

Initial Study and Negative Declaration for the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport

PREPARED FOR:

The City/County Association of Governments of San Mateo County (C/CAG) Board of Directors in its Designated Role as the Airport Land Use Commission for San Mateo County, Redwood City, California

PREPARED BY:

RICONDO & ASSOCIATES, INC.

July 2012

Draft

Ricondo & Associates, Inc. (R&A) prepared this document for the stated purposes as expressly set forth herein and for the sole use of City/County Association of Governments of San Mateo County and its intended recipients. The techniques and methodologies used in preparing this document are consistent with industry practices at the time of preparation.

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PROPOSED NEGATIVE DECLARATION

COMPREHENSIVE AIRPORT LAND USE COMPATIBILITY PLAN

FOR THE ENVIRONS OF SAN FRANCISCO INTERNATIONAL AIRPORT

Project Name: Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (ALUCP or proposed project).

Lead Agency/Project Proponent: The City /County Association of Governments of San Mateo County (C/CAG), acting in its capacity as the Airport Land Use Commission for San Mateo County.

Brief Project Description: The basic function of the ALUCP is to promote compatibility between San Francisco International Airport (*Airport*) and the land uses that surround the *Airport*. As such, the ALUCP includes specified limitations and conditions on the future development of new residential, commercial and other noise and risk-sensitive land uses surrounding the *Airport*. The ALUCP provides land use compatibility policies and criteria for the area surrounding the Airport, and includes components describing the Airport, existing and planned land use in the Airport environs, compatibility zone maps, compatibility policies and criteria, and procedural polices.

Project Location: The ALUCP establishes policies applicable to the development of future land use in the area surrounding the *Airport*, which is located within unincorporated San Mateo County. The ALUCP establishes a two-part Airport Influence Area (AIA). AIA Area A covers all of San Mateo County. AIA Area B, the project referral area, includes portions of the Cities of Burlingame, Colma, Daly City, Hillsborough, Millbrae, Pacifica, San Bruno, San Mateo, South San Francisco and parts of unincorporated San Mateo County. Within Area B, agencies would be required to submit proposed general plan amendments, specific plans, and zoning ordinances and amendments to C/CAG, in its role as the Airport Land Use Commission, for determinations of consistency with the ALUCP.

AIA Area A, which depicts the Airport's location within a regional context, is shown on **Exhibit 2**, Airport Influence Area – Area A, Real Estate Disclosure Area, on page 3-3 of the Initial Study. AIA Area B, the project referral area, is depicted on **Exhibit 3**, Airport Influence Area – Area B, Project Referral Area, on page 3-5 of the Initial Study.

Initial Study: An Initial Study of the ALUCP was prepared in accordance with the California Environmental Quality Act (CEQA)¹ and its implementing guidelines² to ascertain whether implementation of the ALUCP

¹ California Public Resources Code §21000 *et seq.*

² 14 Cal. Code Regs. §15000, *et seq.*

[DRAFT]

might have a significant effect on the environment. A copy of the Initial Study is attached to this proposed Negative Declaration and is incorporated by reference.

Finding: C/CAG finds, on the basis of the whole record before it (including the Initial Study, and any comments received and responses thereto), that there is no substantial evidence that the ALUCP for the *Airport* may have a significant effect on the environment and that this Negative Declaration reflects the ALUC's independent judgment and analysis.

Date: July 9, 2012

Richard Napier
Executive Director
City/County Association of Governments of San Mateo County

1. Introduction

1.1 Purpose of Document

This Initial Study for the Comprehensive Airport Land Use Compatibility Plan (ALUCP) for the Environs of San Francisco International Airport (SFO or the Airport) has been prepared by the City/County Association of Governments of San Mateo County (C/CAG) acting as the Airport Land Use Commission for San Mateo County. The intent of the Initial Study is to determine, pursuant to the California Environmental Quality Act (CEQA)³, if the adoption of the updated SFO ALUCP will result in any significant effect on the environment.

The purpose of the ALUCP is to protect the public health, safety and welfare “by ensuring the orderly expansion of [the Airport] and the adoption of land use measures that minimize the public’s exposure to excessive noise and safety hazards” within the immediate environs of SFO.⁴ The ALUCP aims to discourage the intensification of incompatible land use patterns around the Airport by establishing policies to limit the introduction or expansion of new incompatible land uses.

1.2 Document Format

This Initial Study includes 8 sections.

- **Introduction**

This section describes the proposed project and its purpose, an overview of C/CAG’s role as the San Mateo County Airport Land Use Commission and a discussion on the CEQA process.

- **Environmental Setting**

This section describes the project’s regional setting along with a description of the immediate project site and surrounding land uses.

³ Public Resources Code §21000 et seq.

⁴ Public Utilities Code, §21670.

- **Project Description**

This section summarizes the proposed update to the ALUCP.

- **Analysis of Potentially Displaced Development**

This section describes the proposed ALUCP policies in detail and the potential effect of proposed ALUCP policies on future development in the Airport environs and the potential for future development to be displaced to other areas after implementation of the ALUCP.

- **Environmental Factors Potentially Affected**

This section includes the CEQA environmental analysis checklist and a discussion of factors determined to be potentially affected.

- **Determination**

- This section is a placeholder for C/CAG's official determination regarding the findings of the Initial Study.

- **References and Preparers**

This section lists the references cited in the document and those responsible for the preparation of the document.

- **Appendix**

The appendix includes maps supporting the displacement analysis in Section 4 as it relates to airspace protection.

1.3 Statutory Framework

In 1967, the State of California enacted a law requiring the formation of an airport land use commission in each county containing a public airport.⁵ The declarations in Section 21670 of the California Public Utilities Code define the goals of the California Legislature and underscore the parameters and limitations of the statute:

- (1) It is in the public interest to provide for the orderly development of each public use airport in this state and the area surrounding these airports so as to promote the overall goals and objectives of the California airport noise standards adopted pursuant to Section 21669 and to prevent the creation of new noise and safety problems.

⁵ Public Utilities Code, §21670 et seq.

(2) It is the purpose of this article to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.

- (b) In order to achieve the purposes of this article, every county in which there is located an airport which is served by a scheduled airline shall establish an airport land use commission. Every county, in which there is located an airport which is not served by a scheduled airline, but is operated for the benefit of the general public, shall establish an airport land use commission...

The airport land use commission statutes states that the principal purpose of airport land use compatibility planning is to foster the "orderly expansion" of airports by protecting against the encroachment of new incompatible land uses in areas affected by aircraft noise. That is, the airport land use commission statutory mandate is intended to provide appropriate prospective land use planning through the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports, to the extent that such areas do not already contain incompatible uses. Airport land use commissions, accordingly, are empowered to establish height restrictions for naturally occurring objects (e.g., trees), man-made temporary objects (e.g., cranes), and structures (e.g., buildings); specify future land uses that are compatible with airport operations; and determine future building standards, including sound attenuation standards in the environs of airports. However, airport land use commissions have no authority over existing land uses or the operation of airports.⁶

1.4 San Mateo County Airport Land Use Commission Overview

C/CAG was formed in November 1990 through a Joint Powers Agreement (JPA) between the County and the 20 incorporated cities in the County with the purpose of preparing, adopting, and enforcing state-mandated countywide plans. In February 1991, the County Board of Supervisors and the City Selection Committee of Mayors designated C/CAG as the Airport Land Use Commission for San Mateo County. C/CAG established an Airport Land Use Committee (ALUC) to advise the C/CAG Board on airport/land use compatibility planning issues. The Board, however, retained all decision-making authority as the official airport land use commission established under State law.⁷

C/CAG is an autonomous public agency and is not part of the governmental structure of the County of San Mateo. With respect to its duties as the Airport Land Use Commission in San Mateo County, C/CAG acts

⁶ Public Utilities Code §21674 (a) and (e). In its role as Airport Land Use Commission, C/CAG has no authority over the operation of the Airport.

⁷ Prior to 1990, the airport land use commission function had been the responsibility of the Regional Planning Committee (RPC) of San Mateo County. The RPC was created in 1964 as an advisory body to the County Board of Supervisors. The Board of Supervisors abolished the RPC after the formation of C/CAG. Many of the RPC's functions were assumed by C/CAG.

independently of the County of San Mateo Board of Supervisors. The membership of C/CAG, as of September 2011, is shown in **Table 1**.

C/CAG has several designated roles and implements several multi-jurisdictional plans and programs. The C/CAG Airport Land Use Committee (ALUC) is one of several advisory committees established by the C/CAG Board to provide the Board with technical assistance in the preparation and implementation of plans and programs.

An Executive Director guides C/CAG activities, as directed by the C/CAG Chairperson and the C/CAG Board of Directors. The Executive Director is retained via a contract with the C/CAG Board. The administration of C/CAG also includes assistance from the Executive Director's Advisory Committee, the C/CAG Finance Committee, and an administrative assistant to the Executive Director. Local agency staff provides support for various C/CAG programs and activities. San Mateo County Planning staff provides support for the airport land use commission function of C/CAG, as required by state law.

Table 1 City/County Association of Governments of San Mateo County

VOTING MEMBERS

Town of Atherton	City of Millbrae
City of Belmont	City of Pacifica
City of Brisbane	Town of Portola Valley
City of Burlingame	City of Redwood City
Town of Colma	City of San Bruno
City of Daly City	City of San Carlos
City of East Palo Alto	City of San Mateo
City of Foster City	City of South San Francisco
City of Half Moon Bay	Town of Woodside
Town of Hillsborough	County of San Mateo
City of Menlo Park	

EX-OFFICIO (NON-VOTING) MEMBERS

San Mateo County Transportation Authority	San Mateo County Transit District
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Staff Assistance:
Richard Napier, C/CAG Executive Director; local agency staff for various activities.

NOTE: All members are elected officials of the jurisdictions listed, unless otherwise noted; Membership as of September 2011.

SOURCE: City/County Association of Governments of San Mateo County (C/CAG). "2011 Board Members," www.ccag.ca.gov/board_members.html (accessed September 30, 2011).

PREPARED BY: Ricondo & Associates, March 2012.

1.5 CEQA Process

One of CEQA's primary goals is to disclose to decision makers and the general public any potential environmental effects of proposed projects. CEQA requires that the potential environmental impacts of proposed projects be evaluated before project implementation may begin. Local government land use planning policy documents, including ALUCPs, are considered "proposed projects" under CEQA.⁸ This Initial Study considers potential environmental impacts resulting from the adoption of the updated SFO ALUCP.

According to CEQA, the public agency with primary project approval authority is designated the Lead Agency. The CEQA Lead agency for the SFO ALUCP is C/CAG. This CEQA-compliant Initial Study has been prepared under the direction of C/CAG. The information contained herein will be considered by C/CAG when making a determination of whether to approve the proposed update to the SFO ALUCP.

