provide.

2.2 REVISIONS TO THE DRAFT EIR

1.0 Executive Summary

No changes were made to Chapter 1.0 of the DEIR.

2.0 Introduction

No changes were made to Chapter 2.0 of the DEIR.

3.0 Project Description

No changes were made to Chapter 3.0 of the DEIR.

2.0 COMMENTS AND REVISIONS TO THE DEIR

4.1 Aesthetics

No changes were made to Chapter 4.1 of the DEIR.

4.2 Air Quality

No changes were made to Chapter 4.2 of the DEIR.

4.3 Biological Resources

No changes were made to Chapter 4.3 of the DEIR.

4.4 Cultural and Tribal Resources

No changes were made to Chapter 4.4 of the DEIR.

4.5 Energy

No changes were made to Chapter 4.5 of the DEIR.

4.6 Geology and Soils

No changes were made to Chapter 4.6 of the DEIR.

4.7 Greenhouse Gas Emissions

No changes were made to Chapter 4.7 of the DEIR.

4.8 Hazards and Hazardous Materials

No changes were made to Chapter 4.8 of the DEIR.

4.9 Hydrology

No changes were made to Chapter 4.9 of the DEIR.

4.10 Land Use Planning

No changes were made to Chapter 4.10 of the DEIR.

4.11 Noise

No changes were made to Chapter 4.11 of the DEIR.

4.12 Population and Housing

No changes were made to Chapter 4.12 of the DEIR.

4.13 Public Services and Recreation

No changes were made to Chapter 4.13 of the DEIR.

4.14 Transportation

No changes were made to Chapter 4.14 of the DEIR.

4.15 Utilities

No changes were made to Chapter 4.15 of the DEIR.

2.0 COMMENTS AND REVISIONS TO THE DEIR

4.16 Wildfires

No changes were made to Chapter 4.16 of the DEIR.

5.0 Cumulative Impacts Summary

No changes were made to Chapter 5.0 of the DEIR.

6.0 Project Alternatives

No changes were made to Chapter 6.0 of the DEIR.

7.0 Report Preparers

No changes were made to Chapter 7.0 of the DEIR.

3.1 TOWN OF COLMA

City Manager	Brian Dossey
General Plan Manager	Michael Laughlin Farhad Mortazavi

3.2 ENVIRONMENTAL CONSULTING TEAM

CSG CONSULTANTS

EIR Project Manager	Anna Choudhuri Michael Laughlin Farhad Mortazavi
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Environmental Planners/GIS	Shehriyar Khan Jonathan Kwan Laurel Mathews
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SUB-CONSULTANTS

ASM Affiliates	Ted Bibby Deanna Keegan
CSDA Design Group	Randy Waldeck, P.E.
Kittleson & Associates, Inc	Matt Braughton Damian Stefanakis
PlaceWorks Inc.	Andrea Howard Joanna Jansen

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

EXHIBIT B **MITIGATION MONITORING AND REPORTING PROGRAM**

The California Environmental Quality Act (CEQA) Guidelines Section §15097 requires a public agency to adopt a program for monitoring or reporting on the measures the public agency has required in order to mitigate or avoid significant environmental impacts. This requirement ensures that all environmental impacts found to be potentially significant or significant and unavoidable, are avoided or reduced as feasible to a proposed project. This mitigation and monitoring program (MMRP) has been developed in accordance with State CEQA Guidelines §15097 to ensure that the mitigation measures established in the Town of Colma 2040 General Plan Update Draft Program Environmental Impact Report are properly implemented, reported on, and monitored, per State law.

The objectives of this MMRP are then to:

- verify that each identified mitigation measure has been implemented;
- assign responsibility for the monitoring and reporting of each mitigation measure;
- stipulate the procedure to identify the appropriate enforcement actions’
- identify areas, if any, of non-compliance; and,
- record the actions taken to implement each mitigation; and,

4.1 MITIGATION MONITORING AND REPORTING PLAN

The Town of Colma, serving as the Lead Agency, is responsible for ensuring total compliance with the mitigation measures adopted for the 2040 General Plan Update EIR. The Town will monitor and report on all required mitigation activities according to **Table 4.0.1: Mitigation Monitoring and Reporting Checklist**. If, during project implementation, any of the identified mitigation measures cannot be implemented or appropriately monitored, and/or changes to the mitigation measures are required, the Town shall inform the affected responsible agency(s). The Town of Colma shall then in coordination with the affected responsible agencies, make the determination to make the appropriate modifications, substitution or deletion of mitigation measures, develop alternative feasible mitigation measures, or re-assign monitoring and reporting responsibilities. All changes to this MMRP shall be in accordance with Public Resources Code §21081.6 and State CEQA Guidelines §15162.

Table 4.0.1 presents the implementation plan, mitigation timing, and reporting/monitoring responsibilities for the mitigation measures that would be required under the 2040 GPU EIR:

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Table 4.0.1: Mitigation Monitoring and Reporting Checklist

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
4.2 AIR QUALITY			
<p>Impact 4.2.2: The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State ambient air quality standard.</p>	<p><u>Mitigation Measure AQ-1:</u> As part of the town’s development approval process, the town of Colma shall require applicants for future development projects to comply with the current BAAQMD basic control measures for fugitive dust control, including:</p> <ul style="list-style-type: none"> • Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible. • Pave, apply water twice daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites. • Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer). • Sweep daily (with water sweepers using reclaimed water if possible) or as often as needed all paved access roads, parking areas and staging areas at the construction site to control dust. • Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material. • Hydroseed or apply nontoxic soil stabilizers to inactive construction areas. • Enclose, cover, water twice daily, or apply nontoxic soil binders to exposed stockpiles (dirt, sand, etc.). • Limit vehicle traffic speeds on unpaved roads to 15 miles per hour. • Replant vegetation in disturbed areas as quickly as possible. 	<p>Implementation: Town of Colma Building Department or Planning Department</p> <p>Timing: Prior to issuance of any construction permit</p>	<p>Confirm that all construction plans submitted incorporate all applicable mitigation measures.</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>Impact 4.2.2: The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State ambient air quality standard.</p>	<p><u>Mitigation Measure AQ-2:</u> Prior to issuance of building permits, development project applicants that are subject to CEQA and exceed the screening sizes in the BAAQMD CEQA Guidelines shall prepare and submit to the town of Colma a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the town shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds to the extent feasible. These identified measures shall be incorporated into all appropriate</p>	<p>Responsibility: Town of Colma Building Department</p> <p>Timing: During construction activities</p>	<p>Confirm that technical assessment has been submitted and identified measures are incorporated into construction documents.</p>

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
	construction documents (e.g., construction management plans) submitted to the town of Colma and shall be verified by the Town’s Building Division and/or Planning Division		Initials: _____ Date: _____
Impact 4.2.3: The project could expose sensitive receptors to substantial pollutant concentrations	<p><u>Mitigation Measure AQ-3:</u> Applicants for construction within 1,000 feet of residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in the town of Colma, as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the town prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the Office of Environmental Health Hazard Assessment (OEHHA) and the BAAQMD. The latest OEHHA guidelines shall be used for the analysis, including age-sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM2.5 concentrations exceed 0.3 µg/m3, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include, but are not limited to:</p> <ul style="list-style-type: none"> • During construction, use construction equipment rated as US EPA Tier 4 Interim for equipment of 50 horsepower or more. • During construction, use of construction equipment fitted with Level 3 Diesel Particulate Filters for all equipment of 50 horsepower or more. <p>Measures identified in the HRA shall be included in the environmental document and/or incorporated into the site development plan as a component of the proposed project. Prior to issuance of any construction permit, the construction contractor shall ensure that all construction plans submitted to the Town of Colma Planning Division and/or Building Division clearly show incorporation of all applicable mitigation measures.</p>	<p>Implementation: Town of Colma Building Department or Planning Department</p> <p>Timing: Prior to issuance of any construction permit</p>	<p>Confirm that all construction plans submitted incorporate all applicable mitigation measures.</p> <p>Initials: _____ Date: _____</p>
Impact 4.2.3: The project could expose sensitive receptors to substantial pollutant concentrations	<p><u>Mitigation Measure AQ-4:</u> Prior to discretionary project approval, applicants for industrial or warehousing land uses in addition to commercial land uses that would generate substantial diesel truck travel – i.e., 100 diesel trucks per day or 40 or more trucks with diesel-powered transport refrigeration units per day based on the CARB recommendations for siting new sensitive land uses – shall contact the BAAQMD or the town of Colma in conjunction with the BAAQMD to determine the appropriate level of HRA</p>	(See next page.)	(See next page.)

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
	<p>required. If preparation of an HRA is required, all HRAs shall be submitted to the town and the BAAQMD for evaluation.</p> <p>The HRA shall be prepared in accordance with policies and procedures of the OEHHA and the BAAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E 06) or the risk thresholds in effect at the time a project is considered, or the appropriate noncancer hazard index exceeds 1.0, or 0.3 µ/m3 of PM2.5 or the thresholds as determined by the BAAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms.</p> <p>Measures to reduce risk impacts may include but are not limited to:</p> <ul style="list-style-type: none"> • Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible. • Electrifying warehousing docks. • Requiring use of newer equipment and/or vehicles. • Restricting off-site truck travel through the creation of truck routes. <p>Measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed General Plan.</p>	<p>Implementation: Town of Colma Planning Department</p> <p>Timing: During discretionary permit review</p>	<p>Confirm that discretionary projects meet BAAQMD requirements.</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>4.4 Cultural and Tribal Cultural Resources</p>			
<p>Impact 4.4.1: Future development to implement the proposed project could potentially cause a direct substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section §15064.5</p>	<p><u>Mitigation Measures: CUL-1</u></p> <ol style="list-style-type: none"> 1. For any project with potential to impact historical resources, a historical resource inventory of the project footprint shall be required to identify any historical resources. Before actual field reconnaissance occurs, background research shall include a record search at the NWIC, as well as a review of the SLF maintained by the NAHC. The project archaeologist shall determine the likelihood for the project site to contain archaeological resources by reviewing site photographs and existing historic information and conducting a site visit (for projects with exposed ground). 2. If archaeological resources cannot be avoided, significance evaluations shall be required when a survey identifies new resources, when a survey re-locates previously recorded resources that have not been previously evaluated, and when the survey does not re-locate previously recorded sites if there is a likelihood that the resources still exist. 3. Significance evaluations shall not be required if the historical resource has been evaluated for CEQA significance or for NRHP eligibility within the last five years, and if there has been no change in the conditions that contributed to the determination of significance or eligibility. A historical resource shall be reevaluated if its condition or setting has either improved or deteriorated, if new information is available, or if the resource is becoming increasingly rare due to the loss of other similar resources. 	<p>Implementation: The Town of Colma Planning Department or Building Department</p> <p>Timing: During construction activities</p>	<p>Confirm that procedures have been followed before and during construction as applicable.</p> <p>Initials: _____</p> <p>Date: _____</p>

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
	<p>4. An archaeological testing program shall be required for archaeological sites in need of historical resource significance evaluation. Archaeological testing programs include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. Tribal representatives and/or Native American monitors shall be involved in making recommendations regarding the significance of prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed project, which could result in a combination of project redesign to preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative).</p> <p>5. If significant historical resources are identified within the project footprint, the site may be eligible for designation in one or more registers. If no significant resources are identified, and site conditions are such that there is no potential for further discoveries, then no further action shall be required. If a survey and/or assessment finds nonsignificant resources, no further work shall be required beyond documentation of the resources on the appropriate California Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If the survey finds no significant resources but results of the initial evaluation and testing phase indicate there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring shall be required.</p> <p>6. Preferred mitigation for historical resources shall be to avoid and preserve the resource through project redesign. If the resource cannot be entirely avoided, an archaeologist who meets the U.S. Secretary of the Interior’s Professional Qualifications Standards (SOIPQS) for Archaeology shall take all prudent and feasible measures to minimize harm. For archaeological resources for which preservation is not an option, an archaeologist who meets the SOIPQS for Archaeology shall prepare a research design for a data recovery program. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as existing development or dense vegetation.</p> <p>7. When subsurface investigations, including geotechnical testing and other ground-disturbing activities, impact an archaeological site or a Native American Traditional Cultural Property within the project footprint, a Native American monitor shall be retained. In the event that the data recovery and/or monitoring program reveals human remains, the provisions of PRC Section 5097 shall be applied. An archaeologist who meets the SOIPQS for Archaeology shall consult the Native American monitor during the preparation of the written report, at which time the monitor may express concerns about the treatment of sensitive resources.</p>		

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
<p>Impact 4.4.2: Future development to implement the proposed General Plan Update could result in the potential disturbance of cultural resources (i.e., prehistoric archaeological sites, historical archaeological sites, and isolated artifacts and features) within the Planning Area</p>	<p><u>Mitigation Measures: CUL-2</u></p> <ol style="list-style-type: none"> 1. If an archaeological resource is identified during future development or operations, all activity within 100 feet of the archaeological resource shall cease and be flagged for avoidance. An archaeologist who meets the SOIPQS for Archaeology shall be immediately notified of the discovery. The archaeologist shall inspect the find and notify the Town of their assessment. 2. If the assessment concludes that the discovery constitutes a significant or unique archaeological resource, or TCR, the resource shall be avoided if possible. If avoidance is not possible, the Town shall consult with all applicable parties, including Native American tribes if prehistoric, in an effort to determine measures to mitigate any potential impacts to the resource in accordance with PRC Section 21083.2 and CEQA Guidelines Section 15126.4. An archaeologist who meets the SOIPQS for Archaeology shall employ measures that include documentation of the resource. 3. If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the PRC, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in PRC Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources. 4. If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. These procedures shall be included as Condition of Approval for all projects. Where appropriate, preconstruction measures will follow the guidelines as stated in CUL-1 	<p>(See next page)</p> <p>Implementation: The Town of Colma Planning Department or Building Department</p> <p>Timing: During construction activities</p>	<p>(See next page)</p> <p>Confirm that procedures have been followed before and during construction as applicable.</p> <p>Initials: _____</p> <p>Date: _____</p>
<p>Impact 4.4.3: The proposed project would cause a substantial adverse change in the significance of a TCR as defined in Public Resources Code Section §21074 or §5020.1(k)</p>	<p><u>Mitigation Measures: CUL-3</u></p> <ol style="list-style-type: none"> 1. For any project with potential to result in adverse impacts to TCRs, the Town shall avoid and/or minimize impacts by facilitating the identification of tribal cultural resources through field studies. Coordination and collaboration regarding the resource shall be completed with agencies, tribes, and institutions, such as the Northwest Information Center, the Native American Heritage Commission, and local tribal governments, including consultation as outlined in Senate Bill 18 and Assembly Bill 52. The resource shall be treated with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: (A) Protecting the cultural character and integrity of the resource; (B) Protecting the traditional use of the resource; and (C) Protecting the confidentiality of the resource. 2. If possible, the Town shall avoid and preserve the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context. 3. Greenspace, parks, or other open space shall use appropriate planning to incorporate the resources with culturally appropriate protection and management criteria. Permanent conservation easements or other interests in real property shall be created with culturally 	<p>Implementation: The Town of Colma Planning Department or Building Department</p> <p>Timing: During construction activities</p>	<p>Confirm that procedures have been followed before and during construction as applicable.</p> <p>Initials: _____</p> <p>Date: _____</p>

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
	appropriate management criteria for the purposes of preserving or utilizing the resources or places.		
<p>Impact 4.4.4: Adoption of the proposed General Plan Update could result in the potential disturbance of human remains, including those interred outside of cemeteries within the Planning Area</p>	<p><u>Mitigation Measures: CUL-4</u></p> <ol style="list-style-type: none"> 1. If Native American human remains are discovered within a project footprint, the Town shall work with the most likely descendants identified by the NAHC as provided in PRC Section 5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains, and any items of cultural patrimony associated with Native American burials with the appropriate Native Americans as identified by the NAHC. Action implementing such an agreement is exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5). 2. In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken: <ol style="list-style-type: none"> a. All construction activity shall cease within 100 feet of the discovery until the San Mateo County Medical Examiner is contacted and has completed their study. b. The San Mateo County Medical Examiner shall be contacted to determine whether an investigation of the cause of death is required. c. If the medical examiner determines that the remains are Native American, the medical examiner shall contact the NAHC within 24 hours. d. The NAHC shall identify the person or persons it believes to be the Most Likely Descendant from the deceased Native American. e. The landowner shall discuss and confer with the Most Likely Descendant regarding all reasonable options for treatment of human remains and any associated grave goods as provided in PRC Section 5097.98. 3. As part of the objectives, criteria, and procedures required by PRC Section 21082, a lead agency shall make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions shall include an immediate evaluation of the find by a qualified archaeologist. If the archaeologist determines the find to be a significant historical or archaeological resource, contingency funding and a time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be necessary. Work may continue on other parts of the project site while resource mitigation takes place. 	<p>(See next page)</p> <p>Implementation: The Town of Colma Planning Department or Building Department</p> <p>Timing: During construction activities</p>	<p>(See next page)</p> <p>Confirm that procedures have been followed before and during construction as applicable.</p> <p>Initials: _____</p> <p>Date: _____</p>
4.7 Greenhouse Gas			
<p>Impact 4.7.1: Implementation of the proposed project would</p>	<p><u>Mitigation Measure GHG-1:</u></p>	<p>(See next page)</p>	<p>(See next page)</p>

4.0 MITIGATION MONITORING AND REPORTING PROGRAM

Environmental Impact	Mitigation Measure	Responsibility And Timing	Implementation Monitoring
generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment	<p>The town of Colma shall update the Climate Action Plan (CAP) every five years to ensure the town is monitoring the plan's progress toward achieving the town's greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving a specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under Executive Order S-03-05 for year 2050 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update (e.g., Senate Bill 32 for year 2030). The CAP update shall include the following:</p> <ul style="list-style-type: none"> • GHG inventories of existing and forecast year GHG levels. • Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal of Executive Order S-03-05. • Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP: <ul style="list-style-type: none"> • Administration and staffing • Finance and budgeting • Timelines for measure implementation • Community outreach and education • Monitoring, reporting, and adaptive management • Tracking tools 	<p>Implementation: Town of Colma Planning Department</p> <p>Timing: Ongoing, every five years</p>	<p>Complete CAP update every five years to monitor progress toward GHG reduction goals.</p> <p>Initials: _____</p> <p>Date: _____</p>

EXHIBIT A
CEQA FINDINGS OF FACT; AND
STATEMENT OF OVERRIDING CONSIDERATIONS

The California Environmental Quality Act ("CEQA;" Pub. Resources Code, § 21000, et seq.) requires that public agencies shall not approve or carry out a project for which an environmental impact report has been certified that identifies one or more significant adverse environmental effects of a project unless the public agency makes one or more written Findings for each of those significant effects, accompanied by a brief explanation of the rationale for each Finding (State CEQA Guidelines [Cal. Code Regs., tit. 14, § 15000 et seq.], § 15091). This document presents the CEQA Findings of Fact made by the Town of Colma, in its capacity as the CEQA lead agency, regarding the 2040 General Plan Update ("Project"), evaluated in the Draft Environmental Impact Report ("Draft EIR") and Final Environmental Impact Report ("Final EIR") (collectively, the "EIR") for the Project.

SECTION I.
INTRODUCTION

Pursuant to section 21081 of the Public Resources Code, a public agency may only approve or carry out a project for which an EIR has been completed that identifies any significant environmental effects if the agency makes one or more of the following written finding(s) for each of those significant effects accompanied by a brief explanation of the rationale for each finding:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment.
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

As indicated above, section 21002 requires an agency to "avoid or substantially lessen" significant adverse environmental impacts. Thus, mitigation measures that "substantially lessen" significant environmental impacts, even if not completely avoided, satisfy section 21002's mandate. (*Laurel Hills Homeowners Assn. v. City Council* (1978) 83 Cal.App.3d 515, 521 ["CEQA does not mandate the choice of the environmentally best feasible project if through the imposition of feasible mitigation measures alone the appropriate public agency has reduced environmental damage from a project to an acceptable level"]; *Las Virgenes Homeowners Fed., Inc. v. County of Los Angeles* (1986) 177 Cal. App. 3d 300, 309 ["[t]here is no requirement that adverse impacts of a project be avoided completely or reduced to a level of insignificance . . . if such would render the project unfeasible"].)

While CEQA requires that lead agencies adopt feasible mitigation measures or alternatives

to substantially lessen or avoid significant environmental impacts, an agency need not adopt infeasible mitigation measures or alternatives. (Pub. Resources Code, § 21002.1(c) [if “economic, social, or other conditions make it infeasible to mitigate one or more significant effects on the environment of a project, the project may nonetheless be carried out or approved at the discretion of a public agency”]; see also State CEQA Guidelines, § 15126.6(a) [an “EIR is not required to consider alternatives which are infeasible”].) CEQA defines “feasible” to mean “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” (Pub. Resources Code, § 21061.1.) The State CEQA Guidelines add “legal” considerations as another indicia of feasibility. (State CEQA Guidelines, § 15364.) Project objectives also inform the determination of “feasibility.” (*Jones v. U.C. Regents* (2010) 183 Cal. App. 4th 818, 828-829.) “[F]easibility’ under CEQA encompasses ‘desirability’ to the extent that desirability is based on a reasonable balancing of the relevant economic, environmental, social, and technological factors.” (*City of Del Mar v. City of San Diego* (1982) 133 Cal.App.3d 401, 417; see also *Sequoyah Hills Homeowners Assn. v. City of Oakland* (1993) 23 Cal.App.4th 704, 715.) “Broader considerations of policy thus come into play when the decision making body is considering actual feasibility[.]” (*Cal. Native Plant Soc’y v. City of Santa Cruz* (2009) 177 Cal.App.4th 957, 1000; see also Pub. Resources Code, § 21081(a)(3) [“economic, legal, social, technological, or other considerations” may justify rejecting mitigation and alternatives as infeasible] (emphasis added).)

Environmental impacts that are less than significant do not require the imposition of mitigation measures. (*Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1347.)

The California Supreme Court has stated, “[t]he wisdom of approving . . . any development project, a delicate task which requires a balancing of interests, is necessarily left to the sound discretion of the local officials and their constituents who are responsible for such decisions. The law as we interpret and apply it simply requires that those decisions be informed, and therefore balanced.” (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 576.) In addition, perfection in a project or a project’s environmental alternatives is not required; rather, the requirement is that sufficient information be produced “to permit a reasonable choice of alternatives so far as environmental aspects are concerned.” Outside agencies (including courts) are not to “impose unreasonable extremes or to interject [themselves] within the area of discretion as to the choice of the action to be taken.” (*Residents Ad Hoc Stadium Com. v. Board of Trustees* (1979) 89 Cal.App.3d 274, 287.)

SECTION II.
FINDINGS REGARDING ENVIRONMENTAL IMPACTS NOT REQUIRING MITIGATION

The City Council hereby finds that the following potential environmental impacts of the 2040 General Plan Update are less than significant and therefore do not require the imposition of Mitigation Measures.

A. AESTHETICS

1. Scenic Vistas

Threshold: Would the Project have a substantial adverse effect on a scenic vista?

Finding: Less than significant. (Draft EIR, p. 4.1-6.)

Explanation: Although the Town of Colma contains wide areas of open spaces that provide scenic value to the town, there are no officially designated scenic vistas or highways within the Planning Area. Accordingly, the Project would not damage scenic resources within a state scenic highway.

The surrounding areas of San Bruno Mountain State and County Park located east of the town include views of the hills and open lands, all of which are components of the region's visual character. The Town of Colma is visually characterized by its numerous open cemetery lands, small and low-rise residential structures and a mix of regional retail and local commercial spaces. The common aesthetic component of the town's character is mainly a result of its cemetery land uses. Large properties, rolling hills, and quiet tranquil paths are a feature of the town's cemeteries and future development of high intensity land uses could conflict with this major existing land use, which accounts for approximately 75% of the land uses in the town. The town had identified nine gateways that distinguish the town's image from what is seen from the roadways as people approach and enter the town. The Project proposes updates to the town's existing planning areas, simplifying these into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the Project introduces new land uses such as a medium density residential land use that is consistent with current developments, and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The town does have limited open areas that could be redeveloped as "opportunity" or infill sites at higher intensity or heights for any new development under the 2040 GPU, but such development would not be proximate to, and would not result in a substantial adverse impact to, any scenic vista.

Moreover, the 2040 GPU's Land Use and Open Space Elements include policies and action items that would further protect visual and scenic views from future redevelopment efforts within the Town of Colma, and future development would be required to be consistent with the Project such that the existing visual character of the town is preserved and any potential adverse effects are minimized.

Additionally, the following proposed General Plan policies address impacts to scenic vistas and highways in the Planning Area:

Policy OSC-3-1: Transit Oriented Development. Encourage, to the extent feasible, higher density residential development to be located near transit corridors and public transportation.

Policy M-6-1: Site Planning. Locate and design development projects within a scenic corridor to carefully fit within their environment and setting. The scenic character of the site should be maintained as much as possible. All development should be sited and designed to minimize the impacts of noise, light, glare, and odors on adjacent properties with the community at large.

Policy M-6-2: Access to Scenic Corridors. Minimize the number of access roads to a scenic corridor wherever possible. Development of access roads shall be combined with the intent of minimizing intersections with scenic roadways.

Policy M-6-3: Visual Impacts. Minimize visual impacts along scenic corridors.

Policy M-6-4: Paving Integration. Require new development to design site plans that integrate paved areas into the site, relate paved areas to their structure, and landscape paved areas to reduce their visual impact from scenic corridors. Encourage use of textured paving.

Policy LU-10-7: Landscape Setback. To create a consistent greenbelt theme along El Camino Real between Mission Road and the BART bridge, a 30' landscape setback shall be observed. Within the setback, only surface parking is permitted. Surface parking must maintain a minimum setback of 10', with the setback area heavily landscaped and bermed to visibly screen vehicles.

The GPU would thus have a **less than significant** impact relating to scenic vistas and no mitigation measures are required. (Draft EIR, pp. 4.1-6 through 4.1-7.)

2. Scenic Resources

Threshold: Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Finding: Less than significant. (Draft EIR, p. 4.1-6.)

Explanation: The 2040 General Plan Update would not substantially damage scenic resources, such as trees, rock outcroppings, or historic buildings within a state scenic highway. Although the Town of Colma contains wide areas of open spaces that provide scenic value to the town, there are no officially designated scenic vistas or highways within the Planning Area. Accordingly,

the Project would not damage scenic resources within a state scenic highway.

For these reasons and the reasons discussed in the EIR, the Project would have a **less than significant** impact relating to this issue and no mitigation measures are required. (Draft EIR, pp. 4.1-6 through 4.1-7.)

3. Visual Character

Threshold: In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings?

Finding: Less than significant. (Draft EIR, p. 4.1-8.)

Explanation: The 2040 General Plan Update would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. While the town does have limited open areas that could be redeveloped as “opportunity” or infill sites at higher intensity or heights for any new development under the Project, due to the limited number of vacant and potentially redevelopment sites in the town, the Project has limited potential to change the visual character of the town.

Moreover, no existing developed areas would be altered in terms of uses and architecture. Since the town is limited to infill and redevelopment growth for future residential, commercial or office uses, compact development near the town center is encouraged and would protect the existing visual character of developed areas of the town and would protect the town’s visual character and existing cemetery and open space uses. Moreover, all future development projects would have to be consistent with applicable zoning in the town. Infill development would be encouraged to be aesthetically pleasing and be compatible to surrounding land uses, particularly in the downtown area of the town of Colma. This would assist in creating minimal aesthetic contrasts with the existing uses in terms of scale, color, form, or overall visual character of the area.

Moreover, the following proposed General Plan policies address impacts to the visual character of the Town of Colma:

Policy LU-1-1 **General Plan Land Use Diagram.** Maintain and implement a Land Use Diagram for purposes of describing the types of allowed land uses by geographic location and the density and/or intensity of allowed uses within each designation.

Policy LU-1-2 **Zoning Consistency.** Ensure that zoning designations are consistent with the General Land Use Diagram (Figure LU-4).

Policy LU-1-3 **Balance New Development with Existing Setting.** Prioritize new and higher density development consistent with the Town’s planning areas to

ensure new development is context sensitive and contributes to creating a strong sense of place. New development shall serve to protect and enhance the positive aesthetic qualities of the Town and each geographic area.

Policy LU-1-5 **Clear and Predictable Development Standards.** Strive to adopt and communicate clear and predictable development standards to ensure new development meets the expectations of the town.

Policy LU-10-6 **Spanish Mediterranean Design.** To create a consistent design theme along El Camino Real and at entry gateways, properties included in the Spanish Mediterranean Design Overlay shall utilize Spanish and Mediterranean design elements.

Policy LU-12-1 **Cemetery and Agriculture.** Consider cemetery and agricultural uses as the primary permitted land uses in the Hillside Boulevard Planning Area (*Less than Significant*).

Implementation of the above General Plan policies would assist in reducing impacts associated with land use changes that have the potential to change the overall visual character of the town of Colma. For these reasons and the reasons discussed in the EIR, the 2040 General Plan Update's impacts would be **less than significant** relating to this issue, and no further mitigation is required. (Draft EIR, pp. 4.1-8 through 4.1-9.)

4. **Light and Glare**

Threshold: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Finding: Less than significant. (Draft EIR, p. 4.1-9.)

Explanation: The 2040 General Plan Update would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Though the town has limited areas for redevelopment, other than the Sterling Park residential neighborhood, most of the future development would be in existing commercial areas of the town. However, since the town is primarily built out, future development would be limited to the redevelopment or infill development of underutilized parcels. Therefore, though these new development areas could result in new light sources, they would be compatible with nearby light sources (e.g., light from exiting commercial doors and windows, or upper story residential windows), especially in the Town Center, along Serramonte Blvd and Collins Avenue, and on specific sites on El Camino Real.

Moreover, the following proposed General Plan policies address impacts daytime glare and night-time lighting:

Policy M-6-1: **Site Planning.** Locate and design development projects within a scenic corridor to carefully fit within their environment and setting. The scenic

character of the site should be maintained as much as possible. All development should be sited and designed to minimize the impacts of noise, light, glare, and odors on adjacent properties with the community at large.

Policy M-6-2: **Lighting.** The Town shall minimize obtrusive light by limiting outdoor lighting that is misdirected, excessive, or unnecessary from surrounding residential areas.

Policy M-6-3: **Lighting.** Encourage street and parking lot lighting that creates a sense of security, complements building and landscape design, is energy-efficient, considers night sky visibility impacts (e.g., “dark skies”), and avoids conflicts with nearby residential uses.

Policy M-6-4: **Glare.** The Town shall require that new development avoid the creation of incompatible glare through development design features, nighttime lighting timing restrictions, height restrictions, and types of lights, particularly adjacent to residential areas.

Implementation of the policies described above would assist in further reducing impacts associated with daytime glare and night-time lighting. For these reasons and the reasons discussed in the EIR, the 2040 General Plan Update would have a **less than significant** impact related to daytime glare and nighttime lighting and no further mitigation is required. (Draft EIR, pp. 4.1-9 through 4.1-10.)

B. AGRICULTURE AND FOREST RESOURCES

1. Farmland Conversion

Threshold: Would the Project convert Prime Farmland, Unique Farmland, or Farmland of Statewide significance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

Finding: No impact. (Draft EIR, p. 5.0-4.)

Explanation: The Town of Colma does not encompass any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and therefore the proposed Project would not convert the aforementioned property to non-agricultural use. Therefore, there would be **no impacts**. (Draft EIR, p. 5.0-4.)

2. Agricultural Zoning

Threshold: Would the Project conflict with existing zoning for agricultural use, or a Williamson Act contract?

Finding: No impact. (Draft EIR, p. 5.0-4.)

Explanation: No land in the town is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, and the 2040 General Plan Update would not conflict with existing zoning for agricultural use or a Williamson Act contract. For these reasons and the reasons discussed in the EIR, the 2040 General Plan Update would have **no impact** relating to this issue.

3. Forestland Zoning

Threshold: Would the Project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Finding: No impact. (Draft EIR, p. 5.0-4.)

Explanation: The town of Colma does not encompass any forest land or timberland, and therefore the proposed General Plan Update would not conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production. There would be **no impact**. (Draft EIR, p. 5.0-4.)

4. Loss of Forest Land

Threshold: Would the Project result in the loss of forest land or conversion of forest land to non-forest use?

Finding: No impact. (Draft EIR, p. 5.0-4.)

Explanation: The town of Colma does not encompass any forest land or timberland, and therefore the 2040 General Plan Update would not result in the loss of forest land or conversion of forest land to non-forest use. There would be **no impact**. (Draft EIR, p. 5.0-4.)

5. Conversion of Farmland or Forestland

Threshold: Would the Project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?

Finding: No impact. (Draft EIR, p. 5.0-4)

Explanation: For the reasons discussed in the above findings and for the reasons discussed in the EIR, the 2040 General Plan Update would not involve changes in the existing environment that could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. There would be **no impacts** relating to this issue. (Draft EIR, p. 5.0-4.)

C. **AIR QUALITY**

1. **Air Quality Plans and Air Quality Standards**

Threshold: Would the Project conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Finding: Less than significant. (Draft EIR, p. 4.2-25.)

Explanation: The following describes potential air quality impacts of consistency with the AQMP from the implementation of the proposed Project. The General Plan plays an important role in local agency project review by linking local planning and individual projects to the *2017 Clean Air Plan*. It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the Bay Area.

BAAQMD requires a consistency evaluation of a plan with its current AQMP measures. BAAQMD considers project consistency with the AQMP in accordance with the following:

- Does the project support the primary goals of the AQMP?
- Does the project include applicable control measures from the AQMP?
- Does the project disrupt or hinder implementation of any AQMP control measures?
- Is the project VMT or vehicle trip increase less than or equal to the projected population increase.

Bay Area Air Quality Management District 2017 Clean Air Plan Goals

The primary goals of the 2017 Clean Air Plan are to attain the State and federal AAQS, reduce population exposure and protect public health in the Bay Area, reduce GHG emissions, and protect the climate. Furthermore, the 2017 Clean Air Plan lays the groundwork for reducing GHG emissions in the Bay Area to meet the state's 2030 GHG reduction target and 2050 GHG reduction goal.

Attain Air Quality Standards

BAAQMD's 2017 Clean Air Plan strategy is based on regional population and employment projections in the Bay Area compiled by ABAG, which are based in part on cities' general plan land use designations. These demographic projections are incorporated into Plan Bay Area. Demographic trends incorporated into Plan Bay Area determine VMT in the Bay Area,

which BAAQMD uses to forecast future air quality trends. The SFBAAB is currently designated a nonattainment area for O₃, PM_{2.5}, and PM₁₀ (State AAQS only).

Future growth associated with the proposed Project would occur incrementally throughout the 2040 buildout horizon. The anticipated growth from the proposed Project is within the population and employment projections identified by ABAG for the town of Colma. Because population and employment projections of the proposed Project are consistent with regional projections, BAAQMD emissions forecasts consider the additional growth and associated emissions from the proposed Project. Thus, emissions resulting from potential future development associated with the proposed Project are included in BAAQMD projections, and future development accommodated under the proposed General Plan would not hinder BAAQMDs ability to attain the California or National AAQS. Accordingly, impacts would be **less than significant**.

Reduce GHG Emissions and Protect the Climate

Consistency of the proposed Project with State, regional, and local plans adopted for the purpose of reducing GHG emissions are discussed in Chapter 4.7.1, Greenhouse Gas Emissions, of the Draft EIR. Future development allowed by the proposed Project would be required to adhere to statewide measures that have been adopted to achieve the GHG reduction targets of AB 32 and SB 32. The proposed Project is consistent with regional strategies for infill development identified in Plan Bay Area. Furthermore, the proposed Project would also be consistent with the Town of Colma Climate Action Plan 2030. The proposed Project is consistent with state, regional and local plans to reduce GHG emissions. Therefore, the proposed Project is consistent with the goal of the 2017 Clean Air Plan to reduce GHG emissions and protect the climate, and the impact would be **less than significant**.

2017 Clean Air Plan Control Measures

Table 4.2.8: Control Measures from the BAAQMD 2017 Clean Air Plan of the Draft EIR, identifies the control measures included in the 2017 Clean Air Plan that are required by BAAQMD to reduce emissions for a wide range of both stationary and mobile sources. As shown in the table, the proposed Project would not conflict with the 2017 Clean Air Plan and would not hinder BAAQMD from implementing the control measures in the 2017 Clean Air Plan. Accordingly, impacts would be **less than significant**.

Regional Growth Projections for VMT and Population

Future potential development allowed by the proposed Project would result in additional sources of criteria air pollutants. Growth accommodated by the proposed Project could occur throughout the buildout horizon. BAAQMDs approach to evaluating impacts from criteria air pollutants

generated by a plan's long-term growth is done by comparing population estimates to the VMT estimates. This is because BAAQMDs AQMP plans for growth in the SFBAAB are based on regional population projections identified by ABAG and growth in VMT identified by C/CAG. Changes in regional, community-wide emissions in the EIR Study Area could affect the ability of BAAQMD to achieve the air quality goals in the AQMP. Therefore, air quality impacts for a plan-level analysis are based on consistency with the regional growth projections. Table 4.2.9: Comparison of the Change in Population and VMT in the Town of Colma of the Draft EIR, compares the projected increase in population with the projected increases in total VMT.

As stated, BAAQMD's AQMP requires that the VMT increase by less than or equal to the projected population increase from the proposed Project (e.g., generate the same or less VMT per population). However, because the proposed Project accommodates both residential and nonresidential growth, a better indicator of how efficiently the town is growing can be made by comparing the increase in VMT to the increase in service population (e.g., generate the same or less VMT per service population). This approach is similar to the efficiency metrics for GHG emissions, which consider the total service population when calculating project efficiency. In addition, because the 2017 Clean Air Plan utilized growth projections based, in part, on cities' general plan land use designations, the growth rate in VMT compared to service population is evaluated between buildout under the proposed Project and buildout under the currently allowed under General Plan 2020.

VMT estimates based on data provided by Kittelson & Associates, were calculated for the town of Colma. Implementation of the proposed Project would increase daily VMT by 20,886 vehicle miles per day in the town, or about 30 percent, when compared to existing conditions. However, implementation of the proposed Project would result in lower VMT per capita than under existing conditions (32 percent lower in the town) and lower VMT per service population (8 percent lower in the Town), than under existing conditions. Compared to the demographic and VMT growth projections of the 2040 Without Project conditions (i.e., growth that would occur as currently allowed and projected under the current General Plan), the 2040 With Project conditions would also decrease the VMT/SP by approximately 1 percent in the town. This indicates that buildout conditions under the proposed Project would be more efficient in reducing VMT on a per service population basis. Thus, the proposed Project would be consistent with the goals of the 2017 Clean Air Plan. In summary, implementation of the proposed Project would not conflict with the 2017 Clean Air Plan, and impacts would be **less than significant** and no mitigation is required.

Proposed General Plan Update Policies

The General Plan policies listed in Table 4.2.9 of the Draft EIR would ensure consistency with the AQMP. (Draft EIR, pp. 4.2-25 through 4.2-35.)

2. Cumulatively Considerable Pollutant Emissions

Threshold: Would the Project result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Finding: Less than significant. (Draft EIR, p. 4.2-35.)

Explanation: ***Operation***

BAAQMD has identified thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, NO, PM10, and PM2.5. Development projects below the significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. According to BAAQMD's CEQA Guidelines, long-range plans, such as the proposed General Plan, present unique challenges for assessing impacts. Due to the SFBAAB's nonattainment status for ozone and PM and the cumulative impacts of growth on air quality, many of these plans have significant, unavoidable adverse air quality impacts.

Implementation and adoption of the proposed Project would result in an increase in development intensity in the town. Buildout of the proposed Project would result in direct and indirect criteria air pollutant emissions from transportation, energy (e.g., natural gas use), and area sources (e.g., aerosols and landscaping equipment). Although BAAQMD's CEQA Air Quality Guidelines only require an emissions inventory of criteria air pollutants for project-level analyses, enough information regarding the buildout of the proposed 2040 General Plan is available; thus, an inventory of criteria air pollutants was generated to identify the magnitude of emissions from buildout of the proposed General Plan. Table 4.2.10: Town of Colma Criteria Air Pollutant Emissions Forecast of the Draft EIR, identifies the emissions associated with buildout of the proposed Project. Subsequent environmental review of development projects would be required to assess potential impacts under BAAQMD's project-level thresholds.

The proposed Project includes several policies to reduce air quality impacts of potential future development, particularly in the Land Use (LU), Mobility (M), and Open Space and Conservation (C) Elements. Overall, these components of the proposed Project would contribute to reducing emissions.

Buildout of the proposed Project would not generate a substantial increase in criteria air pollutant emissions because emissions would not exceed the BAAQMD regional significance thresholds for VOC, NOx, PM10, and PM2.5.

Moreover, compliance with the following 2040 General Plan Update policies and programs would contribute to minimizing long-term emissions:

- Policy LU-2-10. Green Building.** Support sustainability and green building best practices through the orientation, design, and placement of buildings and facilities to optimize their energy efficiency in preparation of State zero-net energy requirements for residential construction and commercial construction.
- Policy LU-3-6. Walkable Neighborhoods.** The Town shall promote walkable neighborhoods by supporting alternative modes of transportation; enhancing bike and pedestrian connectivity to local commercial districts and transit centers; and maintaining sidewalks, public plazas, parks and greenways, parkways, street tree canopies, and landscaping throughout residential neighborhoods.
- Policy M-2-1. Reduce Vehicle Miles Traveled.** Require new development projects to achieve a reduction in VMT per capita or VMT per service population compared to both baseline VMT performance conditions and General Plan 2040 VMT performance conditions. The Town will regularly monitor baseline VMT to provide updated benchmarks for project applicants. Encourage use of VMT reduction strategies and methods to encourage non-automobile travel.
- Policy M-2-2. Other Traffic Flow Benchmarks.** Establish additional traffic flow benchmarks, such as VMT, vehicle-hours of travel, and safety-related metrics, in order to evaluate and monitor changes in traffic flow over time.
- Policy M-2-3. VMT Transportation Performance Measures.** Update the Town's transportation measures and thresholds to use VMT standards for traffic impact analysis rather than LOS.
- Policy M-4-4. Transit Oriented Development.** Promote the development of multi-modal mixed-use development at sites surrounding the Colma BART station, where feasible along Mission Road, and at the Town Center site.
- Policy M-4-5. Connections to Homes and Businesses.** Seek opportunities to improve first and last mile connections between transit, homes, and businesses.
- Policy M-5-2. Design for All Travel Modes.** Plan, design, and construct transportation projects to **safely** accommodate the needs of pedestrians, bicyclists, transit riders, motorists, people with mobility challenges, and persons of all ages and abilities.
- Policy M-7-1. TDM Program.** Continue to participate in the TDM Program as outlined by the San Mateo City/County Association of Governments (C/CAG).
- Policy M-7-2. TDM Program for New Development.** Require major development proposals to include a detailed, verifiable TDM program for consideration by the Town during the review of the development application.

Policy M-7-3. Vehicle Trip Reduction. Support vehicle trip reduction strategies, including building safer and more inviting transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.

Policy OSC-3-1. Transit Oriented Development. Encourage, to the extent feasible, higher density residential development to be located near transit corridors and public transportation.

For these reasons and the reasons discussed in the EIR, implementation of the proposed Project would result in a **less than significant operational impact.** (Draft EIR, pp. 4.2-37 through 4.2-40.)

3. Sensitive Receptors

Threshold: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant. (Draft EIR, p. 4.2-40.)

Explanation: The 2040 General Plan Update would not expose sensitive receptors to substantial pollutant concentrations.

Operational Phase Community Risk and Hazards

Types of land uses that typically generate substantial quantities of TACs and PM_{2.5} include industrial and manufacturing (stationary sources) and warehousing (truck idling) land uses.

