



**U.S. Department of Housing and Urban
Development**

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Washington, DC 20410
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Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58

Project Information

Project Name: Eastmoor Residential Development

Responsible Entity: City of Daly City
333 90th Street
Daly City, CA 94015

Grant Recipient (if different than Responsible Entity): City of Daly City
333 90th Street
Daly City, CA 94015

Grant Recipient (if different than Responsible Entity): County of San Mateo
Department of Housing
264 Harbor Blvd., Bldg. A
Belmont, CA 94002

State/Local Identifier: California

Preparer: Dudek
725 Front Street, Suite 400
Santa Cruz, CA 95060

Certifying Officer Name and Title: Thomas J. Piccolotti
City Manager

Consultant (if applicable): Dudek
725 Front Street, Suite 400
Santa Cruz, CA 95060

Direct Comments to: Lenelle Suliguin, Senior Management Analyst
Housing & Community Development Division
333 90th Street
Daly City, CA 94015

Project Location:

The proposed project is located at 493 Eastmoor Avenue, Daly City, CA 94015 (Assessor's Parcel Number [APN] 008-082-200; see Attachment 1). The project site is located at the northwest corner of Eastmoor and Sullivan Avenues in a commercial and residential area of Daly City on a 0.37-acre vacant lot with service commercial zoning and a general plan land use designation. The site is bounded by Sullivan Avenue to the east, a vacant office building to the north, a two-story apartment complex to the west, and Eastmoor Avenue to the south. A Pacific Gas and Electric Company (PG&E) corporation yard is located south of Eastmoor Avenue. Interstate 280 (I-280) is located approximately 170 feet to the east of the site.

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

The proposed project involves the construction of a 70,399-gross-square-foot, 85-foot-tall, seven-story, mixed-use apartment building and associated improvements. The building would contain 35 studio apartments, 36 one-bedroom apartments, and 1 two-bedroom apartment for a total of 72 dwelling units on floors 3 through 7, and 1,196 square feet of street-level retail/office space. Common amenity space for residents would include a 3,396-square-foot podium courtyard, 1,156-square-foot community room, 457-square-foot fitness room, 542-square-foot bike room, 542-square-foot reading room, and 450-square-foot laundry room. A total of 32 parking spaces would be provided in a second-floor parking garage, including two accessible spaces and four Level 2 electric vehicle (EV) charging stations and 28 Level 1 EV charging stations, as well as 10 bike parking spaces. Due to the project site's sloping topography from west to east, the parking garage would be the first building level on the western portion of the site.

The residential portion of the project would achieve Leadership in Energy and Environmental Design (LEED) for Homes Gold for residential construction. In addition to the EV charging stations, the building would have solar panels and is proposed to be all electric.

The proposed floor plans consist of the following:

- Level 1: Commercial space, lobby, transformer room
- Level 2: Parking garage, lobby, mail room
- Level 3: Residential units, podium courtyard, leasing office, community room
- Level 4: Residential units, fitness room
- Level 5: Residential units, bike room
- Level 6: Residential units, reading room
- Level 7: Residential units, laundry room

Density Bonus

Pursuant to the California Government Code Section 65915(d)(2)(C) and the Daly City Municipal Code Section 17.52.040, the proposed project qualifies under the Density Bonus Law for concessions and waivers from development standards. A "density bonus" is "a density increase over the otherwise maximum allowable residential density as of the date of application by the applicant to the [municipality]" (Government Code Section 65915[f]). The purpose of this law is to encourage municipalities to offer incentives to housing developers that will "contribute

significantly to the economic feasibility of lower income housing in proposed housing developments” (Government Code Section 65917). Government Code Section 65915 mandates that local governments provide a density bonus, if requested by the developer, when a developer agrees to construct any of the following: (1) 10 percent of total units for lower income households; (2) 5 percent of total units for very-low-income households; (3) a senior citizen housing development or mobile home park restricted to older persons, each as defined by separate statute; or (4) 10 percent of units in a common interest development for moderate-income families or persons. (Government Code Section 65915[b][1][A]-[D]). The density bonus would allow for (1) a reduction in open space to 74 square feet per unit from 150 square feet per unit; and (2) an increase in the maximum floor/area ratio (FAR) for the project site from 3.0 to 4.41. These concessions would enable the development of the apartment building at the proposed density. Pursuant to California Government Code Section 65915(p)(3)(A), the proposed project qualifies for a reduced parking requirement, i.e., not to exceed 0.5 spaces per unit, because all units in the building would be rental and affordable to lower income families, and the project is located within one-half mile of a major transit stop. This equates to 36 spaces (72 apartment units × 0.5 spaces per unit).

Landscape and Drainage Improvements

No tree removal would be required for project construction as no trees are located on site. Landscape plans include a mix of groundcover, grasses and shrubs, and trees in a sunken plaza at the southeastern corner of the project site, as well as landscaping throughout the podium courtyard. Landscape planting design would conform to the City’s water-efficient landscape ordinance.

The podium courtyard would include water features, an art sculpture nook, a synthetic lawn island inlay with potted palm tree, and planters landscaped with shade trees throughout. The courtyard would contain flexible group seating areas, an outdoor cooking area with umbrella tables and a barbeque grilling island, and a large group dining area with a community table and seating. Planters would also be located along the courtyard perimeter for privacy. All planting areas would be irrigated by an automatic irrigation system.

The project would result in 15,521 square feet of impervious surface area on the site, which would be a net increase of 337 square feet over the existing 15,184 square feet of impervious surface area on the site. Four hundred and twenty-eight (428) square feet of pervious landscaping would be provided. Stormwater runoff would be treated and controlled through three drainage management areas (DMAs) on site, including a proprietary media filter system, self-retaining areas, and an infiltration trench.

Site Access and Off-Site Improvements

Access to the site would be provided from one driveway on Eastmoor Avenue. Improvements in the public right-of-way would also be completed, including replacing the existing sidewalk and installing street trees with decorative tree grates, and reconfiguring the northwest corner of the Sullivan/Eastmoor intersection to remove the existing southbound free right-turn movement by reducing the curb radius at the corner to improve pedestrian safety at the intersection. The project would also include relocation of traffic signals at the Sullivan/Eastmoor intersection and installation of a new standard streetlight pole as conditions of approval. Two fire hydrants are proposed at the northeast and southwest corners of the property.

Construction

Project construction is anticipated to occur over a 22-month period from May 2024 to March 2026. A preferred staging area for project construction activities has been identified on the parcel immediately adjacent to the project site to the north at 1784 Sullivan Avenue (APN 008-082-180). The preferred staging area is currently subject to negotiations with the property owner. No viable alternative sites for construction staging have been identified at this time. Construction of the project would require the use of heavy equipment such as manlifts, cranes, forklifts, backhoes, and loaders. No demolition is proposed as there are no existing structures on site. Construction would require export of 1,500 cubic yards of soil to be disposed of off site at an appropriate licensed facility in accordance with state and federal regulations. Construction activities would be performed from 7:00 a.m. to 6:00 p.m. on weekdays. Project operation is expected to commence in spring 2026.

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

The purpose and need for the proposed project is to develop 72 affordable housing units in Daly City that would help the City achieve its Regional Housing Needs Allocation (RHNA) targets. High housing costs, limited affordable housing supply, and scarcity of land pose challenges in the San Francisco Bay Area, including in Daly City. The Association of Bay Area Governments (ABAG) RHNA Plan estimates that Daly City needs to add approximately 1,336 new housing units for the very low income (<50% of area median income) and 769 units for low income (50-80% of area median income) demographic groups to meet housing needs in 2023 to 2031 (ABAG 2022). The proposed project is within a half-mile of the Colma BART station.

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

The project site is located in a heavily developed, commercial and residential area of the City. The immediate neighborhood is a mixture of multi-family residential, commercial retail/office, and public facility uses.

The proposed project is located within the Sullivan Corridor Specific Plan area. The project site is designated and zoned as Service Commercial (C-S). Surrounding parcels are designed and zoned as Office Commercial (C-O), Residential High Density (R-HD)/Residential High (R-H), Residential Very High Density (R-VHD)/Planned Development (PD), and Public Facilities (PF)/Unzoned (U).

No structures currently occupy the site, and much of the site is covered by asphalt and concrete pavement, dirt, and gravel. No trees are located on site. The site was historically used as agricultural land from approximately 1946, and then was developed as a gasoline service station from approximately 1960 to 2004. The site has a closed leaking underground storage tank (LUST) case associated with the former use, and active remediation activities were conducted at the site from approximately 2004 to 2009. Based on the remediation of the site, including the excavation and removal of contaminated soils, the operation of a soil vapor extraction (SVE) system, and the documented residual soil contamination in the vicinity of the former underground storage tanks (USTs), the LUST case is considered a controlled recognized environmental condition (CREC) and no further site investigation is recommended. As documented in the case closure letter issued in 2009 (see Attachment 2), due to residual soil impacts, development activities on site are subject to review and oversight by San Mateo County Environmental Health.

Funding Information

The City of Daly City has approved conditional allocations of \$1,128,804 in HOME funds and \$1,199,503 in HOME-ARP funds to the project. The Housing Authority of the County of San Mateo (HACSM) has provided a conditional award of thirty-six (36) Section 8 Project-Based Vouchers (PBVs) to the project. The initial term of the Section 8 Project Based Housing Assistance Payments Contract (PBV HAP Contract) will be twenty (20) years. In addition to the initial 20-year term, HACSM and the project owner agreed to a 20-year extension, subject to the HACSM’s determination that the owner is in compliance with the PBV HAP Contract and other applicable HUD requirements, for a total of forty (40) years. The first year of housing payment is estimated to be a maximum of \$1,106,016 depending on the share of rent paid by tenants and based on the HACSM’s PBV preliminary proposed monthly rents, \$2,263 for 16 studios and \$2,798 for 20 1-bedroom units, which are subject to rent reasonableness determination prior to the execution of the PBV HAP Contract.