This Initial Study was prepared in accordance with the State CEQA Guidelines §15063, which outlines requirements including a project description; identification of the environmental setting; a checklist identifying potential environmental effects; a discussion of any necessary mitigation measures; an evaluation of consistency with existing zoning, plans and other land use controls as well as a list of all persons associated with the preparation of the initial study. This Initial Study has been written to meet the CEQA content requirements.

Pursuant to State CEQA Guidelines §15073, this Initial Study must be submitted for a period of public review of no less than 20 days. The public review period for this Initial Study is 42 days, beginning on Thursday, July 12, 2012 and ending on Wednesday, August 22, 2012..

During the public review period, interested parties may submit written comments regarding the information contained in this Initial Study. The public comments along with written responses will be included in the public record and considered by C/CAG during the project approval process.

Written comments must be received by mail, facsimile, or email no later than 5:00 p.m. on Wednesday, August 22, 2012. Please direct all comments to:

Richard Napier
Executive Director
City/County Association of Governments of San Mateo County
555 County Center
Fifth Floor
Redwood City, California 94063
Fax: 650.361.8227
E-mail: rnapier@co.sanmateo.ca.us

⁸ Muzzy Ranch Co. v. Solano County Airport Land Use Commission, 41 Cal. 4th 372; 160 P.3d 116; 60 Cal. Rptr. 3d 247; 2007 Cal. LEXIS 6508; 37 ELR 20150

[DRAFT]

Copies of the Initial Study, Negative Declaration, and all documents incorporated by reference therein, will be available during normal business hours (8:30 a.m. to 5:00 p.m., Monday thru Friday) at C/CAG's offices, located on the fifth floor of the county office building at 555 County Center, Redwood City, CA 94063. These documents also will be available online at http://www.ccag.ca.gov/plans_reports.html. Hard copies are available for review at the following public libraries:

Burlingame Library
480 Primrose Rd
Burlingame, CA 94010
(650) 558-7400

San Bruno Public Library
701 Angus Ave W
San Bruno, CA 94066
(650) 616-7078

Millbrae Library
1 Library Avenue
Millbrae, CA 94030
(650) 697-7607

San Carlos Library
610 Elm Street
San Carlos, CA 94070
(650) 591-0341

Pacifica Sharp Park Library
104 Hilton Way
Pacifica, CA 94044
(650) 355-5196

South San Francisco Library
840 West Orange Ave
South San Francisco, 94080
(650) 829-3862

2. Environmental Setting

2.1 Airport Location and Administration

SFO is the primary air carrier airport in the San Francisco Bay area and the Northern California region. The Airport is located in northern San Mateo County approximately 14 miles south of downtown San Francisco.

The Airport is owned and operated by the City and County of San Francisco and is managed by the San Francisco Airport Commission and Airport Director. The five-member Airport Commission is appointed by the Mayor of San Francisco.

2.2 Project Site and Surrounding Uses

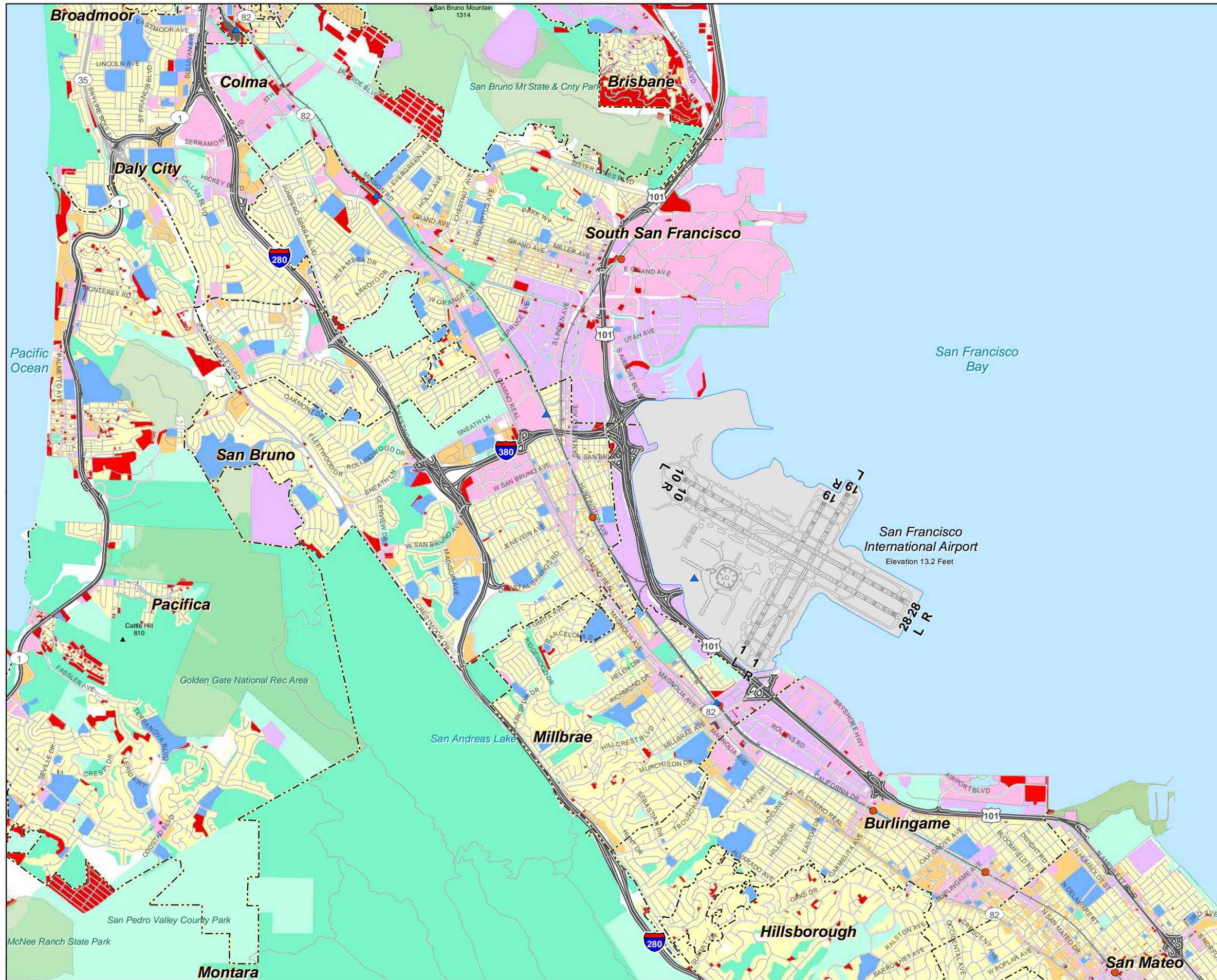
The Airport is in unincorporated San Mateo County and is bordered by the cities of South San Francisco, San Bruno, Millbrae and Burlingame and extends east into San Francisco Bay. U.S. Highway 101 is along the western perimeter of the Airport.

The SFO environs are urban in character with a variety of land uses. As depicted in **Exhibit 1**, existing land use in the area includes heavy industrial, business/technology parks, institutional, commercial, multi-family residential, single-family residential, and park and recreational uses. Steep slopes are in parts of the study area, most of which are currently developed with low-density single-family residential uses. Major transportation corridors traverse the area, including several major freeways, the BART rail line, and the Caltrain commuter rail line. Transit stations are located along the extended centerlines of both sets of parallel runways.

Most of the land along U.S. 101 is developed for industrial, transportation, communications, and utility uses, including a large area north of the Airport in South San Francisco. Commercial development is scattered through the area, although it tends to be concentrated along major thoroughfares.

Residential neighborhoods are located north, west, and south of SFO. These include areas off the west end of Runways 10L and 10R and south of Runways 1L and 1R.

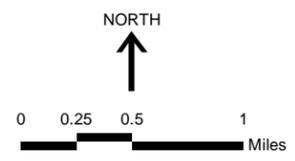
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LEGEND

- ▲ BART Stations
- CALTRAIN Stations
- Municipal Boundary
- Railroads
- == Freeways
- Roads
- Generalized Existing Land Use 2007:
- Vacant
- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

Source:
San Mateo County Planning & Building Department 2007



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3. Project Description

The proposed project that is the subject of this Initial Study is the Comprehensive Airport Land Use Compatibility Plan (ALUCP) for SFO. A copy of the ALUCP is being circulated for public review concurrent with the circulation of this Initial Study. A copy of the ALUCP may be obtained from the City/County Association of Governments of San Mateo County offices located on the fifth floor at 555 County Center in Redwood City, CA 94063. Copies are also available online at http://www.ccag.ca.gov/plans_reports.html. The ALUCP is incorporated by reference and made a part of this Initial Study.

3.1 Project Objectives

The principal objectives of the ALUCP are to:

1. Meet the California legislative mandate to prepare and adopt a Compatibility Plan for the Airport pursuant to the requirements of the State Aeronautics Act.⁹
2. Provide policies for the orderly growth of the Airport and the surrounding area and safeguard the public health, safety and general welfare of the inhabitants in the vicinity of the Airport and the public in general, consistent with the requirements of the State Aeronautics Act.¹⁰

3.2 Proposed Comprehensive Airport Land Use Compatibility Plan

This proposed ALUCP is a comprehensive update of the 1996 SFO ALUCP and provides land use compatibility policies and criteria for the Airport and surrounding areas. The ALUCP proposes land use policies and criteria for implementation by local agencies and does not propose or entail any new development, construction or changes to existing land uses or the environment. No physical construction would result from the adoption of the proposed ALUCP or from subsequent implementation of the ALUCP by local agencies. Similarly, no change in airport facilities or aircraft or airport operations would result with implementation of the ALUCP.

⁹ Public Utilities Code, §§21670.3 and 21675.

¹⁰ Public Utilities Code, §21675.

The SFO ALUCP applies to geographic areas in various cities and unincorporated areas in San Mateo County that are located within the Airport Influence Area (AIA) boundary established and defined in Chapter 4 of the ALUCP. The AIA consists of two areas (Areas A B). Area A, depicted on **Exhibit 2**, is the larger of the two areas and includes all of San Mateo County. All parts of the county are overflowed by at least one flight per week to or from SFO at altitudes of 10,000 feet above mean sea level (MSL) or less.