Stationary (Permitted) Sources

Various industrial and commercial processes (e.g., manufacturing, dry cleaning) allowed under the proposed General Plan would be expected to release TACs. Since TAC emissions are generated by stationary and point sources of emissions within the SFBAAB, they are regulated and controlled by BAAQMD. However, emissions of TACs from mobile sources when operating at a property (e.g., truck idling) are regulated by statewide rules and regulations, not by BAAQMD, and have the potential to generate substantial concentrations of air pollutants.

Land uses that would require a permit from BAAQMD for emissions of TACs include chemical processing facilities, chrome-plating facilities, dry cleaners, and gasoline-dispensing facilities. Though such services are limited in the town, any emissions of TACs from stationary sources are controlled by BAAQMD. Therefore, any future permitting would be subject to further study and health risk assessment prior to the issuance of any necessary project level air quality permits under Regulation 2, New Source

Review, as well as Regulation 11, Rule 18, Reduction of Risk from Air Toxic Emissions at Existing Facilities.

Review under New Source Review ensures that stationary source emissions (permitted sources) would be reduced or mitigated below BAAQMD significance thresholds. Though these sources would incrementally contribute to the proposed General Plan's inventory individually, they would be mitigated to the standards identified above. Impacts related to permitted stationary sources of TACs are considered **less than significant**.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. These pockets have the potential to exceed the State 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. Since CO is produced in the greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

C/CAG's CMP must be consistent with the ABAG/MTC's Plan Bay Area, which is updated periodically. An overarching goal of the Plan Bay Area is to concentrate development in areas where there are existing services and infrastructure rather than allocate new growth in outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle VMT and associated GHG emissions reductions.

The GPU would be consistent with the overall goals of the Plan Bay Area. Additionally, the proposed General Plan would not hinder the capital improvements outlined in the CMP. Thus, the proposed General Plan would not conflict with C/CAG's CMP. Furthermore, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2017a). The proposed General Plan would not increase traffic volumes at affected intersections by more than BAAQMD screening criteria of 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited. Therefore, overall, the proposed Project would not have the potential to substantially increase CO hotspots at intersections in the town and vicinity.

Moreover, the following 2040 General Plan Update policies would further reduce congestion and associated emissions:

- Policy M-7-1. TDM Program.** Continue to participate in the TDM Program as outlined by the San Mateo City/County Association of Governments (C/CAG).
- Policy M-7-2. TDM Program for New Development.** Require major development proposals to include a detailed, verifiable TDM program for consideration by the Town during the review of the development application.
- Policy M-7-3. Vehicle Trip Reduction.** Support vehicle trip reduction strategies, including building safer and more inviting transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.

For these reasons and the reasons discussed in the EIR, localized air quality impacts related to mobile-source emissions would be **less than significant** and no further mitigation is required for mobile source emission impacts. (Draft EIR, pp. 4.2-43 through 4.2-44.)

4. Other Adverse Emissions

Threshold: Would the Project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Finding: Less than significant. (Draft EIR, p. 4.2-44.)

Explanation: The Project would not result in other emissions, such as those leading to odors, that would adversely affect a substantial number of people.

Construction-Related Odors

During construction activities of future developments in the Town, construction equipment exhaust and application of asphalt and architectural coatings would temporarily generate odors. Any construction-related odor emissions would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern, and impacts would be **less than significant**.

Operation-Related Odors

Nuisance odors are regulated under BAAQMD Regulation 7, Odorous Substances, which requires abatement of any nuisance generating an odor complaint. BAAQMD's Regulation 7, Odorous Substances, places general limitations on odorous substances and specific emission limitations on certain odorous compounds. In addition, odors are also regulated under BAAQMD Regulation 1, Rule 1-301, Public Nuisance. Accordingly, the 2040

General Plan Update would not result in emissions that would adversely affect a substantial number of people.

Moreover, the following proposed General Plan Update policy would further reduce potential impacts relating to odors.

Policy M-6-1.

Site Planning. Locate and design development projects within a scenic corridor to carefully fit within their environment and setting. The scenic character of the site should be maintained as much as possible. All development should be sited and designed to minimize the impacts of noise, light, glare, and odors on adjacent properties with the community at large.

Review of projects using BAAQMD's odor screening distances during future CEQA review, implementation of the policies and programs above, and compliance with BAAQMD Regulation 7 would ensure that odor impacts are minimized to **less than significant**. (Draft EIR, p. 4.2-44 through 4.2-46.)

D. BIOLOGICAL RESOURCES

1. Sensitive Species

Threshold: Would the Project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: Less than significant. (Draft EIR, p. 4.3-12.)

Explanation: The 2040 General Plan Update would not have a substantial adverse effect on any sensitive species.

A search of the California Natural Diversity Data Base has revealed the potential occurrence of one amphibian, one bird species, one fish species, four insect species, one reptile (California garter snake), and eight plant species with the town of Colma that are either State or Federal Threatened or Endangered species.

The Project proposes few changes that could potentially alter the future development proposed in the town. The proposed Project updates the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. The planning areas include development standards such as height, FAR, and density as well as development standard bonuses for specific uses in opportunity sites.

Though the proposed Project in itself would not directly approve or entitle any development, it would facilitate future development by allowing for infill development as well as redevelopment of the few vacant and underutilized parcels that exist within the town of Colma, thereby incentivizing new development in already developed areas with limited potential for wildlife habitat.

Moreover, the following proposed General Plan policies would minimize or avoid impacts to riparian corridors and natural communities:

Policy OSC-4-7: Colma Creek Bank Setback. Protect and enhance areas of Colma Creek for riparian habitat, linear park opportunities, and aesthetic value.

Policy OSC-5-3: Sensitive Biological Habitats. Require new development on or near sensitive habitats such as open creeks, ponds and other water features to be subject to an investigation of the presence of the threatened Red-legged frog and endangered San Francisco garter snake.

Policy OSC-5-4: Habitat Enhancement. Require new development to minimize the disturbance of natural habitats and vegetation, and revegetation of disturbed habitat with native or non-invasive, naturalized species.

For these reasons and the reasons discussed in the EIR, the 2040 General Plan Update would have a **less than significant** impact on species identified as a candidate, sensitive, or special statute species in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Moreover, these less than significant impacts would be further reduced with the implementation of the policies described above and no further mitigation is required. (Draft EIR, pp. 4.3-12 through 4.3-13.)

2. Riparian Habitat

Threshold: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Finding: No impact. (Draft EIR, p. 4.3-13.)

Explanation: There are no streams, rivers, vernal pools or marshes within the Planning Area. Colma Creek flows from the San Bruno Mountains through Colma to the San Francisco Bay. While portions of the creek provide habitat and could support protected species, the portions of the creek that flow through Colma flows mostly underground. While portions of the creek daylight in town, it is concrete-lined and does not provide habitat.

There are no State or federally protected wetlands within the General Plan Update Planning Area. Moreover, the majority of the 1225.18-acre Planning

Area is either dedicated for cemetery uses or is already developed with residential and commercial uses. Therefore, there would be **no impact** and no mitigation measures are required. (Draft EIR, p. 4.3-13.)

3. Wetlands

Threshold: Would the Project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Finding: No impact. (Draft EIR, p. 4.3-13.)

Explanation: There are no streams, rivers, vernal pools or marshes within the Planning Area. Colma Creek flows from the San Bruno Mountains through Colma to the San Francisco Bay. While portions of the creek provide habitat and could support protected species, the portions of the creek that flow through Colma flows mostly underground and do not provide habitat.

There are no State or federally protected wetlands within the General Plan Update Planning Area. Moreover, the majority of the 1225.18-acre Planning Area is either dedicated for cemetery uses or is already developed with residential and commercial uses. Therefore, there would be **no impact** and no mitigation measures are required. (Draft EIR, p. 4.3-13.)

4. Wildlife Movement

Threshold: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Finding: Less than significant. (Draft EIR, p. 4.3-13.)

Explanation: The 2040 General Plan Update would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.

While the Planning Area is mainly developed with urban uses, there are small areas of diversified wildlife population within the town. Table 4.3.1 of the Draft EIR lists the various native and migratory wildlife, bird and amphibious species that may be found in the town of Colma, particularly along its areas that abut San Bruno Mountain. Since the town of Colma is located along the Pacific Flyway, migratory birds are often found in the town's open spaces related to cemetery uses. The town's tall tree masses are also potential nesting sites for sensitive raptors protected by the Migratory Bird Treaty Act. Major parts of Colma Creek that flow through the town of Colma, are either underground water resources or contained by narrow culverts. Existing habitats that could support wildlife are surrounded by urban areas and therefore do not support the migration of

land animals. Ornamental ponds within some of the town's cemeteries may be potential habitat for the federally listed threatened Red-legged frog. Site conditions favoring this species include ponds at least two feet deep with moving water and borders of dense, shrubby or emergent riparian vegetation. Although the state and federally-listed endangered San Francisco garter snake seeks the Red-legged frog as a food source, there are currently no known populations of the snake in the town of Colma.

Ornamental ponds within some of the town's cemeteries may be potential habitat for the federally listed threatened Red-legged frog. Conditions favoring this species include ponds at least two feet deep with moving water and borders of dense, shrubby or emergent riparian vegetation. Although the state and federally-listed endangered San Francisco garter snake seeks the Red-legged frog as a food source, there are currently no known populations of the snake in the town of Colma.

Wildlife species typically use movement corridors in various ways. However, movement corridors through the town are somewhat limited due to the geography of the town and its numerous cemetery uses. Since the only large continuous areas of open space within the Planning Area are related to the town's cemetery uses, given their contiguous nature these are the few areas that have the potential to function as wildlife corridors. Future new development will either consist of redevelopment of underutilized or infill sites and no new development would be allowed in the town's cemetery sites. Therefore, although there may be indirect impacts to the movement of wildlife, development/redevelopment under the 2040 General Plan Update is not expected to result in direct impacts to habitat or fragmentation of open space.

In addition to Policy OSC-3.7, Program OSC-3.8a, Policy OSC-4.3, and Policy OSC-4.4, the following proposed General Plan policy minimizes or avoids impacts to important wildlife corridors and linkages:

Policy OSC-5-5: Nesting Bird Protection. Require project applicants to retain the services of a qualified biologist(s) to conduct a pre-construction nesting bird survey during the nesting season (February 1 through August 31) prior to all new development that may remove or be in close proximity to any trees or vegetation that may provide suitable nesting habitat for migratory birds or other special-status bird species. If nests are found the qualified biologist(s) shall identify appropriate avoidance measures, and these measures shall be incorporated into the project and implemented accordingly.

Implementation of the policies described above would further ensure that environmental impacts associated with wildlife species movement is **less than significant** and no mitigation is required. (Draft EIR, pp. 4.3-13 through 4.3-14.)

5. Local Policies and Ordinances

Threshold: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Finding: No impact. (Draft EIR, p. 4.3-14.)

Explanation: The Town of Colma has a Tree Ordinance that promotes the healthy growth of trees, controls the removal of trees, and encourages the replacement of trees within the Town. Any buildout activity under the proposed Project would be required to follow these regulations. Therefore, any buildout activities under the proposed Project would have **no impact** and mitigation is not required. (Draft EIR, p. 4.3-14.)

6. Habitat Conservation Plans

Threshold: Would the Project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Finding: No impact. (Draft EIR, p. 4.3-15.)

Explanation: There are no adopted Habitat Conservation Plans for the Town, nor are there any Natural Community Conservation Plans at the county level that include land within the Planning Area. Therefore, future development under the Project would not conflict with provisions of these conservation plans. There would be **no impact** and no mitigation is required. (Draft EIR, p. 4.3-15.)

E. ENERGY

Threshold: Would the Project result in potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Threshold: Would the Project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Finding: Less than significant. (Draft EIR, p. 4.5-7.)

Explanation: The 2040 General Plan Update will not result in a potentially significant impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation.

Construction of future development, or even redevelopment projects, under the 2040 General Plan Update has the potential to consume electricity, natural gas, gasoline and diesel during the operation of heavy-duty construction equipment and vehicles. However, these would be temporary consumption of energy, only related to project construction

under future development projects. Further, any future development would be limited by the town's geography and relation to existing cemetery uses. The town anticipates that future development projects would be limited to the town center or existing commercial and residential areas. The town of Colma therefore is anticipating more mixed use development, in terms of its growth. This in itself would reduce travel distances and energy consumption.

Additionally, although it is anticipated that energy efficiency will also improve in the future, and any new development under the Project would have to conform to the State of California's AB 32 Scoping Plan (for Greenhouse Gas emissions) and the Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6) and CALGreen Code (Title 24, Part 11). These standards outline improved building design and energy conservation measures to ensure that there are no unnecessary or inefficient use of energy. Most of the town is already developed, with few vacant parcels remaining, and future construction would not require the excessive amount of energy consumptions that typically occur with large scale industrial facilities. Proposed Project policies that would reduce air quality impacts during project construction, as well as constantly evolving energy efficiency standards, would also result in associated reductions in construction related energy uses.

The following proposed General Plan policies further reduce the anticipated less than significant wasteful, insufficient or unnecessary consumption of energy resources during project construction and operation:

- Policy OSC-3-1: Transit Oriented Development.** Encourage, to the extent feasible, higher density residential development to be located near transit corridors and public transportation.
- Policy OSC-3-2: Reduce Energy Consumption.** Support measures and education to reduce energy consumption and increase energy efficiency in residential, commercial, and industrial buildings.
- Policy OSC-3-3: Energy Efficiency in Municipal Operations.** Pursue opportunities to improve energy efficiency and install renewable energy systems, where feasible, in new and existing Town-owned facilities and operations.
- Policy OSC-3-4: GHG Reduction.** Implement the Climate Action Plan to achieve GHG reduction targets that are consistent with the State Scoping Plan, AB 32, and SB 32 and the Town's goals.
- Policy OSC-3-5: Pedestrian-Scaled Design.** Support the use of public/mass transit by encouraging pedestrian-friendly street design and mixed-use development near transit hubs.

For these reasons and the reasons discussed in the EIR, environmental impacts associated with consumption of energy resources would be **less**

than significant and no mitigation is required. (Draft EIR, pp. 4.5-7 through 4.5-9.)

F. **GEOLOGY AND SOILS**

1. **Fault Rupture**

Threshold: Would the Project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault; strong seismic ground shaking; seismic-related ground failure including liquefaction; or landslides?

Finding: Less than significant. (Draft EIR, p. 4.6-12.)

Explanation: The 2040 General Plan Update would not directly or indirectly cause potential substantial adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure including liquefaction, or landslides. The 2040 General Plan Update proposes few changes that could potentially alter the future development proposed in the town, and none of these changes would directly or indirectly cause such substantial adverse effects.

Moreover, the proposed General Plan policies CS-2.1 through CS-2.6 address seismic hazards.

Policy CS-2-1: Geotechnical Studies. Require geotechnical, soils, and foundation reports for proposed projects and subdivisions on sites that have been identified as having moderate or high potential for ground failure, liquefaction, and seismic activity by the Town or by the San Mateo County Seismic and Safety Element.

Policy CS-2-2: Development in Hazardous Areas. Prohibit development, including any land alteration, grading for roads and structural development, in areas of slope instability unless the appropriate mitigation measures are taken.

Policy CS-2-3: Unsafe Buildings. Encourage seismic retrofits of existing buildings based on the recommendations of a licensed engineer or architect. Prioritize working with owners of buildings whose loss would impact the greatest number of people and/or particularly vulnerable groups such as seniors, children, or low-income households.

Policy CS-2-4: Water Infrastructure Safety. Collaborate with San Mateo County, California Water Service Company, and the San Francisco Water District to ensure that all water tanks and main water pipelines are capable of withstanding high seismic stress.

Policy CS-2-5: Erosion Prevention. Require new grading or development to prevent erosion on slope and hillside areas by revegetation or use of slope protection material. Require project grading and drainage plans to demonstrate how the project will maintain natural surface drainage and existing vegetation, to the extent feasible.

Policy CS-2-6: Seismic Hazards. Continue to enforce appropriate standards to ensure existing and new development is located, designed, and constructed to minimize the risk of loss of life and property from seismic hazards.

For these reasons and the reasons discussed in the EIR, environmental impacts associated with such hazards are **less than significant** level and no mitigation is required. (Draft EIR, pp. 4.6-12 through 4.6-13.)

2. Soil Erosion

Threshold: Would the Project result in substantial soil erosion or the loss of topsoil?

Finding: Less than significant. (Draft EIR, p. 4.6-13.)

Explanation: The Project would not result in substantial soil erosion or the loss of topsoil. Generally, development related construction activities on more than one acre are subject to the National Pollutant Discharge Elimination System (NPDES) permit. As a requirement under the NPDES permit, all such development activities have to follow best management practices that reduce soil erosion, loss of topsoil, and pollution of waterways. In addition, earthwork and ground-disturbing activities, typically require grading permits, compliance with which minimizes erosion. Once construction is complete and exposed areas are revegetated or covered by buildings, asphalt, or concrete, the potential erosion hazard is substantially eliminated or reduced.

The proposed General Plan policies CS-2.1, CS-2.2, CS-2.4, and CS-2.6 address soil erosion and loss of topsoil.

Policy CS-2-1: Geotechnical Studies. Require geotechnical, soils, and foundation reports for proposed projects and subdivisions on sites that have been identified as having moderate or high potential for ground failure, liquefaction, and seismic activity by the Town or by the San Mateo County Seismic and Safety Element.

Policy CS-2-2: Development in Hazardous Areas. Prohibit development, including any land alteration, grading for roads and structural development, in areas of slope instability unless the appropriate mitigation measures are taken.

Policy CS-2-4: Water Infrastructure Safety. Collaborate with San Mateo County, California Water Service Company, and the San Francisco Water District to ensure that all water tanks and main water pipelines are capable of withstanding high seismic stress.

Policy CS-2-6: **Seismic Hazards.** Continue to enforce appropriate standards to ensure existing and new development is located, designed, and constructed to minimize the risk of loss of life and property from seismic hazards.

For these reasons and the reasons discussed in the EIR, environmental impacts associated with soil erosion and loss of topsoil are **less than significant** and no mitigation is required. (Draft EIR, pp. 4.6-12 through 4.6-14.)

3. Unstable Soils

Threshold: Would the Project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

Finding: Less than significant. (Draft EIR, p. 4.6-15.)

Explanation: The 2040 General Plan Update would not result in development located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse. While San Mateo County has hillsides with medium or very high susceptibility for landslides, the town of Colma does not have steep slopes. Though it borders the base of the San Bruno Mountains, these are also the areas of the town’s cemetery uses and no future development would be allowed with these land uses.

Moreover, the following 2040 General Plan Update policies address potential slope instability and landslide issues within the town of Colma.

Policy CS-2.1: **Geotechnical Studies.** Require geotechnical, soils, and foundation reports for proposed projects and subdivisions on sites that have been identified as having moderate or high potential for ground failure, liquefaction, and seismic activity by the Town or by the San Mateo County Seismic and Safety Element.

Policy CS-2.2: **Development in Hazardous Areas.** Prohibit development, including any land alteration, grading for roads and structural development, in areas of slope instability unless the appropriate mitigation measures are taken.

Policy CS-2.5: **Erosion Prevention.** Require new grading or development to prevent erosion on slope and hillside areas by revegetation or use of slope protection material. Require project grading and drainage plans to demonstrate how the project will maintain natural surface drainage and existing vegetation, to the extent feasible.

For these reasons and the reasons discussed in the EIR, impacts relating to this issue are therefore **less than significant** and no mitigation is required. (Draft EIR, p. 4.6-15.)

4. **Expansive Soils**

Threshold: Would the Project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?

Finding: No impact. (Draft EIR, p. 4.6-15.)

Explanation: The 2040 General Plan Update would not result in development located on expansive soil that could create substantial risks to life or property. Future development under the Project would be limited to redevelopment of underutilized or infill sites within the town. These available sites are already developed either wholly or partially with residential, commercial or public service uses, and no soil related issues were identified as these sites were developed. Therefore, the proposed Project would have **no impact** related to unstable or expansive soils and no mitigation measures are required. (Draft EIR, pp. 4.6-15 through 4.6-16.)

5. **Septic Tanks**

Threshold: Would the Project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

Finding: No impact. (Draft EIR, p. 4.6-16.)

Explanation: The 2040 General Plan Update would not result in development requiring septic tanks or alternative waste water disposal systems. The Town has approximately 33,600 lineal feet of sewer mains for its wastewater collection. As such, there are no significant adverse environmental impacts associated with septic tanks that would result from implementation of the 2040 General Plan Update. Therefore, the proposed Project would have **no impact** related to soils capability to support wastewater disposal and no mitigation measures are required. (Draft EIR, p. 4.6-16.)

6. **Paleontological Resources**

Threshold: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Finding: Less than significant. (Draft EIR, p. 4.6-16.)

Explanation: The Town of Colma is not located on any unique geological features, nor does it have areas of unique paleontological resources. Moreover, any future new development will consist of redevelopment of underutilized or infill sites, and no new development would be allowed in the town's cemetery sites. In the possibility that unknown resources are found during

construction activities in the Town, federal and State regulations would require protective measures should any paleontological resources be discovered. Section 5097 of the Public Resources Code specifies the procedures to be followed in the event of the unexpected discovery of paleontological resources. Additionally, Section 4.4 Cultural and Tribal Resources of the Draft EIR and 2040 General Plan Update Policy OSC-6-3 address potential impacts on paleontological resources. Potential impacts from adoption of the Project would be **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.6-16 through 4.6-17.)

G. GREENHOUSE GAS EMISSIONS

1. Emission Reduction Plans

Threshold: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?

Finding: Less than significant. (Draft EIR, P. 4.7-23.)

Explanation: Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan, ABAG's/MTC's Plan Bay Area, and the Town's CAP. A consistency analysis with these plans is presented below.

CARB Scoping Plan

The CARB Scoping Plan is applicable to state agencies but is not directly applicable to cities/counties and individual projects (i.e., the Scoping Plan does not require the town to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the State agencies from the Scoping Plan result in GHG emissions reductions at the local level. So local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the corporate average fuel economy standards.

Project GHG emissions shown in Table 4.7.5 of the Draft EIR include reductions associated with statewide strategies that have been adopted since AB 32 and SB 32. Development projects accommodated under the proposed Project are required to adhere to the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32 and SB 32. Future development projects would be required to comply with these state GHG emissions reduction measures because they are statewide strategies. For example, new buildings associated with land uses accommodated by implementing the proposed Project would be required to meet the CALGreen and Building Energy Efficiency Standards in effect at the time when applying for building permits. Furthermore, the proposed

Project includes goals, policies, and programs that would help reduce GHG emissions and therefore help achieve GHG reduction goals. Therefore, implementation of the proposed Project would not obstruct implementation of the CARB Scoping Plan, and impacts would be **less than significant**.

Plan Bay Area

Plan Bay Area is the Bay Area's regional transportation plan to achieve the passenger vehicle emissions reductions identified under SB 375. Plan Bay Area 2050 is the current SCS for the Bay Area, which was adopted October 21, 2021 (ABAG and MTC 2021).

Plan Bay Area 2050 includes strategies to reduce GHG emissions include focusing housing and commercial construction in walkable, transit-accessible places; investing in transit and active transportation; and shifting the location of jobs to encourage shorter commutes (ABAG and MTC 2021). The town of Colma's designated PDA and TPA are areas anticipated to harbor most of the Town's growth in the next 20 years.

The proposed Project places higher-density uses near transit stations and in areas that are less auto dependent. This is supported by Policy LU-1.3, which strives to reduce GHG emissions through the way the town designs and locates new housing, offices, public buildings, and other uses. Thus, the project would be consistent with the overall goals of Plan Bay Area 2050 in concentrating new development in locations where there is existing infrastructure and transit. Therefore, the proposed Project would not conflict with the land use concept plan in Plan Bay Area 2050, and impacts would be **less than significant**.

Colma Climate Action Plan

The CAP provides additional measures and strategies to achieve a GHG reduction target of 15 percent below 2005 levels by 2020, consistent with AB 32. The CAP lays out measures that would exceed the 2020 target and put the town on a trajectory to meet the 2050 goal under Executive Order S-03-05. The proposed Project would further the goals of the CAP by introducing policies and programs that align with the CAP (see Table 4.7.6: Colma Climate Change Action Plan 2030 Consistency Analysis, of the Draft EIR). Consequently, the proposed Project is consistent with the town's CAP, and impacts are **less than significant**.

Proposed General Plan Update Policies

Measures identified in Table 4.7.6 of the Draft EIR would further ensure consistency of the General Plan with plans that have been adopted to reduce GHG emissions.

The Town has prepared an update to the Climate Action Plan to provide guidance for meeting GHG reduction goals to the year 2030. Although not yet officially adopted, the Town plans to adopt the plan in the near future.

For all of the foregoing reasons and the reasons discussed in the EIR, the 2040 General Plan Update would result in a **less than significant impact** relating to this issue, and no mitigation is required. (Draft EIR, pp. 4.7-23 through 4.7-34.)

H. HAZARDS AND HAZARDOUS MATERIALS

1. Hazardous Materials

Threshold: Would the Project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Finding: Less than significant. (Draft EIR, p. 4.8-13.)

Explanation: The use, transport and disposal of hazardous materials is regulated and monitored by local fire departments and the California Highway Patrol (CHP).

While US 280 and State Route 1 (SR 1) border the western edge of the town, neither of these are designated hazardous material transportation routes. Moreover, as required by local, State and federal regulations, any use, transportation, and disposal of hazardous materials is regulated and monitored by the town's fire department, Certified Unified Program Agencies (CUPAs), the California Division of Occupational Safety and Health (OSHA), and the California Department of Toxic Substances Control (DTSC).

The precise increase in the amount of regulated hazardous materials transported to or from the Planning Area as a result of implementation of the proposed Project, cannot be definitively predicted at this time. However, as previously mentioned, all future projects allowed under the 2040 General Plan Update would be required to comply with local, state and federal requirements related to hazardous materials. The use, storage, and transport of hazardous materials by developers, contractors, business owners, and others are required to be in compliance with local, state, and federal regulations during project construction and operation, as well as to be in compliance with a Hazardous Materials Business Plan in accordance with State of California regulations. Facilities that use hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases.

Moreover, the following proposed General Plan policies address the use and handling of hazardous materials and associated land uses involving hazardous materials through the coordination with appropriate agencies regarding route planning and incident response:

- Policy CS-7-1:** **Hazard Mitigation Plan.** Implement, maintain, and update the Local Hazard Mitigation Plan which is part of the larger County Hazard Mitigation Plan.
- Policy CS-7.2:** **Emergency Management Plan.** Continue to participate with San Mateo County's Mutual Aid Programs and Plans for community emergency preparedness.
- Policy CS-7.3:** **Promote Emergency Preparedness.** Utilize multiple information channels to educate residents and businesses of the Town's emergency operations procedure.
- Policy CS-7.4:** **Collaborative Planning.** Improve inter-jurisdictional and interagency cooperation with regard to hazard prevention and emergency response through town participation in and initiation of coordination meetings and exercises.
- Policy CS-7.5:** **Evacuation Routes.** Utilize emergency evacuation routes established by the Town and ensure that all residential areas of Colma maintain access to at least two routes for evacuation.

Impacts from the use and handling of hazardous materials would be **less than significant** and no mitigation is required. Moreover, implementation of the policies described above, as well as adherence to all federal, state, and local regulations regarding the transportation of hazardous materials, would further reduce the environmental impacts associated with the transportation, use and storage of hazardous materials (Draft EIR, pp. 4.8-13 through 4.8-15.)

2. Accident or Upset

Threshold: Would the Project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Finding: Less than significant. (Draft EIR, 4.8-13.)

Explanation: The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As required by local, State and federal regulations, any use, transportation, and disposal of hazardous materials is regulated and monitored by the town's fire department, Certified Unified Program Agencies (CUPAs), the California Division of Occupational Safety and Health (OSHA), and the California Department of Toxic Substances Control (DTSC), though in the event of an accidental release of hazardous materials, the local emergency management agencies (e.g., fire and police departments) would be the first to respond.

Compliance with all applicable federal and state laws related to the transportation of hazardous materials would reduce the likelihood and severity of accidents during transit. The use, storage, and transport of

hazardous materials by developers, contractors, business owners, and others are required to be in compliance with local, state, and federal regulations during project construction and operation, as well as to be in compliance with a Hazardous Materials Business Plan in accordance with State of California regulations. Facilities that use hazardous materials are required to obtain permits and comply with appropriate regulatory agency standards designed to avoid hazardous waste releases.

Moreover, the following proposed General Plan policies address the use and handling of hazardous materials and associated land uses involving hazardous materials through the coordination with appropriate agencies regarding route planning and incident response:

Policy CS-7.2: Emergency Management Plan. Continue to participate with San Mateo County's Mutual Aid Programs and Plans for community emergency preparedness.

Policy CS-7.3: Promote Emergency Preparedness. Utilize multiple information channels to educate residents and businesses of the Town's emergency operations procedure.

Policy CS-7.4: Collaborative Planning. Improve inter-jurisdictional and interagency cooperation with regard to hazard prevention and emergency response through town participation in and initiation of coordination meetings and exercises.

Policy CS-7.5: Evacuation Routes. Utilize emergency evacuation routes established by the Town and ensure that all residential areas of Colma maintain access to at least two routes for evacuation.

Impacts from accidents involving the release of hazardous materials would be **less than significant** and no mitigation is required. Moreover, implementation of the policies described above, as well as adherence to all federal, state, and local regulations regarding the transportation of hazardous materials, would further reduce the environmental impacts associated with the transportation, use and storage of hazardous materials (Draft EIR, pp. 4.8-13 through 4.8-15.)

3. Hazards Near Schools

Threshold: Would the Project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Finding: Less than significant. (Draft EIR, p. 4.8-15.)

Explanation: The 2040 General Plan Update would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. No schools are located, or planned for, within the Planning Area. Moreover, residential land uses do not typically involve the storage or use of substantial

quantities of hazardous materials. There would not be an increase in the storage and use of hazardous materials. Implementation of the project would result in environmental impacts associated with the school hazards to **less than significant** and no further mitigation is required. (Draft EIR, p. 4.8-15.)

4. Waste Sites

Threshold: Would the Project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Finding: Less than significant. (Draft EIR, p.4.8-15.)

Explanation: There are a number of sites within the town that are included on a list of hazardous material sites compiled by pursuant to Government Code Section §65962.5. These sites are subject to various State and federal laws and regulators, including the Certified Unified Program Agencies (CUPAs), the California Division of Occupational Safety and Health (OSHA), and the California Department of Toxic Substances Control (DTSC). The transportation of hazardous materials on area roadways is regulated by the CHP, U.S. Department of Transportation (Hazardous Materials Transportation Act) and Caltrans and use of these materials is regulated by the DTSC (22 Cal. Code Regs. Section §66001, et seq.).

The town of Colma, San Mateo County and the California State Water Resources Board lists 21 hazardous waste sites with the Town. Of these, 19 are closed/completed sites, two are open and one is open but eligible for closure. The Project would result in additional development on already developed properties, two of which are listed as open hazardous sites: 7778 El Camino Real, as well as 1 Sandhill Road, which is a closed landfill and does not have development potential. The property at 7778 El Camino Real has been identified as an opportunity site for future mixed-use development. Adherence to all federal, state, and local regulations regarding hazardous materials sites would ensure environmental impacts associated with the re-use of such sites would be less than significant.

Additionally, the following proposed General Plan policies address hazards to the public and the environment:

Policy CS-2.1: **Geotechnical Studies.** Require geotechnical, soils, and foundation reports for proposed projects and subdivisions on sites that have been identified as having moderate or high potential for ground failure, liquefaction, and seismic activity by the Town or by the San Mateo County Seismic and Safety Element.

The Project would have a **less than significant** impact relating to development of sites included on a list of hazardous materials sites

compiled pursuant to Government Code section 65962.5. No mitigation measures are required. Moreover, with implementation of the policy described above, as well as adherence to all federal, state, and local regulations regarding the hazardous materials sites, would further reduce the environmental impacts associated with the re-use of such sites. (Draft EIR, pp. 4.8-15 through 4.8-16.)

5. Public Airports

Threshold: For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Finding: Less than significant. (Draft EIR, p. 4.8-16.)

Explanation: While the town of Colma does not have any public or private airports within the town limits, it is within influence area B of the San Francisco International Airport (SFO). The SFO Airport is 5.5 miles away from the Planning Area. Other airports in close proximity include the Half Moon Bay Airport, located 11 miles from the Planning Areas and the Oakland Airport and San Carlos Airport, located 13 miles and 15.5 miles, respectively, from the town of Colma. Aircrafts taking off from the closed airport, SFO, fly over a 1.2-mile-wide and 5.8-mile-long area that is referred to as the "gap". The gap stretches over the cities of San Bruno, South San Francisco, and Daly City and is directly adjacent to the town of Colma. In addition, though SFO has designated transitional surfaces as alternate routes for planes to take off or land, one of these transitional surfaces extends over the town and has the potential to affect the town residences.

Proposed General Plan Update Policies

Moreover, the following proposed General Plan policies address airport hazards:

Policy CS-9.1: **ALUC Plan.** Require development within the Airport Influence Area B, designated in the Airport Land Use Compatibility Plan (ALUCP) of the San Francisco International Airport, to comply with all applicable federal and State laws with respect to land use safety and airspace protection criteria.

Policy CS-9.2: **Airport Land Use Commission Review.** Require that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the ALUCP for the environs of San Francisco International Airport.

Implementation of the policies described above would ensure the environmental impacts associated with any airport hazards are **less than significant** and no mitigation measures are required. (Draft EIR, pp. 4.8-16 through 4.8-17.)

6. Emergency Plans

Threshold: Would the Project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Finding: Less than significant. (Draft EIR, p. 4.8-17.)

Explanation: Though the Project would allow for some new residential and commercial development in the Town of Colma, any future projects are not anticipated to impede evacuation routes in the town. Further, the town already has an established roadway and circulation system that may be used for the evacuation of residents and the mobility of fire suppression, emergency response, and law enforcement vehicles. Therefore, there should not be any potential future conflicts with existing emergency response or emergency evacuation plans from implementation of emergency response activities.

Moreover, the following proposed General Plan policies address emergency response and evacuation plans:

Policy CS-7-1: Hazard Mitigation Plan. Implement, maintain, and update the Local Hazard Mitigation Plan which is part of the larger County Hazard Mitigation Plan.

Policy CS-7-2: Emergency Management Plan. Continue to participate with San Mateo County's mutual aid programs and plans for community emergency preparedness.

Policy CS-7-3: Promote Emergency Preparedness. Utilize multiple information channels to educate residents and businesses of the Town's emergency operations procedure.

Policy CS-7-4: Collaborative Planning. Improve inter-jurisdictional and interagency cooperation with regard to hazard prevention and emergency response through town participation in and initiation of coordination meetings and exercises.

Policy CS-7-5: Evacuation Routes. Utilize emergency evacuation routes established by the Town and ensure that all residential areas of Colma maintain access to at least two routes for evacuation.

The Project would have a **less than significant** impact relating to an adopted emergency response or evacuation plan and no mitigation measure are required. Moreover, implementation of the policies described above would further reduce environmental impacts to an adopted emergency response or evacuation plan. (Draft EIR, p. 4.8-17.)

7. Wildland Fires

Threshold: Would the Project expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Finding: No impact. (Draft EIR, p. 4.8-18.)

Explanation: The California Department of Forestry and Fire Protection (CAL FIRE) determines the degree of wildland fire hazard based on the natural setting of the area, the degree of human use of the area and the level and ability of public services to respond to fires that do occur. CAL FIRE has rated the San Bruno Mountain Park and the adjacent undeveloped areas of the town of Colma as areas of moderate fire hazard. Fires in these areas usually occur during the summers primarily where grass and brush grow. CAL FIRE responds to wildland fires from several stations, depending on their proximity and availability. The closest fire station serving the town is at 20 Tower Road in the city of Belmont. The areas that are still undeveloped in the town of Colma are lands for cemetery uses. New residential or commercial land uses can only occur on previously developed land or on approximately 2.8 acres of vacant land. While the Project does have the potential to add future development, all future projects under the GPU would be required to comply with local, State, and federal requirements related to wildland fires, building standards and safety codes, as well as defensible space requirements, where applicable. Further, wildland fires typically are a potential hazard to development located in unmaintained open spaces. Other than cemetery uses, the town is fairly developed, with no large open spaces dedicated to land development. Therefore, the potential for wildland fire is non-existent and the proposed Project would not expose people or structure to a risk of loss, injury, or death. Thus, there is **no impact** and no mitigation is required. (Draft EIR, p. 4.8-18.)

I. HYDROLOGY AND WATER QUALITY

1. Water Quality Standards

Threshold: Would the Project violate any water quality standards or waste discharge requirements?

Finding: Less than significant. (Draft EIR, p. 4.9-8.)

Explanation: The 2040 General Plan Update would not violate any water quality standards or waste discharge requirements.

The Clean Water Act and California State Water Resources Control Board require any development, infrastructure, redevelopment, or improvement project over one acre in size, to be approved for a Storm Water Pollution Prevention Plan (SWPPP), a General Permit particularly during construction activities, as well as implementation of BMPs and methods to prevent erosion and tracking would be required. Also, the town is obligated to follow the mandates of the San Francisco Bay Municipal Regional

Stormwater Permit (MRP) to control stormwater discharge within the town limits. Provisions of the MRP require onsite treatment of stormwater, discharges by businesses, trash capture devices in the storm drain system and more. Furthermore, the proposed policies in the General Plan Update would help mitigate the impacts to surface water quality.

Moreover, the following proposed General Plan policies address surface water quality standards

- Policy OSC-4-1:** **Comply with Water Quality Regulations.** Continue to comply with all State and federal regulations for water quality.
- Policy OSC-4-2:** **Participation in the San Mateo County Stormwater Pollution Prevention Program (SMCWPPP).** Continue to be an active member agency of the SMCWPPP to reduce pollution from being conveyed through the storm water system to the San Francisco Bay.
- Policy OSC-4.-9:** **Water Quality and Conservation Public Information.** Continue to support and coordinate with the Countywide Stormwater Program, Cal Water, and the San Francisco Public Utilities Commission (SFPUC) on their public outreach and education campaigns to conserve and maintain water quality.
- Policy LU-2-4:** **Low Impact Development.** Regulate new development and construction to minimize pollutant and sediment concentrations in receiving waters and ensure that surface water meets or exceeds applicable regulatory water quality standards. Require new development to incorporate Low Impact Development features that treat and reduce surface runoff volumes.

For these reasons and the reasons discussed in the EIR, the Project's environmental impacts associated with surface water quality would be **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.9-8 through 4.9-9.)

2. Groundwater Supplies

Threshold: Would the Project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the Project may impede sustainable groundwater management of the basin?

Finding: Less than significant. (Draft EIR, p. 4.9-9.)

Explanation: The Town of Colma is serviced by Cal Water's South San Francisco District, which provides water from a combination of groundwater as well as purchased water sources and has adequate resources to meet the present needs and foreseeable growth of the town. On both developed and undeveloped sites, compliance with the San Francisco Bay Municipal Regional Stormwater Permit (MRP) requires that projects to include stormwater treatment measures that would allow for the treatment and retention of surface runoff. This improves water quality and allows for

ground water recharge opportunities on developed sites and mitigates the impact of future development and redevelopment activities. The majority of the town's groundwater usage comes from the irrigation of cemetery lands. The development of cemetery structures such as a mausoleum may reduce the ground water use by reducing the need to irrigate. In addition, Colma Municipal Code Chapter 5.11 requires that new development projects that affect 500 square feet or more and landscape modification projects that affect 2,500 square feet or more, including cemetery lands, improve water use efficiency by planting less water intensive species of vegetation and increasing efficiency in irrigation.

Also, statewide NPDES permits are required for construction runoff and dewatering and other releases to surface water as well as the LID techniques required by Policy LU-2-4, would protect groundwater quality under future development and redevelopment activities in the town of Colma. The policies discussed below would further minimize any potential impact from the proposed Project.

Moreover, the following proposed General Plan policies address groundwater supplies and groundwater recharge:

- Policy OSC-4-1:** **Comply with Water Quality Regulations.** Continue to comply with all State and federal regulations for water quality.
- Policy OSC-4-3:** **Reclaimed Water.** Pursue opportunities to install water recycling infrastructure for Town-owned and cemetery landscape areas.
- Policy OSC-4-4:** **Use of Drought Tolerant and Native Plants.** Encourage the use of drought tolerant and native plants in landscaping plans.
- Policy OSC-4-5:** **Green Infrastructure.** Incorporate green infrastructure, which relies on natural processes for stormwater treatment/drainage, groundwater recharge and flood control, into street and rights-of-way wherever practicable, including curb cuts, flow-through planters and bioswales that slow stormwater runoff by dispersing it to vegetated areas, harvesting and use of runoff, and promote infiltration and use of bioretention to clean stormwater runoff.
- Policy LU-2-6:** **Green Infrastructure.** Encourage green infrastructure installations that rely on natural processes for stormwater treatment/drainage, groundwater recharge and flood control.
- Policy LU-2-7:** **Public Green Infrastructure.** Incorporate green infrastructure into street and rights-of-way wherever practicable, including curb cuts, flow-through planters and bioswales that slow stormwater runoff by dispersing it to vegetated areas, harvesting and use of runoff, and promote infiltration and use of bioretention to clean stormwater runoff.

Implementation of the policies described above would reduce the environmental impacts associated with groundwater and groundwater quality to **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.9-9 through 4.9-11.)

3. Erosion or Siltation

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Finding: Less than significant. (Draft EIR, p. 4.9-11.)

Explanation: The Town of Colma has limited vacant parcels and new development under the Project would primarily come from redevelopment of infill sites with higher intensities, with some new development area around the center of the town.

Grading, construction, and general development of a site with urban and infill uses has the potential to alter infiltration and runoff processes by introducing impervious uses that absorb less rainfall and moisture. However, the construction of underground storm drain, as needed, and as part of future development projects in the town could provide for efficient conveyance of runoff to downstream locations of discharge. As new impervious surfaces are added to areas, and as surface and underground drainage conveyance becomes more efficient and more concentrated, the natural infiltration and storage processes are reduced. This in turn could result in increasing the frequency, volume and flow rate of stormwater runoff, increased downstream flooding and/or erosion/sedimentation processes, even outside the town of Colma boundaries.

However, the town also has to comply with the San Mateo Countywide Water Pollutions Prevention Program which addresses issues related to stormwater pollution, which may include, but is not limited to flooding, sedimentation reduction, erosion, and water quality. New development or even redevelopment activities under the 2040 GPU may involve land clearing, grading. Ground disturbance activities that have the potential to temporarily increase soil erosion rates or affect exiting water quality in a project construction area. On both developed and undeveloped sites, compliance with the MRP requires that projects that alter more than 5,000 square feet of land area are required to include stormwater treatment measures that would allow for the treatment and retention of surface runoff. This would improve water quality and allow for ground water recharge opportunities on redeveloped sites and mitigate the impact of development on vacant sites. The stormwater treatment measures would also slow surface runoff before it enters the storm drain system, reducing the load.

Moreover, the following proposed General Plan policies that address stormwater and drainage:

- Policy OSC-4-6:** **Stormwater Runoff.** Require large-scale projects (over 0.5 acres) to channel surface and roof runoff to on-site detention facilities to facilitate groundwater recharge, reduce stormwater pollution, and mitigate flooding of Colma Creek.
- Policy OSC-4-8:** **Colma Creek Enhancements. Enhance Colma Creek where possible** by concrete channel removal, adding landscaping, public pathways, and sitting areas.
- Policy CS-3-2:** **Maintain Drainage Facilities.** Maintain drainage facilities to accommodate the flow capacity of Colma Creek through Colma to accommodate the storm water runoff from a 100-year storm.
- Policy CS-3-4: S** **tormwater Detention.** Require new developments over one half acre in size to construct on-site storm water detention facilities which contribute runoff to Colma Creek in order to store the difference in runoff between the 10-year pre-development storm (original natural state) and the 100-year post-development storm. Any stormwater release should be at the 10-year predevelopment rate.
- Policy LU-2-5:** **Green Infrastructure Plan.** Implement a Green Infrastructure Plan to ensure compliance with the Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit.