Grant Number	HUD Program	Funding Amount
N/A	HOME	\$1,128,804
	HOME-ARP	\$1,199,503
	Project-Based Vouchers	\$22,120,320 (20 years)

Estimated Total HUD Funded Amount: \$24,448,627

Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$71,774,049

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

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

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6		
Airport Hazards 24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	According to the U.S. Environmental Protection Agency’s (EPA’s) NEPassist tool accessed at https://nepassisttool.epa.gov/nepassist/nepamap.aspx , there are no military airports

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>within 15,000 feet of the subject property or civilian airports within 2,500 feet of the subject property (see Attachment 3; see Environmental Review Record [ERR] 1). The proposed undertaking is in compliance with HUD’s Airport Hazard regulations and no mitigation is warranted. The project is in compliance with Airport Hazards requirements.</p>
<p>Coastal Barrier Resources Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to Coastal Barrier Resources System (CBRS) information accessed at https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/, there are no units of the CBRS in California and the project site is not located within a CBRS Unit (see Attachment 4). Therefore, the project is in compliance with HUD’s CBRS regulations and no mitigation is warranted. The project is in compliance with the Coastal Barrier Resources Act (see ERR 2).</p>
<p>Flood Insurance Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to FEMA FIRM #06081C0036F, effective on August 2, 2017 and accessed at https://msc.fema.gov/portal/home, the project site is located within unshaded Zone X (Area of Minimal Flood Hazard). Thus, the project site is designated as an area outside the 100- and 500-year flood zones and the flood potential for the project site is minimal. According to the National Flood Insurance Program (NFIP) Community Status Book accessed at https://www.fema.gov/flood-insurance/work-with-nfip/community-status-book, the project site is located in Community ID #060317D which is a participating community in the NFIP. However, as no structures or insurable property are located within a Special Flood Hazard Area, flood insurance is not required under the NFIP. While flood insurance may not be mandatory in this instance, HUD recommends that all insurable structures maintain flood insurance under the NFIP. The project is in compliance with flood insurance requirements (see Attachment 5; see ERR 3).</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
<p>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 & 58.5</p>		
<p>Clean Air Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>The proposed project falls under the jurisdiction of the Bay Area Quality Management District (BAAQMD) within the South Coast Air Basin. The BAAQMD, according to the EPA, is currently in an attainment zone for fine particulate matter (PM_{2.5}), sulfur dioxide, nitrogen dioxide, and lead. However, the proposed project site is in a marginal-nonattainment zone for federal ozone (8-hour ozone) and in a moderate- maintenance zone for carbon monoxide (CO). To meet HUD’s air quality guidelines, the proposed project must follow the State Implementation Plan, which describes how an area will meet national ambient air quality standards. State Implementation Plan guidelines require the proposed project to keep its criteria pollutant emissions below BAAQMD’s significance thresholds.</p> <p>The project site’s location close to public transportation is consistent with regional efforts to improve transit availability and would reduce the amount of PM_{2.5} emissions associated with motor vehicle travel. By developing affordable housing consistent with the growth anticipated by the City’s General Plan and existing zoning and land use designations, the proposed project is in compliance with the regional air quality strategy, the State Implementation Plan, and the Air Quality Management Plan for this locality.</p> <p>Air quality at the project site could be negatively impacted by fugitive dust (coarse particulate matter [PM₁₀]) and other particulate air pollutants (PM_{2.5}) released during construction-related activities, such as land clearing or grading. Exhaust emissions (oxides of nitrogen [NO_x] and CO) released by heavy construction vehicles could also temporarily impact air quality. Adverse impacts to air quality during</p>

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		<p>construction would be managed by implementing mitigation measures for fugitive dust control in compliance with the Basic Construction Mitigation Measures outlined in Section 8.1.2 within the BAAQMD’s 2017 Clean Air Plan (BAAQMD 2017b). This guideline identifies measures to reduce fugitive dust that are required to be implemented at all construction sites within the BAAQMD (Mitigation Measure AIR-1).</p> <p>The California Emissions Estimator Model (CalEEMod) was used to estimate annual criteria air pollutant emissions during the construction and operational phases of the proposed project. Pollutants PM_{2.5}, NO_x, VOC, and CO levels all fell below <i>de minimis</i> thresholds during the construction- and operational-phase estimates. Daily emissions from the proposed project would not exceed the BAAQMD’s regional construction or operation emissions thresholds (BAAQMD 2017a) (see Attachment 6; see ERR 4).</p>
<p>Coastal Zone Management Coastal Zone Management Act, sections 307(c) & (d)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to the California Coastal Commission’s Coastal Zone Boundary maps accessed at https://www.coastal.ca.gov/maps/czb/, portions the City of Daly City are located within the Coastal Zone; however, the project site is not located within the Coastal Zone (see Attachment 7; see ERR 5). Therefore, the proposed undertaking is in compliance with HUD’s Coastal Zone Management Act regulations and no mitigation is warranted. The project is in compliance with the Coastal Zone Management Act.</p>
<p>Contamination and Toxic Substances 24 CFR Part 50.3(i) & 58.5(i)(2)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>A Phase I Environmental Site Assessment (ESA) conducted by AEI Consultants in February 2020 found no recognized environmental conditions (RECs), or historical RECs (HRECs) on the project site (see Attachment 8). According to the California State Water Resources Control Board (SWRCB) GeoTracker database and historic records, a release of gasoline from an underground storage tank was discovered at the</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>site in 2001. Remediation activities consisted of the excavation and removal of contaminated soil off site for disposal, as well as the removal of four underground storage tanks (USTs). A soil vapor extraction (SVE) system was installed in 2005 to facilitate the removal of benzene and methyl tert-butyl ether (MTBE). The San Mateo County Local Oversight Program issued a LUST Case Closure Letter in 2009, and the case is now considered a controlled REC (CREC). Although site closure was granted, a small amount of gasoline-affected soil may exist near the former UST sites. While these hydrocarbons do not currently pose a risk to the public or environment, any changes in land use or removal of soil could create a risk. Therefore, any proposed land use change or soil removal activity on site should be submitted and reviewed by the San Mateo Groundwater Protection Program.</p> <p>AEI conducted a Phase II ESA at the project site in January 2021 to evaluate residual contamination on site from former gas station operations and releases (see Attachment 9). Results showed that levels of arsenic, benzo(a)pyrene, benzene, and ethylbenzene exceeding residential environmental screening levels were found on site. However, levels of arsenic and benzo(a)pyrene are not expected to pose a long-term exposure risk since the proposed development would essentially include complete surface soil coverage. The Phase II ESA recommended development of a Risk Management Plan (RMP) to address the potential risk associated with the residual contamination both during construction and post-construction residential use. Due to prior environmental conditions at the site, development activities would be subject to review and oversight by San Mateo County Environmental Health.</p>

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		<p>AEI Consultants completed the RMP for the proposed project in February 2022 by collecting several soil and soil vapor samples at on-site borings (see Attachment 10). Groundwater was not collected since it is not expected to be encountered as part of development activities. Similar to the Phase II ESA, arsenic, benzo(a)pyrene in soil, and benzene, ethylbenzene, and trichloroethylene (TCE) in soil gas were found to be contaminants of potential concern (COPCs) on site. As discussed above, levels of arsenic and benzo(a)pyrene are not expected to pose a long-term exposure risk since the proposed development would essentially include complete surface soil coverage. Benzene levels were above residential and commercial/industrial environmental screening levels (ESLs) while ethylbenzene and TCE were detected in soil gas concentrations above their residential ESL but below their commercial/industrial ESLs. The detection of TCE was not known to be associated with an on-site source.</p> <p>While volatile organic compounds (VOCs) were high compared to ESLs, the levels of benzene and ethylbenzene found were significantly lower than the SWRCB's <i>Low-Threat Underground Storage Tank Closure Policy (LTCP)</i> soil gas screening criteria. For petroleum-related VOCs, risk-based screening levels such as ESLs for evaluating risk from vapor intrusion can be overly conservative by not considering biodegradation in site screening. Risk of vapor intrusion is further reduced since VOC attenuation increases with transport across barriers, such as building foundations. While AEI determined that the vapor intrusion risk to the proposed future mixed-use development is low, and the presence of the chemicals identified in soil gas do not pose an unacceptable risk to future residential and commercial users of the site, as a conservative, prophylactic measure,</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>implementation of Mitigation Measure HAZ-1 would ensure that any adverse impacts related to vapor intrusion would be avoided.</p> <p>In addition, implementation of Mitigation Measures HAZ-2 through HAZ-5 would ensure that adverse impacts related to hazardous materials during construction would be reduced.</p> <p>No hazardous materials or petroleum products were observed during the site reconnaissance. USTs and aboveground storage tanks (ASTs) were also not observed during the site reconnaissance. As the project site is currently vacant land and lacks structures, no asbestos-containing materials, lead-based paints, or mold were observed during the site visit. While radon testing was not conducted as part of the Phase I ESA, radon testing completed near the subject property in 2016 indicated levels below the action level set forth by the EPA. As a result, radon is not expected to represent a significant environmental concern at the project site.</p> <p>Although the project site had historically been used for agricultural purposes prior to its use as a gasoline station, the possible former use of agricultural chemicals on site, such as pesticides, herbicides, and fertilizers, is not expected to represent a significant environmental concern at the project site (see ERR 6).</p>
<p>Endangered Species</p> <p>Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402</p>	<p>Yes No</p> <p><input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Due to the urban and commercial setting surrounding the project site, no federally listed special-status plant or wildlife species are expected to be present on site. The U.S. Fish and Wildlife Service’s Information for Planning and Consultation (IPaC) service, accessed at https://ipac.ecosphere.fws.gov/, identified 17 threatened or endangered species potentially occurring on the project site, listed as follows.</p> <ul style="list-style-type: none"> • Mammals: Salt Marsh Harvest Mouse (<i>Reithrodontomys raviventris</i>)