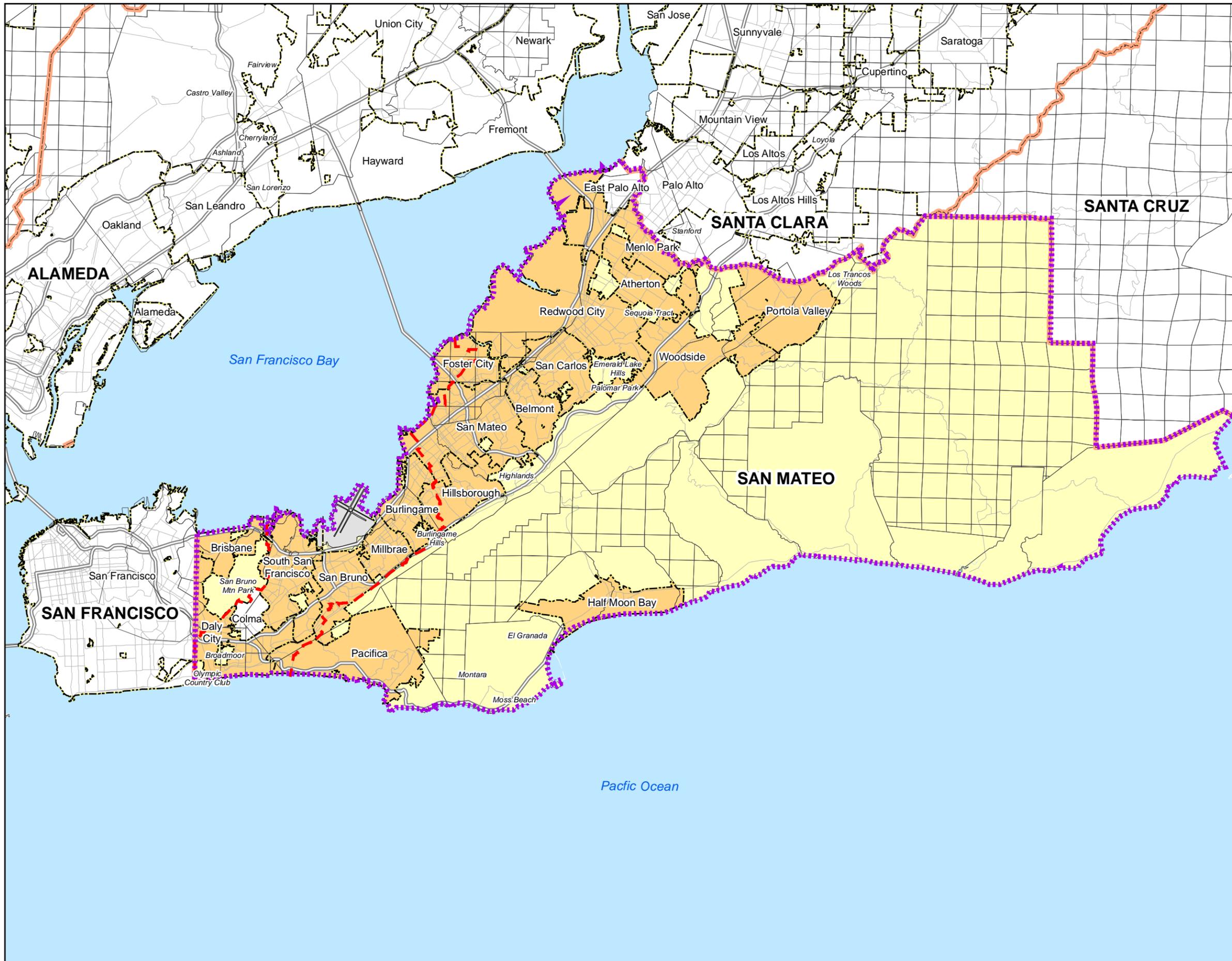
Area B is the smaller of the two areas and lies within Area A. Area B, depicted on **Exhibit 3**, consists of areas exposed to aircraft noise attributable to SFO operations at levels of CNEL 65 dB or greater, areas below the 14 CFR (Code of Federal Regulations) Part 77 conical surface, and areas beneath the TERPS approach surface to Runways 28L and 28R and the one-engine inoperative departure surface for Runways 28L and 28R. The ALUCP was prepared with due consideration to the guidance provided by the Department of Transportation, Division of Aeronautics in the latest version of the *California Airport Land Use Planning Handbook*.¹¹

The SFO ALUCP has four primary areas of concern:

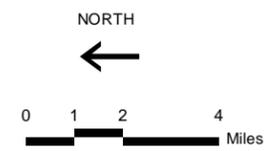
- **Aircraft Noise** – To reduce the potential number of future airport area residents who could be exposed to noise impacts from airport and aircraft operations.
- **Safety of Persons on the Ground** – To minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and accidents.
- **Airspace Protection and Safety of Aircraft in Flight** – To protect the navigable airspace around the Airport for the safe and efficient operation of aircraft in flight and to avoid potential hazards to aircraft in flight.
- **Overflight Notification** – To establish an area within which flights to and from the Airport occur frequently enough and at a low enough altitude to be noticeable by sensitive residents. Within this area, real estate disclosure notices are required, pursuant to State law.

The airport/land use compatibility policies and criteria in the ALUCP apply only to new development. Under State law, the Airport Land Use Commission (the C/CAG Board) has no jurisdiction over existing development, except for nonconforming uses that are proposed for expansion or enlargement. The policies and criteria of the ALUCP, which are intended to promote the compatibility of new development with the Airport, are discussed in detail in the next section.

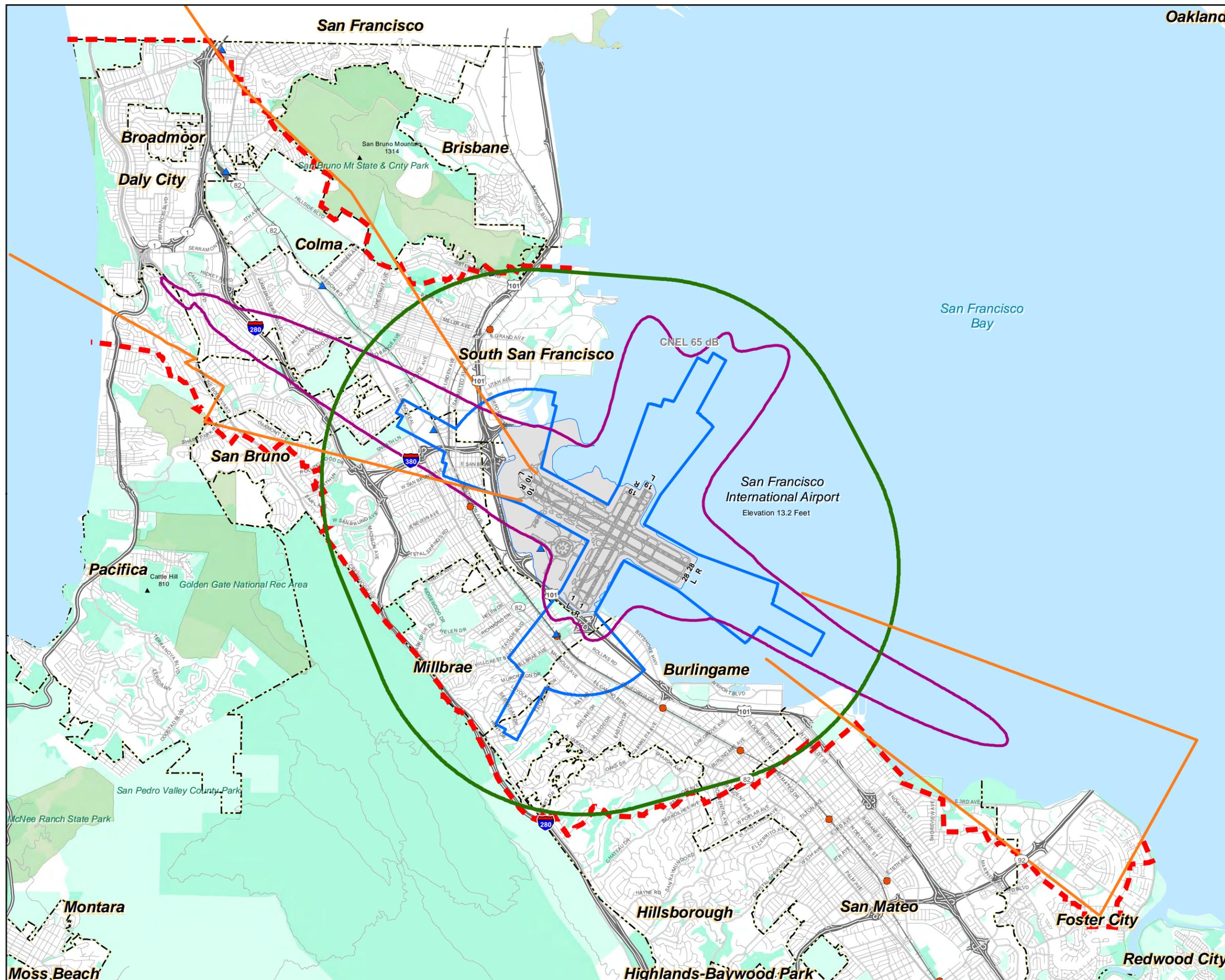
¹¹ California Department of Transportation, Division of Aeronautics, *California Airport Land Use Planning Handbook*, October 2011.



- LEGEND**
- - - Boundary for Airport Influence Area B
 - Airport Influence Area A Boundary
 - County Boundary
 - City Boundary
 - Range/ Township/ Section and Rancho Lines
 - Freeways
 - Roads
 - Municipal Members of SFO/Community Roundtable
 - Unincorporated San Mateo County



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- LEGEND**
- - - Boundary for Airport Influence Area B
 - Outer Boundary of Safety Zones
 - CNEL Contour, 2020 Forecast
 - 14 CFR Part 77 Conical Surface
 - Outer Boundary of TERPS Approach and OEI Departure Surfaces
 - Airport Property
 - ▲ BART Station
 - CALTRAIN Station
 - Municipal Boundary
 - Railroad
 - Freeway
 - Road
 - Local Park, Golf Course, Cemetery
 - Regional Park or Recreation Area
 - Open Space

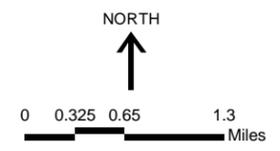
Sources:

100:1 FAA Notification Zone: Ricondo & Associates, Inc. and Jacobs Consultancy, based on 14 CFR Part 77, Subpart B, Section 77.9.

Outer Boundary of TERPS Approach and OEI Departure Surfaces: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009

Safety Compatibility Zones: Jacobs Consultancy Team, 2009; Ricondo & Associates, Inc., 2011

Noise Contour: URS Corporation and BridgeNet International. Draft Environmental Assessment, San Francisco International Airport Proposed Runway Safety Area Program, June 2011



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4. Analysis of Potentially Displaced Development

The adoption of the SFO ALUCP may result in the displacement of future land uses within parts of the AIA. The ALUCP would restrict the future development of dwellings and other noise or risk sensitive land uses within some parts of the AIA based on location relative to the noise and safety zones. The ALUCP would also restrict the height of proposed structures within airspace protection areas, although these provisions of the ALUCP are essentially the same as the 1996 CLUP and would represent little change from current policy.