Implementation of the General Plan Update policies LU-2-6, LU-2-7, OSC-4-5 and the policies described above manage stormwater runoff and provides opportunities for storm water retention and treatment. For the reasons discussed above and in the EIR, the impacts associated with the increase of impervious surfaces and the alteration of drainage patterns would be reduced to **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.9-11 through 4.9-12.)

4. **Flooding**

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

Finding: Less than significant. (Draft EIR, pp. 4.9-11 through 4.9-12.)

Explanation: The 2040 General Plan Update would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

The Town must comply with the San Mateo Countywide Water Pollutions Prevention Program, which addresses issues related to stormwater pollution, which may include, but is not limited to flooding, sedimentation reduction, erosion, and water quality. Moreover, on both developed and

undeveloped sites, compliance with the MRP requires that projects that alter more than 5,000 square feet of land area are required to include stormwater treatment measures that would allow for the treatment and retention of surface runoff. This would improve water quality and allow for ground water recharge opportunities on redeveloped sites and mitigate the impact of development on vacant sites. The stormwater treatment measures would also slow surface runoff before it enters the storm drain system, reducing the load.

Implementation of the General Plan Update policies LU-2-6, LU-2-7, OSC-4-5, OSC-4-6, OSC-4-8, CS-3-2, CS-3-4, and LU-2-5 manage stormwater runoff and provides opportunities for storm water retention and treatment. With the General Plan Update policies, the impacts associated with the increase of impervious surfaces and the alteration of drainage patterns would be reduced to **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.9-11 through 4.9-12.)

5. Runoff

Threshold: Would the Project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantially additional sources of polluted runoff or impede or redirect flood flows?

Finding: Less than significant. (Draft EIR)

Explanation: The 2040 General Plan Update would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantially additional sources of polluted runoff or impede or redirect flood flows.

The Town also has to comply with the San Mateo Countywide Water Pollutions Prevention Program which addresses issues related to stormwater pollution, which may include, but is not limited to flooding, sedimentation reduction, erosion, and water quality. Moreover, on both developed and undeveloped sites, compliance with the MRP requires that projects that alter more than 5,000 square feet of land area are required to include stormwater treatment measures that would allow for the treatment and retention of surface runoff. This would improve water quality and allow for ground water recharge opportunities on redeveloped sites and mitigate the impact of development on vacant sites. The stormwater treatment measures would also slow surface runoff before it enters the storm drain system, reducing the load.

Moreover, the following proposed General Plan policies that address stormwater and drainage:

Policy OSC-4-6: Stormwater Runoff. Require large-scale projects (over 0.5 acres) to channel surface and roof runoff to on-site detention facilities to facilitate groundwater recharge, reduce stormwater pollution, and mitigate flooding of Colma Creek.

Policy OSC-4-8: Colma Creek Enhancements. Enhance Colma Creek where possible by concrete channel removal, adding landscaping, public pathways, and sitting areas.

Policy CS-3-2: Maintain Drainage Facilities. Maintain drainage facilities to accommodate the flow capacity of Colma Creek through Colma to accommodate the storm water runoff from a 100-year storm.

Policy CS-3-4: Stormwater Detention. Require new developments over one half acre in size to construct on-site storm water detention facilities which contribute runoff to Colma Creek in order to store the difference in runoff between the 10-year pre-development storm (original natural state) and the 100-year post-development storm. Any stormwater release should be at the 10-year predevelopment rate.

Policy LU-2-5: Green Infrastructure Plan. Implement a Green Infrastructure Plan to ensure compliance with the Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit.

Implementation of the General Plan Update policies LU-2-6, LU-2-7, OSC-4-5 and the policies described above manage stormwater runoff and provides opportunities for storm water retention and treatment. For these reasons and the reasons discussed in the EIR, the impacts associated with the increase of impervious surfaces and the alteration of drainage patterns would be reduced to **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.9-11 through 4.9-12.)

6. Flood Hazard

Threshold: In flood hazard, tsunami, or seiche zones, would the Project risk release of pollutants due to project inundation?

Finding: No impact. (Draft EIR, p. 4.9-12.)

Explanation: Tsunamis and seiches have not been of historic flooding concern for this area and the implementation of the 2040 General Update will not increase this risk for future development projects. There will be **no impact** and no further mitigation is required. (Draft EIR, pp. 4.9-12 through 4.9-13.)

7. **Water Quality Control Plan**

Threshold: Would the Project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Finding: Less than significant. (Draft EIR, p. 4.9-13.)

Explanation: The Planning Area falls within the jurisdiction of the California Regional Water Quality Control Board, San Francisco Bay Region 2 (RWQCB). The Bay area's RWQCB overall mission is to protect area's overall surface water and groundwater quality.

The town's 2040 GPU does propose additional development in the town over the next 20 years. However, this Program level EIR (PEIR) does not evaluate specific development projects and related impacts to surface water and groundwater, future development and redevelopment activities would have to comply with all construction related General Permit and BMPs. Erosion control, site runoff activities, potential soil and groundwater contamination would have to also comply with existing water quality control plan and groundwater management plan.

Implementation of Policies OSC 4-1, OSC 4-2-, OSC-4-3, OSC-4-4, OSC-4-5, OSC-4-6, OSC-4-8, OSC-4-9, CS-3-2, CS-3-4, LU-2-4, LU-2-5, LU-2-6, LU-2-7 would reduce the environmental impacts associated with groundwater management to **less than significant** and no further mitigation is required. (Draft EIR, p. 4.9-13.)

J. **LAND USE AND PLANNING**

1. **Established Communities**

Threshold: Would the Project physically divide an established community?

Finding: Less than significant. (Draft EIR, p. 4.10-11.)

Explanation: The type of project most likely to have the effect of physically dividing an established community would be a major new road, highway, or similar infrastructure, none of which are proposed as a part of the town's 2040 GPU. The Planning Area currently includes a majority of cemetery uses and some residential, commercial office and public/semi-public uses, with very little space for either new development or infill redevelopment. Future development projects in the town would include the redevelopment of the town center, the commercial core and areas east of Hillside Boulevard and would not separate established communities or neighborhoods. Further, no new transportation corridors are being planned for under the 2040 GPU which could have the potential to divide established communities. Given that the proposed GPU will not divide an established community, the impact of proposed Project, the 2040 Town of Colma General Plan is considered less than significant.

Moreover, the following proposed General Plan policies address compatible land uses and existing communities:

- Policy LU-1-1:** **General Plan Land Use Diagram.** Maintain and implement a Land Use Diagram for purposes of describing the types of allowed land uses by geographic location and the density and/or intensity of allowed uses within each designation.
- Policy LU-1-2** **Zoning Consistency. Ensure that zoning designations are consistent with** the General Land Use Diagram (Figure LU-4).
- Policy LU-6-1:** **New Incompatible Land Uses.** The Town shall prohibit the introduction of new incompatible land uses and environmental hazards into existing residential areas.
- Policy LU-10-1:** **Neighborhood and small scale commercial and service uses.** Neighborhood and small scale and service uses are encouraged on the east side of El Camino Real from the BART bridge north.
- Policy LU-10-2:** **El Camino Real Housing.** Limit housing on El Camino Real to the Town Center site and existing sites by the BART station.
- Policy LU-10-3:** **Mixed Use and Nonresidential Development.** Limit parking, traffic, and other impacts of mixed-use and nonresidential development on adjacent uses and promote high-quality architectural design and effective transportation options.

Implementation of the policies described above would further reduce any impacts to a **less than significant** regarding potential divisions to established communities. No mitigation measure are required. (Draft EIR, pp. 4.10-11 through 4.10-12.)

2. Conflicts With Plans

Threshold: Would the Project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Finding: Less than significant. (Draft EIR, p. 4.10-12.)

Explanation: The Project proposes few changes that could potentially alter the future development proposed in the town. The proposed Project would allow for an additional 328 residential units, 992,500 square feet of commercial uses, and 35,000 square feet of office uses in the Sterling Park, Mission Road, Hillside Boulevard, Commercial Core Planning Areas as well as the Bocci Center, Town Center and Sandblaster sites.

As set forth by state law, the General Plan serves as the primary planning document for a jurisdiction and subordinate documents and plans should be updated to be consistent with any changes to a jurisdiction's existing General Plan. Future development and infrastructure projects will be

considered by the town, each project will be evaluated for conformance by the town's General Plan, Zoning Ordinance, and other relevant plans and regulations.

The proposed Project revises many existing goals and policies and includes new goals, policies and actions to support the town's vision for 2040. The policies and programs address many topics including sustainability, preservation of communities and historic resources and economic development. The update also reflects current codes, design guidelines, and master plans that have been initiated or adopted by the town since the last update. In addition, the Project will update the town's Land Use Map with more defined uses such separating the Residential land use designation to Low Density Residential and Medium Density Residential, minor revisions to established goals and policies, as well as new goals and policies to encourage future mixed-use development/redevelopment projects. The Project would also reflect codes, design guidelines, master plans and other programs that have been initiated or adopted by the town since the last GPU. As needed, other regulations such as the town's existing plans, programs, policies or other implementing tools, may need to be updated to effectively implement the Project . The town's Planning Department has primary responsibility for administering the laws, regulations and requirements that pertain to the physical development of the town of Colma. Amendments may also be needed from time to time to conform to State or federal law passed since adoption of the Project .

The proposed Land Use Element has been prepared to be consistent with the other Elements of the GPU, and would therefore not conflict with other plans, policies or regulations adopted to mitigate any environmental effects. Any future projects would have to be analyzed for their particulate potential environmental impacts pursuant with CEQA. Therefore, the proposed Project would have a less than significant impact with regard to conflicts with applicable land use plans, policies or regulations.

Moreover, the following proposed General Plan policies address the consistency with existing plans:

- Policy LU-1-1:** **General Plan Land Use Diagram.** Maintain and implement a Land Use Diagram for purposes of describing the types of allowed land uses by geographic location and the density and/or intensity of allowed uses within each designation.
- Policy LU-1-2** **Zoning Consistency.** Ensure that zoning designations are consistent with the General Land Use Diagram (Figure LU-4).
- Policy LU-2-5:** **Green Infrastructure Plan.** Implement a Green Infrastructure Plan to ensure compliance with the Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit.
- Policy LU-2-11:** **Climate Action Plan.** Maintain a Climate Action Plan and continue to partner with San Mateo County's Regional Climate Action Planning Suite (RICAPS) to prepare community-wide greenhouse gas inventories.

- Policy LU- 5-1:** **Regional Cooperation.** Participate with other cities in the county and across the region in working towards solutions to the issues of regional land use, housing, homelessness, and transportation planning through partnership with the Association of Bay Area Governments, the Metropolitan Transportation Commission, and the San Mateo City/County Association of Governments (C/CAG).
- Policy OSC-3-4:** **GHG Reduction.** Implement the Climate Action Plan to achieve GHG reduction targets that are consistent with the State Scoping Plan, AB 32, and SB 32 and the Town’s goals.
- Policy OSC-6-2:** **Tribal Consultation Compliance.** Comply with SB 18,AB 52, and other applicable State and federal laws by consulting with local California Native American tribes prior to development decisions or General Plan or Specific Plan amendments. Respect tribal policies regarding confidentiality of information about tribal resources or sacred sites.
- Policy CS-3-1:** **Participate in Regional Adaptation Efforts. Coordinate with regional agencies,** such as the San Francisco Bay Conservation and Development Commission (BCDC) and the Bay Area Regional Collaborative (BARC), in adaptation planning.
- Policy CS-7-1:** **Hazard Mitigation Plan.** Implement, maintain and update the Local Hazard Mitigation Plan which is part of the larger County Hazard Mitigation Plan.
- Policy CS-7-2:** **Emergency Management Plan.** Continue to participate with San Mateo County’s mutual aid programs and plans for community emergency preparedness.
- Policy CS-9-1:** **ALUC Plan.** Require development within the Airport Influence Area B, designated in the Airport Land Use Compatibility (ALUC) Plan of the San Francisco International Airport, to comply with all applicable federal and State laws with respect to land use safety and airspace protection criteria.
- Policy CS-9-2:** **Airport Land Use Commission Review.** Require that all future land use actions and/or associated development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the ALUC Plan for the environs of San Francisco International Airport.
- Policy M-3-3:** **Regional Transportation Planning.** Actively participate in and support regional transportation planning efforts.
- Policy HR-1-1:** **General Plan Consistency.** Ensure that future plans, ordinances, and City programs are complimentary to the historic preservation goals and policies contained within the Town’s Historic Resources Element.
- For these reasons and the reasons discussed in the EIR, the 2040 General Plan Update would have **less than significant** impacts relating to this issue and no mitigation measures would be required. (Draft EIR, pp. 4.10-11 through 4.10-14.)

K. MINERAL RESOURCES

1. Regional and Statewide Mineral Resources

Threshold: Would the Project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Finding: No impact. (Draft EIR, p. 5.0-5.)

Explanation: Colma sand is a well-known construction resource, and had been previously mined from the Hillside Landfill, which closed in 2012. The State Division of Mines and Geology has not classified or designated any areas in the town of Colma as containing regionally significant mineral resources. Therefore, there would be **no impacts** to Mineral Resources from the proposed Project. (Draft EIR, p. 5.0-5.)

2. Locally-Important Mineral Resource

Threshold: Would the Project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Finding: No impact. (Draft EIR, p. 5.0-5.)

Explanation: Colma sand is a well-known construction resource, and had been previously mined from the Hillside Landfill, which closed in 2012. The State Division of Mines and Geology has not classified or designated any areas in the town of Colma as containing regionally significant mineral resources. Therefore, there would be **no impacts** to Mineral Resources from the proposed Project. (Draft EIR, p. 5.0-5.)

L. NOISE

1. Noise Standards

Threshold: Would the Project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Finding: Less than significant. (Draft EIR, p. 4.11-16.)

Explanation: The Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Section 2.05.040 of the town of Colma Municipal Code exempts construction noise from the Noise Limitation included in Section 2.05 of the code. Section 5.04.220 of the Municipal Code includes language regarding standard hours of construction, which should be considered for all future

development projects within the Planning Area. As presented in Regulatory Framework, noise generating construction activity within a radius of 500 feet from any residential unit within town boundaries should only be permitted between the following hours/days: Monday Through Friday 8:00 AM through 7:00 PM; Saturday 9:00 AM through 5:00 PM; Sundays 12:00 PM to 5:00 PM. Noise generating construction activity is prohibited on all of the Federal Holidays listed in the Regulatory Framework Section above. The Building Official, or his or her designee, may grant an exception for special conditions when requested in writing and approved by the Building Official, or his or her designee, prior to the start of the noise generating noise activity.

For projects more than 500 feet from a residential unit in the town of Colma, construction hours shall be assigned on a project-by-project basis by the Building Official, or his or her designee, or as established within a project's Conditions of Approval, based on evaluation of potential noise-related impacts on surrounding uses. See the Regulatory Framework Section for additional information about the town of Colma Standard Hours of Construction.

All future projects within the Planning Area must adhere to the Standard Hours of Construction limitations delineated in the town of Colma Municipal Code. Since construction activities could temporarily increase the existing ambient noise environment around nearby sensitive receptors, construction noise associated with future development within the planning area should be reviewed on a case-by-case basis, and must adhere to Conditions of Approval and any project-specific quantitative noise standards, if applicable.

Conditions of Approval or other construction noise requirements will vary on a case-by-case basis, however, neither CEQA nor the town of Colma Municipal Code provides quantitative significance thresholds or guidelines for construction noise impacts within the planning area. As such, where quantitative construction criteria apply to future developments within the planning area, project construction noise criteria must be developed on a project-specific basis. Project construction noise criteria should account for the existing noise environment, the absolute noise levels during construction activities, the duration of the construction, and the adjacent land use(s). The Federal Transit Administration (FTA) provides several construction noise standards that would apply to future developments within the Planning Area. While the following guidelines may not apply to all developments within the planning area, the following guidelines can be considered reasonable criteria for assessment. If these criteria are exceeded, there may be adverse community reaction. The FTA's general assessment of construction noise standards are summarized in Table 4.11-4: General Assessment Guidelines for Construction Noise Impacts of the Draft EIR.

At this time, details about specific construction activities associated with future developments within the planning area are not known. Future projects within the town of Colma will be required to undergo separate CEQA analyses and will be required to mitigate noise effects to a **less than significant** level and no mitigation measures are required.

The proposed Project is expected to result in increased traffic noise levels throughout the planning area. To determine the significance of increases in roadway noise levels throughout the town, this analysis considers typical human response to noise, described above. Based on this methodology, all noise level increases in excess of 5 dB are considered significant; noise level increases of 3 dB – that are in proximity to residential land uses – are considered significant. Estimated roadway noise levels associated with existing conditions and Future (2040) plus project conditions, as well as the estimated noise level increase, are presented in **Table 4.11-5: Noise Level Increases over Study Area Roadways of the Draft EIR**.

As shown in **Table 4.11-5 of the Draft EIR**, all roadway noise increases due to implementation of the proposed general plan are expected to be less than 3 dB; as such, increases in roadway noise are expected to be **less than significant** and no mitigation is required. (Draft EIR, pp. 4.11-16 through 4.11-18.)

2. **Vibration**

Threshold: Would the Project result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Finding: Less than significant. (Draft EIR, p. 4.11-18.)

Explanation: Implementation of the town of Colma General Plan Update would consist of many future developments within the planning area. Construction of new development within the planning area has the potential to expose people and buildings to high levels of ground-borne vibration. Although vibration levels from construction activities rarely reach the level of causing building damage, construction-related vibration has the potential to cause annoyance at nearby sensitive receivers. The effects of construction vibration vary depending on the intensity of the construction activities, local soil type, and distance to/land use type of nearby receptors. Construction vibration impacts associated with new development in the planning area would occur from the operation of heavy equipment on the project site. In general, site work and demolition activities typically generate the highest levels of vibration throughout a construction project.

Construction activities associated with future development within the planning area would be temporary. All future projects within the planning area must adhere to the Standard Hours of Construction limitations delineated in the town of Colma Municipal Code. Since construction activities could potentially generate high levels of vibration, construction vibration associated with future development within the planning area

should be reviewed on a case-by-case basis and must adhere to Conditions of Approval and any project-specific quantitative vibration standards, if applicable.

At this time, details about specific construction activities associated with future developments within the planning area are not known. Future projects within the town of Colma will be required to undergo separate CEQA analyses and will be required to mitigate vibration effects to a less than significant level. The FTA provides industry-standard construction vibration standards that could apply to future developments within the planning area.⁵ While the following guidelines may not apply to all developments within the planning area, the following guidelines can be considered reasonable criteria for assessment. If these criteria are exceeded, there may be adverse community reaction.

The FTA has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown in Table 4.11-6: Construction Vibration – Building Damage Criteria of the Draft EIR.

In addition to vibration impact thresholds related to project-related building damage, the FTA also provides standards that quantify acceptable levels of vibration in terms of human perception. The vibration perception (annoyance) criteria adopted by the FTA are shown in Table 4.11-7: Construction Vibration – Human Perception of the Draft EIR.

Vibration impact criteria that would apply to many developments within the planning area are provided above. Future projects within the Town of Colma will be required to undergo separate CEQA analyses and will be required to mitigate vibration effects to a less than significant level. Given the limited potential for construction vibration impacts associated with the General Plan update, effects from construction vibration are considered **less than significant** and no mitigation measures are required.

The Project does not introduce any new sources of industrial land uses, or transportation sources that would generate significant levels of vibration. Traffic, including heavy trucks traveling on a highway, rarely generates vibration amplitudes high enough to cause structural or cosmetic damage.

Vibration impacts associated with new zoning or transportation uses are considered **less than significant** and no mitigation measures are required. (Draft EIR, pp. 4.11-18 through 4.11-21.)

3. Airport Noise

Threshold: For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Finding: No impact. (Draft EIR, p. 4.11-21.)

Explanation: The entire town of Colma is outside of the CNEL 65 dBA noise contour associated with the San Francisco International Airport. People residing or working in the Planning Area are not expected to be exposed to excessive noise levels associated with airports. There would be **no impact** related to noise levels associated with airports and no mitigation measures are required. (Draft EIR, p. 4.11-21.)

M. POPULATION AND HOUSING

1. Population Growth

Threshold: Would the Project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of road or other infrastructure)?

Finding: Less than significant. (Draft EIR, p. 4.12-8.)

Explanation: The proposed Project could accommodate limited additional growth through mixed use development, single-family uses, as well as through the expansion of existing business locations. The Project proposes updates to the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. The planning areas include development standards such as height, FAR, and density as well as development standard bonuses for specific uses in opportunity sites. In addition, the proposed GPU introduces new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed Project is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons (from a current population of 1,504 people) over the next 20 years, within the Planning Area.

Since the proposed Project is an update to the town's existing General Plan (including the Land Use and Circulation elements as well as the Climate

Action Plan), the Project by itself does not propose any specific development at this time. There will be a slight buildout of jobs and housing under future development proposed by the Project. Cemetery land uses account for approximately 75% of the town's land area, while approximately 13% of land area is available for residential and commercial uses. Population projections by the Association of Bay Area Governments (ABAG) only increase the town's population by approximately 765 people (from 1,5054 in 2010 to 2,269 in the Buildout Year of 2040) and by 328 households between 2010 and 2040 (Buildout Year). There should not be any substantial unplanned development or population growth in the town of Colma under full buildout of the GPU. Moreover, any population growth in the town over the next 20 years would still remain within the growth levels projected Statewide.

Moreover, the following proposed General Plan policies address future population growth for the town:

Policy LU-1-1: **General Plan Land Use Diagram.** Maintain and implement a Land Use Diagram for purposes of describing the types of allowed land uses by geographic location and the density and/or intensity of allowed uses within each designation.

Policy LU-1-2: **Zoning Consistency.** Ensure that zoning designations are consistent with the General Land Use Diagram.

Policy LU-1-3: **Balance New Development with Existing Setting. Prioritize new and higher** density development consistent with the Town's Planning Areas to ensure new development is context sensitive and contributes to creating a strong sense of place. New development shall serve to protect and enhance the positive aesthetic qualities of the Town and each geographic area.

Policy LU-1-5: **Clear and Predictable Development Standards.** Strive to adopt and communicate clear and predictable development standards to ensure new development meets the expectations of the Town.

For the reasons discussed above and in the EIR, the Project would have a **less than significant** impact relating to this issue and no mitigation measures are required. (Draft EIR, pp. 4.12-8 through 4.12-9.)

2. Displacement of Housing

Threshold: Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere; and displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Finding: Less than significant. (Draft EIR, p. 4.12-9.)

Explanation: While the Project does not directly propose any new development, now, or within the GPU's planning horizon of 20 years, the Project would allow for

the future development of currently vacant lands or the expansion of already developed areas. The proposed growth would be concentrated on the five planning areas proposed under the Project. However, it should be noted that the town of Colma is limited in its areas of additional new housing, which are anticipated to be more mixed-use, multi-family housing than single-family uses. Since the total number of dwelling units can only increase by 328 units up to 2040, displaced residents, if any, should be able to find replacement housing within the Town.

Moreover, the following proposed General Plan policies address future population growth for the town:

Policy LU-1-1: **General Plan Land Use Diagram.** Maintain and implement a Land Use Diagram for purposes of describing the types of allowed land uses by geographic location and the density and/or intensity of allowed uses within each designation.

Policy LU-1-3: **Balance New Development with Existing Setting.** Prioritize new and higher density development consistent with the Town's Planning Areas to ensure new development is context sensitive and contributes to creating a strong sense of place. New development shall serve to protect and enhance the positive aesthetic qualities of the Town and each geographic area.

Policy LU-3-3: **Adequate and Affordable Housing.** The Town shall continue to provide opportunities for a variety of housing types at varying densities and affordability levels.

Policy LU-4-2: **Adequacy to Serve New and Existing Developments.** The Town shall continue to ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with Town standards.

Implementation of Policies LU-1-1, LU-1-2, LU-1-3 and LU-1-5 would further ensure that the impacts to the displacement of existing population is a **less than significant impact** and no mitigation measures are required. (Draft EIR, p. 4.12-9.)

N. PUBLIC SERVICES

1. Fire Protection

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?

Finding: Less than significant. (Draft EIR, p. 4.13-5.)

Explanation: The town of Colma is primarily built out and all new development would primarily come from infill redevelopment with limited new areas for

commercial and residential uses. The Project proposes few changes that could potentially alter the future development proposed in the town. The proposed Project updates the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the proposed Project introduces new land uses such as a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square feet of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed Project is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons (from a current population of 1,504 people) over the next 20 years, within the Planning Area. However, even the limited redevelopment and growth would result in increased demand for fire protection services over the town's Planning Area buildout.

Though not located within its boundaries, the town is serviced by a fire station located less than one mile to the north of the town limit. The proposed Project does not identify the location of any new fire stations within the town's boundaries nor does it require future development to provide a site for a fire station. Should the future residential and commercial uses in the town of Colma require additional fire protection services and stations, these would be addressed in the appropriate project-level environmental document prepared at that time. Also, any new development would be subject to California Fire Code regulations regarding fire resistance rated construction, fire protection systems, appropriate fire apparatus access, means of egress, and fire safety during construction and operation. For the following reasons, the Project would not result in adverse physical impacts associated with the provision of new or physically altered fire protection services and facilities, and impacts would be less than significant.

Moreover, the following proposed General Plan policies address fire safety for the Town of Colma:

Policy CS-4-1: **Alternate EOC.** Establish an alternative Emergency Operations Center (EOC) if the existing EOC is not operational during a fire event.

Policy CS-4-2: **Mutual Aid Agreements.** The Town shall continue to participate in San Mateo County mutual aid agreements related to fire protection.

- Policy CS-4-3: Fire Prevention Education.** Provide regular public education and fire safety programs to the Town's residents and businesses.
- Policy CS-5-1: Adequate Water Supplies.** Require new development projects to document adequate water supplies for fire suppression.
- Policy CS-5-2: Removal of Fire Hazards.** Ensure the Town's code enforcement programs promote the removal of fire hazards such as (but not limited to) litter, rubbish, overgrown vegetation, and dilapidated or abandoned structures.
- Policy CS-5-3: Building Fire Codes.** Require that all buildings and facilities comply with local, State, and federal regulatory standards, such as the California Building and Fire Codes as well as other applicable fire safety standards.
- Policy CS-5-4: Urban Fire Risks.** Work with the Colma Fire Protection District to maintain an ongoing fire inspection program to reduce fire hazards associated with multifamily development, critical facilities, public assembly facilities, industrial buildings, and nonresidential buildings.

For the foregoing reasons and the reasons discussed in the EIR, impacts relating to fire protection services would be **less than significant** and no mitigation is required. (Draft EIR, pp. 4.13-5 through 4.13-6.)

2. Police Protection

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for Sheriff Law Enforcement Services?

Finding: Less than significant. (Draft EIR, p. 4.13-8.)

Explanation: The Project updates the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. The planning areas would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

The town of Colma's police protection is provided by 33 employees consisting of 19 sworn officers and supporting personnel. The town's police department is located at the center of the town at 1199 El Camino Real. The Department provides dispatch and detective services, community

service outreach, and participates in the Daly City/North San Mateo County Special Weapons and Tactics (SWAT) team.

The Department is organized into four divisions: Administration, Patrol, Communications, and Grants, each with specific duties and staff. The Administration, Communications, and Grants divisions provide oversight, clerical and record keeping services, funding and officer training costs of the entire police department. The department's Police Patrol Division responds to all security service related needs, enforces traffic laws, investigates crimes against people and property, and addresses neighborhood quality of life issues.

Future growth under the town's 2040 GPU may result in the increased need for additional law enforcement officials. It is anticipated that the town may increase its current population of 1,504 persons and 490 households to about 2,269 persons and 660 households. This constitutes a 0.28% change in population and a 0.26% change in the number of households under the GPU buildout year and may result in a small increase to the town's police force. The national average of police officer per residents is approximately 2.4 officers per 1,000 residents (FBI Police Employee data, 2011). Therefore the town would need approximately two or three additional officers on its police force, under the 2040 GPU buildout.

Moreover, the following proposed General Plan policies address law enforcement for the town of Colma:

Policy CS-8.1: **Staffing Levels.** Maintain sufficient police staffing levels, including sworn officers and volunteer support, necessary to meet current and projected community needs.

Policy CS-8.2: **Facilities Planning.** Develop, maintain, and implement a Police Department Facilities Master Plan that guides the provision of equipment, facilities, training.

Policy CS-8.3: **Response Times.** Identify, monitor, and achieve appropriate minimum police response times of no more than 10 minutes, for all call levels.

Policy CS-8.4: **Communication.** Encourage and maintain two-way communication with the Town of Colma community to facilitate effective policing.

For the foregoing reasons and the reasons discussed in the EIR, the 2040 General Plan Update would a **less than significant** relating to police protection services, and no mitigation is required. (Draft EIR, pp. 4.13-8 through 4.13-9.)

3. Schools

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in

order to maintain acceptable service ratios, response times, or other performance objectives for schools?

Finding: Less than significant. (Draft EIR, p. 4.13-16.)

Explanation: The Project proposes updates to the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the proposed Project introduces new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed Project is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons over existing conditions within the Planning Area. Any increases in the town's future population could therefore increase the use of existing neighborhood and regional parks and recreational facilities and result in eventual deterioration of such existing facilities.

Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town, through its 2040 GPU, is however committed to providing public park and recreation facilities that meet the needs of its residents. Since the town does not have the capacity to create additional recreational facilities, this commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law. Typical environmental impacts regarding the construction and operation of parks and recreational facilities include noise (during construction and associated with playfields and playgrounds), air quality (during the construction of the facility), biological resources (depending on location), historic/cultural resources (depending on location), public services and utilities (demand for police and fire protection, water, and wastewater service), and traffic on a local neighborhood level.

Moreover, the following proposed General Plan policies address parks and recreation land:

- Policy OSC-1-2: Flexible Open Space Land Uses.** Allow for the use of open space and future cemetery lands for commercial nursery, farming, or other uses which provide a community benefit.
- Policy OSC-1-4: Pedestrian Trails, Bikeways Walkways.** Expand and improve pedestrian trails, bikeways, and walkways to connect trails and allow access to open space land and regional trail facilities.
- Policy OSC-1-5: Colma Creek Trail.** Coordinate with the City of South San Francisco to provide continuous pedestrian access from the Colma BART station along El Camino Real to the southern border of the town.
- Policy OSC-2-1: Open Space for Recreation Use.** Develop and maintain open spaces and recreation areas that are conveniently located, properly designed, and well-maintained to serve the recreation needs and healthy living of the entire community.
- Policy OSC-2-2: Recreation Requirements for New Developments.** Require dedication of improved land, or payment of a fee in lieu of, for park and recreation land for all residential uses.
- Policy OSC-2-3: Expansion of Recreation Space.** Acquire and enhance properties within Colma for recreation and public use if opportunities become available.
- Policy OSC-4-7: Colma Creek Bank Setback.** Protect and enhance areas of Colma Creek for riparian habitat, linear park opportunities, and aesthetic value.
- Policy OSC-4-8: Colma Creek Enhancements.** Enhance Colma Creek where possible by concrete channel removal, adding landscaping, public pathways, and sitting areas.

For the foregoing reasons and the reasons discussed in the EIR, the Project's impacts relating to this issue are **less than significant** and no mitigation measures are required. (Draft EIR, pp. 4.13-16 through 4.13-17.)

4. Parks

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks?

Finding: Less than significant. (Draft EIR, p. 4.13-16.)

Explanation: The Project proposes updates the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the proposed Project introduces new land uses such a medium density residential land use that is consistent with

current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed Project is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons over existing conditions within the Planning Area. Any increases in the town's future population could therefore increase the use of existing neighborhood and regional parks and recreational facilities and result in eventual deterioration of such existing facilities.

Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town, through its 2040 GPU, is however committed to providing public park and recreation facilities that meet the needs of its residents. Since the town does not have the capacity to create additional recreational facilities, this commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law. Typical environmental impacts regarding the construction and operation of parks and recreational facilities include noise (during construction and associated with playfields and playgrounds), air quality (during the construction of the facility), biological resources (depending on location), historic/cultural resources (depending on location), public services and utilities (demand for police and fire protection, water, and wastewater service), and traffic on a local neighborhood level.

Implementation of Policies OSC-1-2, OSC-1-4, OSC-1-5, OSC-2-1, OSC-2-2, OSC-2-3, OSC-4-7, and OSC-4-8 would further reduce the Project's impacts to **less than significant** and no mitigation measures are required. (Draft EIR, pp. 4.13-16 through 4.13-17.)

5. Other Public Facilities

Threshold: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the

construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for other public facilities?

Finding: Less than significant. (Draft EIR, p. 4.13-16.)

Explanation: The Project proposes updates to the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the proposed Project introduces new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed Project is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons over existing conditions within the Planning Area. Any increases in the town's future population could therefore increase the use of existing neighborhood and regional parks and recreational facilities and result in eventual deterioration of such existing facilities.

Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town, through its 2040 GPU, is however committed to providing public park and recreation facilities that meet the needs of its residents. Since the town does not have the capacity to create additional recreational facilities, this commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law. Typical environmental impacts regarding the construction and operation of parks and recreational facilities include noise (during construction and associated with playfields and playgrounds), air quality (during the construction of the facility), biological resources (depending on location), historic/cultural resources (depending on location), public services and utilities (demand for police and fire protection, water, and wastewater service), and traffic on a local neighborhood level.

Moreover, the following proposed General Plan policies address parks and recreation land:

- Policy OSC-1-2: Flexible Open Space Land Uses.** Allow for the use of open space and future cemetery lands for commercial nursery, farming, or other uses which provide a community benefit.
- Policy OSC-1-4: Pedestrian Trails, Bikeways Walkways.** Expand and improve pedestrian trails, bikeways, and walkways to connect trails and allow access to open space land and regional trail facilities.
- Policy OSC-1-5: Colma Creek Trail.** Coordinate with the City of South San Francisco to provide continuous pedestrian access from the Colma BART station along El Camino Real to the southern border of the town.
- Policy OSC-2-1: Open Space for Recreation Use.** Develop and maintain open spaces and recreation areas that are conveniently located, properly designed, and well-maintained to serve the recreation needs and healthy living of the entire community.
- Policy OSC-2-2: Recreation Requirements for New Developments.** Require dedication of improved land, or payment of a fee in lieu of, for park and recreation land for all residential uses.
- Policy OSC-2-3: Expansion of Recreation Space.** Acquire and enhance properties within Colma for recreation and public use if opportunities become available.
- Policy OSC-4-7: Colma Creek Bank Setback.** Protect and enhance areas of Colma Creek for riparian habitat, linear park opportunities, and aesthetic value.
- Policy OSC-4-8: Colma Creek Enhancements.** Enhance Colma Creek where possible by concrete channel removal, adding landscaping, public pathways, and sitting areas.

Implementation of the policies described above would further reduce the Project's impacts to **less than significant** and no mitigation measures are required. (Draft EIR, pp. 4.13-16 through 4.13-17.)

O. RECREATION

1. Increased Use

Threshold: Would the Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Finding: Less than significant. (Draft EIR)

Explanation: The Project proposes updates the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the proposed Project introduces new land

uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square feet of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed Project is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons over existing conditions within the Planning Area. Any increases in the town's future population could therefore increase the use of existing neighborhood and regional parks and recreational facilities and result in eventual deterioration of such existing facilities.

Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town, through its 2040 GPU, is however committed to providing public park and recreation facilities that meet the needs of its residents. Since the town does not have the capacity to create additional recreational facilities, this commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law. Typical environmental impacts regarding the construction and operation of parks and recreational facilities include noise (during construction and associated with playfields and playgrounds), air quality (during the construction of the facility), biological resources (depending on location), historic/cultural resources (depending on location), public services and utilities (demand for police and fire protection, water, and wastewater service), and traffic on a local neighborhood level.

Implementation of Policies OSC-1-2, OSC-1-4, OSC-1-5, OSC-2-1, OSC-2-2, OSC-2-3, OSC-4-7, OSC-4-8 would further reduce the Project's impacts to **less than significant** and no mitigation measures are required. (Draft EIR, pp. 4.13-16 through 4.13-17.)

2. Construction and Expansion

Threshold: Does the Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Finding: Less than significant. (Draft EIR)

Explanation: The 2040 GPU proposes updates the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. In addition, the proposed GPU introduces new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The 2040 GPU would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Implementation of the proposed General Plan Update is expected to result in a total 2,269 people within the Planning Area at buildout (2040). This represents an increase of approximately 765 persons over existing conditions within the Planning Area. Any increases in the town's future population could therefore increase the use of existing neighborhood and regional parks and recreational facilities and result in eventual deterioration of such existing facilities.

Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town, through its 2040 GPU, is however committed to providing public park and recreation facilities that meet the needs of its residents. Since the town does not have the capacity to create additional recreational facilities, this commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law. Typical environmental impacts regarding the construction and operation of parks and recreational facilities include noise (during construction and associated with playfields and playgrounds), air quality (during the construction of the facility), biological resources (depending on location), historic/cultural resources (depending on location), public services and utilities (demand for police and fire protection, water, and wastewater service), and traffic on a local neighborhood level.

Moreover, the following proposed General Plan policies address parks and recreation land:

Policy OSC-1-2: Flexible Open Space Land Uses. Allow for the use of open space and future cemetery lands for commercial nursery, farming, or other uses which provide a community benefit.

Policy OSC-1-4: Pedestrian Trails, Bikeways Walkways. Expand and improve pedestrian trails, bikeways, and walkways to connect trails and allow access to open space land and regional trail facilities.

Policy OSC-1-5: Colma Creek Trail. Coordinate with the City of South San Francisco to provide continuous pedestrian access from the Colma BART station along El Camino Real to the southern border of the town.

Policy OSC-2-1: Open Space for Recreation Use. Develop and maintain open spaces and recreation areas that are conveniently located, properly designed, and well-maintained to serve the recreation needs and healthy living of the entire community.

Policy OSC-2-2: Recreation Requirements for New Developments. Require dedication of improved land, or payment of a fee in lieu of, for park and recreation land for all residential uses.

Policy OSC-2-3: Expansion of Recreation Space. Acquire and enhance properties within Colma for recreation and public use if opportunities become available.

Policy OSC-4-7: Colma Creek Bank Setback. Protect and enhance areas of Colma Creek for riparian habitat, linear park opportunities, and aesthetic value.

Policy OSC-4-8: Colma Creek Enhancements. Enhance Colma Creek where possible by concrete channel removal, adding landscaping, public pathways, and sitting areas.

For these reasons and the reasons discussed in the EIR, the 2040 General Plan Update would have **less than significant** impacts relating to this issue, and no mitigation measures are required. (Draft EIR, pp. 4.13-16 through 4.13-17.)

P. TRANSPORTATION / TRAFFIC

1. Plans, Policies, and Ordinances

Threshold: Would the Project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

Finding: Less than significant. (Draft EIR, p. 4.14-19.)

Explanation: Implementation of the proposed Project could lead to increases in the town of Colma's population and employment, resulting in an associated increase

in the demand for transit services offered by BART and SamTrans. While there are no established standards regarding transit levels of service that have been adopted by the Town or transit agencies, the Project includes policies that support transit-oriented development patterns, strengthen ties between the pedestrian and bicycle networks to transit, promote enhancements to transit facilities, and support increased transit coverage and frequencies in the Town of Colma.

Additionally, implementation of the Project would improve the existing bicycle and pedestrian circulation infrastructure and require future development to provide multimodal circulation improvements. Increases in the town's population and employment that could result under implementation of the Project would also likely lead to increases in pedestrian and bicycle travel beyond current levels.

The Mobility Element developed as part of the Project contains several policies that support access to and the performance of transit, bicycle, and pedestrian facilities. These applicable policies are listed below. Further, the Project includes mixed-use development that is supportive of non-automotive modes.

Moreover, the following General Plan Update policies address the GPU's potential conflict with a program, plan, ordinance or policy addressing the town's circulation system:

- Policy M-1.2:** **Capital Improvement Prioritization.** Maintain and upgrade exiting rights-of-way and ensure that the needs of non-motorized travelers are considered in planning, programing, and design of improvements.
- Policy M-2-4:** **Multi-Modal Impact Fee.** Consider establishing a transportation impact fee for new development tied to performance measures to generate funds for improving all modes of transportation.
- Policy M-3-2:** **El Camino Real.** Ensure that El Camino Real retains its distinct character, while encouraging improvements which support increased multi-modal use.
- Policy M-3-4:** **Transit Funding.** Seek joint transportation and transit funding opportunities with adjoining jurisdictions or agencies to improve transit access in and around Colma.
- Policy M-3-5:** **Transportation Gaps.** Eliminate gaps in the regional active transportation network in Colma.
- Policy M-4-1:** **Transit Stops.** Support the installation of transit stop amenities including shelters, benches, real-time information panels, lighting, bike parking, and bike sharing stations.
- Policy M-4-2:** **Reliable Transportation Services.** Encourage SamTrans and other public transit providers to provide service on regular schedules along El Camino Real, arterial streets, and, as feasible, major collectors; support

these transportation services to increase the mobility of seniors, the disabled, and others who depend on public transportation.

Policy M-4.3: **Consult with SamTrans.** Encourage and support various public transit agencies and companies, ride-sharing programs, and other incentive programs that provide residents and visitors with transportation choices other than the private automobile.

Policy M-4.3: **Encourage Transportation Options.** Encourage and support various public transit agencies and companies, ride-sharing programs, and other incentive programs that provide residents and visitors with transportation choices other than the private automobile.

Policy M-4.4: **Transit Oriented Development.** Promote the development of multi-modal mixed-use development at sites surrounding the Colma BART station, where feasible along Mission Road, and at the Town Center site.

Policy M-5-1: **Complete Streets.** Incorporate Complete Streets infrastructure elements into new streets, street retrofits and certain maintenance projects to encourage multiple modes of travel, based on the modal priorities in Table M-2, as appropriate to the context and determined reasonable and practicable by the Town.

Policy M-5-2: **Design for All Travel Modes.** Plan, design, and construct transportation projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists, people with mobility challenges, and persons of all ages and abilities.

Policy M-5-3: **Bicycle Connection Coordination.** Coordinate with BART, South San Francisco, Daly City, Caltrans, and San Mateo County to plan and implement bicycle and pedestrian improvements which connect with improvements to BART facilities and regional networks.

Policy M-5-4: **Accessibility and Universal Design.** Prioritize implementation of pedestrian facilities that improve accessibility consistent with guidelines established by the Americans with Disabilities Act (ADA), allowing mobility-impaired users, such as the disabled and seniors, to travel safely and effectively within and beyond the town.

Policy M-5.5: **Design of New Development.** Require new development to incorporate design that prioritizes safe pedestrian and bicycle travel and accommodate senior citizens, people with mobility challenges, and children.

Policy M-8-1: **Parking Standards.** Reevaluate minimum parking standards to account for emerging mobility trends, such as shared mobility, micromobility, autonomous vehicles, and future technology changes. The Consider reducing parking requirements for mixed-use developments.

The proposed General Plan policies above address the Project's conflict with a program, plan, ordinance or policy regarding the town's circulation system and further reduces any impacts to a level of **less than significant** and no mitigation is required. (Draft EIR, pp. 4.14-19 through 4.14-20.)