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<ul style="list-style-type: none"> • Birds: California Least Tern (<i>Sterna antillarum browni</i>), California Clapper Rail (<i>Rallus longirostris obsoletus</i>), Western Snowy Plover (<i>Charadrius nivosus nivosus</i>), Marbled Murrelet (<i>Brachyramphus marmoratus</i>) • Flowering Plants: Franciscan Manzanita (<i>Arctostaphylos franciscana</i>), Presidio Manzanita (<i>Arctostaphylos hookeri var. ravenii</i>), Robust Spineflower (<i>Chorizanthe robusta var. robusta</i>), San Francisco Lessingia (<i>Lessingia germanorum</i>), Showy Indian Clover (<i>Trifolium amoenum</i>), White-rayed Pentachaeta (<i>Pentachaeta bellidiflora</i>) • Reptiles: Green Sea Turtle (<i>Chelonia mydas</i>), San Francisco Garter Snake (<i>Thamnophis sirtalis tetrataenia</i>) • Amphibians: California Red-legged Frog (<i>Rana draytonii</i>) • Fishes: Delta Smelt (<i>Hypomesus transpacificus</i>), Tidewater Goby (<i>Eucyclogobius newberryi</i>) • Insects: Monarch butterfly (<i>Danaus plexippus</i>) <p>As stated in the IPaC report and confirmed through NEPAAssist mapping of the project site, although the general habitat ranges of these 17 species overlap with the project location, their critical habitat areas do not intersect with the project site (USFWS 2020a) and the land cover of the project site and surrounding area is mapped as Developed, at Medium to High intensities (see Attachments 11, 12, and 13). Given the urbanized nature of the project site and scarcity of on-site vegetation, it is unlikely that any special-status species would occur on site due to a lack of suitable habitat. Therefore, the proposed project would not impact wildlife movement, migration, or nursery sites (see ERR 7).</p>

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<p>Explosive and Flammable Hazards</p> <p>24 CFR Part 51 Subpart C</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>Explosive or flammable hazardous materials would not be present at the project site, which would provide 72 affordable housing units. The Phase I ESA conducted by AEI Consultants did not identify any hazardous materials or petroleum on the project site (see Attachment 8). A search of the California Environmental Protection Agency’s (CalEPA) website for aboveground petroleum storage and chemical storage sites was also completed to identify aboveground flammable materials storage within a 1-mile radius of the project site. There were no aboveground storage tanks identified in the CalEPA review. However, 29 sites within a 1-mile radius were identified as having chemicals stored on site (CalEPA 2022). HUD’s Acceptable Separation Distance (ASD) Assessment Tool was used to calculate the minimum separation distance between the project site and the CalEPA sites. All sites were farther away than the minimum ASD distance required by HUD. As a result, the proposed project would not expose residents or the surrounding community to dangerous explosive or flammable. Therefore, the proposed development would not expose residents or the surrounding community to dangerous explosive or flammable hazards (see Attachment 14; see ERR 8).</p>
<p>Farmlands Protection</p> <p>Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The proposed development is in an urban setting on land designated as Urban and Built-Up Land by the California Department of Conservation. The land surrounding the project site is also classified as Urban and has a General Plan land use designation of Service Commercial (C-S) (City of Daly City Land Use Element) (City of Daly City 2030 General Plan; DOC 2015). The immediate neighborhood is a mixture of multi-family residential, commercial retail/office, and public facility uses. Since the proposed development would be located on previously disturbed land it would not threaten existing farmlands. Therefore, the proposed project complies with the Farmland Protection Policy Act (see Attachment 15; see ERR 9).</p>

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<p>Floodplain Management Executive Order 11988, particularly section 2(a); 24 CFR Part 55</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>According to FEMA FIRM #06081C0036F, effective on August 2, 2017 and accessed at https://msc.fema.gov/portal/home, the project site is located within unshaded Zone X (Area of Minimal Flood Hazard). Thus, the project site is designated as an area outside the 100- and 500-year flood zones and the flood potential for the project site is minimal. Since the project site does not occur within a floodplain, the project is in compliance with Executive Order 11988 (see Attachment 5; see ERR 10).</p>
<p>Historic Preservation National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p>Dudek prepared a Cultural Resources Inventory and Evaluation Report for the project in December 2022 to assess the project site’s cultural resource sensitivity (see Attachment 16).</p> <p><u>Area of Potential Effects</u> The APE includes two parcels currently designated as APNs 008-082-200 (0.37 acres) and 008-082-180 (0.25 acres), and the adjacent public right of way of Eastmoor Avenue and Sullivan Avenue (approximately 0.7 acres) south and east of the two parcels. The project would be constructed on APN 008-082-200 (493 Eastmoor Avenue), a vacant lot. A potential staging area for the project may be located on APN 008-082-180 (1784 Sullivan Avenue), a lot containing one building (built in 1979). The staging area would occur in the outside area of the parcel only, and no changes would occur to the existing building. The adjacent rights-of-way of Eastmoor and Sullivan Avenues would be affected by utility work as well as roadway and roadside improvement associated with the project. The depth of construction, or vertical APE, is 10 feet.</p> <p><u>Records Search</u> A confidential records search of the APE and a 0.25-mile buffer was conducted at NWIC at Sonoma State University (NWIC File No. 22-0492) to identify historic properties located within the APE that might be affected by the</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>proposed undertaking. In addition, the Built Environment Resources Directory (BERD), NRHP, CRHR, Archaeological Determinations of Eligibility (ADOE), historical maps, and local inventories were reviewed for information relevant to the archaeological sensitivity of the APE. The records search indicated no previous studies with coverage that intersected the APE and no recorded resources within the APE.</p> <p><u>Sacred Lands File Search</u> To identify historic properties due to their importance to local Native American tribes near in the APE, a Native American Heritage commission (NAHC) Sacred Lands File (SLF) search was conducted for the vicinity of the APE. The SLF search results were negative (i.e., no resources were identified).</p> <p><u>Native American Outreach and Coordination</u> The NAHC provided a list of eight Native American contacts from tribes associated with the vicinity of the APE. To obtain cultural resources information from local tribes that might be relevant to the Project, Dudek sent information request letters via email to the Native American contacts provided by the NAHC on October 31, 2022. On November 2, 2022, Irene Zwierlein, sent a list of recommendations from the Amah Mutsun Tribal Band of Mission San Juan Bautista that would be requested if the SLF search were positive or if the CHRIS records search were positive for indigenous resources. The information also included monitoring rates for the Amah Mutsun Tribal Band of Mission San Juan Bautista in the event Native American monitoring is needed for the construction phase of the project. No other Native American contacts have responded to the outreach letters as of November 23, 2022.</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p><u>Site Survey</u> On November 2, 2022, Dudek archaeologist John Schlagheck, MA, RPA, conducted an intensive pedestrian survey of the entire APE to identify whether archaeological resources were present within or immediately adjacent to the APE. Mr. Schlagheck meets the Secretary of the Interior’s Professional Qualifications Standards for Archeology (48 Federal Register 44738–44739). The survey was completed using less than 5-meter transects to identify potential surface archaeological deposits or evidence of buried archaeological deposits. The returned uniformly negative results.</p> <p><u>Determination</u> Dudek’s report recommends a finding of No Historic Properties Affected for the project under Section 106 of the NHPA. Mitigation Measures CUL-1 and CUL-2 would avoid adverse impacts related to the inadvertent discovery of archaeological resources or human remains during construction consistent with NHPA Section 106 regulations.</p> <p>The California State Historic Preservation Office (SHPO) was consulted in December 2022 to identify the presence of any known historical or cultural resources on the project site. Pursuant to 36 Code of Federal Regulations (CFR) 800.3(c)(4), SHPO did not respond within 30 days of receiving the City’s request for a finding or determination. As a result, the City’s consultation requirements with the SHPO are complete. (see Attachment 17; see ERR 11).</p>
<p>Noise Abatement and Control Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B</p>	<p>Yes No <input checked="" type="checkbox"/> <input type="checkbox"/></p>	<p><u>Construction Noise</u> A temporary increase in noise levels would be expected during the construction phase of the project. Noise would be generated by construction equipment and the delivery of materials, among other activities. Increases in ambient noise levels would be restricted to daytime hours (8:00 a.m. – 5:00 p.m. on</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>weekdays), excluding weekends and holidays, and would remain within applicable thresholds.</p> <p><u>Operational Noise</u> The proposed project is not expected to have a negative impact on ambient noise levels during the operational phase. Sources of ambient noise produced by the project during the operational phase would be related to residential land uses. These noise sources may stem from people, car doors slamming, recreational activities, trash collection, and outdoor common areas, among others.</p> <p>Dudek prepared a Technical Noise Memorandum for the proposed project in September 2022. Noise generated by the Bay Area Rapid Transit (BART) system and traffic from Sullivan Avenue, Eastmoor Avenue, Junipero Serra Boulevard, and the I-280 highway were identified as the primary ambient noise sources for the proposed development. Activities at San Francisco International Airport (SFO), the nearest airport approximately 5.8 miles away, were determined to have a negligible impact on noise at the subject property. Noise receivers for the study were placed at the proposed building façade exteriors facing south, southeast, and east, as well as at the proposed location of the podium courtyard, since these areas would experience the greatest impact from transportation-related noise sources. The HUD DNL Calculator was used to estimate noise levels generated by BART while the Federal Highway Administration’s Traffic Noise Model (TNM) version 2.5 was used to calculate noise from vehicle traffic as it provided a more detailed analysis.</p> <p>Results of the noise analysis determined that exposure from traffic noise along the eastern, southeastern, and southern building façades would exceed the HUD exterior noise threshold of 65 dBA DNL by up to 9.9 dB. At the outdoor</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>podium courtyard, the traffic noise levels would not exceed 65 dBA DNL and thus would be well within the “normally acceptable” noise range. The additional noise contribution from the BART system is (for the most part) negligible because traffic noise is by far the dominant noise source. However, additional noise from BART would push the ambient noise at the southern façade of the building over the HUD threshold.</p> <p>24 CFR Part 51, Subpart B states that sites at which environmental or community noise exposure exceeds the 65 dBA DNL threshold are considered noise impacted and require noise attenuation of 5 dB if the DNL is between 65-70 dBA, and 10 dB if the DNL is between 70-75 dBA. Typical new construction of multi-family homes with windows closed provides a minimum of 25 dB exterior to interior noise reduction. In addition, all residential units would be equipped with a forced air heating ventilation air conditioning (HVAC) unit that allows for a “windows closed” condition (i.e., windows do not need to be left open for ventilation). The windows closed scenario would reduce noise levels to approximately 50 dBA DNL, below HUD thresholds. However, to ensure compliance with regulations, the detailed architectural design plans should upgrade window specifications so that that all windows and doors in the east and southeast-facing residential units have a Sound Transmission Class (STC) rating of 35 or greater, and all windows and doors in south-facing residential units have an STC rating of 30 or greater (Mitigation Measure NOI-1). With implementation of the increased STC ratings for windows along the eastern, southeastern, and southern building façades, the proposed project would comply with 24 CFR Part 51, Subpart B and HUD thresholds (see Attachment 18; see ERR 12).</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
<p>Sole Source Aquifers Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The EPA’s Map of Sole Source Aquifer Locations, accessed at https://www.epa.gov/dwssa/map-sole-source-aquifer-locations, was used to identify sole source aquifers in the vicinity of the project site. There are no sole source aquifers located in Daly City, CA (see Attachment 19; see ERR 13). The proposed project is in compliance with the Safe Drinking Water Act.</p>
<p>Wetlands Protection Executive Order 11990, particularly sections 2 and 5</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The U.S. Fish and Wildlife Service’s National Wetland Inventory mapper, accessed at https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper, was used to identify wetlands located on or near the proposed project site. There are no wetlands located on the project site (see Attachment 20; see ERR 14). The closest wetland is a freshwater pond located approximately 0.56 miles southeast of the project site at the Woodlawn Cemetery. The proposed project is in compliance with Executive Order 11990.</p>
<p>Wild and Scenic Rivers Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p>The National Park Service’s Wild and Scenic Rivers interactive map, accessed at https://www.nps.gov/orgs/1912/plan-your-visit.htm, was used to determine the location of designated Wild and Scenic Rivers in the vicinity of the project site. There are no designated Wild and Scenic Rivers on the project site (see Attachment 21; see ERR 15). The closest protected waterway is the Tuolumne River, approximately 200 miles east of the project site. Therefore, the proposed project is in compliance with the Wild and Scenic Rivers Act.</p>
<p>ENVIRONMENTAL JUSTICE</p>		
<p>Environmental Justice Executive Order 12898</p>	<p>Yes No <input type="checkbox"/> <input checked="" type="checkbox"/></p>	<p><u>Construction</u> Adverse impacts to air quality and noise during project construction would be temporary and localized and would be avoided, reduced, or mitigated through incorporation of design features, compliance with applicable regulations and policies, and implementation of mitigation measures. Therefore, project construction would</p>