The State of California requires municipalities and counties to plan for future land use development within their jurisdictions. This requirement is accomplished through the preparation of general plans that determine the desired pattern of future development within their jurisdictions. Zoning ordinances are enacted and maintained by local governments to implement the goals and policies established in the general plans. State law also requires local governments to make their general plans and land use regulations consistent with any ALUC-approved ALUCP applying within their jurisdictions. As the SFO ALUCP includes policies and criteria that limit or restrict development in parts of the AIA, some future land uses otherwise allowed under local general plans may be displaced to other areas after the land use agencies implement the ALUCP. Consequently, environmental impacts may arise from the displacement of future land uses from one area to another.

Potential environmental effects associated with displaced development may include changes in land use patterns and associated shifts in the distribution and concentration of population. By restricting development in parts of the AIA, there is the potential for increased pressure for growth and development in other areas. If this land use development were to occur, potential environmental impacts arising from increased traffic and associated air quality and noise impacts could arise.

Any future development, whether or not it is displaced, would be subject to the zoning and permitting authority of the local agencies (the cities of South San Francisco, San Bruno, Millbrae, Burlingame and Daly City and San Mateo County) would permit. Under CEQA, the environmental impacts arising from future development projects would have to be specifically considered in the environmental documents prepared for those projects as conditions of permit issuance. Thus, it is unlikely that any potential environmental impacts from future projects would avoid appropriate environmental review at the project- level. An important purpose of this analysis of potential development displacement is that it will inform local agencies of the potential for displaced development, and associated consequences, enabling them to plan accordingly.

4.1 Potential Displacement Due to Noise Policies

This section describes the noise compatibility policies of the ALUCP and the potential for those policies to displace potential future development from within the noise compatibility zones to other areas.

4.1.1 LAND USES REGULATED BY NOISE COMPATIBILITY POLICIES

Noise compatibility policies place conditions on new residential and institutional development within the CNEL 65 dB contour, as described in **Table 2**. Within the CNEL 65-70 dB range, only outdoor amphitheatres are considered incompatible. Other noise-sensitive uses are conditionally compatible if they are sound-insulated and if avigation easements are granted to SFO. Within the CNEL 70-75 dB range, dwellings are incompatible and would not be allowable, although exceptions for proposed dwellings on existing lots of record zoned exclusively for residential use are acceptable. Transient lodgings, auditoriums and concert halls, and libraries are conditionally compatible if sound insulation is provided and avigation easements are granted to the Airport. Within the CNEL 75 dB contour, all residential and public/institutional uses are incompatible and would not be allowable. Commercial and industrial uses are compatible within the CNEL 75 dB contour.

4.1.2 DISPLACEMENT ANALYSIS -- NOISE

The area within the noise contours is almost fully developed, as depicted on **Exhibit 4**. Any future development will include infill and redevelopment of existing uses, which could include the reuse or demolition and reconstruction of existing buildings.

The focus of this displacement analysis is on the areas within the CNEL 70 dB contour. Within the CNEL 65-70 dB range, the only land uses that would be incompatible with the ALUCP are outdoor music shells and amphitheatres, which are typically public uses in urbanized areas and relatively rare. Based on the proposal ALUCP noise policy, new residential uses (other than transient lodgings) are generally incompatible within the CNEL 70 dB contour. Residential uses are conditionally compatible on existing lots of record zoned only for residential use if they are sound-insulated, and avigation easements are granted to the Airport.

4.1.2.1 Displacement within the CNEL 70-75 dB Range

The noise compatibility boundaries of the proposed ALUCP are based on a 2020 forecast of operations at SFO, while the boundaries in the 1996 CLUP are based on the 2006 forecast Noise Exposure Map. The 2020 noise contours are somewhat larger than the 2006 contours. While the noise compatibility policies of the proposed ALUCP are essentially the same as the policies in the 1996 CLUP, the increase in the size of the CNEL 70 dB contour increases the area within which new housing would be considered an incompatible use. The intent of the displacement analysis was to determine the number of potential dwelling units allowed under the current land use plans that would no longer be permitted after implementation of the updated ALUCP. Those would represent the housing units displaced under the proposed ALUCP.

Table 2 Noise/Land Use Compatibility Criteria SFO ALUCP

Land Use	Community Noise Equivalent Level (CNEL)			
	Below 65 dB	65-70 dB	70-75 dB	Above 75 dB
Residential				
Residential, single family detached	Y	C	N (a)	N
Residential, multi-family and single family attached	Y	C	N (a)	N
Transient lodgings	Y	C	C	N
Public/Institutional				
Public and Private Schools	Y	C	N	N
Hospitals and nursing homes	Y	C	N	N
Places of public assembly, including places of worship	Y	C	N	N
Auditoriums, and concert halls	Y	C	C	N
Libraries	Y	C	C	N
Outdoor music shells, amphitheaters	Y	N	N	N
Recreational				
Outdoor sports arenas and spectator sports	Y	Y	Y	N
Nature exhibits and zoos	Y	Y	N	N
Amusements, parks, resorts and camps	Y	Y	Y	N
Golf courses, riding stables, and water recreation	Y	Y	Y	Y
Commercial				
Offices, business and professional, general retail	Y	Y	Y	Y
Wholesale; retail building materials, hardware, farm equipment	Y	Y	Y	Y
Industrial and Production				
Manufacturing	Y	Y	Y	Y
Utilities	Y	Y	Y	Y
Agriculture and forestry	Y	Y (b)	Y (c)	Y (c)
Mining and fishing, resource production and extraction	Y	Y	Y	Y

NOTES:

CNEL = Community Noise Equivalent Level, in A-weighted decibels.

Y (Yes) = Land use and related structures compatible without restrictions.

C (conditionally compatible) = Land use and related structures are permitted, provided that sound insulation is provided to reduce interior noise levels from exterior sources to CNEL 45 dB or lower and that an avigation easement is granted to the City and County of San Francisco as operator of SFO. See Policy NP-3.

N (No) = Land use and related structures are not compatible.

(a) Use is conditionally compatible only on an existing lot of record zoned only for residential use as of the effective date of the ALUCP.. Use must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources. The property owners shall grant an avigation easement to the City and County of San Francisco prior to issuance of a building permit(s) for the proposed building or structure. If the proposed development is not built, then, upon notice by the local permitting authority, SFO shall record a notice of termination of the avigation easement.

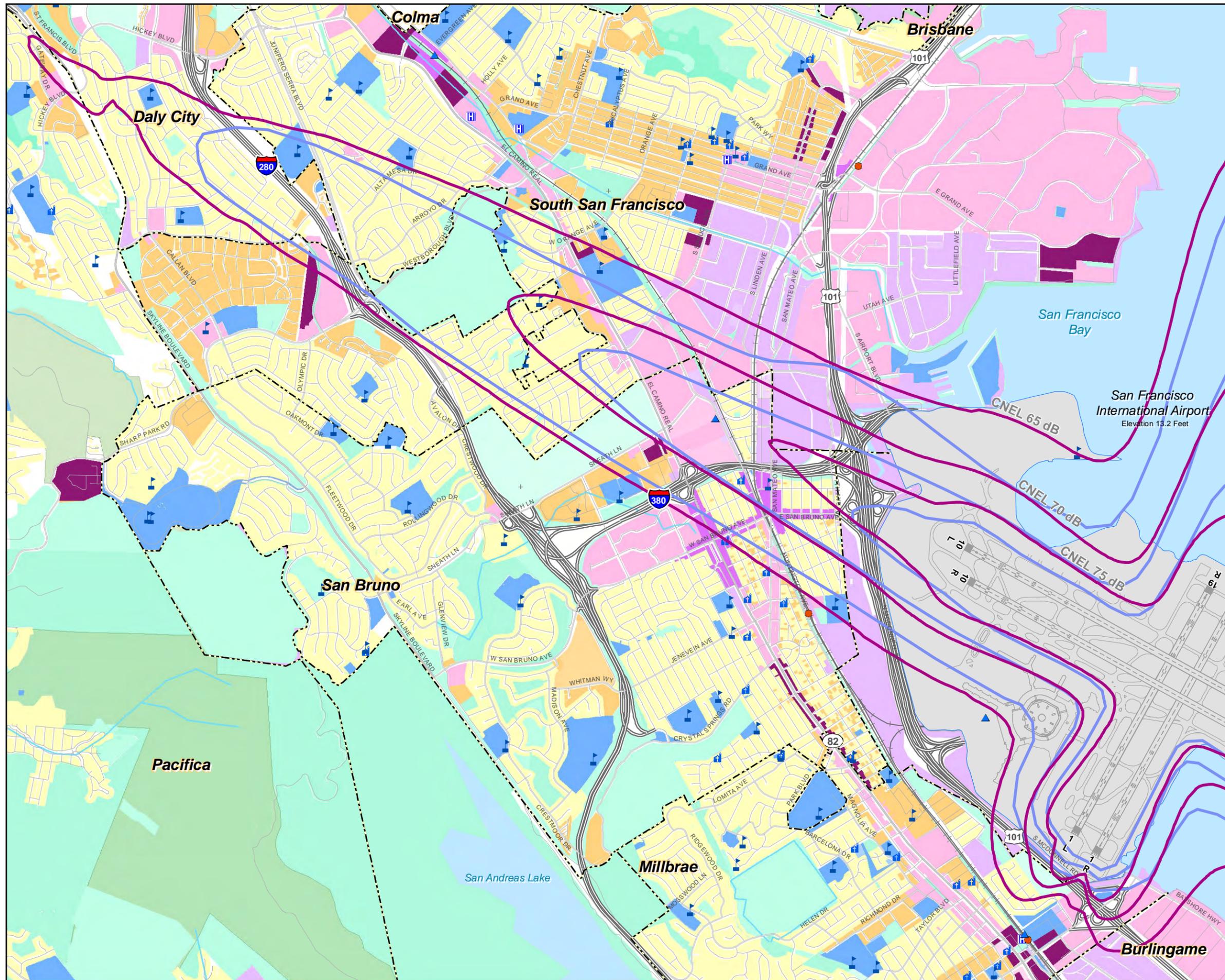
(b) Residential buildings must be sound-insulated to achieve an indoor noise level of CNEL 45 dB or less from exterior sources.

(c) Accessory dwelling units are not compatible.

Sources: Jacobs Consultancy Team 2010. Based on State of California General Plan Guidelines for noise elements of general plans; California Code of Regulations, Title 21, Division 2.5, Chapter 6, Section 5006; and 14 CFR Part 150, Appendix A, Table 1.

Prepared by: Ricondo & Associates, Inc., March 2012.