2. VMT

Threshold: Would the Project conflict or be inconsistent with CEQA Guidelines sections 15064.3, subdivision (b)?

Finding: Less than significant. (Draft EIR, p. 4.14-22.)

Explanation: The residential and employee VMT under the Current General Plan and the Proposed General Plan Update for the town of Colma are shown in Table 4.14.2: Existing and Future VMT per Resident and Employee of the Draft EIR. As shown in the table, the Project is expected to increase VMT per resident above No Project/Previous General Plan conditions. Home-based VMT per resident is expected to increase by 10% while work-based VMT per employee is expected to decrease by approximately 5% under the Project. This change in VMT could be attributed to the increasing amounts of residents living within the town of Colma under the Project and residents needing to travel further for employment opportunities or other needs given the additional residents. The commute VMT reduction may be explained by increased employment opportunities within the town with the Project and better jobs housing balance for those who live and work in the town. For example, the increase of office, retail, and other uses within the town would decrease the need for the town's residents to travel long distances inside and outside the town for their employment or other needs, resulting in shorter vehicular travel distances per capita. However, due to the relatively higher increase in population compared to employment, some residents will need to travel outside the town to reach their employment destinations which may explain the higher home-based VMT per person.

The Project is expected to increase VMT per person above No Project conditions (an increase of 10%, from 9.40 to 10.35). The Project includes policies designed to ensure a VMT threshold is established and Transportation Demand Management (TDM) measures are provided. See the relevant policies to ensure potential VMT impacts are below a level of significance.

The following proposed General Plan policies address vehicle miles traveled:

Policy M-2-1: Reduce Vehicle Miles Traveled. Require new development projects to achieve a reduction in VMT per capita or VMT per service population compared to both baseline VMT performance conditions and General Plan 2040 VMT performance conditions. The Town will regularly monitor baseline VMT to provide updated benchmarks for project applicants. Encourage use of VMT reduction strategies and methods to encourage non-automobile travel.

Policy M-2-2: Other Traffic Flow Benchmarks. Establish additional traffic flow benchmarks, such as vehicle-hours of travel and safety-related metrics, in order to evaluate and monitor changes in traffic flow over time.

Policy M-2-3: **VMT Transportation Performance Measures.** Update the Town's transportation measures and thresholds to use VMT standards for traffic impact analysis rather than LOS.

Policy M-2-6: **Development Review Requirements.** Require proposed development projects that could result in increased traffic to include improvements that assure LOS levels do not fall below the established minimum standard. Ensure that improvements are coordinated with roadway improvements programmed for funding through transportation-related impact fees and that the operational benefits of large-scale, automobile capacity-focused improvements are balanced against the induced VMT resulting from the improvements.

Policy M-7-1: **TDM Program.** Continue to participate in the TDM Program as outlined by the San Mateo City/County Association of Governments (C/CAG).

Policy M-7-2: **TDM Program for New Development.** Require major development proposals to include a detailed, verifiable TDM program for consideration by the Town during the review of the development application.

Policy M-7-3: **Vehicle Trip Reduction.** Support vehicle trip reduction strategies, including building safer and more inviting transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.

Implementation of the policies described above would ensure **less than significant** impacts relating to VMT, and no mitigation measures required. (Draft EIR, pp. 4.14-22 through 4.14-24.)

3. Design Hazards

Threshold: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Finding: Less than significant. (Draft EIR, p. 4.14-20.)

Explanation: The town of Colma maintains improvement standards that guide the construction of new transportation facilities to minimize design hazards for all users of the system. Through the Town's environmental review process, future land use proposals that would add traffic to streets not designed to current standards would be carefully evaluated. If needed, appropriate mitigation measures would be identified, and the project would be conditioned to construct or provide funding for an improvement that would minimize or eliminate the hazard. Typical improvements include shoulder widening, adding turn pockets, adding sidewalks or crosswalks, realigning sharp curves, prohibiting certain turning movements, and signaling intersections, among other options. New and upgraded roadways needed to accommodate new development will be designed according to applicable Federal, State, and local design standards.

The types of uses included within the town as part of the Project are generally similar to existing and surrounding uses and thereby are compatible with the existing uses in the Planning Area. Development and infrastructure projects in the town of Colma would be required to comply with the General Plan, Municipal Code, and applicable State and local regulations. In addition, the Mobility Element developed as part of the General Plan Update contains policies in support of roadway network safety and reducing design hazards. These applicable policies are listed below.

Proposed General Plan Update Policies

The following proposed General Plan policies address hazards due to design features:

- Policy M-1-1:** **Vision Zero.** Eliminate traffic fatalities and reduce the number of non-fatal collisions by 50 percent by 2040.
- Policy M-1-2:** **Capital Improvement Prioritization.** Maintain and upgrade exiting rights-of-way and ensure that the needs of non-motorized travelers are considered in planning, programing, and design of improvements.
- Policy M-5-1:** **Complete Streets.** Incorporate Complete Streets infrastructure elements into new streets, street retrofits and certain maintenance projects to encourage multiple modes of travel, based on the modal priorities in Table M-2, as appropriate to the context and determined reasonable and practicable by the Town.
- Policy M-5-2:** **Design for All Travel Modes.** Plan, design, and construct transportation projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists, people with mobility challenges, and persons of all ages and abilities.
- Policy M-5-3:** **Bicycle Connection Coordination.** Coordinate with BART, South San Francisco, Daly City, Caltrans, and San Mateo County to plan and implement bicycle and pedestrian improvements which connect with improvements to BART facilities and regional networks.
- Policy M-5-4:** **Accessibility and Universal Design.** Prioritize implementation of pedestrian facilities that improve accessibility consistent with guidelines established by the Americans with Disabilities Act (ADA), allowing mobility-impaired users, such as the disabled and seniors, to travel safely and effectively within and beyond the town.
- Policy M-5-5:** **Design of New Development.** Require new development to incorporate design that prioritizes safe pedestrian and bicycle travel and accommodate senior citizens, people with mobility challenges, and children.

For the reasons discussed in above and in the EIR, this impact is **less than significant** and no further mitigation is required. (Draft EIR, pp. 4.14-20 through 4.14-21.)

4. **Emergency Access**

Threshold: Would the Project result in inadequate emergency access?

Finding: Less than significant. (Draft EIR, p. 4.14-22.)

Explanation: Implementation of the proposed Project would result in increased development which would increase the number of users on the town's transportation system. There will be a need to ensure that adequate emergency access provisions are made to accommodate increased population and growth. However, it should be noted that the Project is a programmatic-level document, and emergency accessibility is typically assessed at the project-level. Adequacy of emergency access associated with future development projects would be analyzed and evaluated in detail through this future environmental review process. Additionally, the Mobility Element developed as part of the General Plan update contains policies in support of emergency access along local roads. These applicable policies are listed below.

Moreover, the following proposed General Plan policies address emergency access:

Policy M-4-6: Design of New Development. Require new development to incorporate design that considers emergency access and prioritizes safe pedestrian and bicycle travel and accommodates senior citizens, people with mobility challenges, and children.

Policy M-4-7: Emergency Services. Prioritize emergency service needs when developing transportation plans and making transportation network changes.

For the foregoing reasons and the reasons discussed in the EIR, impacts relating to emergency circulation and access are **less than significant** and no mitigation measures are required. (Draft EIR, p. 4.14-22.)

Q. **UTILITIES AND SERVICE SYSTEMS**

1. **Wastewater Treatment Requirements**

Threshold: Would the Project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Finding: Less than significant. (Draft EIR, p. 4.15-8.)

Explanation: The town does not have its own wastewater treatment facilities and is under agreements with the North San Mateo County Sanitation District Treatment Plant and the South San Francisco Water Quality Control Plant

for such services. While wastewater treatment capacity is projected to be adequate by the North San Mateo County Sanitation District Treatment Plant, new construction in certain areas in town may require the need to construct a sewer lift station. As a part of the town's review process, projects are routed to the wastewater treatment districts to determine if a sewer capacity study is required. The sewer capacity study determines if the sewer lift station is required. The South San Francisco Water Quality Control Plant is unable to determine if there will be an impact to their infrastructure without specific project locations and proposed uses. Since there is no project, South San Francisco Water Quality Control Plant will continue to review project applications for proposed projects within the town and determine if capacity is adequate at that time. Project conditions may be imposed to upgrade existing infrastructure to support proposed projects.

Moreover, the following proposed General Plan policies address water, sewer and wastewater uses in the town:

- Policy OSC-4-1:** **Comply with Water Quality Regulations.** Continue to comply with all State and federal regulations for water quality.
- Policy OSC-4-2:** **Participation in the San Mateo County Stormwater Pollution Prevention Program (SMCWPPP).** Continue to be an active member agency of the SMCWPPP to reduce pollution from being conveyed through the storm water system to the San Francisco Bay.
- Policy OSC-4-3:** **Reclaimed Water.** Pursue opportunities to install water recycling infrastructure for Town-owned and cemetery landscape areas.
- Policy OSC-4-6:** **Stormwater Runoff.** Require large-scale projects (over 0.5 acres) to channel surface and roof runoff to on-site detention facilities to facilitate groundwater recharge, reduce stormwater pollution, and mitigate flooding of Colma Creek.
- Policy OSC-4.-9:** **Water Quality and Conservation Public Information.** Continue to support and coordinate with the Countywide Stormwater Program, Cal Water, and the San Francisco Public Utilities Commission (SFPUC) on their public outreach and education campaigns to conserve and maintain water quality.
- Policy CS-3-4:** **Stormwater Detention.** Require new developments over one half acre in size to construct on-site storm water detention facilities which contribute runoff to Colma Creek in order to store the difference in runoff between the 10-year pre-development storm (original natural state) and the 100-year post-development storm. Any stormwater release should be at the 10-year predevelopment rate.
- Policy LU-2-4:** **Low Impact Development.** Regulate new development and construction to minimize pollutant and sediment concentrations in receiving waters and ensure that surface water meets or exceeds applicable regulatory water quality standards. Require new development to incorporate Low Impact Development features that treat and reduce surface runoff volumes.

Policy LU-2-6: **Green Infrastructure.** Encourage green infrastructure installations that rely on natural processes for stormwater treatment/drainage, groundwater recharge and flood control.

Policy LU-4-2: **Adequacy to Serve New and Existing Developments.** The Town shall continue to ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with Town standards.

Policy LU-4-3: **New Development Fair Share.** The Town shall regularly evaluate and update development impact fees to ensure that new development pays its fair share of providing new public facilities and services and/or the costs necessary to improve or expand infrastructure to serve them, including street improvements, parks, wastewater, stormwater drainage, and other public services.

Policy LU-4-4: **Capital Improvement Program (CIP).** The City shall continue to fund maintenance, improvements, and expansion of town infrastructure, including sewer lines and street infrastructure through a multi-year Capital Improvement.

While there would be no significant need for the construction of new water and wastewater facilities, implementation of the above policies would further assist in reducing the Project impacts to wastewater to a **less than significant** level and no mitigation is required. (Draft EIR, pp. 4.15-8 through 4.15-10.)

2. Water Supplies

Threshold: Would the Project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Finding: Less than significant. (Draft EIR, p. 4.9-9.)

Explanation: The implementation of the town of Colma's 2040 proposed General Plan Update would increase the potential redevelopment of infill sites. The Project proposes updates to the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. The planning areas introduce opportunity sites and new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses,

352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Since the Project would allow for additional development of residential, commercial and office uses, this could result in increased demand for water even this increase would not impact local groundwater supplies. The town of Colma is serviced by Cal Water's South San Francisco District, which provides water from a combination of groundwater as well as purchased water sources and has adequate resources to meet the present needs and foreseeable growth of the town. On both developed and undeveloped sites, compliance with the MRP requires that projects to include stormwater treatment measures that would allow for the treatment and retention of surface runoff. This improves water quality and allows for ground water recharge opportunities on developed sites and mitigates the impact of future development and redevelopment activities. The majority of the town's groundwater usage comes from the irrigation of cemetery lands. The development of cemetery structures such as a mausoleum may reduce the ground water use by reducing the need to irrigate. In addition, Colma Municipal Code Chapter 5.11 requires that new development projects that affect 500 square feet or more and landscape modification projects that affect 2,500 square feet or more, including cemetery lands, improve water use efficiency by planting less water intensive species of vegetation and increasing efficiency in irrigation.

Also, statewide NPDES permits are required for construction runoff and dewatering and other releases to surface water as well as the LID techniques required by Policy LU-2-4, would protect groundwater quality under future development and redevelopment activities in the town of Colma. The policies discussed below would further minimize any potential impact from the proposed Project.

Moreover, the following proposed General Plan policies address groundwater supplies and groundwater recharge:

- Policy OSC-4-1: Comply with Water Quality Regulations.** Continue to comply with all State and federal regulations for water quality.
- Policy OSC-4-3: Reclaimed Water.** Pursue opportunities to install water recycling infrastructure for Town-owned and cemetery landscape areas.
- Policy OSC-4-4: Use of Drought Tolerant and Native Plants.** Encourage the use of drought tolerant and native plants in landscaping plans.
- Policy OSC-4-5: Green Infrastructure.** Incorporate green infrastructure, which relies on natural processes for stormwater treatment/drainage, groundwater recharge and flood control, into street and rights-of-way wherever practicable, including curb cuts, flow-through planters and bioswales that slow stormwater runoff by dispersing it to vegetated areas, harvesting and use of runoff, and promote infiltration and use of bioretention to clean stormwater runoff.

Policy LU-2-6: **Green Infrastructure.** Encourage green infrastructure installations that rely on natural processes for stormwater treatment/drainage, groundwater recharge and flood control.

Policy LU-2-7: **Public Green Infrastructure.** Incorporate green infrastructure into street and rights-of-way wherever practicable, including curb cuts, flow-through planters and bioswales that slow stormwater runoff by dispersing it to vegetated areas, harvesting and use of runoff, and promote infiltration and use of bioretention to clean stormwater runoff.

For the foregoing reasons and the reasons discussed in the EIR, the Project would have a **less than significant impact** relating to this issue, and no further mitigation is required. (Draft EIR, pp. 4.9-9 through 4.9-11.)

3. **Wastewater Capacity**

Threshold: Would the Project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Finding: Less than significant. (Draft EIR, p. 4.15-10.)

Explanation: The town of Colma's collection system is divided into the northern portion of the town which is connected to and serviced by the North San Mateo County Sanitation District, and the southern portion of the collection system which is connected to the City of South San Francisco. Correspondence with these providers in February 2021 have indicated that the North San Mateo County Sanitation District Treatment Plant will have adequate capacity however, new construction in certain areas in town may require the need to construct a sewer lift station. In addition, the South San Francisco Water Quality Control Plant is unable to determine if there will be an impact to their infrastructure without specific project locations and proposed uses but will continue to review project applications for proposed projects within the town and determine if capacity is adequate at that time.

Additionally, current State regulations would require that the town comply with existing wastewater quality standards and that any future new development or infill projects be reviewed by the appropriate wastewater district to ensure that new projects would not exceed their wastewater conveyance and treatment capacities.

Moreover, the following proposed General Plan policies address the town's wastewater treatment needs:

Policy LU-4-1: **Maintaining Adequate Public Infrastructure and Facilities.** The Town shall adequately maintain public infrastructure to ensure the provision of safe and reliable infrastructure to meet the town's current and

future needs, including facilitating upgrades to the utility infrastructure necessary for improved and emerging technologies.

Policy LU-4-2: Adequacy to Serve New and Existing Developments. The Town shall continue to ensure that new and existing developments can be adequately served by municipal services and facilities in accordance with Town standards.

Policy LU-4-3: New Development Fair Share. The Town shall regularly evaluate and update development impact fees to ensure that new development pays its fair share of providing new public facilities and services and/or the costs necessary to improve or expand infrastructure to serve them, including street improvements, parks, wastewater, stormwater drainage, and other public services.

Policy LU-4-4: Capital Improvement Program (CIP). The City shall continue to fund maintenance, improvements, and expansion of town infrastructure, including sewer lines and street infrastructure through a multi-year Capital Improvement Program (CIP).

Wastewater treatment demand resulting from the Project would be accommodated by the town of Colma's existing wastewater service providers, and no additional new wastewater facilities would be required to serve the town. In addition, implementation of the above policies would further assist in further reducing the Project impacts to wastewater to a **less than significant** level and no mitigation is required. (Draft EIR, pp. 4.15-10 through 4.15-11.)

4. Solid Waste

Threshold: Would the Project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Finding: Less than significant. (Draft EIR, p. 4.15-11.)

Explanation: The implementation of the proposed Project has the potential to allow for future development and infill projects that could result in additional solid waste generation over existing levels for the town. This waste would eventually be deposited at the local landfill, which could result in the landfill's current being reduced at a faster rate. Currently, Republic Services, the town's franchise waste hauler, hauls waste to the Los Trancos (Ox Mountain) landfill located in Half Moon Bay. As of December 31, 2019 the Ox Mountain landfill had 18,206,200 cubic yards of remaining capacity. The site is projected to reach its permitted capacity in 2039. Additionally, future land use activities developed under the 2040 GPU would be required to comply with all local, state, and federal statutes and regulations related to solid waste.

Policies LU-4-1 to LU-4-4 ensure that new developments can be supported by public infrastructure and mitigate impacts to landfill capacity. The

Project's impacts to solid waste would be reduced by ensuring that the town has access to landfill waste site(s) with sufficient services and capacity. Implementation of the above policies would assist in reducing the Project impacts to solid waste to a **less than significant** level and no mitigation is required. (Draft EIR, p. 4.15-11.)

5. Solid Waste Laws

Threshold: Will the Project comply with federal, state, and local statutes and regulations related to solid waste?

Finding: Less than significant. (Draft EIR, p. 4.15-11.)

Explanation: The implementation of the proposed Project has the potential to allow for future development and infill projects that could result in additional solid waste generation over existing levels for the town. This waste would eventually be deposited at the local landfill, which could result in the landfill's current being reduced at a faster rate. Currently, Republic Services, the town's franchise waste hauler, hauls waste to the Los Trancos (Ox Mountain) landfill located in Half Moon Bay. As of December 31, 2019 the Ox Mountain landfill had 18,206,200 cubic yards of remaining capacity. The site is projected to reach its permitted capacity in 2039. Additionally, future land use activities developed under the 2040 GPU would be required to comply with all local, state, and federal statutes and regulations related to solid waste.

Policies LU-4-1 to LU-4-4 ensure that new developments can be supported by public infrastructure and mitigate impacts to landfill capacity. The Project's impacts to solid waste would be reduced by ensuring that the town has access to landfill waste site(s) with sufficient services and capacity. Implementation of the above policies would assist in reducing the Project impacts to solid waste to a **less than significant** level and no mitigation is required. (Draft EIR, p. 4.15-11.)

R. WILDFIRE

1. Response Plans

Threshold: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project substantially impair an adopted emergency response plan or emergency evacuation plan?

Finding: Less than significant. (Draft EIR, p. 4.16-8.)

Explanation: Implementation of the proposed Project would result in project occupants to be exposed to pollutants concentrations from a wildfire or the uncontrolled spread of a wildfire due to slope, prevailing winds, and other factors that exacerbate wildfire risks. While the town of Colma is limited in its land area for future development which can only be focused on limited

residential development as well as commercial redevelopment on existing sites within the town, the Project does propose new land uses such as a medium density residential land use that is consistent with current developments as well as a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square feet of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

However, any future development would be required to comply with the town's Local Hazard Mitigation Plan (Plan) as well as any criteria under the County of San Mateo's Emergency Operations Services. The town is covered under the services by the Colma Fire Protection District. Though the District has a number of fire stations in close proximity to the town, Fire Station 85 is located approximately less than a mile to the town's northern boundary. Future development projects would have to comply with Action items specifically related to Actions C-1, C-3, C-6, C-7, C-11 and C-20 (San Mateo County Hazard Mitigation Plan, 2016). Additionally, fire safety codes, emergency access routes and evacuation procedures are already addressed in the town's Local hazard Mitigation Plan and emergency operators (Town staff, fire and police staff). Construction and operation of new residential or commercial development within the town would nominally increase the demand for fire protection in the town. Thus the proposed Project would not impair an adopted emergency response plan or emergency evacuation plan, or would it expose project occupants to uncontrolled wildfire risks.

Moreover, the following proposed General Plan policies address emergency response plans and actions:

- Policy CS-2-2:** **Development in Hazardous Areas.** Prohibit development, including any land alteration, grading for roads and structural development, in areas of slope instability unless the appropriate mitigation measures are taken.
- Policy CS-2-3:** **Unsafe Buildings.** Encourage seismic retrofits of existing buildings based on the recommendations of a licensed engineer or architect. Prioritize working with owners of buildings whose loss would impact the greatest number of people and/or particularly vulnerable groups such as seniors, children, or low-income households.
- Policy CS-4-1:** **Alternate EOC.** Establish an alternative Emergency Operations Center (EOC) to be used in the event the existing EOC is not operational during a fire event.

- Policy CS-7-1:** **Hazard Mitigation Plan.** Implement, maintain and update the Local Hazard Mitigation Plan which is part of the larger County Hazard Mitigation Plan.
- Policy CS-7-2:** **Emergency Management Plan.** Continue to participate with San Mateo County's Mutual Aid Programs and Plans for community emergency preparedness.
- Policy CS-7-3:** **Promote Emergency Preparedness.** Utilize multiple information channels to educate residents and businesses of the Town's emergency operations procedure.
- Policy CS-7-4:** **Collaborative Planning.** Improve inter-jurisdictional and interagency cooperation with regard to hazard prevention and emergency response through town participation in and initiation of coordination meetings and exercises.
- Policy CS-7-5:** **Evacuation Routes.** Utilize emergency evacuation routes established by the Town and ensure that all residential areas of Colma maintain access to at least two routes for evacuation..

For the foregoing reasons and the reasons discussed in the EIR, environmental impacts relating to this issue would be **less than significant**, and no mitigation is required. (Draft EIR, pp. 4.16-8 through 4.16-9.)

2. Pollutant Concentrations

Threshold: Due to slope, prevailing winds, and other factors, would the Project exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?

Finding: Less than significant. (Draft EIR, p. 4.16-8.)

Explanation: Any future development would be required to comply with the town's Local Hazard Mitigation Plan (Plan) as well as any criteria under the County of San Mateo's Emergency Operations Services. The town is covered under the services by the Colma Fire Protection District. Though the District has a number of fire stations in close proximity to the town, Fire Station 85 is located approximately less than a mile to the town's northern boundary. Future development projects would have to comply with Action items specifically related to Actions C-1, C-3, C-6, C-7, C-11 and C-20 (San Mateo County Hazard Mitigation Plan, 2016). Additionally, fire safety codes, emergency access routes and evacuation procedures are already addressed in the town's Local hazard Mitigation Plan and emergency operators (Town staff, fire and police staff). Construction and operation of new residential or commercial development within the town would nominally increase the demand for fire protection in the town. Thus the proposed Project would not impair an adopted emergency response plan or emergency evacuation plan, or would it expose project occupants to uncontrolled wildfire risks.

For the foregoing reasons and the reasons discussed in the EIR, the 2040 General Plan Update's environmental impacts would have a **less than significant** relating to this issue, and no mitigation is required. (Draft EIR, pp. 4.16-8 through 4.16-9.)

3. Infrastructure Risks

Threshold: Would the Project require the installation or maintenance of associated infrastructure (such a roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Finding: No impact. (Draft EIR, p. 4.16-9.)

Explanation: The town of Colma is fairly developed with residential and commercial uses. Existing cemetery land in the town account for approximately 75% of the town's land area, leaving approximately 25% of the town's 1.91 acreages to residential, office, and commercial uses. The types of future GPU las uses would include an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Any new development would therefore be incorporated into the town's existing infrastructure such as roads, emergency water sources, power lines and other utilities. Maintenance of these existing infrastructure would continue as per the town's typical maintenance of its facilities. Therefore implementation of the Project would not require the installation of any new infrastructure and this would have **no impact**, nor require mitigation measures. (Draft EIR, pp. 4.16-9 through 4.16-10.)

4. Runoff Risks

Threshold: Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Finding: No impact. (Draft EIR, p. 4.16-10.)

Explanation: The town of Colma is not located on a slope or downstream from any rivers or streams. The Colma Creek mainly runs underground through the town and there are no water bodies located with the town limits. Therefore

implementation of the Project would not expose people or structure to any impacts from downslope or downstream flooding. There would be **no impact** and no mitigation measures are required. (Draft EIR, p. 4.16-10.)

SECTION III.
IMPACTS THAT ARE LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

The City Council hereby finds that Mitigation Measures have been identified in the EIR and these Findings that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the Mitigation Measures that will reduce them to a less than significant level, are as follows:

A. AIR QUALITY

1. Air Quality Plans and Air Quality Standards

Threshold: Would the Project conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Finding: Less than significant with mitigation. (Draft EIR, p. 4.2-26.)

Explanation: ***Reduce Population Exposure and Protect Public Health***

Buildout of the proposed Project could result in new sources of TACs and PM2.5. Stationary sources, including smaller stationary sources (e.g., dry cleaners, restaurants with charbroilers, emergency generators and boilers) are subject to review by BAAQMD as part of the permitting process. Adherence to BAAQMD permitting regulations would ensure that new stationary sources of TACs do not expose populations to significant health risk. Mobile sources of air toxics (e.g., truck idling) are not regulated directly by BAAQMD. As a result, development allowed by the proposed Project could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. **Mitigation Measure AQ-3.2** would ensure mobile sources of TACs not covered under BAAQMD permits are considered during subsequent project-level environmental review by the town of Colma. Individual development projects would be required to achieve the incremental risk thresholds established by BAAQMD. Thus, implementation of the proposed Project would not result in introducing new sources of TACs that on a cumulative basis, could expose sensitive populations to significant health risk. Therefore, impacts would be **less than significant with mitigation**. (Draft EIR, p. 4.2-26.)

2. Sensitive Receptors

Threshold: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Finding: Less than significant with mitigation. (Draft EIR, p. 4.2-41.)

Explanation: ***Nonpermitted Sources***

Mobile sources of TACs are not regulated by BAAQMD. The primary mobile source of TACs within the town is truck idling and use of off-road equipment. New warehousing operations could generate substantial DPM emissions from off-road equipment use and truck idling. In addition, some warehousing and industrial facilities may include use of TRUs for cold storage. New land uses in the town that would be permitted under the proposed GPU that would use trucks, including trucks with TRUs, could generate an increase in DPM that would contribute to cancer and noncancer health risk in the SFBAAB. Additionally, these types of facilities could also generate particulate matter (PM10 and PM2.5) that may cause an exceedance or contribute to the continuing exceedance of the federal and State AAQS. These new land uses could be near existing sensitive receptors. In addition, trucks would travel on regional transportation routes throughout the Bay Area, contributing to near-roadway DPM concentrations. The GPU does not anticipate significant new growth from industrial warehousing. However, health risk impacts from nonpermitted sources associated with potential development of industrial and commercial land uses are considered significant.

Proposed General Plan Update Policies

- Policy LU- 5-1. Regional Cooperation.** Participate with other cities in the county and across the region in working towards solutions to the issues of regional land use, housing, homelessness, and transportation planning through partnership with the Association of Bay Area Governments, the Metropolitan Transportation Commission, and the San Mateo City/County Association of Governments (C/CAG).
- Policy LU-5-2. San Mateo County Collaboration.** Continue to consult with San Mateo County and other cities in the region on effective land use, transportation, sustainability, and economic development strategies to learn about additional strategies that could be used in Colma to achieve the community's vision and goals.
- Policy LU-6-3. Environmental Protection.** The Town shall apply environmental protection measures equally among geographic and socioeconomic neighborhoods of the town.
- Policy M-3-1. Agency Collaboration and Coordination.** Collaborate with Caltrans, the City and County Association of Governments (C/CAG), surrounding jurisdictions, and other agencies to improve connectivity between the county, cities, and the town.
- Policy M-3-3. Regional Transportation Planning.** Actively participate in and support regional transportation planning efforts.

Policy CS-1-1. Health in All Policies. Prioritize the overall health of Colma residents in Town strategies, programs, daily operations, and practices.

The policies and programs listed above would contribute toward minimizing potential health risk impacts to sensitive receptors. However, implementation of the proposed Project could expose sensitive receptors to substantial toxic air contaminant concentrations from nonpermitted sources.

MM AQ-4: Prior to discretionary project approval, applicants for industrial or warehousing land uses in addition to commercial land uses that would generate substantial diesel truck travel—i.e., 100 diesel trucks per day or 40 or more trucks with diesel-powered transport refrigeration units per day based on the CARB recommendations for siting new sensitive land uses—shall contact the BAAQMD or the town of Colma in conjunction with the BAAQMD to determine the appropriate level of HRA required. If preparation of an HRA is required, all HRAs shall be submitted to the town and the BAAQMD for evaluation.

The HRA shall be prepared in accordance with policies and procedures of the OEHHA and the BAAQMD. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06) or the risk thresholds in effect at the time a project is considered, or the appropriate noncancer hazard index exceeds 1.0, or 0.3 μm^3 of PM_{2.5} or the thresholds as determined by the BAAQMD at the time a project is considered, the applicant will be required to identify and demonstrate that measures are capable of reducing potential cancer and noncancer risks to an acceptable level, including appropriate enforcement mechanisms.

Measures to reduce risk impacts may include but are not limited to:

- Restricting idling on-site beyond Air Toxic Control Measures idling restrictions, as feasible.
- Electrifying warehousing docks.
- Requiring use of newer equipment and/or vehicles.
- Restricting off-site truck travel through the creation of truck routes.

Measures identified in the HRA shall be identified as mitigation measures in the environmental document and/or incorporated into the site development plan as a component of the proposed General Plan.

Development allowed by the proposed Project could result in new sources of criteria air pollutant emissions and/or TACs near existing or planned sensitive receptors. Review of development projects by BAAQMD for permitted sources of air toxics (e.g., industrial facilities, dry cleaners, and gasoline dispensing facilities) in addition to proposed General Plan goals, policies, and programs would ensure that health risks are minimized. Additionally, **Mitigation Measure AQ-4** would ensure mobile sources of TACs not covered under BAAQMD permits are considered during subsequent project-level environmental review by the town of Colma.

Individual development projects would be required to achieve the incremental risk thresholds established by BAAQMD, and TAC and PM2.5, and **impacts would be less than significant with Mitigation Measure AQ-4.** (Draft EIR, pp. 4.2-41 through 4.2-43.)

SECTION IV.
IMPACTS THAN CANNOT BE FULLY MITIGATED TO A LESS THAN SIGNIFICANT
LEVEL

The City Council hereby finds that, despite the incorporation of Mitigation Measures identified in the EIR and in these Findings, the following environmental impacts cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein:

A. AIR QUALITY

1. Cumulatively Considerable Pollutant Emissions

Threshold: Would the Project result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Finding: Significant and unavoidable. (Draft EIR, p. 4.2-35.)

Explanation: This section analyzes potential impacts related to air quality that could occur from the buildout associated with the proposed Project in combination with the regional growth in the SFBAAB. The SFBAAB is currently designated a nonattainment area for California and National O₃, California and National PM_{2.5}, and California PM₁₀ AAQS. At a plan level, air quality impacts are measured by the potential for a project to exceed BAAQMDs significance criteria and contribute to the State and federal nonattainment designations in the SFBAAB. Any project that produces a significant regional air quality impact in an area that is in nonattainment adds to the cumulative impact. The proposed Project would be consistent with the *2017 Clean Air Plan*. However, the proposed General Plan could generate a substantial increase in criteria air pollutant emissions from construction and operational activities that could exceed the BAAQMD regional significance thresholds.

Construction

Construction activities would temporarily increase criteria air pollutant emissions within the SFBAAB. The primary source of NO_x emissions is the operation of construction equipment. The primary sources of particulate matter (PM₁₀ and PM_{2.5}) emissions are activities that disturb the soil, such as grading and excavation, road construction, and building demolition and construction. The primary sources of VOC emissions are the application of architectural coating and off-gas emissions associated with asphalt paving. A discussion of health impacts associated with air pollutant emissions generated by construction activities is included under "Air Pollutants of Concern" in ***Section 4.2.2: Regulatory Framework of the Draft EIR.***

Construction activities associated with the proposed Project would occur over the buildout horizon, causing short-term emissions of criteria air

pollutants. Information regarding specific development projects, soil types, and the locations of receptors would be needed in order to quantify the level of impact associated with construction activity. Due to the scale of development activity associated with buildout of proposed General Plan, emissions would likely exceed the BAAQMD regional significance thresholds. In accordance with the BAAQMD methodology, emissions that exceed the regional significance thresholds would cumulatively contribute to the nonattainment designations of the SFBAAB. Emissions of VOC and NOX are precursors to the formation of O3. In addition, NOX is a precursor to the formation of particulate matter (PM10 and PM2.5). Therefore, the proposed Project would cumulatively contribute to the nonattainment designations of the SFBAAB for O3 and particulate matter (PM10 and PM2.5).

Future development under the proposed Project would be subject to separate environmental review pursuant to CEQA in order to identify and mitigate potential air quality impacts. Subsequent environmental review of development projects would be required to assess potential impacts under BAAQMDs project-level thresholds based on site-specific construction phasing and buildout characteristics. For the proposed Project, which is a broad-based policy plan, it is not possible to determine whether the scale and phasing of individual projects would exceed the BAAQMD's short-term regional or localized construction emissions thresholds. As a result, construction activities associated with implementation of the proposed Project could potentially violate an air quality standard or contribute substantially to an existing or projected air quality violation.

Existing federal, State, and local regulations, and the policies and programs of the proposed Project described throughout this section protect local and regional air quality. Continued compliance with these regulations would reduce construction-related impacts. In addition, there are certain General Plan policies that would reduce construction emissions.

Proposed General Plan Update Policies

The General Plan policies listed in **Table 4.2.9 of the Draft EIR** would ensure consistency with the AQMP. While the existing regulations and policies have the potential to reduce emissions, potential future development projects accommodated under the proposed General Plan (individually or cumulatively) could still exceed the BAAQMD significance thresholds for construction. Therefore, implementation of the proposed Project could result in significant construction-related regional air impacts and the following mitigation measures are required.

MM AQ-1:

As part of the town's development approval process, the town of Colma shall require applicants for future development projects to comply with the current BAAQMD basic control measures for fugitive dust control, including:

- Water all active construction areas at least twice daily, or as often as needed to control dust emissions. Watering should be sufficient

to prevent airborne dust from leaving the site. Increased watering frequency may be necessary whenever wind speeds exceed 15 miles per hour. Reclaimed water should be used whenever possible.

- Pave, apply water twice daily or as often as necessary to control dust, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Cover all trucks hauling soil, sand, and other loose materials or require all trucks to maintain at least 2 feet of freeboard (i.e., the minimum required space between the top of the load and the top of the trailer).
- Sweep daily (with water sweepers using reclaimed water if possible) or as often as needed all paved access roads, parking areas and staging areas at the construction site to control dust.
- Sweep public streets daily (with water sweepers using reclaimed water if possible) in the vicinity of the project site, or as often as needed, to keep streets free of visible soil material.
- Hydroseed or apply nontoxic soil stabilizers to inactive construction areas.
- Enclose, cover, water twice daily, or apply nontoxic soil binders to exposed stockpiles (dirt, sand, etc.).
- Limit vehicle traffic speeds on unpaved roads to 15 miles per hour.
- Replant vegetation in disturbed areas as quickly as possible.

MM AQ-2:

Prior to issuance of building permits, development project applicants that are subject to CEQA and exceed the screening sizes in the BAAQMD CEQA Guidelines shall prepare and submit to the town of Colma a technical assessment evaluating potential project construction-related air quality impacts. The evaluation shall be prepared in conformance with the BAAQMD methodology in assessing air quality impacts. If construction-related criteria air pollutants are determined to have the potential to exceed the BAAQMD thresholds of significance, as identified in the BAAQMD CEQA Guidelines, the town shall require that applicants for new development projects incorporate mitigation measures to reduce air pollutant emissions during construction activities to below these thresholds to the extent feasible. These identified measures shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to the town of Colma and shall be verified by the Town's Building Division and/or Planning Division.

Mitigation Measure AQ-1 would require adherence to the current BAAQMD basic control measures for reducing fugitive dust and reduce fugitive emissions to less-than-significant levels, and **Mitigation Measure AQ-2** would reduce NOX emissions. However, future development in the town could still generate construction exhaust emissions in excess of the BAAQMD significance thresholds. An analysis of emissions generated from the construction of specific future projects under the proposed Project would be required to evaluate emissions compared to BAAQMDs project-level significance thresholds during individual environmental review. The identification of this program-level impact does not preclude the finding of

less-than-significant impacts for subsequent projects that comply with BAAQMD screening criteria or meet applicable thresholds of significance. However, due to the programmatic nature of the proposed Project, no additional mitigation measures are available, and the impact is considered **significant and unavoidable**. (Draft EIR, pp. 4.2-35 through 4.2-37.)

2. Sensitive Receptors

Threshold: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Finding: Significant and unavoidable. (Draft EIR, p. 4.2-40.)

Explanation: Implementation of the proposed Project would cause or contribute significantly to elevated pollutant concentration levels such that it would expose sensitive receptors to elevated pollutant concentrations. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction Community Risk and Hazards

Future construction under the proposed Project would temporarily elevate concentrations of TACs and DPM in the vicinity of sensitive land uses during construction activities. Since the details regarding future construction activities are not known at this time, due to this analysis being conducted at a GPU Program level—including phasing of future individual projects, construction duration and phasing, and preliminary construction equipment—construction emissions are evaluated qualitatively in accordance with BAAQMD’s plan-level guidance. Subsequent environmental review of future development projects would be required to assess potential impacts under BAAQMD’s project-level thresholds. However, construction emissions associated with the proposed Project could exceed BAAQMD’s project level and cumulative significance thresholds for community risk and hazards. Therefore, construction-related health risk impacts associated with the proposed General Plan are considered **significant**.

Proposed General Plan Update Policies

The proposed Project includes the following policies that would reduce construction-related air quality impacts:

Policy LU-6-3. Environmental Protection. The Town shall apply environmental protection measures equally among geographic and socioeconomic neighborhoods of the town.

Policy CS-1-1. Health in All Policies. Prioritize the overall health of Colma residents in its strategies, programs, daily operations, and practices.

MM AQ-3: Applicants for construction within 1,000 feet of residential and other sensitive land use projects (e.g., hospitals, nursing homes, day care centers) in the town of Colma, as measured from the property line of the project to the property line of the source/edge of the nearest travel lane, shall submit a health risk assessment (HRA) to the town prior to future discretionary project approval. The HRA shall be prepared in accordance with policies and procedures of the Office of Environmental Health Hazard Assessment (OEHHA) and the BAAQMD. The latest OEHHA guidelines shall be used for the analysis, including age-sensitivity factors, breathing rates, and body weights appropriate for children ages 0 to 16 years. If the HRA shows that the incremental cancer risk exceeds ten in one million (10E-06), PM2.5 concentrations exceed 0.3 µg/m³, or the appropriate noncancer hazard index exceeds 1.0, the applicant will be required to identify and demonstrate that mitigation measures are capable of reducing potential cancer and noncancer risks to an acceptable level (i.e., below ten in one million or a hazard index of 1.0), including appropriate enforcement mechanisms. Measures to reduce risk may include, but are not limited to:

- During construction, use construction equipment rated as US EPA Tier 4 Interim for equipment of 50 horsepower or more.
- During construction, use of construction equipment fitted with Level 3 Diesel Particulate Filters for all equipment of 50 horsepower or more.

Measures identified in the HRA shall be included in the environmental document and/or incorporated into the site development plan as a component of the proposed Project. Prior to issuance of any construction permit, the construction contractor shall ensure that all construction plans submitted to the Town of Colma Planning Division and/or Building Division clearly show incorporation of all applicable mitigation measures.

Implementation of **Mitigation Measures AQ-2** and **AQ-3** would reduce construction-related health risk impacts to the extent feasible. However, despite implementation of mitigation, construction-related health risk impacts may still exceed the applicable thresholds due to future project-specific circumstances. Therefore, this impact remains **significant and unavoidable**. (Draft EIR, pp. 4.2-40 through 4.2-41.)

B. CULTURAL RESOURCES

1. Historical Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines, section 15064.5?

Finding: Significant and unavoidable. (Draft EIR, p. 4.4-23.)

Explanation: The demolition or substantial alteration of a resource listed on, or formally determined eligible for, the NRHP or the CRHR, including contributors to National Register or California Register Historic Districts, or that meet the CEQA criteria for historical resources, would represent a significant direct impact to historical resources. Additionally, grading, excavation and other ground-disturbing activities associated with development projects may affect currently unknown significant archaeological sites or traditional cultural properties that would represent a significant direct impact to historical resources.

ASM Affiliates (2020) completed a cultural resource study that included a review of historical aerial photographs, topographic maps, and a comprehensive CHRIS records search. Results concluded that no previously recorded archaeological resources are located within the town, and, as such, no archaeological and/or TCRs are listed as historic properties. The town's *Historical Resources Element* (1999) outlines architectural historic properties within the Planning Area. The 2040 GPU proposes updates to the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. The planning areas under the proposed GPU introduces new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The Project would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively.

Proposed General Plan Update Policies

The following proposed GPU policies address the preservation of historic resources in the town of Colma:

Policy LU-13-2: **Historic Buildings.** Historic buildings and uses along Mission Road shall be maintained and enhanced according to the Secretary of the Interior's standards. Adaptive reuse of structures is encouraged.

Policy HR-2-1: **Preservation Collaboration.** Work with the Colma Historical Association as a partner to improve awareness of local preservation.

Policy HR-2-2: **Consultation on Projects.** Consult with the Colma Historical Association on discretionary review projects involving cultural sites and historic resources in the Town of Colma.

Policy HR-3-1: **Public Awareness.** Foster awareness, appreciation and celebration of the Town's unique historic and cultural heritage and educate and encourage preservation of these resources.

According to the *Historical Resources Element* for the town's GPU, historic properties as they pertain to architectural resources are present within the town, though no historic resources as they pertain to archaeological or TCRs are currently within the town limits.

While the GPU does not specifically propose demolition, or substantial alteration of a historical resource, or ground-disturbing activities such as grading or excavation, there are historic properties within the Planning Area and as such it can be assumed that future development consistent with the goals and policies of the GPU have the potential to result in significant direct and/or indirect impacts to historical resources. Therefore, this is a **significant and unavoidable impact**, and the following mitigation measures are proposed:

MM CUL-1

1. For any project with potential to impact historical resources, a historical resource inventory of the project footprint shall be required to identify any historical resources. Before actual field reconnaissance occurs, background research shall include a record search at the NWIC, as well as a review of the SLF maintained by the NAHC. The project archaeologist shall determine the likelihood for the project site to contain archaeological resources by reviewing site photographs and existing historic information and conducting a site visit (for projects with exposed ground).

2. If archaeological resources cannot be avoided, significance evaluations shall be required when a survey identifies new resources, when a survey re-locates previously recorded resources that have not been previously evaluated, and when the survey does not re-locate previously recorded sites if there is a likelihood that the resources still exist.

3. Significance evaluations shall not be required if the historical resource has been evaluated for CEQA significance or for NRHP eligibility within the last five years, and if there has been no change in the conditions that contributed to the determination of significance or eligibility. A historical resource shall be reevaluated if its condition or setting has either improved or deteriorated, if new information is available, or if the resource is becoming increasingly rare due to the loss of other similar resources.

4. An archaeological testing program shall be required for archaeological sites in need of historical resource significance evaluation. Archaeological testing programs include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. Tribal representatives and/or Native American monitors shall be involved in making recommendations regarding the significance of

prehistoric archaeological sites during this phase of the process. The testing program may require reevaluation of the proposed Project, which could result in a combination of project redesign to preserve significant resources as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative).