<p>Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6</p>	<p>Are formal compliance steps or mitigation required?</p>	<p>Compliance determinations</p>
		<p>not have disproportionate adverse impacts to minority or low-income populations.</p> <p><u>Operation</u> Once constructed, the proposed project would provide 72 units of affordable housing to low-income occupants. The EPA’s EJScreen tool was used to evaluate environmental and demographic data for the project site and determine whether the project would have disproportionate adverse environmental impacts on future residents and the surrounding community. Environmental factors are measured using eleven environmental indicators (EI) while demographic factors are measured using seven demographic indicators (DI). An EJScreen report for the subject property was run using a 0.125-mile radius centered around the project site (see ERR 16).</p> <p>Results of the assessment indicate that the proposed project would not have any aggregate Environmental Justice issues based on the factors evaluated by the EJScreen tool. Eight of the eleven EIs were lower in the project area compared to the State average. The subject property has values higher than the state average in the Traffic Proximity, Lead Paint, and Underground Storage Tanks variables. The subject property’s higher score in Traffic Proximity at 3900 is due to the site’s close proximity to the I-280 highway. The project site is also located adjacent to an older building erected before 1960 which could contain lead-based paint. Finally, the higher score in USTs could be attributed to the adjacent PG&E Service Center as well as the project site’s previous use as a gas station.</p> <p>The composite demographic index for the proposed project site is 46%, just 1% less than the state average, which is 47%. The DI for People of Color, Unemployment Rate, Linguistically Isolated, and Over Age 64 are</p>

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
		higher for the subject property compared to the State average. Based on the EJScreen assessment for this site, regardless of the population group served by the proposed development, the local population will not be affected disproportionately by environmental issues. The proposed project would have a beneficial impact on the City’s low-income population by providing affordable housing to low-income and very-low-income families (see Attachment 22; see ERR 15).

Environmental Assessment Factors [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27]