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LEGEND

- Updated Noise Compatibility Zone Boundary Forecast 2020
- 1996 CLUP Noise Compatibility Zone Boundary Forecast 2006 NEM
- Airport Property
- BART Station
- CALTRAIN Station
- School
- Place of Worship
- Hospital
- Municipal Boundary
- Railroad
- Freeway
- Road

Planned Land Use Per General Plans:

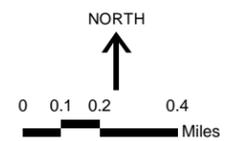
- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space
- Planned use not mapped

Sources:

Noise Contour Data:
 - Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011

County Base Maps:
 - San Mateo County Planning & Building Department, 2007

- Local Plans:**
- Burlingame Bayfront Specific Area Plan, August 2006
 - Burlingame Downtown Specific Plan, January 2009
 - Burlingame General Map, September 1984
 - North Burlingame/ Rollins Road Specific Plan, February 2007
 - Colma Municipal Code Zoning Maps, December 2003
 - Daly City General Plan Land Use Map, 1987
 - Hillsborough General Plan, March 2005
 - Millbrae Land Use Plan, November 1998
 - Pacifica General Plan, August 1996
 - San Bruno General Plan, December 2008
 - San Mateo City Land Use Plan, March 2007
 - San Mateo County Zoning Map, 1992
 - South San Francisco General Plan, 1998



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Exhibit 5 depicts the CNEL 70 dB contours for the 1996 CLUP and the proposed ALUCP. Areas where residential use is allowable under the local general or specific plans are indicated in three colors – tan, brown, and orange. The tan areas indicate where infill development is allowable under the proposed ALUCP, and the brown and orange areas indicate where residential use would not be allowable under the proposed ALUCP. The brown areas are designated in the local plans for mixed use, which could include residential development, but no specific plans or proposals for residential development currently exist. The orange areas are designated for residential use and have specific plans or proposals for residential development.

The CNEL 70 dB contour for the proposed ALUCP intersects four jurisdictions — the cities of Millbrae, San Bruno, and South San Francisco and unincorporated San Mateo County. The three cities are almost fully developed, as are the unincorporated parts of the County in the airport area, and there is little vacant land on which to develop future residential units.

In an effort to meet community housing needs, each of these jurisdictions maintains an inventory of housing opportunity sites where the development of additional dwelling units may be accommodated through new development, redevelopment, or infill. The jurisdictions have estimated the number of additional dwelling units which could be developed on the housing opportunity sites. Only the City of South San Francisco has any housing opportunity sites which would be impacted by the larger CNEL 70 dB contour in the proposed ALUCP, as depicted on **Exhibit 6**.

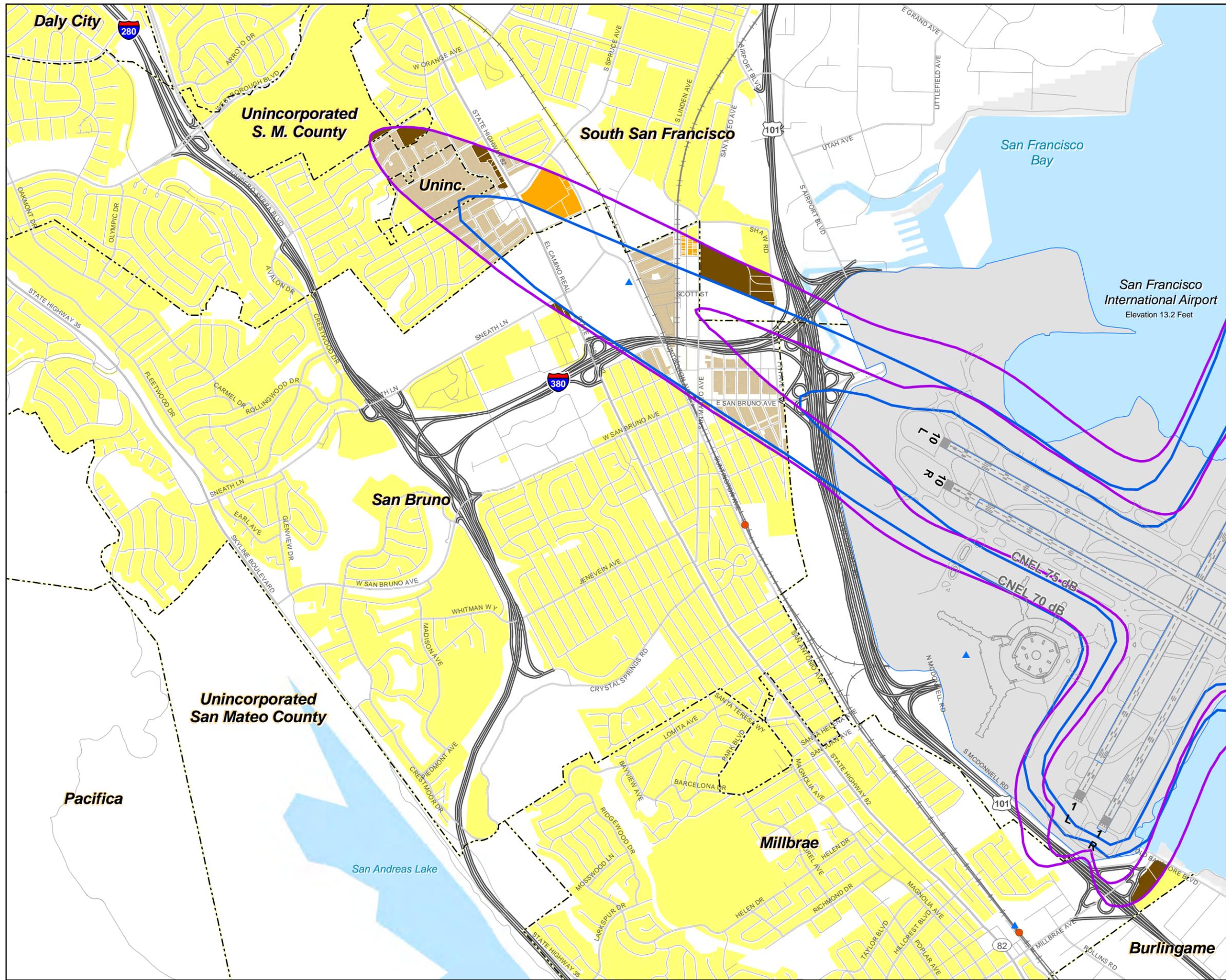
Two housing opportunity sites comprised of four parcels in the South El Camino Real Area of South San Francisco are within the CNEL 70 dB contour of the proposed ALUCP. Housing Opportunity Sites 9 and 10, as identified by the City of South San Francisco, are planned for mixed use development with a total of 386 dwelling units at a density of 60 dwelling units per acre occupying one-third of the land area.¹²

Exhibit 7 is a detailed view of Housing Opportunity Sites 9 and 10 in relation to the noise contours from the 1996 CLUP and the proposed ALUCP. Approximately 2.17 acres of Housing Opportunity Site 9 and 0.39 acres of Housing Opportunity Site 10 remain outside of the CNEL 70 dB contour of proposed ALUCP. These areas could accommodate as many as 64 dwelling units, assuming a density of up to 60 dwelling units per acre. The remainder of Sites 9 and 10 within the CNEL 70 dB contour could be developed for non-residential uses.

Table 3 presents summary findings regarding the displacement of residential dwelling units on Housing Opportunity Sites 9 and 10. A total of 322 units would be displaced from this area with implementation of the proposed ALUCP.

¹² City of South San Francisco General Plan, Housing Element, February 2010

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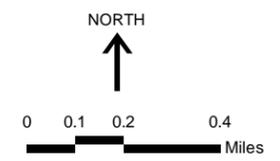


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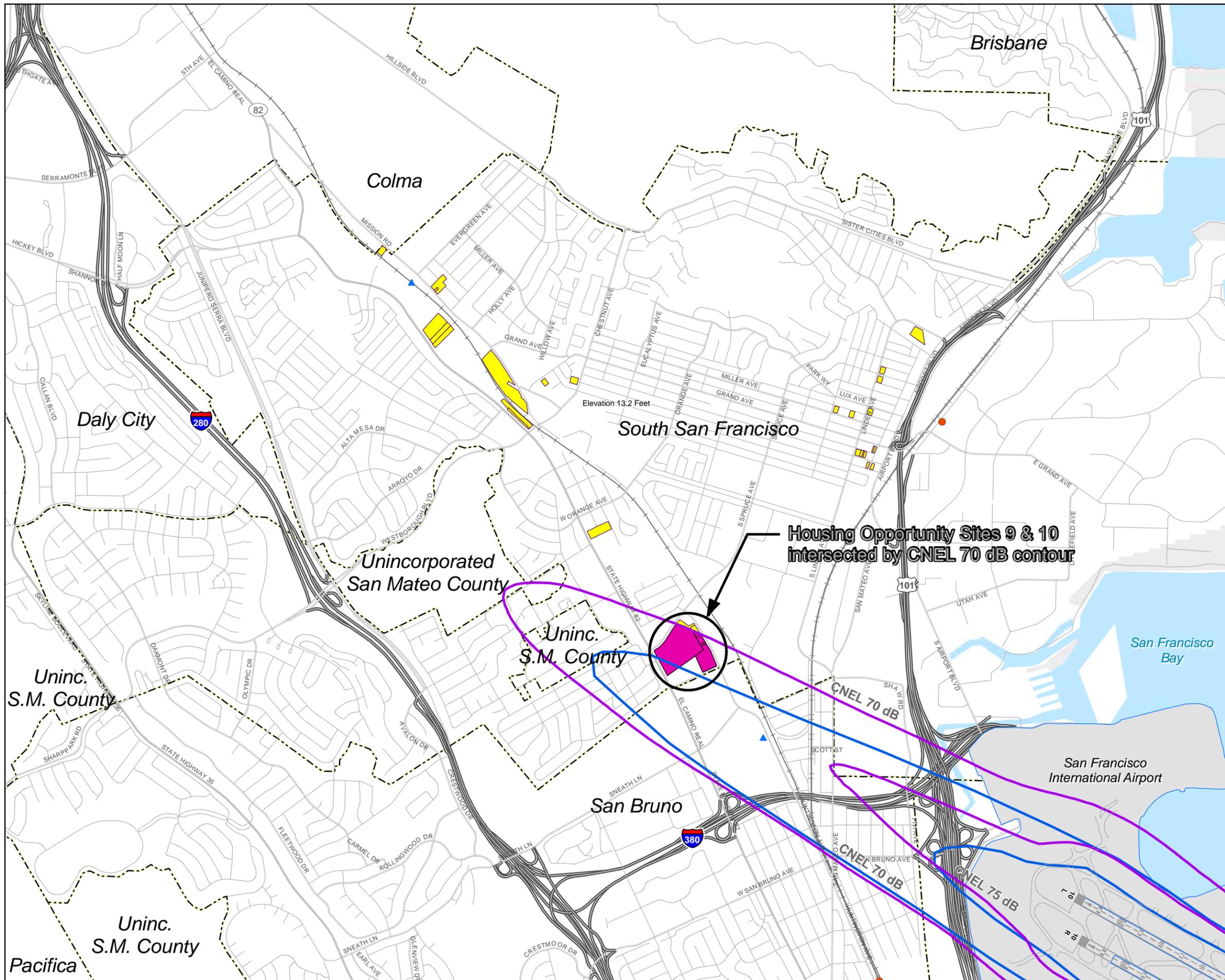
- 1996 CLUP Noise Contour (2006 NEM)
- Updated ALUCP Noise Contour (2020 Forecast)
- ▲ BART Stations
- CALTRAIN Stations
- Airport Property
- Municipal Boundary
- Railroads
- Freeways
- Roads
- Residential Uses Allowed per General/Specific Plan and ALUCP
- Limited Residential Infill Development Allowed per ALUCP
- Residential Uses Allowed per General/Specific Plan - Not Allowed per ALUCP
- Residential Redevelopment Proposed per General/Specific Plan - Not Allowed per ALUCP