5. If significant historical resources are identified within the project footprint, the site may be eligible for designation in one or more registers. If no significant resources are identified, and site conditions are such that there is no potential for further discoveries, then no further action shall be required. If a survey and/or assessment finds nonsignificant resources, no further work shall be required beyond documentation of the resources on the appropriate California Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If the survey finds no significant resources but results of the initial evaluation and testing phase indicate there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring shall be required.

6. Preferred mitigation for historical resources shall be to avoid and preserve the resource through project redesign. If the resource cannot be entirely avoided, an archaeologist who meets the U.S. Secretary of the Interior's Professional Qualifications Standards (SOIPQS) for Archaeology shall take all prudent and feasible measures to minimize harm. For archaeological resources for which preservation is not an option, an archaeologist who meets the SOIPQS for Archaeology shall prepare a research design for a data recovery program. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA, Section 21083.2. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as existing development or dense vegetation.

7. When subsurface investigations, including geotechnical testing and other ground-disturbing activities, impact an archaeological site or a Native American Traditional Cultural Property within the project footprint, a Native American monitor shall be retained. In the event that the data recovery and/or monitoring program reveals human remains, the provisions of PRC Section 5097 shall be applied. An archaeologist who meets the SOIPQS for Archaeology shall consult the Native American monitor during the preparation of the written report, at which time the monitor may express concerns about the treatment of sensitive resources. (Draft EIR, pp. 4.4-23 through 4.4-25.)

2. Archaeological Resources

Threshold: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines, section 15064.5?

Finding: Significant and unavoidable. (Draft EIR, p. 4.4-25.)

Explanation: ASM Affiliates (2020) completed a cultural resource study that included a review of historical aerial photographs, topographic maps, and a comprehensive CHRIS records search. Results concluded that no previously recorded archaeological resources are located within the town, and, as such, no archaeological and/or TCRs are listed as historic properties. The town's *Historical Resources Element* (1999) outlines architectural historic properties within the Planning Area.

Proposed General Plan Update Policies

The following proposed GPU policies address potential disturbances of cultural resources and human remains due to future development:

Policy OSC-6-1: Development Review Process. Require, as part of the development review process, standard conditions of approval or mitigation measures that identify proper measures and protocols to be followed in the event that tribal or cultural resources are discovered on a project site.

According to the *Historical Resources Element* for the Town's GPU, historic properties as they pertain to architectural resources are present within the town, though no historic resources as they pertain to archaeological or TCRs are currently within the town limits.

While the GPU does not specifically propose demolition, or substantial alteration of a historical resource, or ground-disturbing activities such as grading or excavation, the GPU does propose updates to the town's existing planning areas, simplifying the town's existing planning areas into five new planning areas that are consistent with the present condition of the town and the vision of the City Council. The planning areas under the proposed GPU introduces new land uses such a medium density residential land use that is consistent with current developments and a commercial overlay over vacant and underutilized cemetery land east of Hillside Boulevard. The 2040 GPU would allow for an additional 11 residential units in the Sterling Park Planning Area; 20 infill residential units, 15,000 square feet of commercial uses, and 5,000 square feet of office uses in the Mission Road Planning Area; 315,000 square feet of commercial uses within the Hillside Boulevard Planning Area; 310,000 square feet of commercial uses and 10,000 square feet of office uses in the Commercial Core Planning Area; and, 20,000 square of office uses, 352,500 square feet of commercial uses, and 42 residential units, 240 residential units, and 15 residential units at the Bocci Center, Town Center and Sandblaster site, respectively. Therefore there is the potential that previously undiscovered historic properties may exist within the Planning Area and as such it can be

assumed that future development consistent with the goals and policies of the GPU have the potential to result in significant direct and/or indirect impacts to cultural resources. Therefore, this is a **significant and unavoidable impact** and the following mitigation measure would be required:

MM CUL-2

1. If an archaeological resource is identified during future development or operations, all activity within 100 feet of the archaeological resource shall cease and be flagged for avoidance. An archaeologist who meets the SOIPQS for Archaeology shall be immediately notified of the discovery. The archaeologist shall inspect the find and notify the Town of their assessment.

2. If the assessment concludes that the discovery constitutes a significant or unique archaeological resource, or TCR, the resource shall be avoided if possible. If avoidance is not possible, the Town shall consult with all applicable parties, including Native American tribes if prehistoric, in an effort to determine measures to mitigate any potential impacts to the resource in accordance with PRC Section 21083.2 and CEQA Guidelines Section 15126.4. An archaeologist who meets the SOIPQS for Archaeology shall employ measures that include documentation of the resource.

3. If an archaeological site does not meet the criteria defined in subsection (a), but does meet the definition of a unique archaeological resource in Section 21083.2 of the PRC, the site shall be treated in accordance with the provisions of section 21083.2. The time and cost limitations described in PRC Section 21083.2 (c-f) do not apply to surveys and site evaluation activities intended to determine whether the project location contains unique archaeological resources.

4. If an archaeological resource is neither a unique archaeological nor a historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment. These procedures shall be included as Condition of Approval for all projects. Where appropriate, preconstruction measures will follow the guidelines as stated in CUL-1. (Draft EIR, pp. 4.4-26 through 4.4-27.)

3. Human Remains

Threshold: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

Finding: Significant and unavoidable. (Draft EIR, p. 4.4-29.)

Explanation: There are no known areas within the town of Colma where prehistoric human remains have been uncovered, yet much of the town consists of historic cemeteries and burials. Therefore, the potential for encountering prehistoric human remains during construction development activities is

low, but the potential for encountering human remains in general is possible, and GPU implementation may result in impacts to human remains.

While the GPU does not specifically propose demolition or substantial alteration of a resource or ground-disturbing activities such as grading or excavation, as discussed under Impacts 4.4.1-4.4.2, it is possible that future development consistent with the goals and policies of the 2040 General Plan Update have the potential to disturb human remains. Therefore, this is a **significant and unavoidable impact** and the following mitigation measures should be implemented:

MM CUL-4

1. If Native American human remains are discovered within a project footprint, the Town shall work with the most likely descendants identified by the NAHC as provided in PRC Section 5097.98. The applicant may develop an agreement for treating or disposing of, with appropriate dignity, the human remains, and any items of cultural patrimony associated with Native American burials with the appropriate Native Americans as identified by the NAHC. Action implementing such an agreement is exempt from the general prohibition on disinterring, disturbing, or removing human remains from any location other than a dedicated cemetery (Health and Safety Code Section 7050.5).

2. In the event of the accidental discovery or recognition of any human remains in any location other than a dedicated cemetery, the following steps shall be taken:

- a. All construction activity shall cease within 100 feet of the discovery until the San Mateo County Medical Examiner is contacted and has completed their study.
- b. The San Mateo County Medical Examiner shall be contacted to determine whether an investigation of the cause of death is required.
- c. If the medical examiner determines that the remains are Native American, the medical examiner shall contact the NAHC within 24 hours.
- d. The NAHC shall identify the person or persons it believes to be the Most Likely Descendant from the deceased Native American.
- e. The landowner shall discuss and confer with the Most Likely Descendant regarding all reasonable options for treatment of human remains and any associated grave goods as provided in PRC Section 5097.98.

3. As part of the objectives, criteria, and procedures required by PRC Section 21082, a lead agency shall make provisions for historical or unique archaeological resources accidentally discovered during construction. These provisions shall include an immediate evaluation of the find by a qualified archaeologist. If the archaeologist determines the find to be a significant historical or archaeological resource, contingency funding and a

time allotment sufficient to allow for implementation of avoidance measures or appropriate mitigation shall be necessary. Work may continue on other parts of the project site while resource mitigation takes place. (Draft EIR, pp. 4.4-29 through 4.4-30.)

C. GREENHOUSE GAS EMISSIONS

1. Emissions Generation

Threshold: Would the Project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Finding: Significant and unavoidable. (Draft EIR, p. 4.7-16.)

Explanation: Future potential development under the proposed Project would contribute to global climate change through direct and indirect emissions of GHGs in the town. However, a general plan is a long-range policy document that does not directly result in development without additional approvals. Any development proposed in the town of Colma must be analyzed for consistency with the General Plan, zoning requirements, and other applicable local and State requirements; comply with the requirements of CEQA if required; and obtain all necessary clearances and permits from regulatory agencies.

Buildout of the proposed Project is not linked to a specific development time frame but is assumed over a 20-year project horizon. Implementation of the proposed Project by the horizon year of 2040 would result in a net increase of 1,395 people and 889 employees in the town. Table 4.7.5, Horizon Year 2040 GHG Emissions Forecast of the Draft EIR, provides a comparison of the change in GHG emissions in the Town between the CEQA baseline (2020) and the General Plan horizon year (2040) conditions.

Buildout of the land uses accommodated under the proposed 2040 GPU would result in a net increase of 103 MTCO₂e of GHG emissions (1 percent in GHG emissions) from existing conditions and would not exceed the 660 MTCO₂e BAAQMD bright-line screening threshold. In addition, though buildout under the proposed Project is projected to increase service population by 2,284 persons⁶ (a 41 percent increase), emissions per person would decrease compared to the baseline. Emissions per service population would decrease to 2.2 MTCO₂e/SP in horizon year 2040 from 3.0 MTCO₂e/SP for the baseline year.

Consistency with SB 32 and Executive Order S-03-05 GHG Reduction Targets

While the proposed Project would not generate an increase in GHG emissions from the CEQA baseline in the 2040 horizon year forecast, the Draft EIR also analyzes the potential for the proposed Project to conflict with the GHG reduction goals established under SB 32 and Executive Order

S-03-05, which require a reduction in statewide GHG emissions from existing conditions to 40 percent below 1990 levels by 2030 and an 80 percent below 1990 levels by 2050. The Draft EIR assumes that the CEQA baseline (2020 emissions) reflects the AB 32 goal in 2020. As a result, at the General Plan horizon year of 2040, the town would need to reduce GHG emissions by 60 percent to ensure the town is on a trajectory to achieve the long-term goal under Executive Order S-03-05, which is equivalent to 10,119 MTCO_{2e} in the town by the year 2040.

Implementation of the proposed Project would result in a small net increase (103 MTCO_{2e}) in emissions in horizon year 2040 compared to existing baseline. Due to the magnitude of growth anticipated (41 percent increase), GHG emissions would not achieve the 60 percent reduction necessary to ensure the town is on a trajectory to achieve the long-term year 2050 reduction goal of Executive Order S-03-05. Reduction strategies to meet the long-term 2050 GHG reduction goal in addition to establishment of a 2050 reduction target will be included in the planned future updates to the CAP. Additionally, State strategies to achieve post-2030 targets will be necessary. Therefore, until such time, GHG emissions impacts for the proposed Project are considered potentially significant in regard to meeting the long-term year 2050 reduction goal.

Proposed General Plan Update Policies

While growth within the town would cumulatively contribute to GHG emissions impacts, the current General Plan included goals, policies, and programs to reduce GHG emissions. The proposed Project retains or slightly modifies those goals and policies. These are in the Community Health and Safety (CHS), Land Use (LU), Mobility (M), and Open Space and Conservation (OSC) elements. The following describes the goals, policies, and programs that directly and indirectly result in the reduction of GHG emissions by reducing air pollution, incentivizing alternate modes of transportation, creating safe environments for pedestrians and bicyclists, establishing parking spaces for more sustainable modes of travel, and placing higher density housing and commercial uses near transit stations.

- Policy CS-1-3. Physical Activity and the Built Environment.** Support new developments or infrastructure improvements in existing neighborhoods that enable people to drive less and walk, bike, or take public transit more.
- Policy LU-1-4. Land Uses that Support Transit.** Encourage higher-intensity development on the specific opportunity sites designated in the El Camino Real planning area.
- Policy LU-1-6. Public-Private Partnerships.** Consider opportunities to use public investment to form partnerships with the private sector to achieve quality infill development, enhance the public realm, and encourage public transit, walking, and biking.

- Policy LU-2-1.** **Water Conservation.** Promote water conservation by educating and encouraging residents and businesses to incorporate drought tolerant and low water using planting, smart irrigation systems, water efficient appliances, and recycled water systems.
- Policy LU-2-2.** **Water Efficient Landscape.** Apply the Water Efficient Landscape Ordinance to new development and projects that include a qualifying amount of replacement or new landscaping.
- Policy LU-2-3.** **Open Space.** Require accessible, attractive open space that is well maintained and uses sustainable practices and materials in all new multiple dwelling and mixed-use development.
- Policy LU-2-4.** **Low Impact Development.** Regulate new development and construction to minimize pollutant and sediment concentrations in receiving waters and ensure that surface water meets or exceeds applicable regulatory water quality standards. Require new development to incorporate Low Impact Development features that treat and reduce surface runoff volumes.
- Policy LU-2-5.** **Energy Efficiency.** Support energy efficient improvements in aging building stock.
- Policy LU-2-6:** **Solar Energy. Provide incentives for installation of solar and photovoltaic** systems on existing buildings and new development.
- Policy LU-2-7:** **Electric Vehicles.** As Town gasoline-powered vehicles are replaced, purchase electric and hybrid vehicles when practicable. Install electric vehicle charging stations with new commercial and mixed-use developments.
- Policy LU-2-8:** **Climate Action Plan.** Maintain a Climate Action Plan and continue to partner with San Mateo County's Regional Climate Action Planning Suite (RICAPS) to prepare community-wide greenhouse gas inventories.
- Policy LU-2-9:** **Greenhouse Gas Reduction Targets.** Work to achieve greenhouse gas emissions reductions that are consistent with the targets established by AB32 (California Global Warming Solutions Act) and subsequent supporting legislation.
- Policy LU-2-10:** **Green Building.** Support sustainability and green building best practices through the orientation, design, and placement of buildings and facilities to optimize their energy efficiency in preparation of State zero-net energy requirements for residential construction and commercial construction.
- Policy LU-3-6.** **Walkable Neighborhoods.** The Town shall promote walkable neighborhoods by supporting alternative modes of transportation; enhancing bike and pedestrian connectivity to local commercial districts and transit centers; and maintaining sidewalks, public plazas, parks and

greenways, parkways, street tree canopies, and landscaping throughout residential neighborhoods.

Policy LU- 5-1. Regional Cooperation. Participate with other cities in the county and across the region in working towards solutions to the issues of regional land use, housing, homelessness, and transportation planning through partnership with the Association of Bay Area Governments, the Metropolitan Transportation Commission, and the San Mateo City/County Association of Governments (C/CAG).

Policy LU-5-2. San Mateo County Collaboration. Continue to consult with San Mateo County and other cities in the region on effective land use, transportation, sustainability, and economic development strategies to learn about additional strategies that could be used in Colma to achieve the community's vision and goals.

Policy M-2-1. Reduce Vehicle Miles Traveled. Require new development projects to achieve a reduction in VMT per capita or VMT per service population compared to both baseline VMT performance conditions and General Plan 2040 VMT performance conditions. The Town will regularly monitor baseline VMT to provide updated benchmarks for project applicants. Encourage use of VMT reduction strategies and methods to encourage non-automobile travel.

Policy M-2-2. Other Traffic Flow Benchmarks. Establish additional traffic flow benchmarks, such as VMT, vehicle-hours of travel, and safety-related metrics, in order to evaluate and monitor changes in traffic flow over time.

Policy M-2-3. VMT Transportation Performance Measures. Update the Town's transportation measures and thresholds to use VMT standards for traffic impact analysis rather than LOS.

Policy M-2-4. Multi-Modal Impact Fee. Consider establishing a **transportation** impact fee for new development tied to performance measures to generate funds for improving all modes of transportation.

Policy M-3-3. Regional Transportation Planning. Actively participate in and support regional transportation planning efforts.

Policy M-3-4. Transit Funding. Seek joint transportation and transit funding opportunities with adjoining jurisdictions or agencies to improve transit access in and around Colma.

Policy M-3-5. Transportation Gaps. Eliminate gaps in the regional active transportation network in Colma.

Policy M-4-2. Reliable Transportation Services. Encourage SamTrans and other public transit providers to provide service on regular schedules along El Camino Real, arterial streets, and, as feasible, major collectors; support

these transportation services to increase the mobility of seniors, the disabled, and others who depend on public transportation.

- Policy M-4.3. Encourage Transportation Options.** Encourage and support various public transit agencies and companies, ride-sharing programs, and other incentive programs that provide residents and visitors with transportation choices other than the private automobile.
- Policy M-4.4. Transit Oriented Development. Promote the development of multi-modal** mixed-use development at sites surrounding the Colma BART station, where feasible along Mission Road, and at the Town Center site.
- Policy M-4.5. Connections to Homes and Businesses.** Seek opportunities to improve first and last mile connections between transit, homes, and businesses.
- Policy M-5-1. Complete Streets.** Incorporate Complete Streets infrastructure elements into new streets, street retrofits and certain maintenance projects to encourage multiple modes of travel, based on the modal priorities in Table M-2, as appropriate to the context and determined reasonable and practicable by the Town.
- Policy M-5-2. Design for All Travel Modes.** Plan, design, and construct transportation projects to safely accommodate the needs of pedestrians, bicyclists, transit riders, motorists, people with mobility challenges, and persons of all ages and abilities.
- Policy M-5-3. Bicycle Connection Coordination. Coordinate with BART, South San Francisco, Daly City, Caltrans, and San Mateo County** to plan and implement bicycle and pedestrian improvements which connect with improvements to BART facilities and regional networks.
- Policy M-5-4. Accessibility and Universal Design.** Prioritize implementation of pedestrian facilities that improve accessibility consistent with guidelines established by the Americans with Disabilities Act (ADA), allowing mobility-impaired users, such as the disabled and seniors, to travel safely and effectively within and beyond the town.
- Policy M-5-5. Design of New Development.** Require new development to incorporate design that prioritizes safe pedestrian and bicycle travel and accommodate senior citizens, people with mobility challenges, and children.
- Policy M-7-1. TDM Program.** Continue to participate in the TDM Program as outlined by the San Mateo City/County Association of Governments (C/CAG).
- Policy M-7-2. TDM Program for New Development.** Require major development proposals to include a detailed, verifiable TDM program for consideration by the Town during the review of the development application.

- Policy M-7-3. Vehicle Trip Reduction.** Support vehicle trip reduction strategies, including building safer and more inviting transportation networks, supporting connections to high frequency and regional transit, implementing TDM programs, and integrating land use and transportation decisions.
- Policy OSC-1-3. Sustainable Landscape Practices.** Encourage the enhancement of public areas with landscaping practices that minimize water usage.
- Policy OSC-1-4. Pedestrian Trails, Bikeways Walkways.** Expand and improve pedestrian trails, bikeways, and walkways to connect trails and allow access to open space land and regional trail facilities.
- Policy OSC-1-5. Colma Creek Trail.** Coordinate with the City of South San Francisco to provide continuous pedestrian access from the Colma BART station along El Camino Real to the southern border of the town.
- Policy OSC-2-1. Open Space for Recreation Use.** Develop and maintain open spaces and recreation areas that are conveniently located, properly designed, and well-maintained to serve the recreation needs and healthy living of the entire community.
- Policy OSC-2-2. Recreation Requirements for New Developments.** Require dedication of improved land, or payment of a fee in lieu of, for park and recreation land for all residential uses.
- Policy OSC-2-3. Expansion of Recreation Space.** Acquire and enhance properties within Colma for recreation and public use if opportunities become available.
- Policy OSC-3-1. Transit Oriented Development.** Encourage, to the extent feasible, higher density residential development to be located near transit corridors and public transportation.
- Policy OSC-3-2. Reduce Energy Consumption.** Support measures and education to reduce energy consumption and increase energy efficiency in residential, commercial, and industrial buildings.
- Policy OSC-3-3. Energy Efficiency in Municipal Operations.** Pursue opportunities to improve energy efficiency and install renewable energy systems, where feasible, in new and existing Town-owned facilities and operations.
- Policy OSC-3-4. GHG Reduction.** Implement the Climate Action Plan to achieve GHG reduction targets that are consistent with the State Scoping Plan, AB 32, and SB 32 and the Town's goals.
- Policy OSC-3-5. Pedestrian-Scaled Design.** Support the use of public/mass transit by encouraging pedestrian-friendly street design and mixed-use development near transit hubs.

Policy OSC-4-4. Use of Drought Tolerant and Native Plants. Encourage the use of drought tolerant and native plants in landscaping plans.

Policy OSC-5-6. Regional Open Space Preservation Efforts. Support regional and sub-regional efforts to acquire, develop and maintain open space conservation lands.

Despite the policies of the General Plan, implementation of the proposed Project would not meet the long-term GHG reduction goal under Executive Order S-03-05, and impacts would be potentially significant.

Implementation of **Mitigation Measure GHG-1** would ensure that the town is tracking and monitoring the town's GHG emissions in order to chart a trajectory to achieve the long-term year 2050 GHG reduction goal set by Executive Order S-03-05. However, at this time, there is no plan past 2030 that achieves the long-term GHG reduction goal established under Executive Order S-03-05. As identified by the California Council on Science and Technology, the State cannot meet the 2050 goal without major advancements in technology (CCCC 2012). Advancement in technology in the future could provide additional reductions to allow the State and town to meet the 2050 goal; however, no additional statewide measures are currently available. Therefore, this impact would be **significant and unavoidable**. (Draft EIR, pp. 4.7-16 through 4.7-22.)

MM GHG-1: The town of Colma shall update the Climate Action Plan (CAP) every five years to ensure the town is monitoring the plan's progress toward achieving the town's greenhouse gas (GHG) reduction target and to require amendment if the plan is not achieving a specified level. The update shall consider a trajectory consistent with the GHG emissions reduction goal established under Executive Order S-03-05 for year 2050 and the latest applicable statewide legislative GHG emission reduction that may be in effect at the time of the CAP update (e.g., Senate Bill 32 for year 2030). The CAP update shall include the following:

- GHG inventories of existing and forecast year GHG levels.
- Tools and strategies for reducing GHG emissions to ensure a trajectory with the long-term GHG reduction goal of Executive Order S-03-05.
- Plan implementation guidance that includes, at minimum, the following components consistent with the proposed CAP:
 - Administration and staffing
 - Finance and budgeting
 - Timelines for measure implementation
 - Community outreach and education
 - Monitoring, reporting, and adaptive management
 - Tracking tools

D. TRIBAL CULTURAL RESOURCES

1. Tribal Cultural Resources

Threshold: Would the Project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k); or (ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code section 5024.1?

Finding: Significant and unavoidable. (Draft EIR, p. 4.4-27.)

Explanation: Records searches completed by ASM for the town (ASM Affiliates 2020) from the NAHC and NWIC report no known TCRs within the town's Planning Area. The Town has sent information request letters to contacts provided by the NAHC; however, no responses have been received to date. Though there are no reported TCRs within the Planning Area, Native American tribes were distributed across the San Francisco Peninsula region, and there is a possibility that unknown TCRs exist within the area.

Proposed General Plan Update Policies

Policy OSC-6-2: Tribal Consultation Compliance. Comply with SB 18, AB 52, and other applicable State and federal laws by consulting with local California Native American tribes prior to development decisions or General Plan or Specific Plan amendments. Respect tribal policies regarding confidentiality of information about tribal resources or sacred sites.

In addition to the policies listed above, GPU Policy OSC-6-1 also addresses potential disturbances of TCRs.

While the Project does not specifically propose demolition or substantial alteration of a resource or ground-disturbing activities such as grading or excavation, it can be assumed that future development consistent with the goals and policies of the Project have the potential to result in significant direct and/or indirect impacts to TCRs. Therefore there is the potential that previously undiscovered TCRs may exist within the Planning Area and as such it can be assumed that future development consistent with the goals and policies of the Project have the potential to result in significant direct and/or indirect impacts to . Therefore, this is a **significant and unavoidable impact** and the following mitigation measures should be included:

MM CUL-3

1. For any project with potential to result in adverse impacts to TCRs, the Town shall avoid and/or minimize impacts by facilitating the identification of tribal cultural resources through field studies. Coordination and collaboration regarding the resource shall be completed with agencies, tribes, and institutions, such as the Northwest Information Center, the Native American Heritage Commission, and local tribal governments, including consultation as outlined in Senate Bill 18 and Assembly Bill 52. The resource shall be treated with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: (A) Protecting the cultural character and integrity of the resource; (B) Protecting the traditional use of the resource; and (C) Protecting the confidentiality of the resource.

2. If possible, the Town shall avoid and preserve the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context.

3. Greenspace, parks, or other open space shall use appropriate planning to incorporate the resources with culturally appropriate protection and management criteria. Permanent conservation easements or other interests in real property shall be created with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places. (Draft EIR, pp. 4.4-27 through 4.4-28.)

SECTION V. **CUMULATIVE IMPACTS**

Regarding the Project's potential to result in cumulative impacts, the City hereby finds as follows:

A. AESTHETICS

The Project has the potential to change the visual character of the town. Since the town of Colma is mostly built out, future development or addition of new residential and commercial uses, even under cumulative circumstances, would be located on infill sites, underutilized sites, or redevelopment of existing sites. While such structures could impact views from surrounding jurisdictions, overall impacts related to aesthetics would be minimal and limited in a cumulative context.

Although the Project anticipates additional housing and commercial uses over the 20-year General Plan horizon, as mentioned, all future development is anticipated to be developed on vacant or underutilized sites within the town limits. Since the town is limited to infill and redevelopment growth for future residential, commercial or office uses, compact development near the center of town is encouraged and would protect the existing visual character of the town while not visually impacting existing cemetery and open space uses. Infill development would be encouraged so as to be aesthetically pleasing as well as compatible to surrounding land uses, particularly in the central area of the town of Colma. This would, in turn, assist in creating minimal aesthetic contrasts with the existing uses in terms of scale, color, form or overall visual character of the area. Further, though new infill development and redevelopment projects may result in taller or larger buildings than what currently exists in the town, the Project's policies has the potential to reduce any impacts and ensure compatible development.

Implementation of the proposed Project would result in new infill development or redevelopment of existing properties that may add to the potential sources or glare and night-time lighting. These new development areas could result in new light sources which intensifies daytime glare and nighttime lighting levels. However, the Project contains numerous polices related to the protection of aesthetic resources in the Planning Area and future projects would have to be consistent with the 2040 General Plan's policies and minimize effects for light and glare.

Therefore, the impact to aesthetics would be **less than cumulatively considerable**. (Draft EIR, p. 5.0-6.)

B. AGRICULTURE AND FORESTRY RESOURCES

The town of Colma is a small community recognized for its large expanses of cemetery land. Prior to the town's cemetery development, the town of Colma was used for agricultural production, primarily providing produce to the growing City of San Francisco. Agricultural uses were generally limited to small-scale farms and greenhouse activities. The town of Colma and the surrounding area are urbanized and has one zoning designation for memorial park, agriculture, and recreation. The town does not have areas zoned as forest land or timberland, or timberland zoned as Timberland Production. According to the Farmland Mapping and Monitoring Program of the California Resources Agency, the town of Colma is designated as Urban and Built Up. No land in the town is designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Urban and Built-Up Land is defined as "occupied by structures with a building density

of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. The major components of the total open space resource in the town of Colma (about 75% of the total land area) is land owned by cemeteries that is used for memorial parks, agriculture or general open space. The largest landholding of land that is not in use for cemetery use is owned by the Archdiocese of San Francisco. The land is located east of Hillside Boulevard and is primarily used for several wholesale nurseries, in-ground agriculture and landscape contractors. The town of Colma does not encompass any Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, or timberland. (Draft EIR, p. 5.0-4.) Thus, there would be **no cumulative impact**.

C. AIR QUALITY

Emissions of pollutants are not confined to the town's boundaries but are dispersed throughout and accounted for by air basin. Therefore, the cumulative area for air quality impacts is the San Francisco Bay Area Air Basin (SFBAAB). California is divided into air basins for the purpose of managing the air resources of the state based on meteorological and geographic conditions. Like greenhouse gas (GHG) emissions impacts, air quality impacts are regional in nature as no single project generates enough emissions that would cause an air basin to be designated as a nonattainment area. Construction emissions generated by cumulative development associated with buildout of the proposed Project could exceed Bay Area Air Quality Management District's (BAAQMD) project-level significance thresholds and would contribute to the nonattainment designations of the SFBAAB. The SFBAAB is currently designated a nonattainment area for California and National O₃, California and National PM_{2.5}, and California PM₁₀ AAQS. However the 2010 Clean Air Plan, prepared by BAAQMD contains numerous control measures that seek to reduce air pollution in the San Francisco Bay Area by promoting, for example, mixed use development, compact development that reduces vehicle emissions, and projects that reduce exposure from stationary and mobile source pollutants.

The Project does contain goals and policies that promote higher density mixed used development as well as ensuring that future development projects would comply with regional efforts to reduce air quality emissions throughout the Bay Area. However, in combination with past, present, and reasonably foreseeable projects elsewhere within the SFBAAB, the proposed Project's contribution to cumulative air quality impacts would result in a **significant and unavoidable** impact. (Draft EIR, pp. 5.06 through 5.07.)

D. BIOLOGICAL RESOURCES

The cumulative area for impacts to biological resources is the Planning Area as well as surrounding jurisdictions. On a cumulative level, the change in land uses can potentially contribute to a loss of potential habitat for special-status species that currently inhabit the area or could inhabit the area in the future. In addition to potential direct impacts on biological resources from project implementation, the increased human presence can cause potential indirect impacts that could result in direct mortality, habitat loss, deterioration of habitat suitability, and avoidance of habitat. The wildlife species associated with each habitat will likely be affected as well.

However, with the majority of the land reserved for cemetery uses, the town is generally built out. The majority of new development will come from in-fill sites or redevelopment of underutilized sites and would not occur within any potential biological features or habitat located

within the town. In addition, the Conservation and Natural Resources Element of the General Plan establishes policies and programs to protect and conserve special status species and their habitat. Therefore, the Project would have a **less than cumulatively considerable impact** on biological resources. (Draft EIR, p. 5.0-7.)

E. CULTURAL RESOURCES

Historical Resources

The cumulative area for impacts to cultural and tribal resources is the Planning Area as well as surrounding jurisdictions. Therefore, the Planning Area and the surrounding areas of San Mateo County as a whole must be considered for the purpose of evaluating land use conversion issues associated with cultural and tribal resources on a cumulative level. The jurisdictional boundaries of the town form the geographic context in which to analyze cumulative impacts to historical resources. Compliance with the goals and policies in the town's GPU related to historical resources will be necessary for its implementation. **Mitigation Measures CUL-1** and **CUL-2** will apply to historical resources inadvertently discovered during construction activities. Future development projects will have to demonstrate that the project includes adequate measures to mitigate potentially significant impacts to historical resources in accordance with CEQA, and the preservation of resources outlined in the town's GPU, thereby reducing cumulative impacts of historical resources to a less than significant level. Therefore, the proposed Project would have a **less than cumulatively considerable** impact to historical resources.

Archaeological Resources

The San Francisco Bay Area provides the geographic context for the cumulative impacts analysis of archaeological resources. Though evidence of human occupation exists throughout the San Francisco Peninsula region, there are no known archaeological sites within ¼ mi. of the GPU project area. Throughout this region, many archaeological sites do exist that contain artifacts and features of value in reconstructing cultural patterns of early indigenous people. Construction activities associated with implementation of the GPU and future development projects have the potential to impact unknown archaeological resources and may present a significant cumulative impact to those resources. However, **Mitigation Measures CUL-1** and **CUL-3** would apply to archaeological resources inadvertently discovered during construction activities and would reduce potential impacts to a less than significant level. Therefore, implementation of the proposed Project would have a **less than cumulatively considerable** impact to archaeological resources.

Human Remains

The San Francisco Bay region provides the geographic context for cumulative impacts analysis of human remains. The numerous archaeological sites in the San Francisco Bay region indicate that prehistoric early human occupation occurred throughout. Additionally, historic-era occupation of the area increases the possibility that humans could be interred outside formal cemeteries. Cumulative development projects could encounter unknown, interred human remains during construction activities, which would result in a significant cumulative impact. Unidentified human remains, whether as part of a prehistoric burial, an archaeological site, or an isolated occurrence, could be present below the ground surface. **Mitigation Measures CUL-1** and **CUL-4**, which include compliance with Health and Safety Code Section 7050.5 and PRC Section 5097.98, apply to the identification of human remains inadvertently discovered during construction activities. These measures would provide an opportunity to minimize disturbance and appropriately treat human remains discovered. These measures would reduce the impacts of inadvertent discoveries of human remains to a less than significant level. Therefore, the proposed Project would have a

less than cumulatively considerable impact to human remains. (Draft EIR, pp. 5.0-7 through 5.0-8.)

F. ENERGY

The California Energy Commission oversees the achievement of the State's ambitious climate and energy goals and ensures that the State's energy systems remain accessible, reliable, safe and affordable through planning and policy implementation. Therefore, the cumulative area of analysis for energy impacts is the State of California.

The implementation of the Project could result in the addition of 765 people, 328 housing units and 1,028,500 square feet of commercial and office developments. The addition of population and buildings has the potential to have an adverse impact on the environment by using more energy. However, California is transitioning its electricity system to one that relies increasingly on clean energy sources and increasing energy efficiency through building code updates. The 2019 Building Energy Efficiency Standards improve upon the 2016 Energy Standards for new construction of, and additions and alterations to, residential and nonresidential buildings. In addition, the population and anticipated growth in the town of Colma is small in comparison to the growth in San Mateo County and the state of California. Therefore, the impact to energy is **less than cumulatively considerable**. (Draft EIR, pp. 5.0-8 through 5.0-9.)

G. GEOLOGY AND SOILS

The cumulative area for geology impacts is the Planning Area as well as surrounding jurisdictions. Potential infill projects within the town and any future development projects with the Bay Area has the potential to bring additional people and structures to this area. There is always a chance that a fault located anywhere in the cumulative area could rupture and impact the town. The relative risk to safety from potential ground shaking within San Mateo County varies by location, geologic conditions and the source of the triggering event. Additionally, construction, grading, excavation, removal of vegetation and loading activities could temporarily increase runoff, erosion, and sedimentation.

While cumulative impacts to geology and soils may occur in the region as individual projects are constructed, the town's General Plan policies and programs, along with state and federal regulations, reduce the risk to people in the region. Considering the programs and policies from the proposed Project and state and federal regulations, the overall impact of the proposed Project to geology and soils would be less than significant and the project's cumulative contribution to geology and soils impacts would be **less than cumulatively considerable**. (Draft EIR, p. 5.0-9.)

H. GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions (GHG emissions) have the potential to adversely affect the environment because, on a cumulative basis, they contribute to global climate change. In turn, global climate change has the potential to result in rising sea levels, which can inundate low-lying areas; affect rain and snow fall, leading to changes in water supply; and affect habitat, leading to adverse effects on biological and other resources. Since GHG emissions come from many

different sources in both current and expected future activities in a growing community, identification and reduction of GHG emissions is an important consideration in long-range planning efforts.

The town of Colma has updated its Climate Action Plan (CAP) so as to strive for reductions in GHGs over the 20 year horizon of the 2040 GPU. The town's updated CAP provides guidance to the town's future development/redevelopment and includes guidance for new development so as to attempt to reduce any future project's contribution to climate change. Implementation of the proposed Project would result in a small, 1 percent increase in GHG emissions in horizon year 2040 from existing baseline and would not meet the long-term GHG reduction goal under Executive Order S-03-05. Implementation of **Mitigation Measure GHG-1** would ensure that the town is tracking and monitoring the town's GHG emissions in order to chart a trajectory to achieve the long-term year 2050 GHG reduction goal set by Executive Order S-03-05. It should be noted though that no one single emitter of GHGs is solely capable of triggering global climate change on its own. Therefore, the incremental addition to cumulative global GHG impacts of the proposed 2040 GPU buildout would be **significant and unavoidable**. (Draft EIR, p. 5.0-9.)

I. HAZARDOUS AND HAZARDOUS MATERIALS

The land use policies in the proposed Project would provide direction for growth within the town limits, while the San Mateo County General Plan policies provides direction for growth outside the town limits, but within the Planning Area boundaries. Thus, the cumulative area for hazard impacts is the Planning Area as well as surrounding jurisdictions.

Development in the region identified in Section 4.0 of the Draft EIR would change the intensity of land uses in the town. In particular, the implementation of the Project would provide additional housing, employment, shopping, and recreational opportunities. Growth in the town could lead to increased noise, risk of flooding, risk of fire, and transport of hazardous materials on the state highways and interstates as well as that also serve the town. In addition, development elsewhere in the region could have a greater effect on the transport and accidental release of hazardous materials.

However, considering the town's General Plan Update policies and programs, and state and federal regulations to reduce impacts related to hazards and the transport of hazardous materials, the overall impact would be less than significant and the project's contribution to cumulative hazards and human health impacts would be **less than cumulatively considerable**. (Draft EIR, p. 5.0-10.)

J. HYDROLOGY AND WATER QUALITY

All of the surface drainage in the town of Colma's boundaries ultimately flows into Colma Creek, through the city of South San Francisco, and out into the San Francisco Bay. Therefore, the cumulative area of hydrology impacts is the Colma Creek watershed and San Francisco Bay. While the town of Colma is limited in its land area for future development, future development is anticipated to utilize infill and underutilized sites at higher densities and intensities for both residential and commercial projects. The implementation of the Project may also increase construction that results in runoff and the introduction of additional pollutants to runoff. These

future development/redevelopment projects have the potential to impact groundwater recharge, impact water quality and alter drainage patterns, among others. However, future developments are required to include stormwater treatment measures that would retain and treat runoff if 5,000 square feet or greater, of land area is affected. This improves water quality by removing pollutants, allows for ground water recharge opportunities on developed sites and mitigates the impact of development on vacant sites. In addition, any future development/redevelopment project in the town would be required by the San Mateo Countywide Water Pollution Prevention Program (SMCWPP) to comply with the NPDES Stormwater Discharge Permit, all local stormwater permit requirements. Compliance with water quality regulations, including the implementation of best management practices at construction sites would prevent erosion and tracking would mitigate construction runoff impacts. Therefore, impacts to hydrology would be **less than cumulatively considerable**. (Draft EIR, p. 5.0-10.)

K. LAND USE AND PLANNING

The cumulative area for land use impacts is the Planning Area as well as surrounding jurisdictions. Typically, a cumulative impact on land use may result from projects that would destroy an established community by the construction of new roadways, highways or infrastructure, or plans and policies (in the cumulative context) that would conflict with existing plans at a cumulative level. While the Project would increase land use intensities within the town and anticipated adding more residences and businesses within the town boundaries by 2040, the Project itself does not propose any specific developments. GPU policies ensure that new developments and redevelopment projects would be designed to be compatible in use and character, are compatible with existing neighborhoods, and comply with zoning regulations. In addition GPU policies ensure that the developments are compatible with other adopted land use plans and regulations. Therefore, the cumulative impacts to land use are **less than cumulatively considerable**. (Draft EIR, p. 5.0-10.)

L. MINERAL RESOURCES

The State Division of Mines and Geology has not classified or designated any areas in the town of Colma as containing regionally significant mineral resources. Therefore there would be **no cumulative impacts** to Mineral Resources from the proposed Project. (Draft EIR, p. 5.0-5.)

M. NOISE

Ambient noise levels within the town of Colma and its surrounding cities and counties have the potential to increase temporarily due to the construction of new development. Thus, the cumulative area for noise impacts is the Planning Area as well as surrounding jurisdictions.

Construction noise impacts typically result from noise generated by the operation of heavy equipment on a project site, as well as from trucks arriving to and departing from the site, which would be an intermittent source of noise. Typical project construction activities normally include demolition, grading/excavation, installation of utilities, and erection of the building. Equipment used in these activities typically include bulldozers, excavators, graders, backhoes, concrete trucks, loaders, and heavy-duty trucks.

Implementation of the Project has the potential to result in a number of future developments and redevelopment within the Planning Area. Construction within the Planning Area as well in those jurisdictions around the town, has the potential to expose people and buildings to high levels of ground-borne vibration. Although vibration levels from construction activities rarely reach the level of causing building damage, construction-related vibration has the potential to cause annoyance at nearby sensitive receivers. The effects of construction vibration vary depending on the intensity of the construction activities, local soil type, and distance to/land use type of nearby receptors. Construction vibration impacts would occur from the operation of heavy equipment on a project site. In general, site work and demolition activities typically generate the highest levels of vibration throughout a construction project.

However, it should be noted that the town is primarily built out and future development would be limited to infill sites or as redevelopment on developed but underutilized sites. Buildout of the Project, in relation to cumulative buildout in the areas surrounding the town would not result in substantial increase in noise levels. Therefore, cumulative noise impacts associated with the Project are **less than cumulatively considerable**. (Draft EIR, p. 5.0-11.)

N. POPULATION AND HOUSING

The cumulative area for population and housing impacts is the Planning Area as well as surrounding jurisdictions. The Project would increase land use intensities within the town and would add more residences within the town boundaries by 2040. Given that population and housing impacts are cumulative in nature, and that residents do not always work where they live in the regional area, the general region surrounding the town, including all of San Mateo County and parts of the city and county of San Francisco, Santa Clara County, and Alameda County must be considered when evaluating cumulative land use impacts. Population growth is not, in itself, an environmental impact; however, the direct and indirect effects related to population growth can lead to physical environmental effects.

While the GPU has the potential to increase the intensity of land uses in the town and increase the potential growth of the town, the Project in itself are not expected to induce substantial population growth in a cumulative context. GPU policies also encourage mixed use developments and developments around transit-oriented corridors, mitigating some of the impacts of growth. In addition, GPU policies ensure that land uses are compatible with each other and are consistent with zoning, resulting in compatible communities. Therefore, the cumulative impacts to population growth are **less than cumulatively considerable**. (Draft EIR, p. 5.0-11.)

O. PUBLIC SERVICES

The cumulative area for impacts to public services is the Planning Area as well as surrounding jurisdictions. The Project has the potential add 765 people, 328 housing units and 1,028,500 square feet of commercial and office developments, that may require more public resources. The town estimated that two additional police officers would be required under the Project; the number of firefighters is more difficult to estimate since the town operates solely on volunteer fire fighting resources. The town's existing fire protection and emergency medical services, and police services, primarily serve the town but people outside of the town could also use those resources, therefore the project area and the surrounding areas of unincorporated San Mateo County, Daly City, and South San Francisco should be considered for the purpose of evaluating impacts related to public services.

In regard to fire protection, police and emergency medical services, the proposed Project does not identify the location of any new stations within the town's boundaries to expand existing services. Should the future residential and commercial uses in the town of Colma require additional fire protection, police, or medical services, these would be addressed in the appropriate project-level environmental document prepared at that time.

Any increases in the town's future population could increase the use of existing neighborhood and regional parks and recreational facilities. Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town is however committed to providing public park and recreation facilities that meet the needs of its residents. This commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law.

While the potential growth at buildout would impact existing resources and services, policies in the proposed Project would ensure that public services are funded to continue to provide services to the town. Therefore, the cumulative impact to Public Services is **less than cumulatively considerable**. (Draft EIR, p. 5.0-12.)

P. RECREATION

The cumulative area for impacts to recreation is the Planning Area as well as surrounding jurisdictions. The Project has the potential add 765 people, 328 housing units and 1,028,500 square feet of commercial and office developments, that may require more public resources. The town's existing recreation services primarily serve the town but people outside of the town could also use those resources, therefore the project area and the surrounding areas of unincorporated San Mateo County, Daly City, and South San Francisco should be considered for the purpose of evaluating impacts related to recreation.

Any increases in the town's future population could increase the use of existing neighborhood and regional parks and recreational facilities. Since the town is limited on space to add new public park and/or recreational facilities, the creation of such additional recreational facilities would be a challenge to the town. The town is however committed to providing public park and recreation

facilities that meet the needs of its residents. This commitment may require the town to creatively utilize its existing facilities or to enter into development agreements with neighboring jurisdictions to allow for the creation and maintenance of walkways, trails and bike facilities. The construction (or expansion of existing recreational facilities) would be subject to its own environmental review pursuant to CEQA and State law.