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

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

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
LAND DEVELOPMENT		
<p>Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design</p>	<p>2</p>	<p><u>Sullivan Corridor Specific Plan</u> The proposed apartment building is in the Sullivan Corridor Specific Plan area. The Specific Plan was adopted in October 1998 as a means to plan for the expansion of the Daly City Civic Center and to revitalize the commercial areas with the plan’s geographic area. As such, the plan articulates development parameters, including land uses and development intensities, for the plan area. The subject vacant parcel lies within Sub-Area 9 of the Specific Plan defined as Eastmoor Avenue Mixed Use. The Specific Plan designates the subject parcel Service Commercial (C-S). Service Commercial land use designations were retained for the gas station operating on the existing lot when the Specific Plan was published.</p> <p>The proposed mixed-use 72-unit apartment building can be approved with a use permit according to the Specific Plan. The Specific Plan stipulates that any uses allowed in the Specific Plan Retail and Office Commercial (C-R/O) are allowed on parcels designated Service Commercial (C-S) subject to use permit approval. The C-R/O designation allows a variety of retail, office, and service commercial uses, and “any residential uses.” The applicant has proposed 72 units on a 16,015-square-foot site, roughly equating to 200 units per acre. When proposed in a mixed-use format, i.e., residential over retail/office, the building is not subject to a density limitation and can therefore be approved at the proposed density.</p> <p>Because all the units in the proposed project would be affordable, the project qualifies for concessions and waivers from development standards pursuant to the State’s Density Bonus Law. The applicant is requesting two concessions: The first concession would allow for a reduction in open space to 74 square feet per unit (150 square feet per unit is normally required) and the second concession is to authorize an increase in the maximum floor area ratio (FAR) for the project site from 3.0 to 4.41, which would enable the development of the apartment building at the proposed density.</p> <p><u>Use Permit</u> As identified above, the applicant is required to obtain a use permit under the Sullivan Corridor Specific Plan for the proposed mixed-use building. The subject parcel is designated Service Commercial (C-S) in the Sullivan Corridor Specific Plan. The adjacent parcel to north is designated commercial Office (C-O), the adjacent parcel to south is designated Public Utility (U), the adjacent parcel to west is designated Residential High Density, and I-280 is directly east of the subject parcel. The proposed mixed-use apartment building is compatible with these surrounding land uses in terms of</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>project scale and intensity combining residential and commercial use consistent with the way in which residential and commercial use presently exist on surrounding properties.</p> <p>The Specific Plan includes objectives and policies that would support the proposed project density. Specific Plan Land Use Objective 2.5 encourages additional residential development that reinforces existing neighborhoods and is within walking distance to the Colma BART Station. Likewise, the General Plan Housing Element Policy HE-3 indicates that the City should provide regulatory incentives for developers to construct higher-density mixed-use development along Mission Street, Geneva Avenue, and any other locations within close proximity to public transit. In the case of this particular parcel, the Colma BART Station is less than a half-mile from the site and a SamTrans bus route runs along Eastmoor Avenue providing an ideal location for a denser development pattern.</p> <p><u>Design Review</u></p> <p>The proposed building would be four stories higher than the next tallest adjacent building. The elevation of the site increases southward toward the Sullivan/Eastmoor intersection. The proposed building would therefore serve as a focal point on property that is currently vacant. The subject corner would become an important transition to residential from the I-280 on- and off-ramps and the heavy commercial activity to the north.</p> <p>The applicant has proposed the seven-story mixed use apartment building to provide the greatest portion of its massing along Sullivan Avenue. The building mass is reduced along the south and west elevations and is therefore compatible with existing building type transitions from multi-family residential to single-family residential west along Eastmoor Avenue. Additionally, the building design includes architectural elements at these elevations, in combination with color and street-level material variation to provide both visual interest and to reduce the scale of large walls that would otherwise have a more massive appearance in the context of smaller adjacent structures.</p> <p>The building footprint is designed to follow the sloping topography by terracing the ground floor commercial unit along Eastmoor and Sullivan Avenues. The mass of upper residential floors is mitigated by vertical wall sections that are articulated with building reveal and setbacks. This articulation is enhanced by changes in color and materials. Each vertical wall section is capped with a flat roof banded by a cornice to break up the massing of the building and to give some articulation of the roof line of the building.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>The building is designed with two major openings: a vehicle entry along Eastmoor Avenue and the main pedestrian entry along Sullivan Avenue, which provides access to the commercial tenant at street level, parking garage below, and apartment units above. The foundation including the garage platform would be clad in metal and stucco of varying colors. The garage door for the parking structure will be recessed back from the street. The pedestrian entry door frames would be aluminum, although the upper-story windows would be vinyl. Some apartments facing the street unit would include a balcony with metal railings.</p> <p>The proposed project design is consistent with the objectives of the Sullivan Corridor Specific Plan and would incorporate several Conditions of Approval as required by the City.</p>
<p>Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff</p>	<p>2</p>	<p><u>Soil Suitability</u> The Phase I ESA evaluated on-site soil conditions using the U.S. Department of Agriculture Soil Survey tool. According to the Soil Survey, the soils in the vicinity of the subject property are classified as Urban Land. The Urban Land designation indicates that more than 85 percent of the original soils have been disturbed or covered by paved surfaces, buildings, or other structures. According to a subsurface investigation at the subject property, soil types encountered during drilling activities at the site consisted of sands, silty sands, clay sands, and silts to a depth of approximately 109.5 feet below ground surface (bgs).</p> <p>A Geotechnical Engineering Study prepared by Earth Systems Pacific in 2018 was updated in March 2020 to reflect current site conditions. The report concludes that the project site is suitable for the proposed development as long as the recommendations made in the report are implemented. The primary geotechnical considerations at the site include seismic shaking, seismically induced settlement, potentially unstable ground at the first-floor level for construction traffic, shoring for first-floor construction, and the variable depths of cut and fills due to the slope on site. Recommendations for the site grading, retaining wall and foundation construction, and other geotechnical aspects of the project are included in the report (see Attachment 23). Due to prior environmental conditions on site, including the requirements for closure of the LUST case in 2009, mitigation measures included in the RMP for soil management and construction impacts should be implemented (see Mitigation Measures HAZ-1 through HAZ-5).</p> <p><u>Slope and Drainage</u> According to the Geotechnical Engineering Study, the proposed project site slopes down from the southwestern corner with ground surface elevation of 246 feet to the northeastern corner, where the ground surface elevation is 228 feet. The slope is</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>relatively steep in the southwestern corner, relatively flat in the middle portion of the site, and slopes steeply to the east in the eastern portion.</p> <p><u>Erosion and Stormwater Runoff</u> Erosion due to stormwater runoff at the project site would be minimized by the lack of exposed soils after construction of the residential building and associated structures and parking areas. Impervious surface area on the site would have a net increase of 337 square feet following development of the proposed project. Stormwater runoff would be treated and controlled through three drainage management areas (DMAs) on site, including a proprietary media filter system, self-retaining areas, and an infiltration trench.</p> <p>The State Water Resources Control Board (SWRCB) and the Regional Water Quality Control Board (RWQCB) monitor water quality in the Bay Area. These agencies oversee the implementation of the National Pollutant Discharge Elimination System (NPDES) stormwater discharge permits. The SWRCB has implemented a NPDES Construction General Permit for the State of California for projects disturbing 1 or more of acres of soil, requiring dischargers to obtain coverage under the General Permit, file a Notice of Intent (NOI), and prepare a stormwater pollution prevention plan (SWPPP) prior to commencement of construction. As project construction would disturb 0.37 acres, it is exempt from these Construction General Permit requirements.</p> <p>The San Francisco Bay RWQCB also has issued a Municipal Regional Stormwater NPDES Permit, which includes requirements for incorporating LID measures into new development and redevelopment projects. These requirements are known as Provision C.3 requirements. Provision C.3 applies to projects that create and/or replace 10,000 or more square feet of impervious surface. The project would result in 15,521 square feet of impervious surface area on the site, which would be a net increase of 337 square feet over the existing 15,184 square feet of impervious surface area on the site. Therefore, Provision C.3 applies to the project.</p> <p>Under Provision C.3, projects that disturb more than 10,000 square feet are required to design and construct stormwater treatment controls to treat post-construction stormwater runoff. Amendments to the Municipal Regional Stormwater NPDES Permit require all of the post-construction runoff to be treated by using Low Impact Development (LID) treatment controls, such as biotreatment facilities. The City participates in the San Mateo Countywide Pollution Prevention Program, and is required to</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>implement LID BMPs under the Municipal Regional Stormwater Permit (Provision C.3.b.). LID practices include source control BMPs, site design BMPs, and stormwater treatment BMPs on site or at a joint stormwater treatment facility. The project would include stormwater treatment and control through three drainage management areas (DMAs) on site, including a proprietary media filter system, self-retaining areas, and an infiltration trench, per C.3 requirements.</p> <p>With adherence to the C.3 requirements and the City’s standard stormwater conditions of approval, potential adverse impacts related to stormwater runoff would be avoided.</p>
<p>Hazards and Nuisances including Site Safety and Noise</p>		<p><u>Hazardous Materials</u> Explosive or flammable hazardous materials would not be present at the project site, which would provide 72 affordable housing units. The Phase I ESA conducted by AEI Consultants did not identify any hazardous materials or petroleum on the project site.</p> <p><u>Site Safety</u> The proposed project would not create a risk of explosion, release of hazardous substances, or other dangers to public health. The project site is not located near any hazardous operations. The project would provide a safe place for customers, employees, and residents.</p> <p>While no site safety hazards or nuisances are present at the site, it is possible that during construction of the project, construction traffic, noise, dust, and vapor encroachment could be considered a nuisance to the construction crew or immediate neighbors. As discussed in the Air Quality, Soil Suitability, and Stormwater sections above, BMPs and mitigation measures would be implemented to prevent health and safety risks to construction workers and neighbors.</p> <p>The project would be constructed consistent with the Building Construction/Hazardous Structures policies in the City’s Safety Element of the 2030 General Plan. No impacts related to hazards, nuisance, or site safety would occur.</p> <p><u>Noise</u> The proposed project may result in temporary construction noise. The project includes measures to reduce construction-related noise on surrounding sensitive noise receptors. Increases in ambient noise levels would be restricted to daytime hours (8:00 a.m. – 5:00 p.m. on weekdays), excluding weekends and holidays, and would remain within applicable thresholds. The time limitation protects residents near the construction activity</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>from the higher noise levels during the noise sensitive times of the day (evening and nighttime) and noise sensitive times of the week (weekends when people are usually home) (Daly City General Plan Noise Element 2022).</p> <p>A Technical Noise Memorandum for the proposed project prepared by Dudek in September 2022 determined that exposure from traffic generated along Sullivan Avenue, Eastmoor Avenue, and I-280 were the primary noise sources for the development. Exposure from traffic noise along the eastern, southeastern, and southern building façades would exceed the HUD exterior noise threshold of 65 dBA DNL by up to 9.9 dB. To reduce noise levels to within HUD thresholds, all residential units would be equipped with a forced air HVAC unit that allows for a “windows closed” condition (i.e., windows do not need to be left open for ventilation) (see Mitigation Measure NOI-1). In addition, the detailed architectural design plans would upgrade window specifications so that that all windows and doors in the east and southeast-facing residential units have a STC rating of 35 or greater, and all windows and doors in south-facing residential units have an STC rating of 30 or greater. These mitigation measures would reduce noise to within HUD thresholds.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
SOCIOECONOMIC		
Employment and Income Patterns	1	Project construction would generate a limited number of temporary construction jobs and operation would generate a nominal amount of permanent jobs (e.g., management, clerical, and janitorial jobs), which could result in a minor increase in per capita income. Construction activity could result in direct economic effects related to increased spending on construction materials, equipment, and services. The magnitude of the economic benefits of construction spending to the City’s economy would depend on the proportion of employment, goods, and services procured from local residents and businesses and would likely have a relatively minor benefit on the City’s economy.
Demographic Character Changes, Displacement	1	The proposed project would not have an adverse impact on community character or result in the displacement of existing businesses or individuals because the project would occur on vacant land that was previously developed with a gas station. Since the immediate neighborhood bordering the site is a mixture of multi-family residential, commercial retail/office, and public facility uses, the proposed development would maintain community character. The project would benefit Daly City by adding 72 affordable housing units to the City’s housing stock, helping the City achieve its RHNA targets.

Environmental Assessment Factor	Impact Code	Impact Evaluation
Environmental Justice	1	As discussed above, based on the EJScreen assessment for the project site, regardless of the population group served by the proposed development, the local population will not be affected disproportionately by environmental issues. The proposed project would have a beneficial impact on the City’s low-income population by providing affordable housing to low-income and very-low-income families (see Attachment 22; see ERR 15).