Sources:

- Noise Contour Data:**
- Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011
- County Base Maps:**
- San Mateo County Planning & Building Department 2007
- Residential Uses/Redevelopment Allowed:**
- City of South San Francisco General Plan, Housing Element, February 2010
 - El Camino Real/Chesnut General Plan Amendment, February 2011
 - City of San Bruno General Plan, Housing Element, March 2010
 - U.S. Navy Site and its Environs Specific Plan, January 2002



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LEGEND

- 1996 CLUP Noise Contour (2006 NEM)
- Updated ALUCP Noise Contour (2020 Forecast)
- ▲ BART Stations
- CALTRAIN Stations
- Airport Property
- Municipal Boundary
- Railroads
- Freeways
- Roads

City of South San Francisco Housing Opportunity Sites

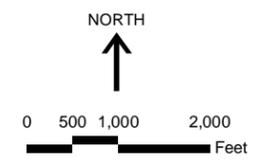
- Housing Opportunity Sites
- Housing Opportunity Site within CNEL 70 dB Contour

Sources:

Noise Contour Data:
 -Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011

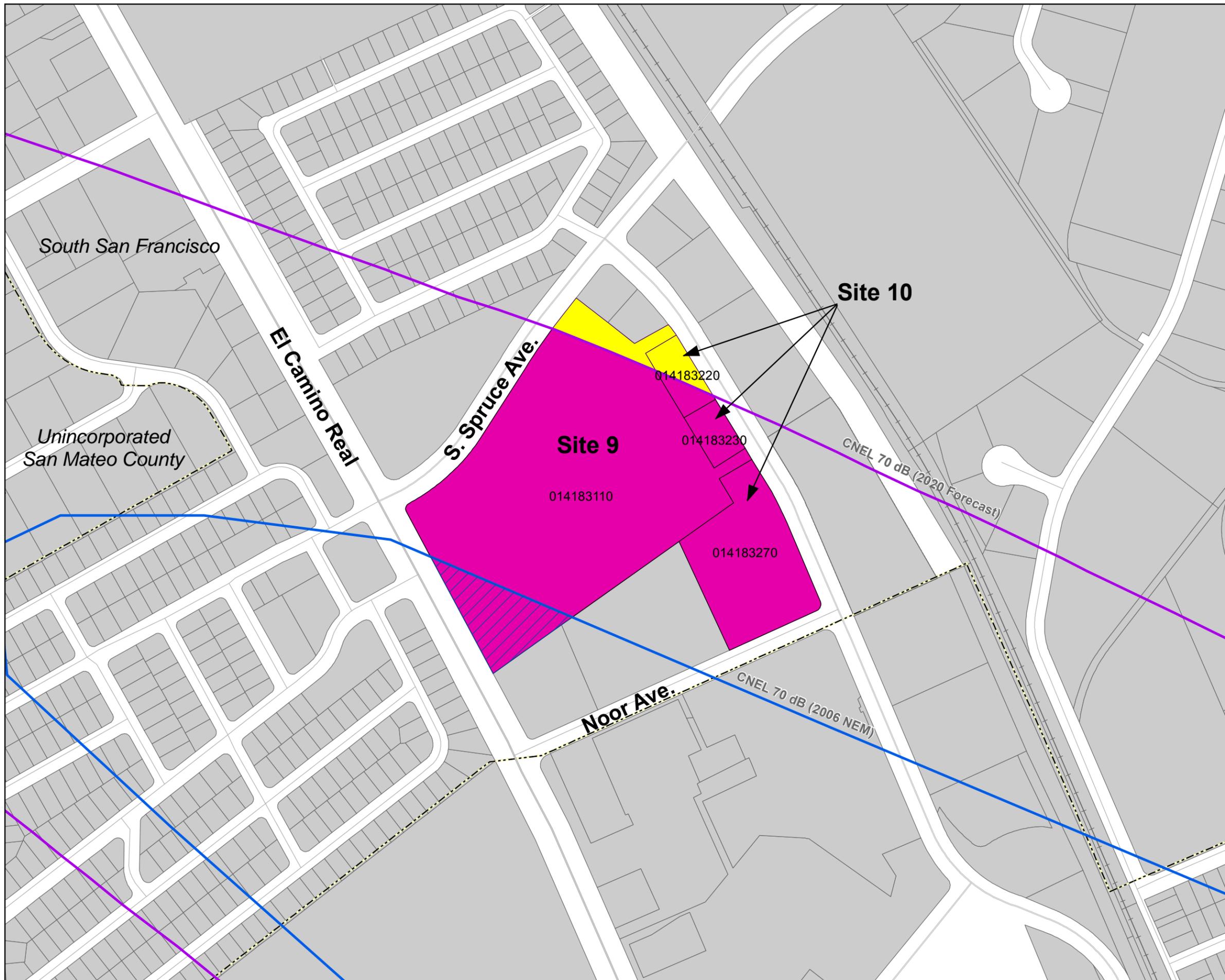
County Base Maps:
 -San Mateo County Planning & Building Department 2007

Housing Opportunity Sites:
 -City of South San Francisco General Plan, Housing Element, February 2010



Housing Opportunity Sites 9 & 10 intersected by CNEL 70 dB contour

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LEGEND

- 1996 CLUP Noise Contour (2006 NEM)
- Updated ALUCP Noise Contour (2020 Forecast)
- ▲ BART Stations
- CALTRAIN Stations
- Airport Property
- Municipal Boundary
- Railroads
- Freeways
- Roads

City of South San Francisco Housing Opportunity Sites

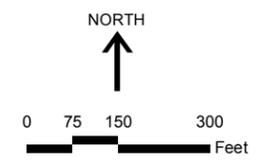
- Portion Available for Residential Use per Updated ALUCP
- Portion within 2020 CNEL 70 dB Contour — Residential Not Allowed per Updated ALUCP
- Portion within 2006 CNEL 70 dB Contour — Residential Not Allowed per 1996 CLUP

Sources:

Noise Contour Data:
 -Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011

County Base Maps:
 -San Mateo County Planning & Building Department 2007

Housing Opportunity Sites:
 -City of South San Francisco General Plan, Housing Element, February 2010



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Table 3 South San Francisco Housing Opportunity Sites Intersected by the 2020 CNEL 70 dB Contour

SITE #	APN	AREA		DWELLING UNITS		
		TOTAL AREA (ACRES)	AREA OUTSIDE CNEL 70 DB CONTOUR	ESTIMATE IN TOTAL AREA	POTENTIAL IN AREA OUTSIDE CNEL 70 DB (AT 60 DUS/AC)	DISPLACED
9	014183110	14.75	0.68	295	41	254
10	014183220	0.64	0.39	13 ^{1/}	23 ^{1/}	-10 ^{1/}
10	014183230	0.49	0.00	10	0	10
10	014183270	3.4	0.00	68	0	68
Total		19.28	1.07	386	64	322

NOTE:

1/ The current plans for Site 10 call for only 13 dwelling units because part of the site is proposed for nonresidential use. The portion of the site outside the CNEL 70 dB contour could actually accommodate 23 units, more than currently proposed for the site.

SOURCE: City of South San Francisco General Plan, Housing Element, February 2010.

PREPARED BY: Ricondo & Associates, Inc., 2012

Table 4 compares the displaced dwelling units with the potential number of new housing units that north San Mateo County cities have estimated they can accommodate on housing opportunity sites. The total potential housing yield in these five cities is estimated at 3,558 units, including 431 in Brisbane,¹³ 50 in Colma,¹⁴ 908 in Daly City,¹⁵ 925 in San Bruno,¹⁶ and 1,244 in South San Francisco.¹⁷ The 322 housing units displaced from Housing Opportunity Sites 9 and 10 in South San Francisco represent 26 percent of the total dwelling unit yield estimated in South San Francisco and nine percent of the total dwelling unit yield among the five north side cities.

Despite the potential displacement of housing units that would be caused by implementation of the updated ALUCP, South San Francisco has sufficient capacity for new housing to meet its Regional Housing Needs Allocation (RHNA) through June 2014. The RHNA for the C/CAG sub region identified a need for 1,635 units in South San Francisco for the period of January 1, 2007 to June 30, 2014. Between January 1, 2007 and June 30, 2009, 815 units were constructed, leaving a remaining need for need for 820 units. The net estimated housing yield of 1,012 units, after accounting for the potential displacement of 322 dwelling units still exceeds the RHNA balance of needed dwelling units.

¹³ City of Brisbane, 2007-2014 Housing Element, January 2011.

¹⁴ Town of Colma General Plan, Housing Element, April 2004.

¹⁵ Daly City 2030, Draft Housing Element, December 2011.

¹⁶ City of San Bruno Housing Element, 2009-2014, March 2010.

¹⁷ City of South San Francisco General Plan, Housing Element, February 2010.

Table 4 Residential Dwelling Unit Capacity in South San Francisco and Adjacent Communities

JURISDICTION	ANTICIPATED DWELLING UNITS	DISPLACED DWELLING UNITS	NET ANTICIPATED DWELLING UNITS	PERCENTAGE OF ANTICIPATED DWELLING UNITS DISPLACED
Brisbane	431	0	431	0%
Colma	50	0	50	0%
Daly City	908	0	908	0%
San Bruno	925	0	925	0%
South San Francisco	1244	322	922	26%
Totals	3558	322	3236	9%

SOURCE: City of Brisbane, 2007-2014 Housing Element, January 2011; Town of Colma General Plan, Housing Element, April 2004; Daly City 2030, Draft Housing Element, December 2011; City of San Bruno Housing Element, 2009-2014, March 2010; City of South San Francisco General Plan, Housing Element, February 2010.