While the potential growth at buildout would impact existing resources and services, policies in the proposed Project would ensure that public services are funded to continue to provide services to the town. Therefore, the cumulative impact to Recreation is **less than cumulatively considerable**. (Draft EIR, p. 5.0-12.)

Q. TRANSPORTATION

The transportation analysis assesses impacts between No Project (Current General Plan) and Cumulative (2040) Plus Plan (Proposed General Plan Update) to determine if the implementation of the GPU would result in a cumulative increase in VMT and congestion. In addition, impacts to emergency access are reviewed on the same level. Therefore, the cumulative area for transportation impacts is the regional transportation system.

The implementation of the Project would increase VMT per person and congestion over No Project Conditions. However, implementation of GPU policies would mitigate the impacts to these areas and therefore, impacts to transportation are **less than cumulatively considerable**. (Draft EIR, p. 5.0-12.)

R. TRIBAL CULTURAL RESOURCES

The San Francisco Bay region provides the geographic context for the cumulative impacts analysis to Tribal Cultural Resources (TCRs). Impacts would be cumulative if the project, in combination with cumulative development, contributed to the permanent loss of TCRs on a regional scale. The cumulative context for TCRs is the ancestral land affiliated with the Ohlone or Costanoan group of Native Americans.

The Project includes goals and policies for preserving and protecting TCRs. Specifically, these measures include requesting information and tribal contacts from the NAHC, as well as outreach and consultation. Compliance with the goals and policies in the Project related to TCRs will be necessary for its implementation and to demonstrate that the project includes adequate measures to mitigate potentially significant impacts to resources in accordance with CEQA and AB 52. **Mitigation Measures CUL-1 and CUL-3** will apply to the identification of tribal cultural resources inadvertently discovered during construction activities. Following the town's request for information from tribal representatives with regard to the GPU, there are no known TCRs within the GPU Planning Area, and thus a direct affect to known TCRs would not occur; however, past development within the regional San Francisco Bay tribal affiliated areas has caused undeveloped land to convert to urban land uses over time, thereby changing the landscape and context in which TCRs exist and resulting in their overall reduction. Future development of currently undeveloped land could contribute to further reduction of unknown or previously unrecorded TCRs in the San Francisco Bay region and cumulative effects could be **cumulatively significant and unavoidable**. (Draft EIR, p. 5.0-8.)

S. UTILITIES AND SERVICE SYSTEMS

Under buildout conditions, additional development allowed by the proposed Project would increase demand for water, wastewater conveyance, solid waste disposal, energy and telecommunications facilities. Each utility covers different areas and therefore varies in terms of area of cumulative impact. Therefore, the cumulative area for impacts to utilities is the service areas of the Cal Water South San Francisco Bayshore Water District (water supply), North San Mateo County Sanitation District Treatment Plant and South San Francisco Water Quality Control Plant (wastewater treatment), Pacific Gas and Electric and Peninsula Clean Energy (energy) and Ox Mountain Landfill.

The increased development and population allowed by the proposed Project would increase the demand of each resource and impact each of the utilities. However, proposed GPU policies are included to ensure that utility supplies are adequate and have a mechanism for expansion when needed. Therefore, the impacts to utilities are **less than cumulatively considerable**. (Draft EIR, p. 5.0-13.)

T. WILDFIRE

The town is built out and does not include any fire hazard severity zones within the boundaries. However, directly east of the town boundaries, lands that include San Bruno Mountain are classified as very high fire hazard severity zones. Therefore, the cumulative area for wildfire impacts is the Planning Area as well as surrounding jurisdictions.

Future developments would only nominally increase the demand for fire protection in the town due to the small geography of the planning area, the fact that there is no fire hazard severity zone in the town, and the regulations that new development and redevelopment projects are required to meet. Therefore, the impacts to wildfires are **less than cumulatively considerable**. (Draft EIR, p. 5.0-13.)

SECTION VI.
FINDINGS REGARDING SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Sections 15126(c) and 15126.2(c) of the CEQA Guidelines, require that an EIR address any significant irreversible environmental changes that would occur should the project be implemented. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources is not justified.

An irreversible commitment of non-renewable natural resources is inherent in any development project(s), or in the case of the Project here (General Plan Update), several development projects over a long period of time. The potential future development associated with implementation of the Project would consume limited, slowly renewable and non-renewable resources. Such resources used for future construction projects would include, but are not limited to, lumber and other related forest products; sand and gravel; native topsoil; a variety of metals used in the manufacture of building materials such as steel, copper piping and wiring; and hydrocarbon-based fuel sources that require extraction and chemical alteration and/or combustion of natural resources such as oil, natural gas, coal, and shale. As such, future construction activities related to implementation of the Project would result in the short-term, yet irretrievable, commitment of nonrenewable energy resources.

Resources that would be continually consumed with implementation of the Project include water, electricity, natural gas, and fossil fuels. However, the amount and rate of consumption of these resources would not result in the inefficient or wasteful use of such resources. With respect to operational activities, compliance with all applicable building codes, as well as the town's General Plan policies and standard conservation features, would ensure that natural resources are conserved to the maximum extent possible. Although nominal, the energy requirements associated with implementation of the Project would, nonetheless, represent a long-term commitment of non-renewable resources.

Given the above, potential future development associated with the Project would result in the short- and long-term commitment of limited, slowly renewable, and nonrenewable resources, which would limit the availability of these particular resource quantities for future generations or for other uses through and potentially after the planning horizon. However, continued use of such resources would be nominal and would not conflict with the town's growth forecasts. Therefore, although irreversible changes would result from implementation of the Project, such changes would not be considered significant.

SECTION VII.
GROWTH-INDUCING IMPACTS

Section 15126.2(e) of the State CEQA Guidelines requires a Draft EIR to discuss the ways the Project could foster economic or population growth or the construction of additional housing, directly or indirectly, in the surrounding environment. In accordance with State CEQA Guidelines Section 15126.2(e), a Project would be considered to have a growth-inducing effect if it would:

- Directly or indirectly foster economic or population growth, or the construction of additional housing in the surrounding environment;
- Remove obstacles to population growth (e.g., construction of an infrastructure expansion to allow for more construction in service areas);
- Tax existing community service facilities, requiring the construction of new facilities that could cause significant environmental effects; or
- Encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively.

In addition, CEQA Guidelines that that growth inducement must not be assumed.

Based on Government Code Section 65300, the proposed Project is intended to serve as the overall plan for the physical development of the town of Colma. While the Project does not specifically propose any development/redevelopment projects, it does regulate future population and economic growth of the town that could lead to indirect growth-inducing effects. Since the Draft EIR discusses the environmental effects associated with the implementation of the proposed Project, the environmental effects of growth, especially on lands beyond the town's proposed Planning Area could be similar to those associated with the proposed Project evaluated in Sections 4.1 through 4.16 of the Draft EIR. (Draft EIR, p. 5.0-2.) Implementation of the Project could refine existing land use designations in the town as it establishes new policies to direct and manage future development. In addition, the Project could induce further population growth and job expansion in the town of Colma, as well as indirectly inducing growth if it were to remove an obstacle to additional growth and development, such as removing a constraint on a required public service, such as sewer service. (Draft EIR, p. 5.0-1.)

SECTION VIII. **ALTERNATIVES**

A. BACKGROUND

The Draft EIR analyzed two alternatives to the Project as proposed and evaluated these alternatives for their ability to avoid or reduce the Project's significant environmental effects while also meeting the majority of the Project's objectives. The Town finds that it has considered and rejected as infeasible the alternatives identified in the EIR and described below. This section sets forth the potential alternatives to the Project analyzed in the EIR and evaluates them in light of the Project objectives, as required by CEQA.

Where significant impacts are identified, section 15126.6 of the State CEQA Guidelines requires EIRs to consider and discuss alternatives to the proposed actions. Subsection (a) states:

- (a) An EIR shall describe a range of reasonable alternatives to the 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, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Subsection 15126.6(b) states the purpose of the alternatives analysis:

- (b) Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.

In subsection 15126.6(c), the State CEQA Guidelines describe the selection process for a range of reasonable alternatives:

- (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the Project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

The range of alternatives required is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed Project. Alternatives are limited to ones that would avoid or substantially lessen any of the significant effects of the Project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the Project.

B. PROJECT OBJECTIVES

The following objectives have been established for the Project (Draft EIR, p. 3.0-6):

1. To enable the community to agree on long- and short-term policies related to each of the elements encompassed within the General Plan;

2. To establish a vision for the physical nature of Colma in the future and set the tone for the corresponding land use and related policies required to advance this vision; and
3. Outline a long-range vision that reflects the aspirations of the community;
4. Establish goals and policies to guide development and conservation decisions by the City Council, and Town staff;
5. Provide a basis for determining whether specific development proposals and public projects are in harmony with the Town's long-range vision;
6. Allow City departments, other public agencies, and private developers to design projects that enhance the character of the community, promote public health, preserve environmental resources, and minimize hazards;
7. Provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Zoning Ordinance, subdivision regulations, and the Capital Improvement Program.

C. ALTERNATIVES CONSIDERED BUT REJECTED FROM DETAILED ANALYSIS

Section 15126.6(c) of the State CEQA Guidelines specifies that an EIR should (1) identify alternatives that were considered by the lead agency but were eliminated from detailed consideration because they were determined to be infeasible during the scoping process; and (2) briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives; (ii) infeasibility; and/or (iii) inability to avoid significant environmental impacts.

The following alternatives were considered but rejected as part of the environmental analysis for the Project:

- Off-Site Alternative (Draft EIR, p. 6.0-5.)

Finding: The City Council rejects the Off-Site Alternative, on the following ground, which provides sufficient justification for rejection of this alternative: (1) the alternative is technically, financially, and legally infeasible given that it would not be pertinent or possible to consider an off-site alternative since that would need to include a long-range plan for the Town; the project site (town of Colma) cannot be relocated since the Town's boundaries are already established; and any off-site alternative that considers another location would not meet the basic project objectives and future development for the Town. Therefore, this alternative is eliminated from further consideration.

D. EVALUATION OF ALTERNATIVES SELECTED FOR ANALYSIS

The alternatives selected for further detailed review within the EIR focus on alternatives that could the Project's significant environmental impacts, while still meeting most of the basic Project objectives. Those alternatives include:

- **Alternative 1: No Project Alternative (Draft EIR, p. 6.0-1.)**
- **Alternative 2: Residential Focused Alternative (Draft EIR, p. 6.0-1.)**

1. **Alternative 1: No Project Alternative**

Description: The No Project analysis discusses both the existing conditions at the time the NOP is published as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved. Therefore under Alternative 1, the Town would continue to implement the current (1999) General Plan, with no Climate Action Plan (CAP) in effect and with no changes made to update any of the Land Use, Open Space, Conservation, Noise, Circulation and Historical Resources Elements or the Land Use Map. It assumes that the existing General Plan would continue to guide development in the Planning Area, without directly resulting in new development. In the case of this alternative, the proposed 2040 General Plan Update would not be approved and the existing 1999 Town of Colma General Plan, would continue as the primary guiding document for growth and development within the town. (Draft EIR, p. 6.0-2.)

The 1999 General Plan Planning Area includes a total of 1225 acres and is the same as the town boundary and its sphere of influence (SOI). Buildout of the existing 1999 General Plan or No Project Alternative would result in approximately 680 housing units, a population of 2,310, and a total of 4,315 jobs within the Planning Area, expected to occur by year 2040 (See **Table 6.0-1: Comparison of Alternatives at Buildout of the Draft EIR**). In comparison, the proposed 2040 General Plan Update would increase the population to approximately 2,854 and housing units to 845. In relation to the proposed 2040 GPU, the No Project Alternative:

- Has different land uses— both in mix and location;
- Has lower allowable land use densities/intensities;
- Prohibits residential development in various commercially zoned areas;
- Does not promote mixed-use development to the same extent as in the Proposed Project;
- Does not have a Medium Density Residential land use designation. Medium Density land uses such as multifamily developments are allowed on properties with a Commercial designation;
- Has reduced alternate modes of transportation.

Impacts:

AESTHETICS

The No Project Alternative would result in less development compared to the proposed Project. Therefore, this alternative will lead to fewer obstructions to views, fewer sources of light and glare, and less construction activity. Therefore, while the No Project Alternative would result in less development than that under the proposed Project, it would potentially result in lower quality design or have other aesthetic-related impacts. This has the potential to result in greater impacts under the No Project Alternative than under the proposed Project. (Draft EIR, p. 6.0-6.)

AIR QUALITY

The air quality impacts between the proposed Project and the No Project Alternative would be similar and the degree of the impact is related to the amount of development and

population at buildout. Air quality impacts to current as well as future businesses and residences under the No Project Alternative would be similar to those under the proposed Project, but less than the proposed Project. (Draft EIR, p. 6.0-6.)

BIOLOGICAL RESOURCES

While the Planning Area is mainly developed with urban uses, there are small areas of diversified wildlife population within the town. Since the town of Colma is located along the Pacific Flyway, migratory birds are often found in the town's open spaces related to cemetery uses. The No Project Alternative would focus future development on the few vacant and underutilized parcels that exist within the town of Colma. The No Project Alternative would result in less development than the proposed Project and has the potential to have less impacts to biological resources within the town. (Draft EIR, p. 6.0-6.)

CULTURAL AND TRIBAL RESOURCES

Cultural resources include buildings of historical importance, registered historic sites, and archaeological resources and tribal resources include site features, places, cultural landscapes, sacred places, or objects that are of value to a tribe and is either on or eligible for the California Historic Register or local historic register. A previously completed cultural resource studies and the town's previous Historical Resources Element (1999) shows that no previously recorded archaeological resources, Cultural and Tribal resources or Native American remains are currently within the town limits. The town does have many historical resources (primarily in cemeteries) eligible for designation on the National Register. However, future ground disturbing activities associated with construction excavation under the proposed Project, as well as the No Project alternative, could uncover unknown resources, and the potential impacts to cultural and tribal resources would depend on the location and amount of any future development. Since the No Project Alternative proposes less development than the proposed Project, it would have a less potential to impact cultural and tribal resources. (Draft EIR, p. 6.0-7.)

ENERGY

The No Project Alternative would increase the amount of development and population in town, which in turn would increase the demand for energy use under varying degrees. Compared to the No Project Alternative, the proposed Project proposes more potential development and has the most potential to increase the population and demand for energy use and thus could have an adverse impact on the environment. Construction of future development, or even redevelopment projects has the potential to consume gasoline and diesel during the operation of heavy-duty construction equipment and vehicles. However, these would-be temporary consumption of energy, only related to project construction under future development projects. Moreover the 2040 GPU policies promote energy efficiency which reduces the amount of energy used per capita, and future development/redevelopment under the proposed Project (2040 GPU). The proposed Project would also have to conform to the State of California's AB 32 Scoping Plan (for Greenhouse Gas emissions) and the Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6) and CALgreen Code (Title 24, Part 11).

Therefore, the comparative energy and power use under the proposed Project would be lower than under the No Project Alternative conditions.

While the No Project alternative may use less electricity overall, it would likely result in a higher energy use per capita for the reasons above. Since the No Project Alternative does not consider the sustainability plans or programs as under the proposed Project, it would have greater impacts than the proposed Project. (Draft EIR, p. 6.0-7.)

GEOLOGY

The town of Colma is located along the Serra Fault Zone and is approximately less than a mile east from the San Andreas Fault Zone. Therefore, the town has the potential to experience considerable ground shaking and rupture, in the event of an earthquake, particularly within the 2040 GPU's planning horizon. The current state and federal engineering and design regulations that minimize seismic and geologic impacts apply equally to all future development/redevelopments under the proposed Project as well as the No Project Alternative. Since both of these alternatives have the potential to ultimately bring more people and businesses to the area, these future residences and businesses could be potentially exposed to seismic impacts from earthquakes and other geologic risks such as ground shaking and ground failure due to seismic activity, landslides, and soil expansion. Thus, the No Project Alternative and the proposed Project have the potential to expose people and businesses to seismic risks. The proposed Project has the potential to expose even more people to such risks since it proposes more residential development, while the No Project Alternative would expose a smaller amount of people and businesses to potential geologic and seismic impacts. (Draft EIR, pp. 6.0-7 through 6.0-8.) Impacts would be less under the No Project Alternative.

GREENHOUSE GAS EMISSIONS

According to the town's Greenhouse Gas (GHG) Emissions Inventories, the majority of the town's GHG emissions come from transportation and energy use. Most of the on-road vehicles used for transportation burn fossil fuels such as gasoline or diesel which results in GHG emissions. Electric vehicles do not burn fossil fuels but GHGs may be emitted elsewhere, depending on the electric power source.. Most of the customers in town utilize 100% carbon-free electricity procured by Peninsula Clean Energy. Natural gas consumption is the main contributor to GHG emissions from energy use.

The No Project Alternative would result in less development and overall population growth, and therefore, less demand for energy use and transportation. However, the No Project alternative would likely result in more emissions per person without updated policies or the town's compliance with the 2030 Climate Action Plan than would apply to the proposed Project. Since the No Project Alternative would not have the same, if any, energy saving and conservation measures as those under the proposed Project, its impacts to GHG is greater than those under the proposed Project. (Draft EIR, p. 6.0-8.)

HAZARDOUS MATERIALS

The proposed Project anticipates that both infill and underutilized sites in the town would be developed, though with varying degrees of residential and commercial uses. While the

proposed Project may facilitate more development than the No Project alternative, the town is generally built out and there are few industrial sites within the town boundaries. Future development would be restricted to higher density uses in limited areas of the town; and the proposed project envisions more mixed-use development, particularly more residential development than the No Project Alternative. Such future development has the potential to increase exposure to possible hazardous materials, particularly as the town does have two open hazardous sites within its boundaries, one of which is the closed landfill. In general, impacts with regard to hazardous materials come in the form of development near existing land uses that handle hazardous materials, areas where hazardous materials are stored or transported or by redeveloping contaminated sites. Even though growth in the town under the proposed Project would be greater than that anticipated under the No Project Alternative, any new development/redevelopment activities within the town of Colma would be required to follow the California Hazardous Waste Control Law, the Porter-Cologne Water Quality Act, other legislation as well as the 2040 GPU policies to lessen impacts from hazardous substances. (Draft EIR, p. 6.0-8.) The No Project Alternative would result in less development, and therefore would result in less of an impact to hazardous materials than the proposed Project.

HYDROLOGY

Urban development/redevelopment has the potential to increase impervious surfaces that could lead to increased runoff rates, water pollutants, flooding, and decreased groundwater recharge. Since the proposed Project encourages more future development/redevelopment activities than under the No Project Alternative, these future development efforts would be in infill areas of the town, impacts to the town's hydrology would be limited. Though the No Project Alternative would result in the least amount of future development and therefore impact less amounts of impervious surfaces than the proposed Project, all future construction activities would have to comply with the NPDES stormwater permits. Also, the proposed Project would have to adhere to the 2040 GPU policies that encourage the incorporation of green infrastructure in site designs, manage runoff, and comply with water quality regulations. With green infrastructure, new developments would be designed to capture, treat, and retain runoff while promoting infiltration. Even though the 2040 GPU policies would not be in place to benefit new developments under the No Project Alternative, all new development is still required to comply with green infrastructure requirements. The No Project Alternative would result in less development thereby resulting in less of an overall impact to hydrology and flooding than the proposed Project. (Draft EIR, p. 6.0-9.)

LAND USE AND PLANNING

Generally, the proposed GPU and No Project Alternative are consistent in land use patterns, outside of a few minor land use designation changes. However, the proposed Project, if adopted, would become the Planning Area's new guiding policy document for future land use planning as well as residential and commercial development.

The proposed Project would result in more residential and non-residential development than the No Project Alternative. **Table 6.0-1 of the Draft EIR** shows a comparison of housing units and population at full buildout of the proposed Project and the No Project Alternative. The proposed Project would focus more on infill development and

redevelopment of sites along El Camino Real, in order to encourage additional mixed-use housing opportunities at all income levels, while the No Project Alternative would continue existing trends with housing and commercial development within the town. While both scenarios allow for more development and housing, the proposed Project increases land use intensities and allows for more housing units and population growth. The proposed Project results in 845 housing units compared to 680 in the No Project Alternative at buildout in 2040. The scale of future housing development is far below that under the proposed Project. Therefore, the No Project Alternative has less impacts from future growth and land use planning than the No Project Alternative. (Draft EIR, p. 6.0-9.)

NOISE

The proposed Project would result in increased land use intensity, and potentially more redevelopment of existing properties than under the No Project Alternative. However, the proposed Project and the No Project Alternative would result in similar short-term noise impacts, particularly with short-term construction noise levels and on longer activity days since the type of activities (excavation, removal of site debris, building construction etc.). It should be noted that the duration of construction noise under the No Project Alternative would be different and potentially less than that under the proposed Project since the No Project Alternative would involve less development activities.

Roadway noise is the largest contributor to noise impacts in the town and all three scenarios would increase existing traffic and thus ambient noise levels between now and buildout in 2040. Though these future increase in noise levels within the town are significant and unavoidable due to potential future growth in the town, the No Project Alternative would still result in less impacts than the proposed project. Since the No Project Alternative proposes less development than the proposed project, it will result in less increases in overall operational noise levels in the town than the proposed Project.

The impacts on stationary noise sources for the proposed Project and the No Project Alternative would be similar to each other since the proposed development/redevelopment of the town under any of the alternatives would not be significantly different between the alternatives. Construction activities and equipment used for the No Project Alternative as well as the proposed Project would result in similar vibration impacts. (Draft EIR, pp. 6.0-9 through 6.0-10.)

PUBLIC SERVICES AND RECREATION

Development under the proposed Project and the No Project Alternative would require additional public services and park areas. Other services such as police, fire, and emergency services would be required to be expanded to accommodate additional population growth. While the greatest growth in these services would be from the proposed Project, the impacts of such service expansion would be greater than those for the No Project Alternative. Since the No Project Alternative would have fewer population growth, it would have less impact related to public services and recreation facilities than the proposed Project. (Draft EIR, p. 6.0-10.)

TRANSPORTATION

The proposed project would encourage better connectivity between all means of transportation (such as walking, biking, use of public transportation) and thus increased demand for these services more than the No Project Alternative. Similarly, the proposed Project would have better safety and roadway hazard improvements as well as emergency access components than under the No Project Alternative.

It should be noted that the No Project Alternative only characterizes future buildout under the town's existing 1999 General Plan and does not include any of the local transportation network improvements that would be undertaken under the proposed Project. The proposed Project would significantly generate more home-based VMT than the No Project Alternative, due to the increased projected number of residents in the town and these residents needing to travel further for employment opportunities and other related uses. Since the proposed Project would result in greater development in the town center and the El Camino Real, these would have greater impacts on existing roadway operational deficiencies than the No Project Alternative. (Draft EIR, pp. 6.0-10 through 6.0-11.)

UTILITIES

The proposed Project and the No Project Alternative would require utilities and infrastructure, including water sewer electricity and landfill capacity. The demand on utilities and service systems is contingent on the amount of future growth. The proposed Project proposes similar types of development at buildout and is expected to demand a similar amount of resources from the utilities.

The proposed Project would result in higher population and commercial use, and thus have higher impacts to utility facilities at buildout. The No Project Alternative would result in less development and therefore lower population and jobs at buildout and thus would have less impacts to public utilities such as water, sewer, electricity, and landfill capacity than the proposed Project. (Draft EIR, p. 6.0-11.)

WILDFIRE

Wildfire impacts could affect the town under the proposed Project and No Project Alternative. The town of Colma is limited in its land area for future development which can only be focused on limited residential as well as commercial development/redevelopment on existing sites within the town. As new development occurs and existing structures are replaced with buildings built under more modern building codes, fire safety will increase. Moreover, any new construction would be required to comply with the town's Local Hazard Mitigation Plan as well as any criteria under the County of San Mateo's Emergency Operations Services. Since the proposed Project (2040 GPU) would result in greater residential and commercial activities than under the No Project Alternative, impacts could potentially be greater under the proposed Project than under the No Project Alternative. (Draft EIR, p. 6.0-11.)

Attainment of Project Objectives: The No Project Alternative would result in approximately 680 housing units, a population of 2,310, and a total of 4,315 jobs within the Planning Area, expected to occur by year 2040. It would not achieve many of the Project objectives to the same extent as the proposed Project. The No Project Alternative does not promote mixed-use development to the same extent as the proposed Project. It also would not

reflect current community sentiment and changes in land use, growth patterns, and demographic and economic conditions, and therefore would not meet the objective of outlining a long-range vision that reflects the aspirations of the community.

Finding: The City Council rejects Alternative 1: No Project Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative fails to meet most of the Project objectives to the same extent as the proposed Project; (2) the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to greenhouse gas emissions; and (3) the alternative would result in increased impacts relating to aesthetics, energy, and greenhouse gas emissions.

2. Alternative 2: Residential Focused Alternative

Description: This alternative provides an increased number of residential units and maintains/decreases future commercial land use development that already exist within the town. This alternative assumes that the Town Center opportunity site would be developed to include 20% more residential units than the proposed General Plan, resulting in 48 additional units. It also assumes that by constructing more residential uses at the site, the available space for commercial uses would be further limited at the site. This alternative also assumes that more residential development could occur elsewhere on El Camino Real, closer to the Colma BART station, and that less residential development may occur at the Town Center site.

The Residential Focused Alternative and the proposed Project both emphasize development within the El Camino Real Corridor. Both seek to provide new community amenities, improved local and regional connectivity, as well as enhanced economic activity. Given the large number of jobs in comparison to the town's population, this alternative could potentially lower the total vehicle miles traveled by providing housing to those that work in the area.

The Residential Focused Alternative and the proposed Project are based on similar assumptions of buildout of opportunity sites and sites designated with a commercial overlay within the Planning Area. Opportunity sites consist of sites that are currently vacant or underutilized. What distinguishes the Residential Focused Alternative is its revision of land use density to promote more residential units in the potential mixed-use environment around the town center. (Draft EIR, p. 6.0-5.0)

Impacts:

AESTHETICS

Differences in aesthetics between the proposed Project and the Residential Focused Alternative are relatively minor and relate to the intensity of the future residential and commercial development/redevelopment of infill sites in the town. Compared to the Residential Focused Alternative, proposed Project (2040 General Plan Update) would allow for increased height and intensified residential land uses along El Camino Real. The increased height would be allowed at select opportunity sites where topography, setbacks, and existing developments would reduce the impacts of the additional height. The proposed Project and the Residential Focused Alternative would essentially include policies

that would reduce impacts on aesthetics and light and glare issues with new design standards and policies. (Draft EIR, pp. 6.0-5 through 6.0-6.) The impacts under the Residential Focused Alternative would be similar to the proposed Project.

AIR QUALITY

The air quality impacts between the proposed Project and the Residential Focused Alternative would be similar because the degree of the impact is related to the amount of development and population at buildout. However, the Residential Focused Alternative would have more air quality impacts than the proposed Project. The Residential Focused Alternative, while anticipating slightly more growth and possibly in a geographically different area than under the proposed Project, has not been considered under the BAAQMD's growth projections for the town or its related air quality impacts. Since more residences would be constructed under the Residential Focused Alternative than the proposed Project, construction emissions, exposure from TACs, exposure from operational emissions and all other related air quality emissions would be greater under the Residential Focused Alternative than under the proposed Project. (Draft EIR, p. 6.0-6.)

BIOLOGICAL RESOURCES

While the Planning Area is mainly developed with urban uses, there are small areas of diversified wildlife population within the town. Since the town of Colma is located along the Pacific Flyway, migratory birds are often found in the town's open spaces related to cemetery uses. The proposed Project and Residential Focused Alternative would focus future development on the few vacant and underutilized parcels that exist within the town of Colma. While the types of uses and intensity of future development would differ between the proposed Project and the Residential Focused Alternative, the impacts to biological resources would be similar as this alternative would result in approximately the same urban footprint. (Draft EIR, p. 6.0-6.)

CULTURAL AND TRIBAL RESOURCES

Cultural resources include buildings of historical importance, registered historic sites, and archaeological resources and tribal resources includes site features, places, cultural landscapes, sacred places, or objects that are of value to a tribe and is either on or eligible for the California Historic Register or local historic register. A previously completed cultural resource studies and the town's previous Historical Resources Element (1999) shows that no previously recorded archaeological resources, Cultural and Tribal resources or Native American remains are currently within the town limits. The town does have many historical resources (primarily in cemeteries) eligible for designation on the National Register. However, future ground disturbing activities associated with construction excavation under the proposed Project, as well as the Residential Focused Alternative, could uncover unknown resources, and the potential impacts to cultural and tribal resources would depend on the location and amount of any future development. (Draft EIR, p. 6.0-7.) The impacts to cultural and tribal cultural resources under the Residential Focused Alternative would be similar to the proposed Project because it would result in approximately the same footprint.

ENERGY

The two scenarios, under the proposed Project and the Residential Focused Alternative, would increase the amount of development and population in town, which in turn would increase the demand for energy use under varying degrees. The proposed Project and the Residential Focused Alternative propose more potential development and has the most potential to increase the population and demand for energy use and thus could have an adverse impact on the environment. Construction of future development, or even redevelopment projects has the potential to consume gasoline and diesel during the operation of heavy-duty construction equipment and vehicles. However, these would be temporary consumptions of energy, only related to project construction under future development projects. Moreover the 2040 GPU policies promote energy efficiency which reduces the amount of energy used per capita, and future development/redevelopment under the proposed Project (2040 GPU) as well as the Residential Focused Alternative would be subject to these same energy saving policies and standards. Both the proposed Project and the Residential Focused Alternative would also have to conform to the State of California's AB 32 Scoping Plan (for Greenhouse Gas emissions) and the Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6) and CALgreen Code (Title 24, Part 11). Therefore, the comparative energy and power use under the proposed Project and the Residential Focused Alternative would be similar. (Draft EIR, p. 6.0-7.)

GEOLOGY

The town of Colma is located along the Serra Fault Zone and is approximately less than a mile east from the San Andreas Fault Zone. Therefore, the town has the potential to experience considerable ground shaking and rupture, in the event of an earthquake, particularly within the 2040 GPU's planning horizon. The current state and federal engineering and design regulations that minimize seismic and geologic impacts apply equally to all future development/redevelopments under the proposed Project as well as the Residential Focused Alternative. Since the proposed Project and the Residential Focused Alternative both have the potential to ultimately bring more people and businesses to the area, these future residences and businesses could be potentially exposed to seismic impacts from earthquakes and other geologic risks such as ground shaking and ground failure due to seismic activity, landslides, and soil expansion. Thus, the proposed Project and the Residential Focused Alternative have the potential to expose people and businesses to seismic risks. (Draft EIR, pp. 6.0-7 through 6.0-8.) Because the Residential Focused Alternative proposes more residential development than the proposed Project, the Residential Focused Alternative would expose more people to such risks than the proposed Project, and impacts would be greater.

GREENHOUSE GAS EMISSIONS

According to the town's Greenhouse Gas (GHG) Emissions Inventories, the majority of the town's GHG emissions come from transportation and energy use. Most of the on-road vehicles used for transportation burn fossil fuels such as gasoline or diesel which results in GHG emissions. Electric vehicles do not burn fossil fuels but GHGs may be emitted elsewhere, depending on the electric power source. Most of the customers in town utilize 100% carbon-free electricity procured by Peninsula Clean Energy. Natural gas consumption is the main contributor to GHG emissions from energy use.

The amount of development or even redevelopment efforts would be greater under the Residential Focused Alternative than that under the proposed Project, and so the GHG impacts from the Residential Focused Alternative would likely be greater than those under the proposed Project. (Draft EIR, p. 6.0-8.)

HAZARDOUS MATERIALS

The proposed Project and the Residential Focused Alternative anticipate that both infill and underutilized sites in the town would be developed, though with varying degrees of residential and commercial uses. While the Residential Focused Alternative may facilitate more development than the proposed Project, the town is generally built out and there are few industrial sites within the town boundaries. Future development would be restricted to higher density uses in limited areas of the town; and both the proposed Project and the Residential Focused Alternative envision more mixed-use development, particularly more residential development. Such future development has the potential to increase exposure to possible hazardous materials, particularly as the town does have two open hazardous sites within its boundaries, one of which is the closed landfill. In general, impacts with regard to hazardous materials come in the form of development near existing land uses that handle hazardous materials, areas where hazardous materials are stored or transported or by redeveloping contaminated sites. Under both the proposed Project and the Residential Focused Alternative, new development/redevelopment activities within the town of Colma would be required to follow the California Hazardous Waste Control Law, the Porter-Cologne Water Quality Act, other legislation as well as the 2040 GPU policies to lessen impacts from hazardous substances. (Draft EIR, p. 6.0-8.) Thus, impacts from the Residential Focused Alternative would be similar to those impacts under the proposed Project.

HYDROLOGY

Urban development/redevelopment has the potential to increase impervious surfaces that could lead to increased runoff rates, water pollutants, flooding, and decreased groundwater recharge. Since the proposed project and the Residential Focused Alternative encourage more future development/redevelopment activities, these future development efforts would be in infill areas of the town, and impacts to the town's hydrology would be limited. All future construction activities would have to comply with the NPDES stormwater permits. Also, the proposed project and the Residential Focused Alternative would have to adhere to the 2040 GPU policies that encourage the incorporation of green infrastructure in site designs, manage runoff, and comply with water quality regulations. With green infrastructure, new developments would be designed to capture, treat, and retain runoff while promoting infiltration. All new development is still required to comply with green infrastructure requirements. (Draft EIR, p. 6.0-9.) Accordingly, the Residential Focused Alternative would have similar impacts to hydrology as the proposed Project.

LAND USE AND PLANNING

Generally, the proposed Project and the Residential Focused Alternative are consistent in land use patterns, outside of a few minor land use designation changes. However, as with the proposed Project, the Residential Focused Alternative, if adopted, would become the Planning Area's new guiding policy document for future land use planning as well as residential and commercial development.

The proposed Project and the Residential Focused Alternative differ in the amount of residential and non-residential development assumed at buildout in the year 2040. The proposed Project would result in more commercial development and less housing units compared to the Residential Focused Alternative. **Table 6.0-1 of the Draft EIR** shows a comparison of housing units and population at full buildout of the proposed Project and the Residential Focused Alternative. The proposed Project and the Residential Focused Alternative would focus more on infill development and redevelopment of sites along El Camino Real, in order to encourage additional mixed-use housing opportunities at all income levels. Both the proposed Project and the Residential Focused Alternative increase land use intensities and allow for more housing units and population growth. The proposed Project results in 845 housing units compared to 887 in the Residential Focused Alternative. (Draft EIR, pp. 6.0-9.) Thus, impacts to land use and planning would be greater under the Residential Focused Alternative than the proposed Project.

NOISE

The proposed Project and the Residential Focused Alternative would result in increased land use intensity, and potentially more redevelopment of existing properties. However, the proposed Project and the Residential Focused Alternative would result in similar short-term noise impacts, particularly with short-term construction noise levels and on longer activity days since the type of activities (excavation, removal of site debris, building construction etc.). Due to its greater development targets, construction noise impacts under the Residential Focused Alternative would be greater than those under the proposed Project.

Roadway noise is the largest contributor to noise impacts in the town and all three scenarios would increase existing traffic and thus ambient noise levels between now and buildout in 2040. The Residential Focused Alternative would generate increased residential and commercial activity than under the proposed Project. Therefore, operational noise levels under the Residential Focused Alternative would be greater than that under the proposed Project.

The impacts on stationary noise sources for the proposed Project and the Residential Focused Alternative would be similar to each other since the proposed development/redevelopment of the town under any of the alternatives would not be significantly different between the alternatives. Construction activities and equipment used for the Residential Focused Alternative as well as the proposed project would result in similar vibration impacts. However, since the Residential Focused Alternative would involve more construction activities due to its overall development efforts, the duration of vibration impacts due to construction would be slightly greater under the Residential Focused Alternative than the proposed Project. (Draft EIR, pp. 6.0-9 through 6.0-10.)

PUBLIC SERVICES AND RECREATION

Development under the proposed Project and the Residential Focused Alternative would require additional public services and park areas. Other services such as police, fire, and emergency services would be required to be expanded to accommodate additional population growth. (Draft EIR, p. 6.0-10.) Because development under the Residential Focused Alternative would be slightly greater than the development under the proposed Project, impacts under the Residential Focused Alternative would be greater.

TRANSPORTATION

The proposed Project as well as the Residential Focused Alternative would encourage better connectivity between all means of transportation (such as walking, biking, use of public transportation) and thus increased demand for these services. Similarly, the proposed Project and the Residential Focused Alternative would have better safety and roadway hazard improvements as well as emergency access components.

The proposed Project as well as the Residential Focused Alternative would significantly generate more home-based VMT, due to the increased projected number of residents in the town and these residents needing to travel further for employment opportunities and other related uses. Since the Residential Focused Alternative would result in greater development in the town center and the El Camino Real than the proposed Project, it would have greater impacts on existing roadway operational deficiencies. (Draft EIR, pp. 6.0-10 through 6.0-11.)

UTILITIES

The proposed Project and the Residential Focused Alternative would require utilities and infrastructure, including water sewer electricity and landfill capacity. The demand on utilities and service systems is contingent on the amount of future growth. The proposed Project and the Residential Focused Alternative propose similar types of development at buildout and is expected to demand a similar amount of resources from the utilities. Since the Residential Focused Alternative would result in more population growth than that under the proposed Project, it is possible that additional infrastructure may be needed under this alternative than that under the proposed Project. However, it is possible that any needed utility infrastructure upgrades will be of a similar size and extent to that for the proposed Project, since development will occur at magnitudes comparable to the proposed Project, and at locations similar to the proposed Project.

The Residential Focused Alternative would result in higher population and commercial use than the proposed Project, and thus have higher impacts to utility facilities at buildout. (Draft EIR, p. 6.0-11.)

WILDFIRE

Wildfire impacts could affect the town under the proposed Project and the Residential Focused Alternative. The town of Colma is limited in its land area for future development which can only be focused on limited residential as well as commercial development/redevelopment on existing sites within the town. As new development occurs and existing structures are replaced with buildings built under more modern building codes, fire safety will increase. Moreover, any new construction would be required to comply with the town's Local Hazard Mitigation Plan as well as any criteria under the County of San Mateo's Emergency Operations Services. Since both the Residential Focused Alternative and the proposed Project (2040 GPU) would result in greater residential and commercial activities, wildfire impacts would be similar. (Draft EIR, p. 6.0-11.)

Attainment of Project Objectives: The Residential Focused Alternative would attain all of the Project objectives. It would enable the community to agree on long- and short-term policies related to each of the elements encompassed within the General Plan. It would

establish a vision for the physical nature of Colma in the future and set the tone for the corresponding land use and related policies required to advance this vision, and outline a long-range vision that reflects the aspirations of the community. It would also establish goals and policies to guide development and conservation decisions by the City Council and staff, and provide a basis for determining whether specific development proposals and public projects are in harmony with the Town's long-range vision. It would also allow the Town departments, other public agencies, and private developers to design projects that enhance the character of the community, promote public health, preserve environmental resources, and minimize hazards. It would also provide the basis for establishing and setting priorities for detailed plans and implementing programs, such as the Zoning Ordinance, subdivision regulations, and the Capital Improvement Program. However, the Residential Focused Alternative would not reduce any of the proposed Project's impacts, and in fact would result in greater or similar impacts.

Finding: The City Council rejects Alternative 2: Residential Focused Alternative, on the following grounds, each of which individually provides sufficient justification for rejection of this alternative: (1) the alternative fails to avoid or reduce the Project's significant and unavoidable impacts relating to air quality, cultural and tribal cultural resources, and greenhouse gas emissions; and (2) the alternative would result in increased impacts relating to air quality, geology, land use and planning, public services and recreation, transportation, and utilities.

E. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed Project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR. Based on the alternatives analysis contained within the Draft EIR, the Residential Focused Alternative is identified as the Environmentally Superior Alternative.

The No Project Alternative reduces impacts in most areas, including air quality, which has a significant impact under the proposed Project. On the other hand, the No Project Alternative has impacts that are greater than the proposed Project with respect to aesthetics, energy, and greenhouse gas emissions. Most notable is the area of greenhouse gas emissions, where the implementation of a new 2030 Climate Action Plan could reduce greenhouse gas emissions within the town. The No Project Alternative is still environmentally superior, as impacts are reduced in more topical areas than they are increased.

Based on a comparison of the alternatives' overall environmental impacts and their compatibility with proposed Project, the Residential Focused Alternative would be the environmentally superior alternative for this EIR (other than the No Project Alternative). (Draft EIR, p. 6.013.) The Residential Focused Alternative would support additional housing, which would result in a more balanced jobs/housing ratio in the town, and would meet the Project objectives. However, the environmental impacts of the additional development and population results in similar or greater impacts in every area. Therefore, the Residential Focused Alternative is worse than the proposed Project in terms of environmental impacts.

SECTION IX.
ADOPTION OF STATEMENT OF OVERRIDING CONSIDERATIONS

Pursuant to State CEQA Guidelines Section 15093(a), the City Council must balance, as applicable, the economic, legal, social, technological, or other benefits of the Project against its unavoidable environmental risks in determining whether to approve the project. If the specific benefits of the project outweigh the unavoidable adverse environmental effects, those environmental effects may be considered acceptable.

Having reduced the adverse significant environmental effects of the Project to the extent feasible by adopting the mitigation measures; having considered the entire administrative record on the project; the City Council has weighed the benefits of the Project against its unavoidable adverse impacts after mitigation in regards to air quality, cultural resources, tribal cultural resources, and greenhouse gas emissions. While recognizing that the unavoidable adverse impacts are significant under CEQA thresholds, the City Council nonetheless finds that the unavoidable adverse impacts that will result from the Project are acceptable and outweighed by specific social, economic and other benefits of the Project.

In making this determination, the factors and public benefits specified below were considered. Any one of these reasons is sufficient to justify approval of the Project. Thus, even if a court were to conclude that not every reason is supported by substantial evidence, the City Council would be able to stand by its determination that each individual reason is sufficient. The substantial evidence supporting the various benefits can be found in the preceding findings, which are incorporated by reference into this section, and in the documents found in the Records of Proceeding.

The City Council therefore finds that for each of the significant impacts which are subject to a finding under CEQA Section 21081(a)(3), that each of the following social, economic, and environmental benefits of the Project, independent of the other benefits, outweigh the potential significant unavoidable adverse impacts and render acceptable each and every one of these unavoidable adverse environmental impacts:

1. The Project reflects the stated vision, goals and objectives of the Town of Colma.
2. The Project will designate areas for housing to ensure orderly development patterns that accommodate projected population and avoid or minimize land use conflicts.
3. The Project will ensure that sensitive land uses such as the Town's cemeteries and historic resources are not significantly impacted by development.
4. The Project will improve and maximize economic viability of the currently vacant and underutilized Project site and area by providing strategic land use designations.
5. The Project will ensure that the Town of Colma's public facilities and infrastructure system can effectively serve the land use framework.

6. The Project designates a Town Center area which will enhance the character of the Town of Colma and promote economic development and enhanced employment opportunities.
7. The Project will maximize and broaden the Town's sales tax base by providing local and regional tax-generating uses.

EXHIBIT B
MITIGATION MONITORING AND REPORTING PROGRAM

Appendix A

Notice of Preparation and Response Letters

Appendix A contains the Notice of Preparation (NOP), posted by the Lead Agency on June 3, 2020; the mailing list of all agencies, organizations, and individuals that received the Notice of Preparation and all response letters that the Lead Agency received .