Environmental Assessment Factor	Impact Code	Impact Evaluation
COMMUNITY FACILITIES AND SERVICES		
Educational and Cultural Facilities	2	<p>Given the availability of educational institutions in the area and the low probability of residents with children, adverse impacts to schools are not anticipated.</p> <p>The project is located near multiple educational facilities, as follows:</p> <ul style="list-style-type: none"> • M.P. Brown Elementary School, approximately 0.2 miles west of the proposed project site • Daniel Webster Elementary School, approximately 0.8 miles southwest of the proposed project site • Westmoor High School, approximately 0.7 miles west of the proposed project site • Thomas Edison Elementary School, approximately 1.3 miles southwest of the proposed project site • Thomas R. Pollicita Middle School, approximately 1 mile northeast of the proposed project site
Commercial Facilities	2	No adverse impacts to surrounding commercial facilities are anticipated. The proposed project site is bordered by residential and commercial land uses.
Health Care and Social Services	2	<p>Adverse impacts on healthcare and social services are not anticipated due to the relatively small size of the project and availability of service providers near the proposed development.</p> <p>The project site is situated near numerous healthcare facilities, including the following:</p> <ul style="list-style-type: none"> • Seton Medical Center located at 1900 Sullivan Avenue, Daly City, CA 94015, approximately 0.4 miles south of the proposed project site • San Mateo Medical Center located at 380 90th Street, Daly City, CA 94015, approximately 0.6 miles north of the proposed project site • Dignity Health – GoHealth Urgent Care located at 325 Gellert Boulevard, Daly City, CA 94015, approximately 1.8 miles south of the proposed project site

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<ul style="list-style-type: none"> • Excelsior Health Services at 888 Paris Street, San Francisco, CA 94112, approximately 4 miles northeast of the proposed project site • Sutter Urgent Care – San Mateo located at 100 S. San Mateo Drive #2nd, San Mateo, CA 94401, approximately 14 miles southeast of the proposed project site
Solid Waste Disposal / Recycling	2	<p>Solid waste disposal at the project site would be provided by Republic Services, located at 1680 Edgeworth Avenue, Daly City, CA 94015. Waste collected by Republic Services is processed at the City’s Mussel Rock Transfer Station. Materials that cannot be recycled or composted are transferred to the Ox Mountain Sanitary Landfill near Half Moon Bay. The Ox Mountain Sanitary Landfill has a permitted throughput of 3,598 tons per day with a maximum permitted capacity of 60,500,000 cubic yards (cy) and is projected to continue operation through January 1, 2034 when it is expected to reach capacity and would have to be closed. As of December 2015, the remaining capacity at the Ox Mountain Sanitary Landfill is 22,180,000 cy (CalRecycle 2022).</p> <p>All waste generated during the construction and operational phases would be properly disposed of and recycled where possible. The amount of solid waste generated by the proposed project during the construction and operational phases would be a fraction of the throughput taken to the Ox Mountain Sanitary Landfill daily. Thus, the landfill has adequate capacity to serve the project. As a result, adverse impacts from solid waste disposal associated with the proposed project are not anticipated.</p>
Waste Water / Sanitary Sewers	2	<p>The proposed project is connected to the City’s wastewater and sewer services, provided by the North San Mateo County Sanitation District (NSMCSD). A Technical Memorandum studying the City’s wastewater collection system was prepared by Woodard and Curran in February 2020 (see Attachment 24). Results of the study indicated that flow from the proposed project site would enter the City’s system via a 15-inch sewer on Eastmoor Avenue and Sullivan Avenue, then continue north and northwest to the NSMCSD’s Wastewater Treatment Plant. The proposed development would not contribute to the loads of any required capacity improvements in the 2015 Model Update, as none of the improvements in the update were located downstream of the development. No additional sewage infrastructure would be required for the proposed development. Therefore, adverse impacts to wastewater systems and sanitary sewers servicing the project site are not anticipated.</p>
Water Supply	2	<p>Potable water at the proposed project site is supplied by the Daly City Water and Wastewater Resources Department. The City purchases approximately half of its water from San Francisco, which obtains water from the Hetch Hetchy watershed north of Yosemite National Park and Crystal Springs, a large waterbody</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>next to Highway 280 in San Mateo. The remaining half of the City’s water supply is obtained from local groundwater wells (City of Daly City 2020). According to the Phase I ESA, prior on-site investigation activities have not revealed any groundwater sources.</p> <p>Brown and Caldwell (BC) conducted a Hydraulic Analysis for the proposed project in June 2020 to determine the water main sizes required to deliver domestic and fire flow demands to the proposed project (see Attachment 25). Results of the analysis determined that the existing City public water system near the project site would deliver satisfactory pressure and flow to the proposed project. BC recommends connecting to the existing 14-inch-diameter cast iron pipe under Eastmoor Ave. In addition, the hydraulic model for the proposed development meets fire hydrant flow requirements set by water industry standards for a distribution system. The project would require a minimum of three new fire hydrants per the California Fire Code and City Design Standards. As a result, the proposed project is not anticipated to strain the City’s existing water resources.</p>
Public Safety - Police, Fire and Emergency Medical	2	<p>The Daly City Police Department (DCPD) provides law enforcement services to Daly City. The DCPD offices are located at 333 90th Street, approximately 0.5 miles south of the project site.</p> <p>The North County Fire Authority (NCFA), a Joint Powers Authority that serves Brisbane, Daly City, and Pacifica, provides rapid assistance for fire, emergency medical, or other hazardous situations to an area approximately 60 square miles with a population of over 185,000 citizens. The NCFA station located closest to the project site is Station 95 at 191 Edgemont Drive, located approximately 1 mile southwest of the project site.</p> <p>The proposed project would incrementally increase demand for police, fire, and emergency medical services by adding residences and businesses to the project site. However, the proposed project would constitute infill development, located within an urbanized area that already has access to services. Emergency vehicle access to the project site would be provided from one driveway on Eastmoor Avenue. The proposed project would be required to comply with all applicable codes for fire safety and emergency access. The project would not include physical modifications to the existing roadway network which provides emergency access to the site, except for improvements at the Sullivan/Eastmoor intersection to improve pedestrian safety and relocate traffic signals. Given the foregoing, the project would not have adverse impacts on public safety.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
Parks, Open Space and Recreation	2	<p>The City has 65.4 acres of developed parks including community, neighborhood, tot lot, and special purpose parks, and 68.6 acres of open space (City of Daly City 2020). In addition, numerous regional park and open space facilities are located near the City. Public recreational spaces in proximity to the project site include the following:</p> <ul style="list-style-type: none"> • Alta Loma Tot Lot located at 008532470, Daly City, CA 94015, approximately 0.6 miles southwest of the proposed project site • Westmoor Beach, approximately 2 miles west of the proposed project site, off the behind, Skyline Blvd, Daly City, CA 94015 • Mussel Rock Park located at Skyline Dr., & Westline Dr., Daly City, CA 94015, approximately 3 miles southwest of the proposed project site • Sterling Park Recreation Center, approximately 1 mile east of the proposed project site at 427 F St., Colma, CA 94014 • San Bruno Mountain State & County Park located at 555 Guadalupe Canyon Pkwy, Brisbane, CA 94005, approximately 3.2 miles northeast of the proposed project site <p>The proposed project also includes private open space amenities for residents including a podium courtyard and community room. The project applicant would be required to pay applicable impact fees for the construction of the proposed project, a portion of which would go to public improvements such as parks. These fees would satisfy the need for any new or physically altered parks or recreational facilities and the proposed project’s impacts on parks and recreational facilities would not be adverse.</p>
Transportation and Accessibility	2	<p>A Traffic Impact Study Report was conducted by TJKM Transportation Consultants in January 2020 to evaluate the impact the proposed project would have on existing traffic and transportation infrastructure (see Attachment 26).</p> <p><u>Construction</u> Construction hours would occur from 8:00 a.m. to 5:00 p.m. on weekdays. Project construction would result in short-term, temporary transportation impacts associated with the delivery of construction materials and equipment, removal of construction debris, and parking for construction workers. Such impacts would cease upon completion of construction activities.</p> <p><u>Operation</u> The Traffic Impact Study Report studied four signalized intersections near the project site during morning (7:00-9:00 a.m.)</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>and evening (4:00-6:00 p.m.) peak travel hours. Project operation is anticipated to generate 315 daily trips, of which 21 trips would be generated during the a.m. peak hour and 26 trips would be generated during the p.m. peak hour. All study intersections are expected to operate at level of service (LOS) C and D or better after construction of the proposed project. Therefore, the project would not have a significant impact on any study intersections during peak travel times.</p> <p><u>Vehicle Miles Traveled</u> The project is unlikely to result in adverse impacts related to vehicle miles traveled (VMT) for the following reasons:</p> <ul style="list-style-type: none"> • The project would provide housing in a segment of the Bay Area that has a surplus of jobs relative to the supply of housing. The large supply of jobs in San Francisco and other neighboring cities results in relatively long commute lengths for many employees, particularly those community from homes in the East Bay and San Francisco. The provision of housing in Daly City will help to reduce VMT at a regional level by providing homes closer to job locations. • The commercial portion of the development would consist of a relatively small-scale commercial space that would mostly likely serve local customers and as well pass-by trips on Eastmoor Avenue. <p><u>Access and Circulation</u> A single driveway on Eastmoor Avenue would provide adequate access to the project site. The project would also include relocation of traffic signals at the Sullivan/Eastmoor intersection and installation of a new standard streetlight pole as conditions for project approval.</p> <p><u>Pedestrian, Bicycle, and Transit Facilities</u> Pedestrian facilities near the project site include sidewalks on one or both sides of the road. Based on the Daly City Bicycle and Pedestrian Master Plan (2013) and the Daly City 2030 General Plan, bicycle facilities are not present in the project vicinity. The nearest bus stop to the project site is at the corner of Eastmoor Ave and Sullivan Ave, approximately 150 feet west of the proposed development. This bus stop is serviced by the 24 and 121 bus lines. The proposed project would not conflict with existing and planned pedestrian or bicycle facilities, and will add a moderate amount of trips to existing transit facilities, which the existing transit capacity can accommodate.</p> <p>Given the above, the project would not have adverse impacts on transportation and accessibility.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
NATURAL FEATURES		
Unique Natural Features, Water Resources	2	<p>The project site, which is currently a vacant and paved lot, does not encompass any unique natural features. Federally protected natural resources, such as rivers, wetlands, coastal zones, and endangered species, are not present on the project site or adjacent properties. Therefore, the proposed project would not result in the alteration of any waterways, unique features, or critical habitat, nor the loss of any federally listed species.</p> <p>As discussed above, potential adverse impacts on water quality resulting from stormwater runoff would be addressed through compliance with C.3. requirements and the City’s standard conditions of approval related to stormwater runoff.</p>
Vegetation, Wildlife	2	<p>While the proposed project is located within the ranges of seventeen endangered or threatened species, none are likely to occur on site due to the lack of suitable habitat. According to NEPAassist mapping, the project site and surrounding properties are defined as Developed, at Medium to High intensities. Results from the USFWS IPaC analysis of the area similarly state that the project site is situated outside of critical habitat areas for the endangered or threatened that overlap with the project area (USFWS 2020a) (see ERR 6).</p> <p>There are currently no trees located on site. Landscape plans include a mix of grasses, shrubs, and trees. Landscape planting design would conform to the City’s water-efficient landscape ordinance.</p>
Other Factors	1	<p>The project would provide additional low-income housing and commercial space that would serve the local community, which would be beneficial to residents and the community.</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
CLIMATE AND ENERGY		
Climate Change Impacts	2	<p>Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. An expanding body of scientific research supports the theory that global climate change is currently causing changes in weather patterns, average sea level, ocean acidification, chemical reaction rates, and precipitation rates, and that it will increasingly do so in the future. The climate and several naturally occurring resources within California are adversely affected by climate change. Increased precipitation and sea level rise will increase coastal flooding, saltwater intrusion, and degradation of wetlands. Mass migration and/or loss of plant and animal species could also occur. Potential effects of global climate change that could adversely affect human health include more extreme heat waves and heat-related stress; an</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		<p>increase in climate-sensitive diseases; more frequent and intense natural disasters such as flooding, hurricanes, and drought; and increased levels of air pollution.</p> <p>The frequency and severity of natural hazards may be affected by climate change, including flooding, sea-level rise, hurricanes and extreme storms, drought, extreme heat, wildfire, landslides, and extreme cold. Similarly, climate change may alter site suitability factors, such as air quality, urban heat island effects, soil stability, water resources, groundwater availability (e.g., water table level, reliance on a sole source aquifer), excessive stormwater runoff and site flooding, wastewater control systems, and water treatment facilities.</p> <p>As discussed above, the project site is not within a flood zone (see Attachment 5; see ERR 3). The project site is not within a low-lying area or subject to sea-level rise (NOAA 2023) (see Attachment 27). The project site is in an urbanized area that is not subject to wildfire hazards (CAL FIRE 2023) (see Attachment 28). As previously discussed, the project site is not in an area that relies on a sole-source aquifer. No substantial issues related to air quality, soil suitability, stormwater, wastewater systems, or water supply have been identified in the preceding analyses. Thus, the project would not lead to potential climate-change-related impacts that would substantially adversely affect residents.</p> <p>As described further below, the project would not include natural gas. The project would include solar panels and EV charging stations, and would achieve LEED for Homes Gold for residential construction. Compliance with the California Green Building Standards (CALGreen) Code would ensure the project incorporates various measures to reduce greenhouse gas (GHG) emissions. The project is located within one-half mile of a major transit stop, which would serve to reduce the GHG emissions associated with motor vehicle travel. As previously discussed, criteria air pollutant emissions from project construction and operation would be below <i>de minimis</i> thresholds, and daily emissions from the proposed project would not exceed the BAAQMD’s regional construction or operation emissions thresholds (BAAQMD 2017a) (see Attachment 6; see ERR 4). Therefore, the proposed project would not contribute substantially to climate change impacts.</p>
Energy Efficiency	2	<p>The project would be required to comply with applicable building energy efficiency standards pursuant to Title 24, Part 6 of the California Code of Regulations. At the building permit stage, the project would comply with the CALGreen Code that establishes mandatory green building standards for all buildings</p>