PREPARED BY: Ricondo & Associates, Inc., July 2012

Other uses that are incompatible within the CNEL 70 dB contour are schools, hospitals, places of public assembly and zoos/nature exhibits. Given the fully developed environment and the specialized nature of these uses, it is unlikely that new development of these uses would occur in the future, even without implementation of the proposed ALUCP. Some existing schools and places of assembly are located within the CNEL 70 dB contour. Because the nonconforming use policies of the ALUCP allow for the reconstruction and expansion (subject to certain conditions) of nonconforming uses, implementation of the ALUCP would not create any indirect pressure for the relocation of those existing uses.¹⁸

4.1.2.2 Displacement within the CNEL 75 dB Contour

General plan land use designations within the CNEL 75 dB contour include industrial, residential, parks, and public uses (highway right-of-way). All the area is currently developed. Based on the ALUCP policies, residential use and parks are incompatible within the CNEL 75 dB contour. Industrial use is compatible.

The residential-designated area within the CNEL 75 dB contour in San Bruno is fully developed. The affected area covers approximately 4.2 acres designated for single-family residential and 0.2 acres designated for multi-family residential. This represents 0.3% of the 1,282.5 acres of total planned single family residential and 0.1% of the 145.2 acres of total planned multi-family land area in San Bruno. The nonconforming use policies of the ALUCP allow for reconstruction and expansion of existing residential uses, so the ALUCP would not create indirect pressure for the abandonment or relocation of the neighborhood.

¹⁸ Nonconforming uses could be reconstructed and enlarged, subject to specific conditions, under the proposed ALUCP. The dwelling unit density of residential uses and the floor area of nonresidential uses cannot be increased. Schools and hospitals may be enlarged if they provide additional exits in the expanded parts of the buildings. In all cases, however, reconstructed nonconforming uses shall comply with the noise compatibility and airspace protection policies of the ALUCP. If abandoned for 24 months or more, the sites and buildings could be reused only in conformance with the ALUCP.

4.2 Potential Displacement Due to Safety Policies

This section describes the safety compatibility policies of the ALUCP and the potential for those policies to displace potential future development from within the safety zones to other areas.

4.2.1 LAND USES REGULATED BY SAFETY COMPATIBILITY POLICIES

Safety compatibility policies, described in **Table 5**, prohibit new children's schools, large child daycare centers and hospitals and nursing homes in all five safety zones. In Safety Zone 2, incompatible uses include large child daycare facilities and noncommercial employer-sponsored facilities, hazardous uses, and critical public utilities. In Safety Zone 1 any new structures or places of public assembly not in structures are incompatible. **Exhibit 8** and **Exhibit 9** present maps of the safety zones and general plan land use designations.

4.2.2 SPECIFIC PLANS WITHIN SAFETY ZONES

Portions of six specific plans are within the safety zones of the proposed ALUCP. The relationship of these plans to the safety standards of the proposed ALUCP are briefly described in this section.

4.2.2.1 East of 101 Area Plan

The City of South San Francisco adopted the East of 101 Area Plan to guide redevelopment in this old industrial area. Exhibit 8 depicts the location of Area Plan, part of which lies within Safety Zone 3. The only land uses allowed under the Area Plan that appear to be affected by the standards of the proposed ALUCP are daycare centers, which are permitted in a commercially designated area intersected by Safety Zone 3. As noted in Table 5, large daycare centers are incompatible in Safety Zone 3, although noncommercial, employer-sponsored daycare centers are acceptable in Safety Zone 3. There are sizeable areas of commercially designated land outside Safety Zone 3 where daycare centers could be accommodated.

4.2.2.2 San Bruno Transit Corridors Plan

The City of San Bruno is preparing to approve a new specific plan, the San Bruno Transit Corridors Plan, depicted in Exhibit 8. Parts of the specific plan area are intersected by Safety Zones 2, 3 and 4. No land uses are proposed in these parts of the specific plan area that would be incompatible in any of the safety zones.

4.2.2.3 U.S. Navy Site and its Environs Specific Plan (The Crossings)

This specific plan is in San Bruno, as depicted in Exhibit 8. The northeast corner of the plan is intersected by Safety Zone 4. This area is designated for neighborhood retail/commercial use. No uses that would be incompatible in Safety Zone 4 are specified in this area.

4.2.2.4 Burlingame Bayfront Specific Area Plan

This specific plan is along the Bay, east of U.S. Highway 101. Part of the area is within Safety Zone 3. No uses that would be incompatible in Safety Zone 3 are specified in this area.

Table 5 Safety Compatibility Criteria SFO ALUCP

ZONE	LAND USE CRITERIA	
	INCOMPATIBLE ^{1/}	AVOID ^{1/}
Zone 1: Runway Protection Zone and Object Free Area (RPZ-OFA)	All new structures ^{4/} Places of assembly not in structures Hazardous uses ^{2/} Critical public utilities ^{2/}	Nonresidential uses except very low intensity uses ^{4/} in the "controlled activity area." ^{2/}
Zone 2: Inner Approach/Departure Zone (IADZ)	Children's schools ^{4/} Large child day care centers and noncommercial employer-sponsored centers ancillary to a place of business) Hospitals, nursing homes Hazardous uses ^{2/} Critical public utilities ^{2/}	---
Zone 3: Inner Turning Zone (ITZ)	Biosafety Level 3 and 4 facilities ^{4/} Children's schools ^{2/} Large child day care centers ^{2/} Hospitals, nursing homes	Hazardous uses other than Biosafety Level 3 and 4 facilities ^{2/} Critical public utilities ^{2/}
Zone 4: Outer Approach/Departure Zone (OADZ)	Biosafety Level 3 and 4 facilities ^{4/} Children's schools ^{2/} Large child day care centers ^{2/} Hospitals, nursing homes	Hazardous uses other than Biosafety Level 3 and 4 facilities ^{2/} Critical public utilities ^{2/}
Zone 5: Sideline Zone (SZ)	Children's schools ^{4/} Large child day care centers and noncommercial employer-sponsored centers ancillary to a place of business) Hospitals, nursing homes Hazardous uses ^{2/} Critical public utilities ^{2/}	---

NOTES:

1/ *Avoid:* Use is not fully compatible and should not be permitted unless no feasible alternative is available. Where use is allowed, habitable structures shall be provided with at least 50 percent more exits than required by applicable codes. Where the 50-percent factor results in a fraction, the number of additional exits shall be rounded to the next highest whole number.

Incompatible: Use is not compatible in the indicated zone and cannot be permitted.

2/ Definitions

Biosafety Level 3 and 4 facilities: Medical and biological research facilities involving the storage and processing of extremely toxic or infectious agents. See Policy SP-3 for additional detail.

Children's schools: Public and private schools serving preschool through grade 12, excluding commercial services.

Controlled Activity Area: The lateral edges of the RPZ, outside the Runway Safety Area (RSA) and the extension of the RSA, which extends to the outer edge of the RPZ. See FAA Advisory Circular 150/5300-13, Airport Design, Section 212a.(1)(b).

Critical public utilities: Facilities that, if disabled by an aircraft accident, could lead to public safety or health emergencies. They include the following: electrical power generation plants, electrical substations, wastewater treatment plants, and public water treatment facilities.

Hazardous uses: Uses involving the manufacture, storage, or processing of flammable, explosive, or toxic materials that would substantially aggravate the consequences of an aircraft accident. See Policy SP-3 for additional detail.

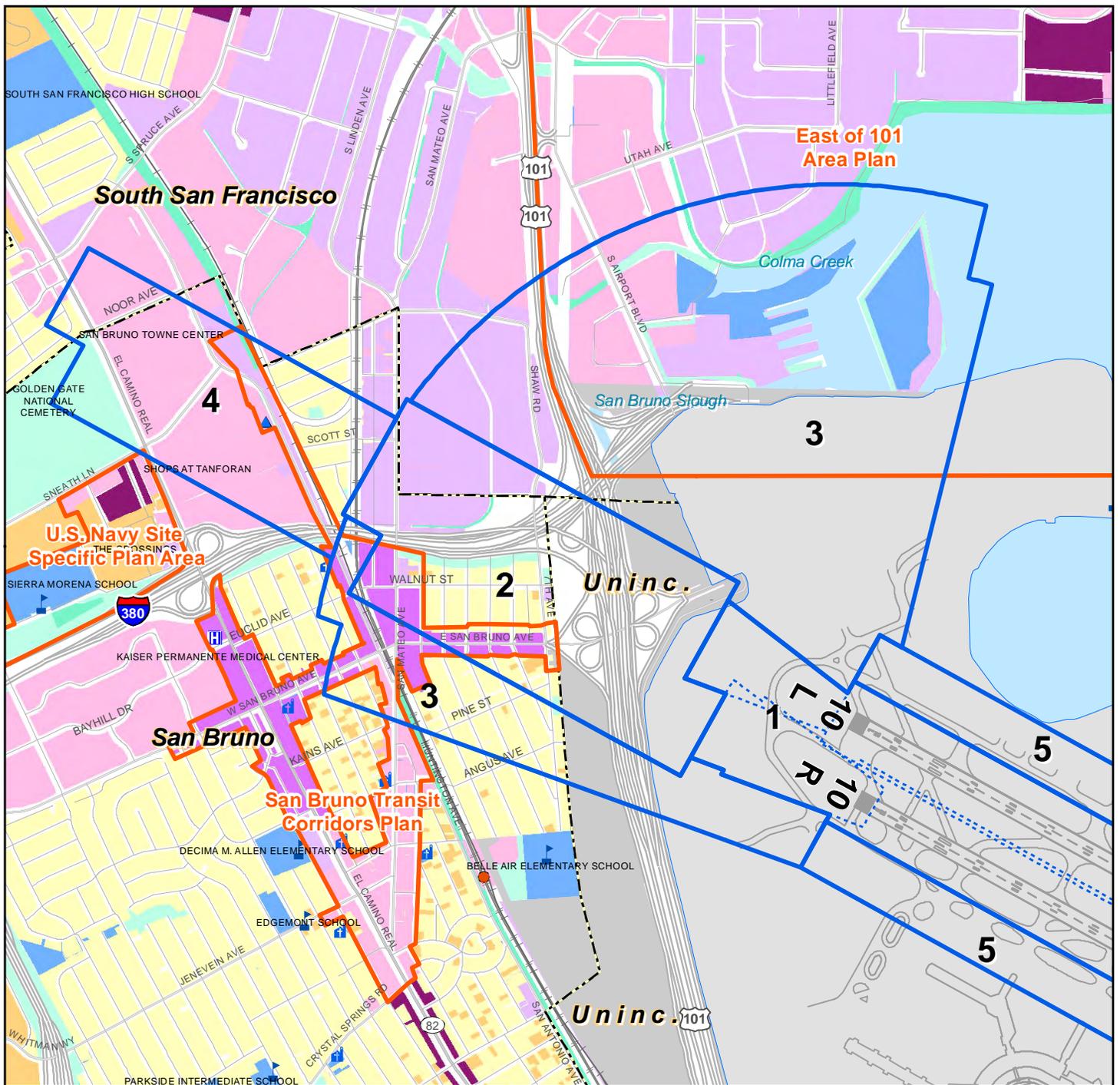
Large child day care centers: Commercial facilities defined in accordance with Health and Safety Code, Section 1596.70, et seq., and licensed to serve 15 or more children. Family day care homes and noncommercial employer-sponsored facilities ancillary to place of business are allowed.