NOTICE OF PREPARATION (NOP)

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE TOWN OF COLMA

Date: June 3, 2020

To: Responsible Agencies, Organizations and Interested Parties

Subject: Notice of Preparation for a Draft Environmental Impact Report for the Town of Colma 2040 General Plan Update

Project Title: 2040 General Plan Update

Lead Agency: Town of Colma

Project Location: Colma, San Mateo County

Main Contact: Michael P. Laughlin, AICP, City Planner

The Town of Colma is commencing its preparation of a Draft Program-level Environmental Impact Report (EIR) for the 2040 General Plan Update and has released this Notice of Preparation (NOP), in accordance with the California Environmental Quality Act (CEQA), CEQA Guidelines, and local implementation procedures. In compliance with CEQA, the Town of Colma (Town) will be the Lead Agency and will prepare the EIR. Attached are the project descriptions, location maps, and identification of the potential environmental issues to be explored.

The Town requests your input regarding the scope and content of environmental analysis that is relevant to your respective agency's statutory/regulatory responsibilities in order to ascertain potential environmental impacts of the proposed Project. Information gathered during the NOP comment period will be used to shape and focus the environmental impact analyses.

Pursuant to CEQA Guidelines §15082 (b), you have 30 days from the date of receipt of this NOP to respond. Please send your comments by the earliest possible date, but no later than 5:00 P.M. July 13th, 2020. Please send your responses to:

Ms. Anna Choudhuri
Town of Colma Planning Department
1198 El Camino Real, Colma, CA 94014
annac@csgengr.com

Governor's Office of Planning & Research

JUN 03 2020

STATE CLEARINGHOUSE

Public Review Period: June 9, 2020 to July 13th, 2020

A scoping meeting will be conducted at 7:00 p.m. on Wednesday, June 24, 2020, to collect oral comments from agencies and the public. The meeting will occur virtually, and details will be posted on the Town's website: Colma.ca.gov at least 72 hours prior to the meeting.

PROJECT LOCATION:

As required by CEQA Guidelines, the Colma General Plan EIR will identify the potential environmental impacts associated with implementation of the General Plan update. This analysis will assess and, if necessary, include measures to mitigate potential impacts related to CEQA-required topics. These topics are: aesthetics; air quality; agricultural and forest resources; biological resources; cultural resources; energy, geology and soils; greenhouse gases; hazards and hazardous materials; hydrology; land use and planning; noise; population and housing; public services; transportation; tribal cultural resources; utilities; and wildfires. The Town of Colma, as the Lead Agency has determined mineral resources and recreation to have no impacts.

The Town of Colma is a small incorporated town in San Mateo County, California, on the San Francisco Peninsula (see **Figure 1**). The Town of Colma is located in northern San Mateo County and is surrounded by the cities of Daly City to the north and South San Francisco to the south. To the east lies the San Bruno Mountain State Park, and along the western border of the Town lies the junction of Highway 1 and Interstate 280. El Camino Real, or State Route 82, runs north-south through the middle of town, and BART runs underground and roughly parallel to the El Camino Real corridor.

The 2040 General Plan Planning Area is composed of approximately a total area of 1.9 square miles (see **Figure 2**). The 2010 United States Census reported that the Town had a population of 1,792. The population density was 938.6 people per square mile. The Town's 17 cemeteries comprise approximately 73% of the town's land area. Within the Town of Colma boundary, the ground elevation ranges from about 100 feet to about 500 feet above Mean Sea Level. Colma also includes approximately 1.89 square miles of a wide valley associated with Colma Creek. Most of the land east of El Camino Real is committed to cemetery use or agricultural fields. Land west of El Camino Real is oriented more to commercial uses although the Town's regionally oriented commercial core is bracketed on the north and south by cemeteries.

PROJECT DESCRIPTION:

The Town of Colma General Plan articulates the long-term shared community vision for the preservation, enhancement and improvement of the Town. It is a long-range plan that directs decision making, and establishes rules and standards for town improvements and new development. It reflects the community's vision for the future and is intended to provide direction through the year 2040. The last General Plan Update was in 1999. The housing element was updated in 2015 and will not be a part of the current General Plan update. The 2040 General Plan update will provide the context to effectively plan and manage the Town of Colma based on an updated set of goals, policies, and implementation programs that reflect the values and aspirations for the future expressed by the community. Additionally, the update will equip the Town of Colma with a policy framework to responsibly manage future projects and have the capacity to accommodate the growth and development anticipated to occur in the Town for the next 20 years.

As required by CA Government Code section 65302, the General Plan will cover the seven mandated elements. However, for the Town of Colma General Plan Update these include: Land Use, Circulation/Transportation (Mobility), Housing, Natural Resources/Conservation, Hazards and Safety. In addition to these elements, Colma has chosen to prepare a Historic Resources Element due to most of the Town's land use being reserved for cemetery uses. This element will provide an information base of existing historic resources as well as provide policy direction for the preservation of the Town of Colma's historic cultural resources.

These elements will establish policy direction for the Town, relating to:

- The use and development of all remaining land within the Town of Colma
- The types and provision of housing growth in the community
- The protection and continued use and expansion of cemetery land uses
- The growth of existing businesses as well as the attraction of new commercial ventures
- The provision of public safety services and protection against natural and human caused hazards (including noise)

The 2040 General Plan update identifies and prioritizes opportunities to preserve the character of the community, conserve natural resources, and direct land use policies that enable sustainable growth and employment opportunities in Colma.

As part of the alternatives process for the General Plan update, the Town evaluated the change in land use type and development intensity that may result in environmental impacts. These changes are described as follows:

- Change in permitted land use and intensity for the "Town Center Site" located at the southwest corner of Serramonte Boulevard and El Camino Real
- Change in permitted land use and intensity for undeveloped lands on the east side of Hillside Boulevard
- Change in permitted land use and intensity for properties which may redevelop along the Serramonte Boulevard corridor
- Change in intensity for specific in-fill development opportunity sites
- Change in land use policies which would allow for housing in specific areas of the Town where housing has not been permitted before

It is anticipated that these potential changes in land use and intensity or density would be a primary change in the General Plan that may result in environmental impacts. The Proposed Land Use Map is shown in Figure 3. At buildout under the draft General Plan, the Town anticipates the following:

- Residential Units: 328 units
- Commercial Building Square Footage: 993,500
- Office Building Square Footage: 35,000

POTENTIAL ENVIRONMENTAL IMPACTS TO BE CONSIDERED:

A Draft Program-level Environmental Impact Report (EIR) will be prepared in conjunction with the 2040 General Plan Update. A program-level EIR generally looks at the broad policy of a planning document, i.e., a general plan, and will analyze the potential environmental consequence of adopting the proposed 2040 General Plan Update Colma General Plan 2040. It may will not address potential project specific site-specific impacts of the any individual projects that may fall within the planning document.be approved by the City Council.

The general plan update EIR anticipates potential significant environmental effect concerning the following environmental issues:

- Aesthetics
- Agriculture/ Forestry Resources
- Biological Resources
- Air Quality
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hydrology
- Land Use/ Planning
- Noise
- Population/ Housing
- Public Services
- Transportation
- Tribal Cultural Resources
- Utilities
- Wildfire

The GPU Draft PEIR does not anticipate potential significant environmental effect concerning the following environmental issues:

- Mineral Resources
- Recreation

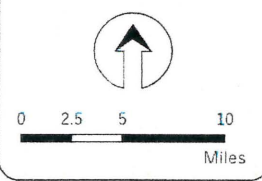


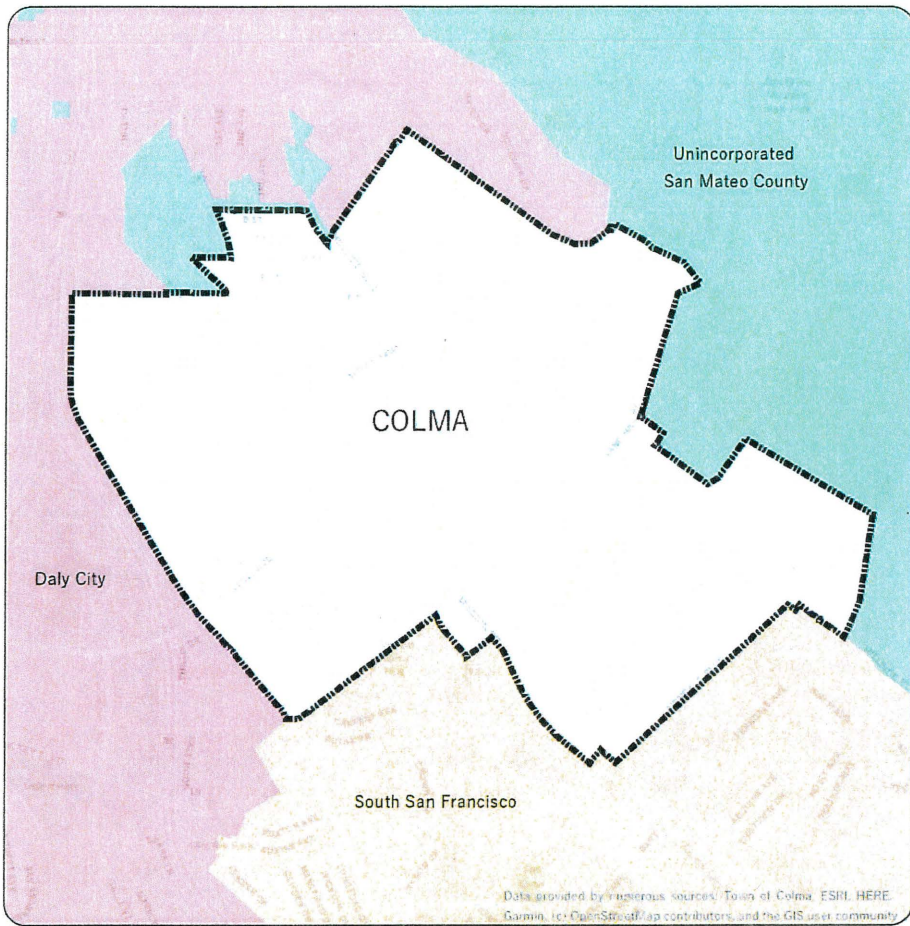
Town of Colma

Figure 1: Regional Location Map

Town Limit, Sphere of Influence, and Planning Area

Data provided by numerous sources: Town of Colma, ESRI, National Geographic, and the GIS user community



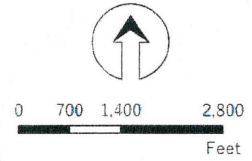


Town of Colma

Figure 2: Project Location Map

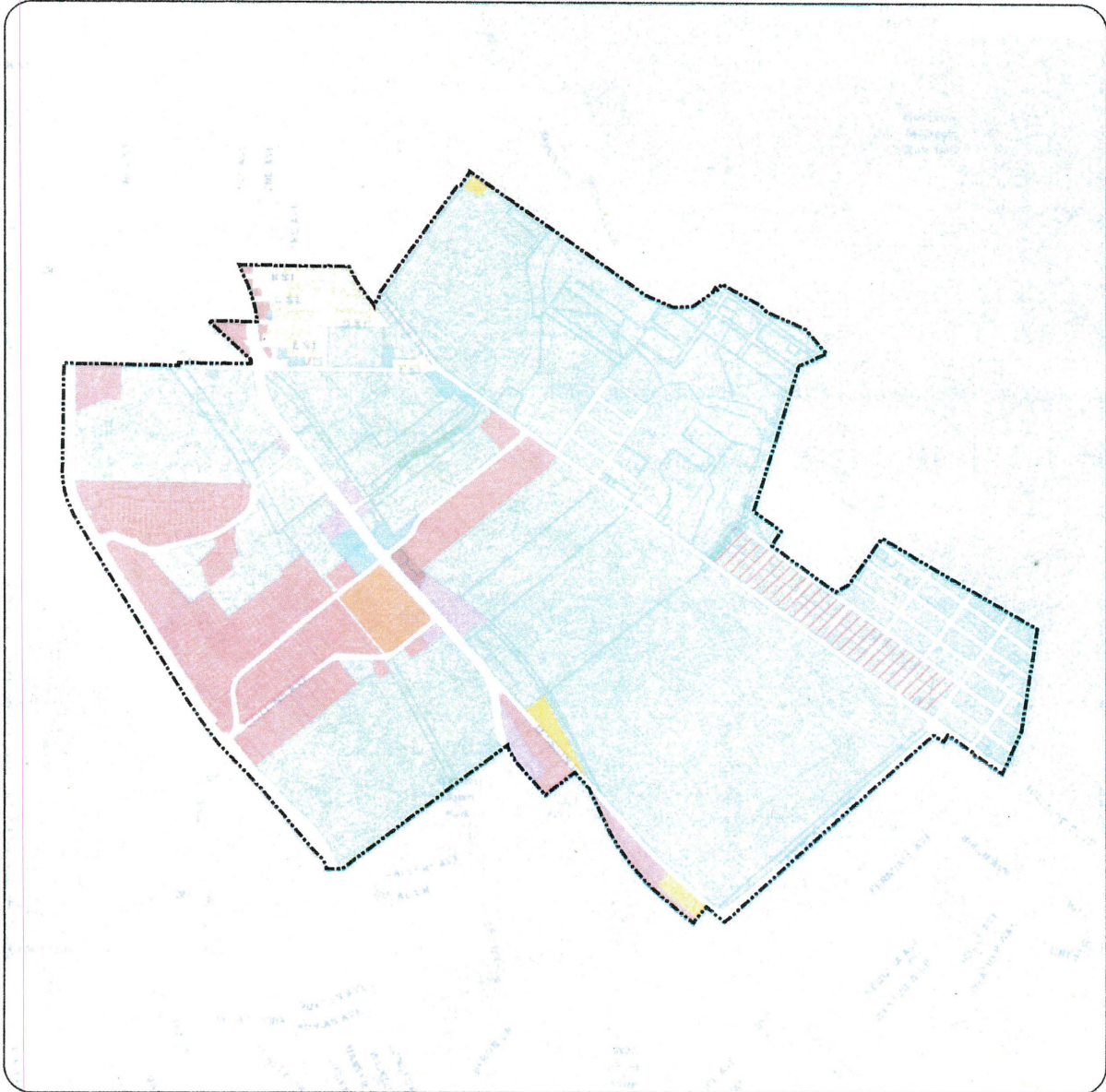
Town Limits, Sphere of Influence, and Planning Area


-  City of Daly City
-  City of South San Francisco
-  Unincorporated San Mateo County



Town of Colma

Figure 3: Proposed
Land Use Map



 Town Limits
Overlay

 Commercial Overlay

LAND USE

Cemetery


 Commercial

Executive Administrative

Low Density Residential

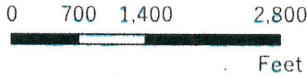
 Medium Density

Public/Quasi-Public/Utility

 Town Center Commercial

 Town Center Mixed Use

Data provided by numerous sources:
Town of Colma, ESRI, USGS, NOAA,
FEMA, HERE, Garmin, (c) OpenStreetMap
contributors, and the GIS user community



2020069005

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH #

Project Title: Town of Colma General Plan Update

Lead Agency: Town of Colma Contact Person: Anna Choudhuri
Mailing Address: 1198 El Camino Real Phone: (650) 757-8888
City: Colma Zip: 94116 County: San Mateo

Project Location: County: San Mateo City/Nearest Community: Town of Colma
Cross Streets: None - Entire Town - Bounded by San Bruno Mtn., Lawndale Blvd., I 280 and F Street Zip Code: 94014
Longitude/Latitude (degrees, minutes and seconds): ... Total Acres:
Assessor's Parcel No.: None Section: Twp.: Range: Base:
Within 2 Miles: State Hwy #: 280, 82 Waterways: Colma Creek
Airports: None Railways: None (BART extends through town) Schools: Jefferson Union and SSF Districts

Document Type:

CEQA: [X] NOP [] Draft EIR NEPA: [] NOI Other: [] Joint Document
[] Early Cons [] Supplement/Subsequent EIR [] EA [] Final Document
[] Neg Dec (Prior SCH No.) [] Draft EIS [] Other:
[] Mit Neg Dec Other:

Local Action Type:

[X] General Plan Update [] Specific Plan [] Rezone [] Annexion
[] General Plan Amendment [] Master Plan [] Prezone [] Redevelopment
[] General Plan Element [] Planned Unit Development [] Use Permit [] Coastal Permit
[] Community Plan [] Site Plan [] Land Division (Subdivision, etc) [] Other:

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JUN 03 2020
STATE CLEARINGHOUSE

Development Type:

[] Residential: Units Acres
[] Office: Sq.ft. Acres Employees
[] Commercial: Sq.ft. Acres Employees
[] Industrial: Sq.ft. Acres Employees
[] Educational:
[] Recreational:
[] Water Facilities: Type MGD
[] Transportation: Type
[] Mining: Mineral
[] Power: Type MW
[] Waste Treatment: Type MGD
[] Hazardous Waste: Type
[] Other:

Project Issues Discussed in Document:

[X] Aesthetic/Visual [] Fiscal [X] Recreation/Parks [X] Vegetation
[X] Agricultural Land [X] Flood Plain/Flooding [X] Schools/Universities [X] Water Quality
[X] Air Quality [X] Forest Land/Fire Hazard [] Septic Systems [X] Water Supply/Groundwater
[X] Archeological/Historical [X] Geologic/Seismic [X] Sewer Capacity [X] Wetland/Riparian
[X] Biological Resources [X] Minerals [] Soil Erosion/Compaction/Grading [X] Growth Inducement
[] Coastal Zone [X] Noise [X] Solid Waste [X] Land Use
[X] Drainage/Absorption [X] Population/Housing Balance [X] Toxic/Hazardous [X] Cumulative Effects
[X] Economic/Jobs [X] Public Services/Facilities [X] Traffic/Circulation [] Other:

Present Land Use/Zoning/General Plan Designation:

Project Description: (please use a separate page if necessary)

The Town of Colma is updating its 1999 General Plan. The 2040 General Plan update will provide the context to effectively plan and manage the Town of Colma based on an updated set of goals, policies, and implementation programs that reflect the values and aspirations for the future expressed by the community. As required by CA Government Code section 65302, the General Plan will cover the seven mandated elements. However, for the Town of Colma General Plan Update these include: Land Use, Circulation/Transportation (Mobility), Housing, Natural Resources/Conservation, Hazards and Safety. In addition to these elements, Colma has chosen to prepare an Historic Resources Element due to most of the Town's land use being reserved for cemetery uses the many historic resources present both in and outside of the Town's cemeteries.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with and "X".
If you have already sent your document to the agency please denote that with an "S".

- | | |
|---|--|
| <input checked="" type="checkbox"/> Air Resources Board | <input checked="" type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District # 4 | <input checked="" type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input type="checkbox"/> Regional WQCB # _____ |
| <input checked="" type="checkbox"/> Caltrans Planning | <input type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input checked="" type="checkbox"/> SWRCB: Water Quality |
| <input checked="" type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region # 3 | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> General Services, Department of | |
| <input type="checkbox"/> Health Services, Department of | Other: _____ |
| <input checked="" type="checkbox"/> Housing & Community Development | Other: _____ |
| <input checked="" type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date June 9, 2020 Ending Date _____

Lead Agency (Complete if applicable):

Consulting Firm: _____ Applicant: _____
 Address: _____ Address: _____
 City/State/Zip: _____ City/State/Zip: _____
 Contact: _____ Phone: _____
 Phone: _____

Signature of Lead Agency Representative:  Date: June 2, 2020

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

San Francisco Bay Region Water
Quality Control District
1515 Clay Street, #1400
Oakland, CA 94612

Planning Director
San Mateo County Planning Dept.
455 County Center, 4th Floor
Redwood City, CA 94063

So. San Francisco Unified School Dist.
398 B Street
South San Francisco, CA 94080

No. San Mateo County Sanitation District
153 Lake Merced Boulevard
Daly City, CA 94015

Service Planning Department
PG&E
275 Industrial Road
San Carlos, CA 94070

City of South San Francisco
Planning Department
315 Maple Avenue
South San Francisco, CA 94080

Jefferson Union High School District
699 Serramonte Boulevard, # 100
Daly City, CA 94015

Jefferson Elementary School District
101 Lincoln Avenue
Daly City, CA 94014

Regional Clearinghouse Coordinator
c/o ABAG
P.O. Box 2050
Oakland, CA 94604-2050

San Francisco Water Department
1990 Newcomb Avenue
San Francisco, CA 94124

Maria Torres/Linda Sousa
AT&T - Public Works Coordinator
795 Folsom Street, Room 426
San Francisco, CA 94107-1243

Ms. Ann Stillman
Flood Control District,
SMCO Public Works
555 County Center, 5th Floor
Redwood City, CA 94063

Executive Officer
San Bruno Mountain Watch
P.O. Box 53
Brisbane, CA 94005

South San Francisco
Sewer Department
400 Grand Avenue
South San Francisco, CA 94080

District Manager
California Water Service
341 North Delaware Street
San Mateo, CA 94401-1727

Director of Planning
CalTrans District 4
P.O. Box 23660
Oakland, CA 94623-0660

Ms. Ann Stillman
Colma Lighting District,
SMCO Public Works
555 County Center, 5th Floor
Redwood City, CA 94063

Northwest Info. Ctr. Sonoma State
University
150 Professional Center Drive, Suite E
Rohnert Park, CA 94928

South San Francisco Sewer Department
400 Grand Avenue
South San Francisco, CA 94080

PG&E
450 Eastmoor Avenue
Daly City, CA 94015

Transportation Planning
C/CAG
455 County Center, 5th Floor
Redwood City, CA 94063

City of Daly City
Planning Department
333 - 90th Street
Daly City, CA 94015

Planning Division
Association of Bay Area Governments
101 Eighth Street
Oakland, CA 94604

Bay Area Air Quality Management
District
939 Ellis Street
San Francisco, CA 94109

City Engineer
City of South San Francisco
P.O. Box 711, 400 Grand Avenue
South San Francisco, CA 94083

Mr. Geoff Balton
Colma Fire Protection District
50 Reiner Street
Colma, CA 94014

San Mateo County
Environmental Health Director
2000 Alameda de las Pulgas, Suite 100
San Mateo, CA 94403

Airport Land Use
C/CAG
455 County Center, 5th Floor
Redwood City, CA 94063

Caltrans District 4, Planning
P.O. Box 23660
Oakland, CA 94623-0660

Irenne Zwierlein, Chair
Amah Mutsun Tribal Band of Mission
San Juan Bautista
789 Canada Road
Woodside, CA 94062

Andrew Galvan
The Ohlone Tribe
P.O. Box 3152
Fremont, CA 94539

Tony Cerda
Coastanoan Rumsen Carmel Tribe
240 East 1st Street
Pomona, CA 91766

Monica Arellano
Muwekma Ohlone Tribe of the San
Francisco Bay Area
PO Box 360791
Milpitas, CA 95036

Ann Marie Sayers
Indian Canyon Mutsun Band of
Costanoan
P.O. Box 28
Hollister, CA 95024

NATIVE AMERICAN HERITAGE COMMISSION

7/2/2020

June 5, 2020

Governor's Office of Planning & Research

Jun 12 2020

STATE CLEARINGHOUSE

Re: 2020069005, Town of Colma General Plan Update Project, San Mateo County

Dear Ms. Choudhuri:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



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AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

- 1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:** Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a.** A brief description of the project.
 - b.** The lead agency contact information.
 - c.** Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d.** A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

- 2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report:** A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).
 - a.** For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

- 3. Mandatory Topics of Consultation If Requested by a Tribe:** The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a.** Alternatives to the project.
 - b.** Recommended mitigation measures.
 - c.** Significant effects. (Pub. Resources Code §21080.3.2 (a)).

- 4. Discretionary Topics of Consultation:** The following topics are discretionary topics of consultation:
 - a.** Type of environmental review necessary.
 - b.** Significance of the tribal cultural resources.
 - c.** Significance of the project's impacts on tribal cultural resources.
 - d.** If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

- 5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process:** With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

- 6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document:** If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a.** Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b.** Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Staff Services Analyst

cc: State Clearinghouse

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

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7/2/2020

Governor's Office of Planning & Research

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a California Way of Life.***Jul 13 2020**

July 13, 2020

STATE CLEARINGHOUSE

SCH #2020069005

GTS #04-SM-2020-00322

GTS ID: 19638

Co/Rt/Pm: SM/82/22.588

Anna Chaudhuri
Town of Colma, Planning Department
1198 El Camino Real,
Colma, CA 94014

**Town of Colma General Plan Update- Notice of Preparation (NOP) of an
Environmental Impact Report****Dear Anna Chaudhuri:**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Town of Colma General Plan Update NOP. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the June 2020 NOP.

Project Understanding

The Town of Colma General Plan is a long-range plan that directs decision making and establishes rules and standards for town improvements and new development. It reflects the community's vision for the future and is intended to provide direction through the year 2040. The last General Plan Update was in 1999. The 2040 General Plan update will provide the context to effectively plan and manage the Town of Colma based on an updated set of goals, policies, and implementation programs that reflect the values and aspirations for the future expressed by the community. Additionally, the update will equip the Town of Colma with a policy framework to responsibly manage future projects and have the capacity to accommodate the growth and development anticipated to occur in the Town for the next 20 years. The Town is centrally bisected by State Route (SR)-82 and the intersection of Highway (HWY)-1 and Interstate (I)-280.

*"Provide a safe, sustainable, integrated and efficient transportation
system to enhance California's economy and livability"*

Travel Demand Analysis

Please note that a travel demand analysis that provides a Vehicle Miles Traveled (VMT) analysis is required as part of the California Environmental Quality Act (CEQA) process. With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and VMT as the primary transportation impact metric. The travel demand analysis should include:

- A VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, the Office of Planning and Research's Guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.
- A schematic illustration of walking, biking and auto conditions in the plan area and area roadways. Potential safety issues for all road users should be identified and fully mitigated.
- The plan's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Transportation Impact Fees

The City should identify any generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed plan; viable funding sources such as the City's existing development and/or transportation impact fee programs should also be identified. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

The City should also ensure that a capital improvement plan identifying the cost of needed improvements, funding sources, and a scheduled plan for implementation is prepared along with the General Plan. Caltrans welcomes the

Anna Chaudhuri, Planning Dept
July 13, 2020
Page 3

opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at (510)286-5614 or laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact ldigr-d4@dot.ca.gov.

Sincerely,

A handwritten signature in black ink that reads "Mark Leong". The signature is written in a cursive, flowing style with a long horizontal stroke at the end.

Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

cc: State Clearinghouse



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Bay Delta Region
2825 Cordelia Road, Suite 100
Fairfield, CA 94534
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www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



June 26, 2020

Governor's Office of Planning & Research

Jun 26 2020

STATE CLEARINGHOUSE

Ms. Anna Choudhuri
Town of Colma Planning Department
1198 El Camino Real
Colma, CA 94014
annac@csgengr.com

**Subject: Town of Colma General Plan Update, Notice of Preparation,
SCH No. 2020069005, Town of Colma, San Mateo County**

Dear Anna Choudhuri,

The California Department of Fish and Wildlife (CDFW) has reviewed the Notice of Preparation (NOP) prepared by the Town of Colma for the Town of Colma General Plan Update (Project) located in the County of San Mateo. CDFW is submitting comments on the NOP regarding potentially significant impacts to biological resources associated with the Project.

CDFW ROLE

CDFW is a Trustee Agency with responsibility under the California Environmental Quality Act (CEQA; Pub. Resources Code, § 21000 et seq.) pursuant to CEQA Guidelines section 15386 for commenting on projects that could impact fish, plant, and wildlife resources (e.g., biological resources). CDFW is also considered a Responsible Agency if a project would require discretionary approval, such as permits issued under the California Endangered Species Act (CESA), the Native Plant Protection Act, the Lake and Streambed Alteration (LSA) Program, and other provisions of the Fish and Game Code that afford protection to the state's fish and wildlife trust resources.

PROJECT DESCRIPTION

The Project will update the Town of Colma's 1999 General Plan with goals, policies, and implementation programs for future projects within the Town of Colma. The Project will include proposed projects through the year 2040 and focus on land use, circulation/transportation, housing, natural resources/conservation, hazards and safety, and historic resources.

COMMENTS AND RECOMMENDATIONS

CDFW offers the following comments and recommendations to assist the Town of Colma in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on biological resources.

Ms. Anna Choudhuri
Town of Colma Planning Department
June 26, 2020
Page 2 of 6

COMMENT 1: Artificial Lighting

Issue: The Project could increase artificial lighting. Artificial lighting often results in light pollution, which has the potential to significantly and adversely affect biological resources.

Evidence the impact would be significant: Night lighting can disrupt the circadian rhythms of many wildlife species. Many species use photoperiod cues for communication (e.g., bird song; Miller 2006), determining when to begin foraging (Stone et al. 2009), behavior thermoregulation (Beiswenger 1977), and migration (Longcore and Rich 2004). Aquatic species can also be affected, for example, salmonids migration can be slowed or stopped by the presence of artificial lighting (Tabor et al. 2004, Nightingale et al. 2006).

Recommendations to minimize significant impacts: CDFW recommends eliminating all non-essential artificial lighting. If artificial lighting is necessary, CDFW recommends avoiding or limiting the use of artificial lights during the hours of dawn and dusk, when many wildlife species are most active. CDFW also recommends that outdoor lighting be shielded, cast downward, and does not spill over onto other properties or upwards into the night sky (see the International Dark-Sky Association standards at <http://darksky.org/>).

COMMENT 2: Exterior Windows

Issue: The glass used for exterior building windows could result in bird collisions, which can cause bird injury and mortality.

Evidence the impact would be significant: Birds, typically, do not see clear or reflective glass, and can collide with glass (e.g., windows) that reflect surrounding landscape and/or habitat features (Klem and Saenger 2013, Sheppard 2019). When birds collide with glass, they can be injured or killed. In the United States, the estimated annual bird mortality is between 365-988 million birds (Loss et al. 2014).

Recommendations to minimize significant impacts: CDFW recommends incorporating visual signals or cues to exterior windows to prevent bird collisions. Visual signals or cues include, but are not limited to, patterns to break up reflective areas, external window films and coverings, ultraviolet patterned glass, and screens. For best practices on how to reduce bird collisions with windows, please go to the United States Fish and Wildlife Service's website for Buildings and Glass (<https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/buildings-and-glass.php>).

COMMENT 3: Stream Hydromodification

Issue: The Project could increase impervious surfaces within the Project area. Impervious surfaces, stormwater systems, and storm drain outfalls have the potential to

Ms. Anna Choudhuri
Town of Colma Planning Department
June 26, 2020
Page 3 of 6

significantly affect fish and wildlife resources by altering runoff hydrograph and natural streamflow patterns.

Evidence the impact would be significant: Urbanization (e.g., impervious surfaces, stormwater systems, storm drain outfalls) can modify natural streamflow patterns by increasing the magnitude and frequency of high flow events and storm flows (Hollis 1975, Konrad and Booth 2005).

Recommendations to minimize significant impacts: CDFW recommends that storm runoff be dispersed as sheet flow through the property rather than funneled to stormwater outfalls. CDFW also recommends incorporating permeable surfaces throughout the Project area to allow stormwater to percolate in the ground and prevent stream hydromodification.

COMMENT 4: Special-Status Species Surveys

CDFW recommends that before future project implementation, special-status species surveys be conducted for species that have the potential to occur or will be impacted by the project implementation. CDFW recommends, if available, using established species survey protocols.

Survey and monitoring protocols and guidelines are available at:
<https://wildlife.ca.gov/Conservation/Survey-Protocols>.

COMMENT 5: Nesting Birds

Issue: Project construction could result in disturbance of nesting birds.

Evidence the impact would be significant: Noise can impact bird behavior by masking signals used for bird communication, mating, and hunting (Bottalico et al. 2015). Birds hearing can also be damaged from noise and impair the ability of birds to find or attract a mate and prevent parents from hearing calling young (Ortega 2012).

Recommendations to minimize significant impacts: If ground-disturbing or vegetation-disturbing activities occur during the bird breeding season (February through early-September), the Project applicant is responsible for ensuring that implementation of the Project does not result in violation of Fish and Game Codes.

To evaluate and avoid for potential impacts to nesting bird species, CDFW recommends incorporating the following mitigation measures into the Project's draft EIR, and that these measures be made conditions of approval for the Project.

Ms. Anna Choudhuri
Town of Colma Planning Department
June 26, 2020
Page 4 of 6

Recommended Mitigation Measure 1: Nesting Bird Surveys

CDFW recommends that a qualified avian biologist conduct pre-Project activity nesting bird surveys no more than seven (7) days prior to the start of ground or vegetation disturbance, and every 14 days during Project activities to maximize the probability that nests are detected. CDFW recommends that nesting bird surveys cover a sufficient area around the Project area to identify nests and determine their status. A sufficient area means any area potentially affected by the Project.

During nesting bird surveys, CDFW recommends that a qualified avian biologist establish behavioral baseline of all identified nests. During Project activities, CDFW recommends having the qualified avian biologist continuously monitor nests to detect behavioral changes resulting from Project activities. If behavioral changes occur, CDFW recommends stopping the activity, that is causing the behavioral change, and consulting with a qualified avian biologist on additional avoidance and minimization measures.

Recommended Mitigation Measure 2: Nesting Bird Buffers

During Project activities, if continuous monitoring of nests by a qualified avian biologist is not feasible, CDFW recommends a minimum no-disturbance buffer of 250 feet around active nests of non-listed bird species and a 1,000-foot no-disturbance buffer around active nests of non-listed raptors. These buffers are advised to remain in place until the breeding season has ended or until a qualified avian biologist has determined that the birds have fledged and are no longer reliant upon the nest or on-site parental care for survival. Variance from these no-disturbance buffers is possible when there is compelling biological or ecological reason to do so, such as when the Project area would be concealed from a nest site by topography. CDFW recommends that a qualified avian biologist advise and support any variance from these buffers.

REGULATORY REQUIREMENTS

California Endangered Species Act

Please be advised that a CESA Permit must be obtained if the Project has the potential to result in “take” of plants or animals listed under CESA, either during construction or over the life of the Project. Issuance of a CESA Permit is subject to CEQA documentation; the CEQA document must specify impacts, mitigation measures, and a mitigation monitoring and reporting program. If the Project will impact CESA listed species, early consultation is encouraged, as significant modification to the Project and mitigation measures may be required in order to obtain a CESA Permit.

CEQA requires a Mandatory Finding of Significance if a project is likely to substantially impact threatened or endangered species (CEQA section 21001(c), 21083, and CEQA Guidelines section 15380, 15064, 15065). Impacts must be avoided or mitigated to less-

Ms. Anna Choudhuri
Town of Colma Planning Department
June 26, 2020
Page 5 of 6

than-significant levels unless the CEQA Lead Agency makes and supports Findings of Overriding Consideration (FOC). The CEQA Lead Agency's FOC does not eliminate the Project proponent's obligation to comply with Fish and Game Code section 2080.

Lake and Streambed Alteration (LSA) Program

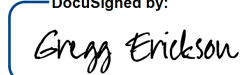
Notification is required, pursuant to CDFW's LSA Program (Fish and Game Code section 1600 et. seq.) for any Project-related activities that will substantially divert or obstruct the natural flow; change or use material from the bed, channel, or bank including associated riparian or wetland resources; or deposit or dispose of material where it may pass into a river, lake or stream. Work within ephemeral streams, washes, watercourses with a subsurface flow, and floodplains are subject to notification requirements. CDFW, as a Responsible Agency under CEQA, will consider the CEQA document for the Project. CDFW may not execute the final LSA Agreement until it has complied with CEQA (Public Resources Code section 21000 et seq.) as the responsible agency.

FILING FEES

CDFW anticipates that the Project will have an impact on fish and/or wildlife, and assessment of filing fees is necessary (Fish and Game Code section 711.4; Pub. Resources Code, section 21089). Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW.

Thank you for the opportunity to comment on the Project's NOP. If you have any questions regarding this letter or for further coordination with CDFW, please contact Ms. Monica Oey, Environmental Scientist, at (707) 428-2088 or monica.oey@wildlife.ca.gov; or Ms. Randi Adair, Senior Environmental Scientist (Supervisory), at randi.adair@wildlife.ca.gov.

Sincerely,

DocuSigned by:

BE74D4C93C604EA...
Gregg Erickson
Regional Manager
Bay Delta Region

REFERENCES

Beiswenger, R. E. 1977. Diet patterns of aggregative behavior in tadpoles of *Bufo americanus*, in relation to light and temperature. Ecology 58:98–108.

Ms. Anna Choudhuri
Town of Colma Planning Department
June 26, 2020
Page 6 of 6

- Bottalico, Pasquale & Spoglianti, Dorina & Bertetti, Carlo & Falossi, Marco. 2015. Effect of noise generated by construction sites on birds, paper presented at Internoise 2015, International Congress and Exposition on Noise Control Engineering.
- Hollis, G. 1975. The effect of urbanization on floods of different recurrence interval. *Water Resources Research* 11:431-435.
- Klem, D. and P. G. Saenger. 2013. Evaluating the Effectiveness of Select Visual Signals to Prevent Bird-window Collisions. *The Wilson Journal of Ornithology* 125(2):406-411.
- Konrad, C.P. and D.B. Booth. 2005. Hydrologic changes in urban streams and their ecological significance, paper presented at American Fisheries Society Symposium, American Fisheries Society.
- Longcore, T., and C. Rich. 2004. Ecological light pollution - Review. *Frontiers in Ecology and the Environment* 2:191–198.
- Loss, S.R., T. Will, S.S. Loss, and P.P. Marra. 2014. Bird-building collisions in the United States: estimates of annual mortality and species vulnerability. *Condor* 116: 8-23.
- Miller, M. W. 2006. Apparent effects of light pollution on singing behavior of American robins. *The Condor* 108:130–139.
- Ortega, C. P. 2012. Chapter 2: Effects of noise pollution on birds: A brief review of our knowledge. *Ornithological Monographs* 47: 6-22.
- Sheppard, C. D. 2019. Evaluating the relative effectiveness of patterns on glass as deterrents of bird collisions with glass. *Global Ecology and Conservation* 20:e00795.
- Stone, E. L., G. Jones, and S. Harris. 2009. Street lighting disturbs commuting bats. *Current Biology* 19:1123–1127. Elsevier Ltd.
- Tabor, R. A., G. S. Brown, and V. T. Luiting. 2004. The effect of light intensity on sockeye salmon fry migratory behavior and predation by cottids in the Cedar River, Washington. *North American Journal of Fisheries Management* 24:128–145.

Laurel Mathews

From: Hallare, Jason <Jason.Hallare@ssf.net>
Sent: Thursday, June 25, 2020 10:16 AM
To: Anna Choudhuri
Subject: NOP EIR - Colma General Plan

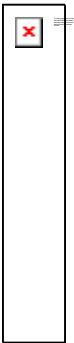
Hi Anna,

SSF has reviewed the NOP you sent us and take no issue with the scope and content presented.

Thank you,



Jason Hallare, P.E. | Senior Engineer
City of South San Francisco | Engineering Division
315 Maple Avenue | South San Francisco, CA 94080
Direct (650) 829-6667 | [Engineering Webpage](#)



Laurel Mathews

From: Fong, Lynn S <LSFong@sfgwater.org>
Sent: Friday, June 12, 2020 2:58 PM
To: Anna Choudhuri
Cc: CDD Engineering
Subject: Notice of Preparation (NOP) response from CCSF CDD Engineering
Attachments: Draft Environmental Impact Report for Town of Colma 06-3-2020.pdf

Hello Anna, The SFPUC City Distribution Division (CDD) Engineering Section has reviewed the Draft Environmental Impact Report for the Town of Colma. CDD Engineering does not have any comments due to the fact that the limits identified on the project location map falls outside of the SF City Distribution Division (CDD) jurisdiction. The jurisdiction line is located that the CCSF City and County limits.

Thank you,

Lynn S. N. Fong, P.E.
City Distribution Division
San Francisco Public Utilities Commission
Phone: 415 550-4922
LSFong@sfgwater.org





BAY AREA
AIR QUALITY
MANAGEMENT
DISTRICT

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Pauline Russo Cutter
Scott Haggerty
Nate Miley

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(SF Mayor's Appointee)

SAN MATEO COUNTY

David J. Canepa
Carole Groom
Davina Hurt

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Jack P. Broadbent
EXECUTIVE OFFICER/APCO

Connect with the
Bay Area Air District:



June 26, 2020

Mr. Michael P. Laughlin, AICP, City Planner
Planning Department
Town of Colma
1198 El Camino Real
Colma, CA 94014

RE: Draft Environmental Impact Report for the Town of Colma 2040 General Plan Update – Notice of Preparation

Dear Mr. Laughlin,

Bay Area Air Quality Management District (Air District) staff has reviewed the Notice of Preparation (NOP) for the Environmental Impact Report for the Town of Colma 2040 General Plan Update (Plan). The Town of Colma intends to prepare a programmatic EIR to evaluate the environmental issues associated with the adoption and buildout of the Plan for Land Use, Circulation/Transportation, Housing, Natural Resources/Conservation, Hazards and Safety, and Historic Resources.

Air District staff recommends the EIR include the following information and analysis:

- **Provide a detailed analysis of the Plan's potential effects on local and regional air quality.** The EIR should include a discussion of the Air District's attainment status for all criteria pollutants and the implications for the region if these standards are not attained or maintained by statutory deadlines. The Air District's CEQA Air Quality Guidelines, which provide guidance on how to evaluate a Plan's construction, operational, and cumulative air quality impacts, can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines>.
- **Estimate and evaluate the potential health risk to populations within and near the Plan area from toxic air contaminants (TAC) and fine particulate matter (PM2.5) as a result of the Plan's construction and operation.** Air District staff recommends that the EIR evaluate potential cumulative health risk impacts of TAC and PM2.5 emissions on sensitive receptors within and near the Plan area. Additionally, Air District staff recommends going beyond current building codes for air filtration, when considering exposure reduction measures.

-
- **The GHG impact analysis should include an evaluation of the Plan's consistency with the most recent draft of the California Air Resources Board's AB 32 Scoping Plan and with the State's 2030 and 2050 climate goals outlined in SB32, as well as the State's Carbon Neutrality by 2045 goals, SB 100, the 100 Percent Clean Energy Act of 2018, and Executive Order B-55-18.** The Air District's current recommended GHG thresholds in our CEQA Guidelines are based on the State's 2020 GHG targets, which are now superseded by the 2030 GHG targets established in SB 32. The EIR should demonstrate how the Plan will be consistent with the Scoping Plan, SB32, SB100 and Executive Order B-55-18.
 - **Identify and include all feasible Plan-level design features to reduce potential impacts of criteria pollutants, TACs, and GHGs.** Chapter 9, Section 6, of the Air District's CEQA Air Quality Guidelines provides recommended mitigation measures and policies for general plans.
 - **Evaluate the Plan's consistency with the Air District's 2017 Clean Air Plan (2017 CAP).** The EIR should discuss 2017 CAP measures relevant to the Plan and show the Plan's consistency with the measures. The 2017 CAP can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans>.
 - **The Air District's CEQA website contains several tools and resources to assist lead agencies in analyzing air quality and GHG impacts.** The tools can be found on the Air District's website: <https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/ceqa-tools>.
 - **Discuss how the Plan will address Senate Bill 1000 (SB1000), the Planning for Healthy Communities Act.** SB1000, which became effective January 1, 2018, requires all California jurisdictions to consider environmental justice issues in their General Plans. Environmental justice (EJ), as defined by the State, focuses on disproportionate and adverse human health impacts that affect low income and minority communities already suffering from cumulative and legacy environmental and health impacts. Although the Town of Colma has not identified any disadvantaged communities and does not plan to add an Environmental Justice element, the Air District supports the Town of Colma's efforts to integrate environmental justice policies into the Plan.