Environmental Assessment Factor	Impact Code	Impact Evaluation
		in California. The project would be 100% electric and would not utilize any natural gas. In June 2022, Bright Green Strategies, Inc. confirmed that the proposed development would achieve LEED for Homes Gold for residential construction (see Attachment 29). The proposed project would include EV charging stations on both levels of the parking garage. The residential building would include solar panels for improved building energy performance. An emergency generator would not be stored on site. The project site is also located in close proximity to public transportation, with the Colma BART station within a half-mile of the site.

Additional Studies Performed:

- *Final Traffic Impact Study Report*, prepared by TJKM, January 2020
- *Hydraulic Analysis for the 493 Eastmoor Project*, prepared by Brown and Caldwell, June 2020
- *Phase I Environmental Site Assessment*, prepared by AEI Consultants, February 2020
- *Phase II Subsurface Investigation*, prepared by AEI Consultants, January 2021
- *Risk Management Plan*, prepared by AEI Consultants, February 2022
- *Technical Memorandum- Wastewater Collection System Hydraulic Modeling Support*, prepared by Woodard and Curran, February 2020
- *Updated Geotechnical Engineering Study*, prepared by Earth Systems Pacific, March 2020
- *Technical Noise Memo*, prepared by Dudek, September 2022
- *Cultural Resources Inventory and Evaluation Report*, prepared by Dudek, December 2022

Field Inspection (Date and completed by):

Field inspection was completed by John Schlagheck, Archaeologist with Dudek, on November 2, 2022.

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

ABAG (Association of Bay Area Governments). 2022. *Final Regional Housing Needs Allocation (RHNA) Plan: San Francisco Bay Area, 2023-2031*. Adopted December 2021. Updated March 2022.

BAAQMD (Bay Area Air Quality Management District). 2017a. *California Environmental Quality Act Air Quality Guidelines*. May 2017. Accessed November 9, 2022 at https://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en&rev=0d2d971e661d41f28a56953f1776bdde.

BAAQMD. 2017b. *Spare the Air, Cool the Climate: A Blueprint for Clean Air and Climate Protection in the Bay Area*. Final 2017 Clean Air Plan. Adopted April 19, 2017.

- Accessed November 9, 2022 at https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en.
- CAL FIRE (California Department of Forestry and Fire Protection). 2023. San Mateo County State Responsibility Area Fire Hazard Severity Zones. June 15, 2023. Accessed July 10, 2023 at https://osfm.fire.ca.gov/media/nefnkmtw/fhsz_county_sra_11x17_2022_sanmateo_2.pdf.
- CalEPA (California Environmental Protection Agency). 2023. “CalEPA Regulated Site Portal.” Accessed January 23, 2023 at <https://siteportal.calepa.ca.gov/nsite/map/help>.
- CalRecycle. 2022. SWIS Facility/Site Activity Details: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-0002). Accessed November 9, 2022 at <https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223>.
- CCC (California Coastal Commission). 2019. “Maps – Coastal Zone Boundary: San Mateo County.” Accessed November 9, 2022 at <https://coastal.ca.gov/maps/czb/>.
- City of Daly City. 2013. *Daly City 2030 General Plan*. Adopted March 25, 2013. Accessed November 9, 2022 at <https://www.dalycity.org/363/General-Plan>.
- City of Daly City. 2020. *Play Daly: Daly City Parks & Open Space Master Plan*. March 2020. Accessed November 9, 2022 at <https://www.dalycity.org/DocumentCenter/View/3370/Daly-City-Parks-and-Open-Space-Master-Plan-PDF>.
- City of Daly City. 2022. “How Water Gets to You.” Water & Wastewater Resources Department. Accessed November 9, 2022 at <https://dalycity.org/666/How-Water-Gets-to-You#:~:text=Sources%20of%20Water&text=The%20City%20of%20Daly%20City,Highway%20280%20in%20San%20Mateo>.
- DOC (California Department of Conservation). 2016. California Important Farmland Finder. Accessed November 9, 2022 at <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- EPA (U.S. Environmental Protection Agency). 2020. “Nonattainment Areas for Criteria Pollutants.” August 31, 2022. Accessed September 12 2022 at <https://www.epa.gov/green-book>.
- EPA. 2022. “EJScreen: Environmental Justice Screening and Mapping Tool.” April 1, 2022. Accessed August 3, 2022 at <https://www.epa.gov/ejscreen>.
- EPA. 2022. “NEPAssist.” March 16, 2022. Accessed August 3, 2022 at <https://www.epa.gov/nea/nepassist>.
- EPA. 2022. “Sole Source Aquifers for Drinking Water.” Last updated May 25, 2022. Accessed September 9, 2022 at <https://www.epa.gov/dwssa/map-sole-source-aquifer-locations>.

FEMA (Federal Emergency Management Agency). 2017. "FEMA Flood Map Service Center: Flood Insurance Rate Map for City of Daly City, California." Accessed August 11, 2022 at <https://msc.fema.gov/portal/home>.

NOAA (National Ocean and Atmospheric Administration). 2023. "Sea Level Rise Viewer." Accessed July 10, 2023 at <https://coast.noaa.gov/slr/#/layer/slr/10/-13634259.89665146/4534275.751064842/12/satellite/none/0.8/2050/interHigh/midAccretion>.

USFWS (U.S. Fish and Wildlife Service). 2019. "Coastal Barrier Resources System Mapper." Updated July 31, 2019. Accessed September 2022 at <https://fwsprimary.wim.usgs.gov/CBRSMapper-v2/>.

USFWS. 2022a. "Information for Planning and Consultation (IPaC)." Accessed August 12, 2022 At <https://ipac.ecosphere.fws.gov/location/index>.

USFWS. 2022b. "National Wetlands Inventory, Surface Waters and Wetlands Map." Accessed September 9, 2022 at <https://www.fws.gov/wetlands/data/mapper.html>.

U.S. National Park Service. 2019. "Interactive map of NPS Wild and Scenic Rivers." Accessed September 9, 2022 at <https://nps.maps.arcgis.com/apps/View/index.html?appid=ff42a57d0aae43c49a88daec0e353142>.

List of Permits Obtained:

Use Permit UPR-6-19-14076 and Design Review DR-6-19-14077

Public Outreach [24 CFR 50.23 & 58.43]:

The proposed project was presented to the Planning Commission on February 4, 2020, and to the City Council on February 24, 2020. Property owners within 300 feet of the project site were sent notices regarding both meetings. Also, meeting notices were published in the newspaper of general circulation in accordance with California State Law.

The Draft Environmental Assessment will be made available for public review and comment beginning on August 24, 2023, and concluding on September 8, 2023.

Cumulative Impact Analysis [24 CFR 58.32]:

The proposed project is consistent with the type and density of development established under land use regulations in the Sullivan Corridor Specific Plan after considering concessions and a density bonus for the proposed project. The proposed project helps achieve the goal of increasing affordable housing units in the area and providing a retail/office space to the residents of the neighborhood. Environmental impacts identified in this document, including cumulative impacts, are mitigated through the mitigation measures, and would be adopted as a condition of approval of the project. No negative (adverse) cumulative impact is anticipated.

Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]**Reduced Project Alternative**

Reducing the size of the project could potentially reduce impacts incrementally, such as construction-period air quality and noise. However, the mitigation measures identified for the project would still apply to a reduced project on this site. Reducing the size of the project would not change the relative magnitude of the impact or the mitigation measures as compared to the project as proposed. A reduced project would not fully realize the potential of this currently unused site to provide the City with an opportunity to best meet its affordable housing goals. Therefore, a reduced-project alternative was not considered.

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

Under the No Action Alternative, the proposed project would not proceed, and the project site would remain vacant for the foreseeable future. The adverse impacts discussed in this EA would not occur, nor would beneficial impacts occur such as providing much-needed affordable housing and associated amenities to the community. The project site may remain vacant, or potentially sold for other development purposes. It is unknown at this time if or when another proposed development would be forthcoming. As previously stated, the project site is designated Service Commercial (C-S) in the Sullivan Corridor Specific Plan, which stipulates that any uses allowed in the Specific Plan Retail and Office Commercial (C-R/O) are allowed on parcels designated Service Commercial (C-S) subject to use permit approval. The C-R/O designation allows a variety of retail, office, and service commercial uses, and “any residential uses.” Thus, it is reasonable to assume that any forthcoming proposed projects could involve retail, commercial, and/or residential uses.

Summary of Findings and Conclusions:

The proposed project involves the construction of a 72-unit affordable housing development at 493 Eastmoor Avenue in Daly City, CA, including 1,196 square feet of street-level office/retail space and multiple on-site amenities for residents, including a courtyard, community room, fitness room, bike room, reading room, laundry room, and parking garage. With implementation of the mitigation measures listed below, the project would have no significant effect on the quality of the human environment. The project would benefit the City of Daly City and low-income residents needing affordable housing by providing high-quality affordable housing in a desirable area with access to employment opportunities and all standard community services.

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

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

Law, Authority, or Factor	Mitigation Measure
Clean Air	<p><u>AIR-1: Construction-Related Air Pollution Controls.</u> The project applicant shall implement all of the following applicable air pollution control measures during construction of the project:</p> <ol style="list-style-type: none"> 1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. 2. All haul trucks transporting soil, sand, or other loose material off-site shall be covered. 3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. 4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour. 5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. 6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code Regulations [CCR]). Clear signage shall be provided for construction workers at all access points. 7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer’s specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation. 8. Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District’s phone number shall also be visible to ensure compliance with applicable regulations.
Contamination and Toxic Substances	<p><u>HAZ-1: Vapor Intrusion Risk.</u> As a conservative prophylactic measure, the potential preferential pathway of VOCs to upper, residential levels of the building shall be addressed by installing conduit seals at mechanical and electrical conduits that penetrate through the subsurface and enter through upper level residential units throughout the building footprint. Conduit seals shall be specified by the mechanical, electrical, and plumbing engineer (MEP) for the project consistent with Class 1 Division 2 hazardous area classifications. Additionally, existing unused utilities shall be abandoned and sealed where appropriate as part of</p>

Law, Authority, or Factor	Mitigation Measure
	<p>redevelopment activities. Newly installed utilities and utility trenches shall be sealed at or near the building perimeter using a controlled density fill (CDF) plug to limit vapor migration within the utility trench.</p> <p><u>HAZ-2: Site Control.</u> The General Contractor shall implement site control procedures to prevent unwanted public access and control the flow of personnel, vehicles, and materials in and out of the site while working with potentially contaminated materials. In addition, site control measures will help control the spread of COPCs from the site, if they are present. Site control measures to be implemented by the General Contractor include, but are not limited to:</p> <ul style="list-style-type: none"> • Fencing the site perimeter, including installation of construction fence screen. • Controlling access and egress at selected locations. • Posting signs at all site entrances. • Instructing visitors to sign in at the project support area. <p><u>HAZ-3: Equipment Decontamination.</u> The General Contractor shall establish and implement decontamination procedures to reduce the potential for construction equipment and vehicles to release potentially impacted soil onto public roadways or other inadvertent off-site transfer. At a minimum, contractors shall place gravel at all site access points and remove excess soil from construction equipment using dry methods (e.g., brushing or scraping) prior to moving the equipment to off-site locations.</p> <p><u>HAZ-4: Personal Protective Equipment.</u> Contractors shall use personal protective equipment (PPE), including appropriate clothing, to isolate workers from COPCs and physical hazards. The appropriate contractor shall evaluate the level of PPE and modify the level of PPE, if warranted, based on conditions encountered at the site and/or type of work activity in accordance with their own HSP. The minimum level of protection for workers coming into direct contact with potentially contaminated materials is Level D, as described below:</p> <ul style="list-style-type: none"> • Coveralls or similar construction work clothing; • Reflective safety vests; • Steel-toed boots; • Hard hat; • Work gloves, as necessary; • Safety glasses, as necessary; and • Hearing protection, as necessary.

Law, Authority, or Factor	Mitigation Measure
	<p><u>HAZ-5: Dust Control.</u> Mitigation measures to minimize the creation and dispersion of dust during soil handling and earthwork will include, but not be limited to, the following measures:</p> <ul style="list-style-type: none"> • Exposed on-site soils to be moistened twice a day to prevent visible airborne dust. • Moistening of all soils during truck loading for disposal or off-haul purposes. • Application of water while grading, excavating, and loading, as needed. • If visible dust is present, conducting dust suppression activities such as soil moistening. • Covering stockpiles with 10-mil polyethylene sheeting (or equivalent). • Limiting vehicle speeds to 5 miles per hour on unpaved portions of the site. • Covering all disposal trucks and/or off-haul trucks with a tarpaulin and rinsing of truck tires before leaving the site. • Minimizing the drop heights while loading/unloading soil. • On-site soil disturbance and/or loading activities will be suspended if winds exceed 20 miles per hour. • Dust suppression shall not produce excess stormwater and runoff.
<p>Historic Preservation (Cultural Resources)</p>	<p><u>CUL-1: Unanticipated Discovery of Archaeological Resources.</u> In the event that archaeological resources (sites, features, or artifacts) are exposed during construction activities for the project, all construction work occurring within 100 feet of the find shall immediately stop until a qualified archaeologist, meeting the Secretary of the Interior’s Professional Qualification Standards, can evaluate the significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the National Environmental Policy Act (NEPA), the archaeologist may record the find to appropriate standards (thereby addressing any data potential) and allow work to continue. If the archaeologist observes the discovery to be potentially significant under NEPA, additional treatment may be required.</p>

Law, Authority, or Factor	Mitigation Measure
	<p><u>CUL-2: Unanticipated Discovery of Human Remains.</u> In accordance with California Health and Safety Code Section 7050.5, if potential human remains are found, the lead agency staff and the County Coroner must be immediately notified of the discovery. The coroner would provide a determination within 48 hours of notification. No further excavation or disturbance of the identified material, or any area reasonably suspected to overlie additional remains, can occur until a determination has been made. If the County Coroner determines that the remains are, or are believed to be, Native American, the coroner would notify the Native American Heritage Commission (NAHC) within 24 hours. In accordance with Public Resources Code Section 5097.98, the NAHC must immediately notify those persons it believes to be the Most Likely Descendant (MLD) from the deceased Native American. Within 48 hours of this notification, the MLD would recommend to the lead agency her/his preferred treatment of the remains and associated grave goods. Further, federal regulations require that Native American human remains, funerary objects, and object of cultural patrimony are handled consistent with the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) for all discovery situations in accordance with 43 Code of Federal Regulations Part 10.</p>
Noise Abatement and Control	<p><u>NOI-1: Interior Noise Attenuation.</u> In order to ensure compliance with 24 CFR Part 51, Subpart B and that the HUD noise standard of 45 dBA DNL is not exceeded, the detailed architectural design plans (when these are prepared) shall provide the following specification for upgraded windows:</p> <ul style="list-style-type: none"> • All windows and doors in the east and southeast-facing residential units (i.e., the residential units with doors or windows facing I-280) shall have a sound Transmission Class (STC) rating of 35 or greater. • All windows and doors in the south-facing residential units (i.e., the residential units with doors or windows facing I-280) shall have a sound Transmission Class (STC) rating of 30 or greater.

Determination:

Finding of No Significant Impact [24 CFR 58.40(g)(1); 40 CFR 1508.27]
The project will not result in a significant impact on the quality of the human environment.

Finding of Significant Impact [24 CFR 58.40(g)(2); 40 CFR 1508.27]
The project may significantly affect the quality of the human environment.

Preparer Signature: Catherine Wade Date: 8/4/2023

Name/Title/Organization: Catherine Wade/Project Manager/Dudek

Certifying Officer Signature:  Date: 8/10/23

Name/Title: Thomas J. Piccolotti/City Manager

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