We encourage Town of Colma staff to contact Air District staff with any questions and/or to request assistance during the environmental review process. If you have any questions regarding these comments, please contact Kelly Malinowski, Senior Environmental Planner, at (415) 749-8673 or kmalinowski@baaqmd.gov

Sincerely,



Greg Nudd
Deputy Air Pollution Control Officer

cc: BAAQMD Director David J. Canepa
BAAQMD Director Carole Groom
BAAQMD Director Davina Hurt
Ms. Anna Choudhuri, Planning Department, Town of Colma



**County of San Mateo
Department of Public Works
Utilities-Flood Control-Watershed Protection**

**2040 General Plan Update
Town of Colma**

To: Ms. Ann Choudhuri, Town of Colma Planning Department, 1198 El Camino Real, Colma, CA 94014

From: *MC* Mark Chow, P.E., Principal Civil Engineer, Utilities-Flood Control-Watershed Protection Section

e-cc: Ann Stillman, P.E., Deputy Director, Engineering & Resource Protection Division

Len Materman, CEO, San Mateo County Flood and Sea Level Rise Resiliency District

Krzysztof Lisaj, P.E., Senior Civil Engineer, Utilities-Flood Control-Watershed Protection

Tiffany Deng, P.E., Associate Civil Engineer, Utilities-Flood Control-Watershed Protection

Aaron Francis, Resource Conservation Specialist II, Utilities-Flood Control-Watershed Protection

Date: July 16, 2020

Subject: Colma Creek Flood Control Zone Review, 2040 General Plan Update, Town of Colma

Reason for Review: **Notice of Preparation – Draft Environmental Impact Report for The Town of Colma 2040 General Plan Update**

Reviewers: Tiffany Deng, Aaron Francis

Submittal/Review No.: #1 (Final)

The County of San Mateo Department of Public Works, in its capacity as a consultant for the San Mateo County Flood and Sea Level Rise Resiliency District (District) which includes the Colma Creek Flood Control Zone (Zone), has reviewed the document identified above for the subject project and offers the following comments:

JUL 23 '20 PM 3:30

Flood Control Zone Comments

1. Our records show some of the proposed development sites are located within the Zone. The District requires that the discharge rate from any future development sites not exceed the existing rate prior to development, and drainage analyses and calculations showing existing and future discharge rates must be submitted for review and approval. If it is determined that the future discharge rate exceeds the existing rate, an on-site storm water

2040 General Plan Update, Town of Colma

detention system, which would release surface runoff at a rate comparable to the existing flow rate of the site must be designed and incorporated into the project.

2. The District advocates that trash management measures be incorporated into future projects' design elements of the storm drainage system and appurtenances to keep trash out of local creeks, streams and the District's flood control channel. Please ensure that the trash collecting devices are installed at storm drain inlets and maintained by the property owner(s).

Bio-retention facilities

3. The District anticipates that the Town will be reviewing any bio-retention facilities proposed by future projects for compliance with requirements of Provision C.3.d of the NPDES Municipal Regional Stormwater Permit (Order No. R2-2015-0049) from the San Francisco Bay Regional Water Quality Control Board.

Biological Resources

4. Biological reports and/or design plans for future projects that have the potential to impact habitats within the Zone shall be submitted to the District for review and comment.

Laurel Mathews

From: Michael Laughlin (Colma Contractor) <mlaughlin@colma.ca.gov>
Sent: Thursday, June 18, 2020 1:30 PM
To: Kelly Malinowski
Cc: Areana Flores; Anna Choudhuri
Subject: RE: Town of Colma General Plan NOP: an additional question

Hi Kelly – Yes, it was CalEnviorScreen 3.

For the GP buildout, the numbers you list below are possible totals. However, these are not the net totals when you consider the buildout potential of the current General Plan. Net numbers would be:

Residential: 256

Commercial: 828,000

Office: -49,000 (existing GP is 84,000 sf. and new GP is 35,000. Office square footage was shifted to more general commercial in new GP assumptions)

Sincerely,

Michael P. Laughlin, AICP

City Planner, CSG Consultants

michael.laughlin@colma.ca.gov

650.757.8888 *main*

650.757.8896 *direct*

650.757.8890 *fax*

From: Kelly Malinowski <kmalinowski@baaqmd.gov>
Sent: Thursday, June 18, 2020 12:12 PM
To: Michael Laughlin (Colma Contractor) <mlaughlin@colma.ca.gov>
Cc: Areana Flores <aflores@baaqmd.gov>; Anna Choudhuri <annac@csgengr.com>
Subject: Re: Town of Colma General Plan NOP: an additional question

Hi Michael,

Thanks for the quick response on this, I enjoyed talking with you too! All sounds good and makes sense regarding SB1000.

Just 2 quick clarifying questions:

- Which resource did you consult RE: disadvantaged communities? Was it CalEnviroScreen 3.0?
- For the improvements included in the update (below), are these all new?

- "Specifically, the update will include: 328 residential units, 993,500 square feet of commercial building space, and 35,000 square feet of office building space[WG1]."

I am not sure if we will end up sending a letter officially, but I will let you know either way next week once our Director is back in the office, and can send info. we would have sent in the letter via email, if helpful, if we don't end up sending an official letter.

Thanks again Michael for all of this help, hope you are having a good rest of your week!

Kelly

Kelly Malinowski, MPA | Senior Environmental Planner

Planning and Climate Protection Division

Bay Area Air Quality Management District

Office: 415-749-8673

From: Michael Laughlin (Colma Contractor) <michael.laughlin@colma.ca.gov>
Sent: Thursday, June 18, 2020 8:18 AM
To: Kelly Malinowski <kmalinowski@baaqmd.gov>
Cc: Areana Flores <aflores@baaqmd.gov>; Anna Choudhuri <annac@csgengr.com>
Subject: RE: Town of Colma General Plan NOP: an additional question

Hi Kelly – I enjoyed talking with you the other day! Colma is small, with just over 450 residential units, which are located primarily in the north part of the town, just east of the Colma BART station. From all of the resources I have consulted, Colma does not have any areas of the town which are disadvantaged communities (although the area north of the BART station in unincorporated San Mateo County and in Daly City do have some disadvantaged communities). We are not planning to prepare a separate Environmental Justice element (since there would not be much to say). Instead, we will be incorporating policies in the plan to satisfy our SB1000 requirements.

Please let us know if you have any additional questions.

Sincerely,

Michael P. Laughlin, AICP

City Planner, CSG Consultants



Town of Colma

Planning Department

1198 El Camino Real, Colma, CA 94014

www.colma.ca.gov

michael.laughlin@colma.ca.gov

650.757.8888 *main*

650.757.8896 *direct*

650.757.8890 *fax*

Colma Green!

From: Kelly Malinowski <kmalinowski@baaqmd.gov>
Sent: Wednesday, June 17, 2020 5:58 PM
To: Michael Laughlin (Colma Contractor) <mclaughlin@colma.ca.gov>
Cc: Areana Flores <aflores@baaqmd.gov>
Subject: Town of Colma General Plan NOP: an additional question

Hi Michael,

Thanks so much for your call the other day to touch base on the Town of Colma General Plan NOP, and our question of your planned location for housing. Thanks also for sharing my enthusiasm and interest about the Town! 😊

I wanted to reach back out with one more clarifying question, regarding [SB1000](#), legislation directing cities to include identification of disadvantaged communities within the area covered by the General Plan, to either adopt an Environmental Justice element, or incorporate Environmental Justice goals and policies into other elements of the General Plan.

Do you know yet if you have any identified disadvantaged communities, and if you plan to include this element or these types of goals? I know the Town is small, and might not have any disadvantaged communities as identified by the state, so wanted to check-in before including this type of recommendation in the forthcoming letter.

Thanks so much for your time with this question, and if easier to discuss on the phone, I'm free tomorrow anytime before 2:30p or after 4:30p if helpful.

Thanks Michael!
Kelly

Kelly Malinowski, MPA | Senior Environmental Planner

Planning and Climate Protection Division

Bay Area Air Quality Management District

Office: 415-749-8673

Appendix B

Notices to Tribes

Appendix B contains a list identifying all tribes that the lead agency must notify under SB 18 and AB 52 pursuant to the preparation of an environmental document, and the letters that were sent to those tribes with notice of the EIR.

STATE OF CALIFORNIA

Edmund G. Brown Jr., Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
Fax (916) 657-5390



January 4, 2012

Michael Laughlin
Town of Colma Planning Department
1190 El Camino Real
Colma, CA 94014

Fax #: 650-757-8890

of Pages: 2

RE: SB 18 Tribal Consultation: Town of Colma 2009 Housing Element Update, San Mateo County.

Dear Mr. Laughlin:

Government Code §65352.3 requires local governments to consult with California Native American tribes identified by the Native American Heritage Commission (NAHC) for the purpose of protecting, and/or mitigating impacts to cultural places. Attached is a consultation list of tribes with traditional lands or cultural places located within the requested plan amendment boundaries.

As a part of consultation, the NAHC recommends that local governments conduct record searches through the NAHC and California Historic Resources Information System (CHRIS) to determine if any cultural places are located within the area(s) affected by the proposed action. NAHC Sacred Lands File requests must be made in writing. All requests must include county, USGS quad map name, township, range and section. Local governments should be aware, however, that records maintained by the NAHC and CHRIS are not exhaustive, and a negative response to these searches does not preclude the existence of a cultural place. A tribe may be the only source of information regarding the existence of a cultural place.

If you receive notification of change of addresses and phone numbers from Tribes, please notify me. With your assistance we are able to assure that our consultation list contains current information.

If you have any questions, please contact me at (916) 653-4040.

Sincerely,

A handwritten signature in black ink, appearing to read "Debbie Pilas-Treadway".

Debbie Pilas-Treadway
Environmental Specialist III

RECEIVED

JAN 04 2012

PLANNING DEPT

**Native American Tribal Consultation List
San Mateo County
January 4, 2012**

Amah/Mutsun Tribal Band
Irene Zwierlein, Chairperson
789 Canada Road
Woodside, CA 94062
amah_mutsun@yahoo.com
(650) 851-7747 - Home

Ohlone/Costanoan

Indian Canyon Mutsun Band of Costanoan
Ann Marie Sayers, Chairperson
P.O. Box 28
Hollister, CA 95024
ams@indiancanyon.org
831-637-4238

Ohlone/Costanoan

Muwekma Ohlone Indian Tribe of the SF Bay Area
Rosemary Cambra, Chairperson
2574 Seaboard Avenue
San Jose, CA 95131
muwekma@muwekma.org
408-205-9714

Ohlone / Costanoan

The Ohlone Indian Tribe
Andrew Galvan
PO Box 3152
Fremont, CA 94539
chochenyo@AOL.com
(510) 882-0527 - Cell

Ohlone/Costanoan
Bay Miwok
Plains Miwok
Patwin

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3.

NATIVE AMERICAN HERITAGE COMMISSION

7/2/2020

June 5, 2020

Governor's Office of Planning & Research

Anna Choudhuri
Town of Colma
1198 El Camino Real
Colma, CA 94116

Jun 12 2020

STATE CLEARINGHOUSE

Re: 2020069005, Town of Colma General Plan Update Project, San Mateo County

Dear Ms. Choudhuri:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, § 15064.5 (b) (CEQA Guidelines §15064.5 (b))). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines § 15064 (a)(1))). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.



CHAIRPERSON
Laura Miranda
Luiseño

VICE CHAIRPERSON
Reginald Pagaling
Chumash

SECRETARY
Merri Lopez-Keifer
Luiseño

PARLIAMENTARIAN
Russell Attebery
Karuk

COMMISSIONER
Marshall McKay
Wintun

COMMISSIONER
William Mungary
Paiute/White Mountain
Apache

COMMISSIONER
Julie Tumamait-Stenslie
Chumash

COMMISSIONER
[Vacant]

COMMISSIONER
[Vacant]

EXECUTIVE SECRETARY
Christina Snider
Pomo

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project:

Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:

- a. A brief description of the project.
- b. The lead agency contact information.
- c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
- d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).

2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subs. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1 (b)).

- a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).

3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:

- a. Alternatives to the project.
- b. Recommended mitigation measures.
- c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).

4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:

- a. Type of environmental review necessary.
- b. Significance of the tribal cultural resources.
- c. Significance of the project's impacts on tribal cultural resources.
- d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).

5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).

6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:

- a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
- b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

- 7. Conclusion of Consultation:** Consultation with a tribe shall be considered concluded when either of the following occurs:
- a.** The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b.** A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).
- 8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document:** Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).
- 9. Required Consideration of Feasible Mitigation:** If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).
- 10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:**
- a.** Avoidance and preservation of the resources in place, including, but not limited to:
 - i.** Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii.** Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b.** Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i.** Protecting the cultural character and integrity of the resource.
 - ii.** Protecting the traditional use of the resource.
 - iii.** Protecting the confidentiality of the resource.
 - c.** Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d.** Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e.** Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f.** Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).
- 11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource:** An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
- a.** The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b.** The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c.** The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>.

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.

4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, § 15064.5(f) (CEQA Guidelines § 15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code § 7050.5, Public Resources Code § 5097.98, and Cal. Code Regs., tit. 14, § 15064.5, subdivisions (d) and (e) (CEQA Guidelines § 15064.5, subds. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Nancy.Gonzalez-Lopez@nahc.ca.gov.

Sincerely,



Nancy Gonzalez-Lopez
Staff Services Analyst

cc: State Clearinghouse



June 5, 2020

Irenne Zwierlein, Chair
Amah Mutsun Tribal Band of Mission San Juan Bautista
789 Canada Road
Woodside, CA 94062

RE: SB 18 and AB52 Notification for the Colma General Plan Update

Dear Ms. Zwierlein,

This letter is to notify you of the proposed update of the Colma General Plan (Project) in the Town of Colma (Town), San Mateo County, California. The Town of Colma is in the process of updating its General Plan, last updated in 1999. As described in the attached Notice of Preparation, the update will consider changes in land uses for sites within the Town. Since the Project requires a General Plan Amendment, the Town must comply with California Public Resources Code Sections 65352.3- 65352.4 per Senate Bill 18 (SB 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the California Native American Heritage Commission prior to approval of the Project.

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the Town, as Lead Agency under CEQA, will prepare an Environmental Impact Report (EIR) for the General Plan Update Project.

This letter also serves to initiate consultation in compliance with Assembly Bill 52 (AB 52, Chapter 532, Statutes of 2014), which is required to consider the Project potential impacts to tribal cultural resources as part of the CEQA environmental review. To ensure compliance with AB 52 and Public Resources Code Section 21080.3.1, we are requesting any information you may have of tribal cultural resources within the Project area boundaries and offer this opportunity to request consultation with the Town regarding this Project.

Your input is important to the Town's planning process. We request that you advise the Town if you wish to initiate consultations with the Town on the Project. Under the provisions of SB 18, you have 90 days from the date of this notice to advise the Town if you are interested in further consultation. Under the provisions of AB 52 (and currently Executive Order N-54-20 extending the review period due to Covid-19), you have 60 days from the receipt of this notice to advise the Town if you are interested in consultation.

If you know of any cultural resources that may be of religious and/or cultural significance to your community within the Project area, or if you would like more project information, please contact Anna Choudhuri by letter, phone or email at this address:



TOWN OF COLMA
PLANNING DEPARTMENT

1198 El Camino Real • Colma, California 94014
Phone: (650) 757-8888 • FAX: (650) 757-8890

Ms. Anna Choudhuri
Town of Colma Planning Department
1198 El Camino Real
Colma, CA 94014
(530) 574-2031
annac@csgengr.com

Your comments are important to the Town. Thank you for your involvement in this process.

Michael P Laughlin AICP
City Planner

Attachment: Notice Of Preparation, Town of Colma General Plan



June 5, 2020

Ann Marie Sayers
Indian Canyon Mutsun Band of Costanoan
P.O. Box 28
Hollister, CA 95024

RE: SB 18 and AB52 Notification for the Colma General Plan Update

Dear Ms. Sayers,

This letter is to notify you of the proposed update of the Colma General Plan (Project) in the Town of Colma (Town), San Mateo County, California. The Town of Colma is in the process of updating its General Plan, last updated in 1999. As described in the attached Notice of Preparation, the update will consider changes in land uses for sites within the Town. Since the Project requires a General Plan Amendment, the Town must comply with California Public Resources Code Sections 65352.3- 65352.4 per Senate Bill 18 (SB 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the California Native American Heritage Commission prior to approval of the Project.

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Your input is important to the Town's planning process. We request that you advise the Town if you wish to initiate consultations with the Town on the Project. Under the provisions of SB 18, you have 90 days from the date of this notice to advise the Town if you are interested in further consultation. Under the provisions of AB 52 (and currently Executive Order N-54-20 extending the review period due to Covid-19), you have 60 days from the receipt of this notice to advise the Town if you are interested in consultation.

If you know of any cultural resources that may be of religious and/or cultural significance to your community within the Project area, or if you would like more project information, please contact Anna Choudhuri by letter, phone or email at this address:



June 5, 2020

Mr. Tony Cerda
Coastanoan Rumsen Carmel Tribe
240 East 1st Street
Pomona, CA 91766

RE: SB 18 and AB52 Notification for the Colma General Plan Update

Dear Mr. Cerda,

This letter is to notify you of the proposed update of the Colma General Plan (Project) in the Town of Colma (Town), San Mateo County, California. The Town of Colma is in the process of updating its General Plan, last updated in 1999. As described in the attached Notice of Preparation, the update will consider changes in land uses for sites within the Town. Since the Project requires a General Plan Amendment, the Town must comply with California Public Resources Code Sections 65352.3- 65352.4 per Senate Bill 18 (SB 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the California Native American Heritage Commission prior to approval of the Project.

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If you know of any cultural resources that may be of religious and/or cultural significance to your community within the Project area, or if you would like more project information, please contact Anna Choudhuri by letter, phone or email at this address:



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Phone: (650) 757-8888 • FAX: (650) 757-8890

Ms. Anna Choudhuri
Town of Colma Planning Department
1198 El Camino Real
Colma, CA 94014
(530) 574-2031
annac@csgengr.com

Your comments are important to the Town. Thank you for your involvement in this process.

Michael P Laughlin AICP
City Planner

Attachment: Notice Of Preparation, Town of Colma General Plan



June 5, 2020

Andrew Galvan
The Ohlone Tribe
P.O. Box 3152
Fremont, CA 94539

RE: SB 18 and AB52 Notification for the Colma General Plan Update

Dear Mr. Galvan,

This letter is to notify you of the proposed update of the Colma General Plan (Project) in the Town of Colma (Town), San Mateo County, California. The Town of Colma is in the process of updating its General Plan, last updated in 1999. As described in the attached Notice of Preparation, the update will consider changes in land uses for sites within the Town. Since the Project requires a General Plan Amendment, the Town must comply with California Public Resources Code Sections 65352.3- 65352.4 per Senate Bill 18 (SB 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the California Native American Heritage Commission prior to approval of the Project.

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the Town, as Lead Agency under CEQA, will prepare an Environmental Impact Report (EIR) for the General Plan Update Project.

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Town of Colma Planning Department
1198 El Camino Real
Colma, CA 94014
(530) 574-2031
annac@csgengr.com

Your comments are important to the Town. Thank you for your involvement in this process.

Michael P Laughlin AICP
City Planner

Attachment: Notice Of Preparation, Town of Colma General Plan



June 5, 2020

Monica Arellano
Muwekma Ohlone Tribe of the San Francisco Bay Area
PO Box 360791
Milpitas, CA 95036

RE: SB 18 and AB52 Notification for the Colma General Plan Update

Dear Ms. Arellano,

This letter is to notify you of the proposed update of the Colma General Plan (Project) in the Town of Colma (Town), San Mateo County, California. The Town of Colma is in the process of updating its General Plan, last updated in 1999. As described in the attached Notice of Preparation, the update will consider changes in land uses for sites within the Town. Since the Project requires a General Plan Amendment, the Town must comply with California Public Resources Code Sections 65352.3- 65352.4 per Senate Bill 18 (SB 18), which requires local governments to conduct meaningful consultation with California Native American tribes on the contact list maintained by the California Native American Heritage Commission prior to approval of the Project.

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, the Town, as Lead Agency under CEQA, will prepare an Environmental Impact Report (EIR) for the General Plan Update Project.

This letter also serves to initiate consultation in compliance with Assembly Bill 52 (AB 52, Chapter 532, Statutes of 2014), which is required to consider the Project potential impacts to tribal cultural resources as part of the CEQA environmental review. To ensure compliance with AB 52 and Public Resources Code Section 21080.3.1, we are requesting any information you may have of tribal cultural resources within the Project area boundaries and offer this opportunity to request consultation with the Town regarding this Project.

Your input is important to the Town's planning process. We request that you advise the Town if you wish to initiate consultations with the Town on the Project. Under the provisions of SB 18, you have 90 days from the date of this notice to advise the Town if you are interested in further consultation. Under the provisions of AB 52 (and currently Executive Order N-54-20 extending the review period due to Covid-19), you have 60 days from the receipt of this notice to advise the Town if you are interested in consultation.

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Ms. Anna Choudhuri
Town of Colma Planning Department
1198 El Camino Real
Colma, CA 94014
(530) 574-2031
annac@csgengr.com

Your comments are important to the Town. Thank you for your involvement in this process.

Michael P Laughlin AICP
City Planner

Attachment: Notice Of Preparation, Town of Colma General Plan

Appendix C

Noticing for Draft EIR

Appendix C contains the Notice of Availability (NOA), Notice of Completion (NOC), and State Clearinghouse Summary form that were submitted and posted during the public review period for the Draft Environmental Impact Report

Notice of Availability of a Draft Environmental Impact Report
for the
Colma 2040 General Plan Update
SCH No. 2020-069005

SUMMARY:

Notice is hereby given by the Town of Colma, as the Lead Agency pursuant to the California Environmental Quality Act (CEQA), that the above-named draft Program Environmental Impact Report (DPEIR) is available for public review and comment.

Comments on the DPEIR will be received for a 50-day period, commencing on December 6, 2021 and ending at 5:00pm on January 25, 2021, after which a Final PEIR will be prepared containing comments and responses to comments that, together with the DPEIR, will form the Final PEIR. The Final PEIR will be used by the Town of Colma City Council in its consideration of approval of the proposed 2040 General Plan Update, described below.

PROJECT LOCATION AND DESCRIPTION:

The proposed 2040 General Plan Update applies to the entire Town of Colma. The Town is bounded by San Bruno Mountain, Lawndale Blvd, Interstate-280, and F Street.

Under State of California law (Government Code §65300 et seq.), every city and county in the State is required to adopt a general plan that functions as the comprehensive and all-encompassing policy document for future growth and development. The purpose of a jurisdiction's general plan is to function as a "constitution" for land use planning and to provide a basis for sound decisions regarding long-term physical development, for development in the incorporated area, as well in any land outside city boundaries. It also provides the connection between community values, objectives, and decisions on the Town of Colma's future housing, growth, and development.

California Government Code §65302 requires that a general plan include the following seven elements: Land Use, Circulation, Housing, Conservation, Open Space, Noise, and Safety. Additional elements may be included as well, at the discretion of a jurisdiction. All elements have equal weight, and no one element supersedes another. Cities and towns may amend the general plan four times a year (each amendment may include any number of changes), and cities are encouraged to keep the plan current through regular updates. The current Town of Colma General Plan has not been comprehensively updated since it was first adopted on June 16, 1999, by Resolution 99-22. The 2040 Town of Colma General Plan Update updates the Town's 1999 General Plan Elements: Land Use; Mobility (Circulation); Community Health, Safety and Services (Noise and Safety); and Open Space and Conservation. The Housing Element is not

currently being updated. Colma is not required to include an environmental justice element because it does not contain any Communities of Concern, as defined by the State of California.

ANTICIPATED SIGNIFICANT ENVIRONMENTAL EFFECTS:

The DEIR's analysis of project impacts identified potentially significant impacts on the following:

- Air Quality (Potential impacts range from less than significant to significant)
- Cultural and Tribal Resources (Potential impacts are potentially significant)
- Greenhouse Gas Emissions (Potential impacts range from less than significant to significant)

PUBLIC REVIEW PROCESS:

One purpose of the California Environmental Quality Act is to inform the public of the potential environmental impacts of a project such as the 2040 General Plan Update. The purpose of this notice is to consult with and request comment on the DEIR from interested parties and responsible agencies.

The DEIR is available for review between 9:00am and 4:00pm Monday through Friday at Colma Town Hall, 1198 El Camino Real, California 94014

The DEIR is also available for review or download at the Town of Colma website, www.colma.ca.gov.

Comments on the DEIR may be submitted to:

Town of Colma
Planning Department
ATTN: 2040 General Plan Update DEIR
1198 El Camino Real
Colma, CA 94014

Please include a return address and contact name with your written comments. Comments can also be sent via email with subject line "2040 General Plan Update DEIR" to planning@colma.ca.gov.

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH # 2020069005

Project Title: 2040 General Plan Update

Lead Agency: Town of Colma Contact Person: Brian Dossey
 Mailing Address: 1198 El Camino Real Phone: 650-997-8300
 City: Colma Zip: 94014 County: San Mateo

Project Location: County: San Mateo City/Nearest Community: Colma

Cross Streets: Entire Town - bounded by San Bruno Mountain, Lawndale Blvd, I-280 and F Street Zip Code: 94014

Longitude/Latitude (degrees, minutes and seconds): _____ ° _____ ' _____ " N / _____ ° _____ ' _____ " W Total Acres: _____

Assessor's Parcel No.: N/A Section: _____ Twp.: _____ Range: _____ Base: _____

Within 2 Miles: State Hwy #: 280, 82 Waterways: Colma Creek

Airports: None Railways: None (BART runs underground) Schools: Jefferson Union and SSF

Document Type:

CEQA: NOP Draft EIR NEPA: NOI Other: Joint Document
 Early Cons Supplement/Subsequent EIR EA Final Document
 Neg Dec (Prior SCH No.) _____ Draft EIS Other: _____
 Mit Neg Dec Other: _____ FONSI

Local Action Type:

General Plan Update Specific Plan Rezone Annexation
 General Plan Amendment Master Plan Prezone Redevelopment
 General Plan Element Planned Unit Development Use Permit Coastal Permit
 Community Plan Site Plan Land Division (Subdivision, etc.) Other: _____

Development Type:

Residential: Units _____ Acres _____
 Office: Sq.ft. _____ Acres _____ Employees _____ Transportation: Type _____
 Commercial: Sq.ft. _____ Acres _____ Employees _____ Mining: Mineral _____
 Industrial: Sq.ft. _____ Acres _____ Employees _____ Power: Type _____ MW _____
 Educational: _____ Waste Treatment: Type _____ MGD _____
 Recreational: _____ Hazardous Waste: Type _____
 Water Facilities: Type _____ MGD _____ Other: General Plan Update

Project Issues Discussed in Document:

Aesthetic/Visual Fiscal Recreation/Parks Vegetation
 Agricultural Land Flood Plain/Flooding Schools/Universities Water Quality
 Air Quality Forest Land/Fire Hazard Septic Systems Water Supply/Groundwater
 Archeological/Historical Geologic/Seismic Sewer Capacity Wetland/Riparian
 Biological Resources Minerals Soil Erosion/Compaction/Grading Growth Inducement
 Coastal Zone Noise Solid Waste Land Use
 Drainage/Absorption Population/Housing Balance Toxic/Hazardous Cumulative Effects
 Economic/Jobs Public Services/Facilities Traffic/Circulation Other: _____

Present Land Use/Zoning/General Plan Designation:

N/A

Project Description: (please use a separate page if necessary)

The Town of Colma is updating its 1999 General Plan. The 2040 General Plan Update will provide the context to effectively plan and manage the Town of Colma's future growth based on an updated set of goals, policies, and implementation programs that reflect the values and aspirations for future expansions in the community, as expressed by residents and the business community. As required by California Government Code 65302, the Town of Colma General Plan Update include the following Elements: Land Use, Circulation/Transportation (Mobility), Housing, Natural Resources/Conservation, Hazards and Safety. In addition to these elements, the Town of Colma has been chosen to prepare an Historic Resources Element due to most of the Town's land use being reserved for cemetery uses as well as the many historic resources present both in and outside of the Town's cemeteries.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X". If you have already sent your document to the agency please denote that with an "S":

- | | |
|---|--|
| <input checked="" type="checkbox"/> Air Resources Board | <input checked="" type="checkbox"/> Office of Historic Preservation |
| <input type="checkbox"/> Boating & Waterways, Department of | <input type="checkbox"/> Office of Public School Construction |
| <input type="checkbox"/> California Emergency Management Agency | <input checked="" type="checkbox"/> Parks & Recreation, Department of |
| <input type="checkbox"/> California Highway Patrol | <input type="checkbox"/> Pesticide Regulation, Department of |
| <input checked="" type="checkbox"/> Caltrans District # <u>4</u> | <input checked="" type="checkbox"/> Public Utilities Commission |
| <input type="checkbox"/> Caltrans Division of Aeronautics | <input checked="" type="checkbox"/> Regional WQCB # <u>2</u> |
| <input checked="" type="checkbox"/> Caltrans Planning | <input type="checkbox"/> Resources Agency |
| <input type="checkbox"/> Central Valley Flood Protection Board | <input type="checkbox"/> Resources Recycling and Recovery, Department of |
| <input type="checkbox"/> Coachella Valley Mtns. Conservancy | <input type="checkbox"/> S.F. Bay Conservation & Development Comm. |
| <input type="checkbox"/> Coastal Commission | <input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy |
| <input type="checkbox"/> Colorado River Board | <input type="checkbox"/> San Joaquin River Conservancy |
| <input checked="" type="checkbox"/> Conservation, Department of | <input type="checkbox"/> Santa Monica Mtns. Conservancy |
| <input type="checkbox"/> Corrections, Department of | <input type="checkbox"/> State Lands Commission |
| <input type="checkbox"/> Delta Protection Commission | <input type="checkbox"/> SWRCB: Clean Water Grants |
| <input type="checkbox"/> Education, Department of | <input checked="" type="checkbox"/> SWRCB: Water Quality |
| <input checked="" type="checkbox"/> Energy Commission | <input type="checkbox"/> SWRCB: Water Rights |
| <input checked="" type="checkbox"/> Fish & Game Region # <u>3</u> | <input type="checkbox"/> Tahoe Regional Planning Agency |
| <input type="checkbox"/> Food & Agriculture, Department of | <input type="checkbox"/> Toxic Substances Control, Department of |
| <input type="checkbox"/> Forestry and Fire Protection, Department of | <input type="checkbox"/> Water Resources, Department of |
| <input type="checkbox"/> General Services, Department of | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Health Services, Department of | <input type="checkbox"/> Other: _____ |
| <input checked="" type="checkbox"/> Housing & Community Development | |
| <input checked="" type="checkbox"/> Native American Heritage Commission | |

Local Public Review Period (to be filled in by lead agency)

Starting Date 12/06/2021 Ending Date 01/25/2022

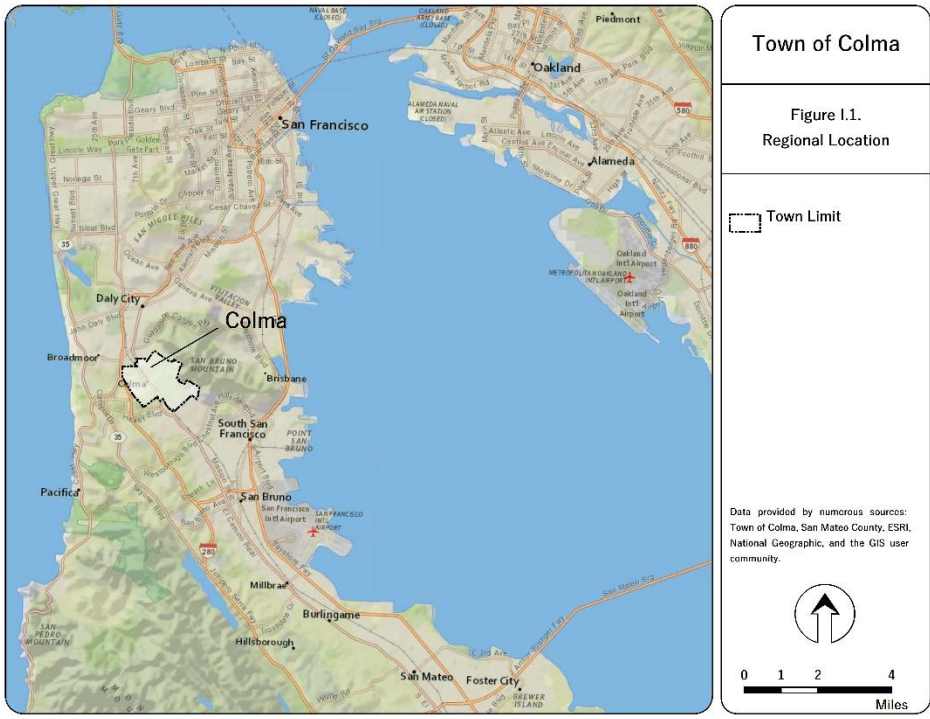
Lead Agency (Complete if applicable):

Consulting Firm: <u>CSG Consultants</u>	Applicant: <u>Town of Colma</u>
Address: <u>550 Pilgrim Drive</u>	Address: <u>1198 El Camino Real</u>
City/State/Zip: <u>Foster City, CA 94404</u>	City/State/Zip: <u>Colma, CA 94014</u>
Contact: <u>Farhad Mortazavi</u>	Phone: <u>650-757-8888</u>
Phone: <u>650-757-8896</u>	

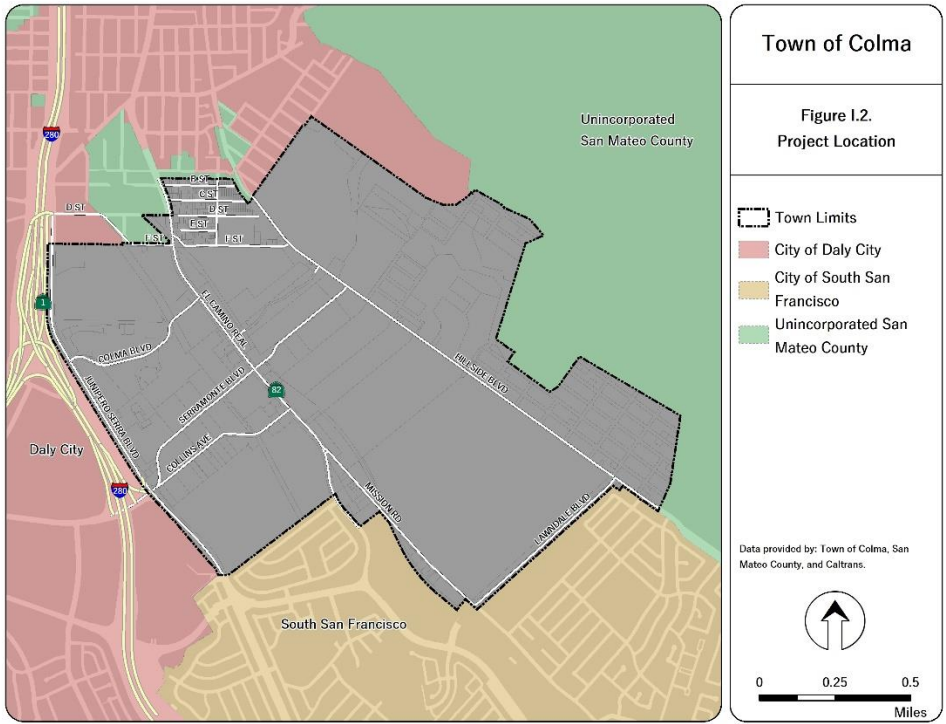
Signature of Lead Agency Representative:  Date: 12/06/2021

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.

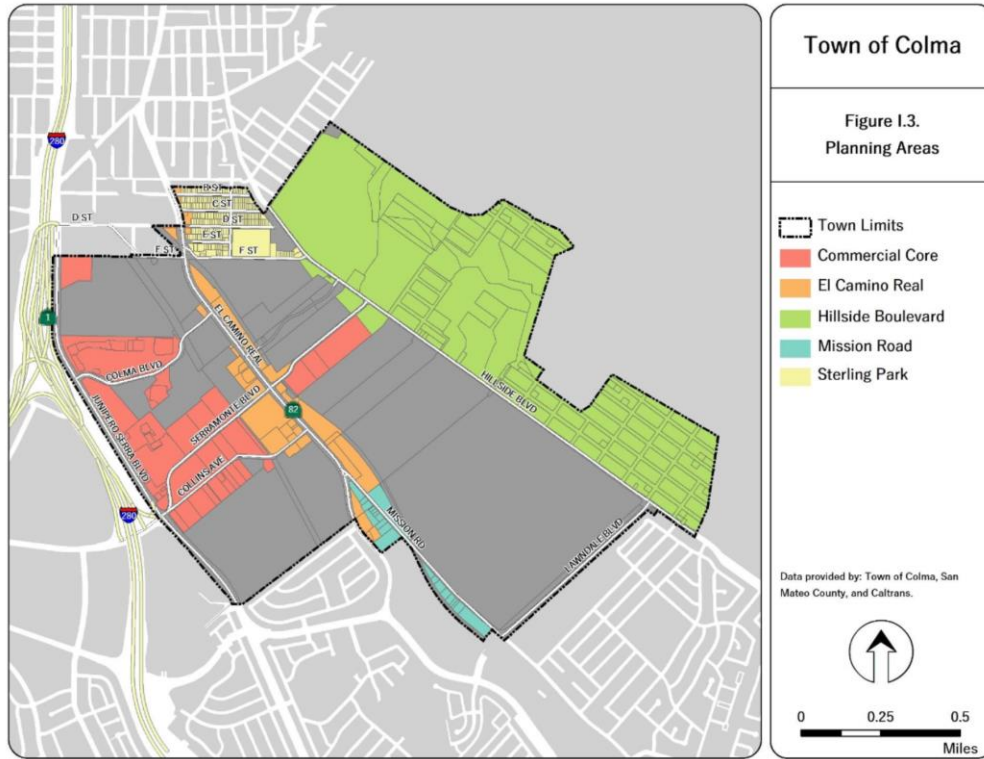
Project Location: Regional Location



Project Location: Town of Colma Boundaries



Project Location: Planning Areas



Summary Form for Electronic Document Submittal

Form F

Lead agencies may include 15 hardcopies of this document when submitting electronic copies of Environmental Impact Reports, Negative Declarations, Mitigated Negative Declarations, or Notices of Preparation to the State Clearinghouse (SCH). The SCH also accepts other summaries, such as EIR Executive Summaries prepared pursuant to CEQA Guidelines Section 15123. Please include one copy of the Notice of Completion Form (NOC) with your submission and attach the summary to each electronic copy of the document.

SCH #: 2020069005

Project Title: 2040 General Plan Update

Lead Agency: Town of Colma

Contact Name: Brian Dossey

Email: brian.dossey@colma.ca.gov Phone Number: 6507578300

Project Location: Town of Colma San Mateo County
City *County*

Project Description (Proposed actions, location, and/or consequences).

The Town of Colma is updating its 1999 General Plan. The 2040 General Plan Update will provide the context to effectively plan and manage the Town of Colma's future growth based on an updated set of goals, policies, and implementation programs that reflect the values and aspirations for future expansions in the community, as expressed by residents and the business community. As required by California Government Code 65302, the Town of Colma General Plan Update include:the following Elements: Land Use, Circulation/Transportation (Mobility), Housing, Natural Resources/Conservation, Hazards and Safety. In addition to these elements, the Town of Colma has been chosen to prepare an Historic Resources Element due to most of the Town's land use being reserved for cemetery uses as well as the many historic resources present both in and outside of the Town's cemeteries.

Identify the project's significant or potentially significant effects and briefly describe any proposed mitigation measures that would reduce or avoid that effect.

The DEIR's analysis of project impacts identified potentially significant impacts on the following: Air Quality (Potential impacts range from less than significant to significant); Cultural and Tribal Resources (Potential impacts are potentially significant); Greenhouse Gas Emissions (Potential impacts range from less than significant to significant).

Impact 4.2.2: The project would result in a cumulatively considerable net increase of criteria pollutants for which the project region is in non-attainment under applicable federal or State ambient air quality standard. (Significant and Unavoidable). Mitigation Measure AQ-1 (page 4.2-36); AQ-2 (page 4.2-36 to 4.2-38). Impact 4.2.3: The project could expose sensitive receptors to substantial pollutant concentrations. (Significant and Unavoidable). Mitigation Measure AQ-3 (page. 4.2-40 to 4.2-42); AQ-4 (page 4.2-42 to 4.2-43). Impact 4.4.1: Future development to implement the proposed project could potentially cause a direct substantial adverse change in the significance of an historical resource as defined in CEQA Guidelines Section §15064.5 (Significant and Unavoidable). Mitigation Measure CUL-1 (page 4.4-24 to 4.2-25). Impact 4.4.2: Future development to implement the proposed General Plan Update could result in the potential disturbance of cultural resources (i.e. prehistoric archaeological sites, historical archaeological sites, and isolated artifacts and features) within the Planning Area. (Significant and Unavoidable). Mitigation Measure CUL-2 (page 4.4-27). Impact 4.4.3: Would the project cause a substantial adverse change in the significance of a TCR as defined in Public Resources Code Section §21074 or §5020.1(k) (Significant and Unavoidable). Mitigation Measure CUL-3 (page 4.4-28). Impact 4.4.4: Adoption of the proposed General Plan Update could result in the potential disturbance of human remains, including those interred outside of cemeteries within the Planning Area. (Significant and Unavoidable). Mitigation Measure CUL-4 (page 4.4-29 to 4.2-30). Impact 4.7.1: Implementation of the proposed project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. (Significant and Unav

If applicable, describe any of the project's areas of controversy known to the Lead Agency, including issues raised by agencies and the public.

N/A

Provide a list of the responsible or trustee agencies for the project.

Town of Colma (Lead Agency), CSG Consultants (Consultant)

Appendix D

Notice of Determination

Appendix D contains the Notice of Determination which was submitted along with the Final EIR.

Notice of Determination

Appendix D

To:

Office of Planning and Research
U.S. Mail: Street Address:
P.O. Box 3044 1400 Tenth St., Rm 113
Sacramento, CA 95812-3044 Sacramento, CA 95814

County Clerk
County of: San Mateo
Address: 555 County Center
Redwood City, CA 94063

From:

Public Agency: Town of Colma
Address: 1198 El Camino Real
Contact: Brian Dossey
Phone: 650-757-8888

Lead Agency (if different from above):
Address: _____
Contact: _____
Phone: _____

SUBJECT: Filing of Notice of Determination in compliance with Section 21108 or 21152 of the Public Resources Code.

State Clearinghouse Number (if submitted to State Clearinghouse): 2020069005

Project Title: 2040 General Plan Update

Project Applicant: Town of Colma

Project Location (include county): Entire town of Colma, San Mateo County

Project Description:

The Town of Colma is updating its 1999 General Plan. The 2040 General Plan Update will provide the context to effectively plan and manage the Town of Colma's future growth based on an updated set of goals, policies, and implementation programs that reflect the values and aspirations for future expansions in the community, as expressed by residents and the business community. As required by California Government Code 65302, the Town of Colma General Plan Update include:the following **+**

This is to advise that the Town of Colma has approved the above
(Lead Agency or Responsible Agency)

described project on 03/23/2022 and has made the following determinations regarding the above
(date)
described project.

1. The project [will will not] have a significant effect on the environment.
2. An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
 A Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [were were not] made a condition of the approval of the project.
4. A mitigation reporting or monitoring plan [was was not] adopted for this project.
5. A statement of Overriding Considerations [was was not] adopted for this project.
6. Findings [were were not] made pursuant to the provisions of CEQA.

This is to certify that the final EIR with comments and responses and record of project approval, or the negative Declaration, is available to the General Public at:
www.colma.ca.gov

Signature (Public Agency):  Title: City Manager

Date: 03/23/2022 Date Received for filing at OPR: _____