3/ Structures serving specific aeronautical functions are allowed, in compliance with applicable FAA design standards.

4/ Examples include parking lots and outdoor equipment storage.

SOURCE: Ricondo & Associates, Inc., February 2012.

PREPARED BY: Ricondo & Associates, Inc., March 2012



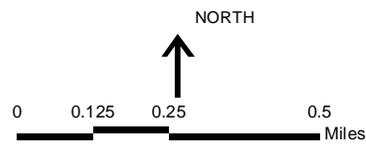
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Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- ▲ BART Station
- CALTRAIN Station
- ✎ School
- ✎ Place of Worship
- 🏥 Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

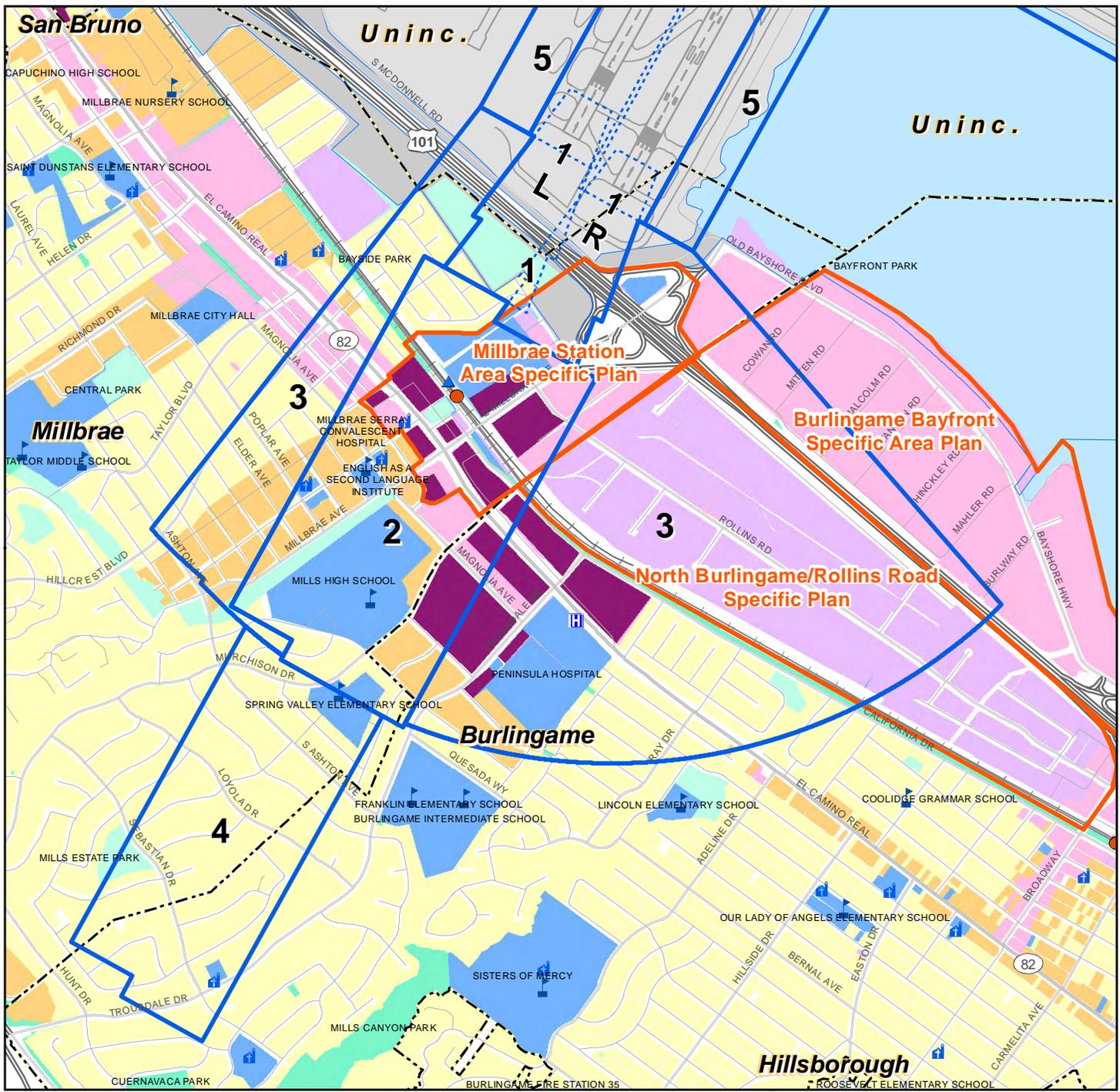
- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space



**SAFETY COMPATIBILITY ZONES
IN THE CITIES OF SOUTH SAN FRANCISCO
AND SAN BRUNO**

Comprehensive Airport Land Use Plan
for the Environs of San Francisco International Airport

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Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones

Internal boundaries of ALP-defined areas

Specific Plan Area

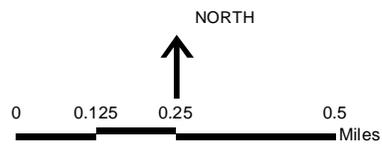
Airport Property

- ▲ BART Station
- CALTRAIN Station
- 🏫 School
- 🕌 Place of Worship
- 🏥 Hospital

- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space



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4.2.2.5 North Burlingame/Rollins Road Specific Plan

This specific plan covers a relatively large part of Burlingame, east of U.S. Highway 101. Most of the specific plan area is within Safety Zone 2, and a small part is within Safety Zone 2. No uses that would be incompatible with the safety standards of either safety zone are specifically planned in these areas.

4.2.2.6 Millbrae Station Area Specific Plan

The Millbrae Station Area Specific Plan (MSASP), the boundaries of which are indicated in Exhibit 9, lies entirely within Safety Zones 1, 2, and 3. The MSASP encourages a relatively dense, transit-oriented development pattern around the Millbrae Caltrain/BART station. The MSASP was originally adopted in 1998 and was deemed consistent with the ALUCP in effect at that time. The Specific Plan has not yet been fully developed and implemented. The MSASP conflicts with the safety policies of the proposed ALUCP in a few locations, as discussed in the following sections.

4.2.3 DISPLACEMENT ANALYSIS – SAFETY

The safety policies of the updated ALUCP are expected to have only minimal displacement effects because the affected areas are almost fully developed. The potential effects in each safety zone are described in this section.

4.2.3.1 Displacement within Safety Zone 1 (RPZ-OFA)

Safety Zone 1 extends off Airport property only south of Runways 1R-19L and 1L-19R and across U.S. Highway 101 in the City of Millbrae (Exhibit 9). General plan land use designations in this area are residential, parks, commercial, and public. All off-airport land in the RPZ is currently developed consistent with the general plan land use designations.

The residential area covers 3.2 acres and is developed as a single-family neighborhood. The area accounts for approximately 0.3% of the 1073.1 acres of land designated for residential use in the Millbrae General Plan. The commercial-designated land in Safety Zone 1 is part of the MSASP site with a maximum floor area ratio of 0.50. It is currently a parking lot serving the area immediately surrounding the Millbrae CALTRAIN/BART station. Although the current use of surface parking would be compliant with the proposed ALUCP, any future structures would be prohibited in the RPZ. Thus the commercial development that could potentially occur on this site under the MASAP, would be displaced with implementation of the proposed ALUCP.¹⁹ This area occupies 2.6 acres and could accommodate building floor area of 57,854 square feet.

¹⁹ Under State law, the City of Millbrae would need to amend any general or specific plans and zoning ordinances to be consistent with the updated ALUCP. Alternatively, the City Council is authorized to overrule the ALUCP based on a two-thirds majority approval and the adoption of findings explaining how the City's current planning and zoning regulations in the affected areas fulfill the airport compatibility objectives of state law. Public Utilities Code, §21675.1(d)€(f)and Government Code §65302.3(b)-(c).

The nonconforming use policies of the ALUCP would not create indirect pressure for the relocation of existing nonconforming uses with Safety Zone 1, or any other safety zone, because they allow the reconstruction and enlargement (subject to certain conditions) of nonconforming uses.²⁰

4.2.3.2 Displacement within Safety Zone 2 (IADZ)

Most of Safety Zone 2 lies within the cities of San Bruno (Exhibit 8) and Millbrae (Exhibit 9). Small parts extend into South San Francisco and Burlingame. No undeveloped land is within Safety Zone 2 off either the west or south ends of the runways. The displacement of future development could occur only where a developer anticipated the redevelopment of existing uses for a use that would not comply with the safety criteria for Zone 2, as listed in Table 4.

The Millbrae Station Area Specific Plan provides for the potential redevelopment of the City public works storage yard in Safety Zone 2 for a nursing home, day care center, outpatient facility, or similar public use. All would be incompatible under the safety policies in this safety zone. With the exception of child day care centers, these uses are highly specialized and occur at only limited locations in urban areas. Under the current zoning, Care Facilities are allowed either conditionally or by right in three different zoning districts: R-2, R-3 and C. Approximately 180 acres of land within the City of Millbrae is within these zoning districts. Also under the current zoning, State-Regulated Residential Care Facilities are allowed by right in four separate zoning districts: R-1LL, R-1, R-2 and R-3, which occupy approximately 1,230 acres. While all of those areas are currently developed, so is the City public works yard. Redevelopment would be required to accommodate new development of these uses anywhere in the City. Thus, the ALUCP cannot be considered to create any special displacement effect for these uses.

Several existing land uses would be nonconforming with the ALUCP safety criteria for Safety Zone 2. West of Runways 28L and 28R, one small school is located near San Mateo Avenue in San Bruno (Exhibit 8). South of Runways 1L and 1R in Millbrae, they include Millbrae Serra Convalescent Hospital, Mills High School, the English as a Second Language Institute, and a portion of the Spring Valley Elementary School campus (Exhibit 9). As previously discussed, the nonconforming use policies of the ALUCP allow the reconstruction and enlargement (subject to certain conditions) of nonconforming uses, so they would not be seriously affected by the updated ALUCP.²¹

²⁰ Nonconforming uses can be reconstructed and enlarged, subject to specific conditions, under the proposed ALUCP. The dwelling unit density of residential uses and the floor area of nonresidential uses cannot be increased. Schools and hospitals may be enlarged if they provide additional exits in the expanded parts of the buildings. In all cases, however, reconstructed nonconforming uses shall comply with the noise compatibility and airspace protection policies of the ALUCP. If abandoned for 24 months or more, the sites and buildings could be reused only in conformance with the ALUCP.

²¹ Nonconforming uses could be reconstructed and enlarged, subject to specific conditions, under the proposed ALUCP. The dwelling unit density of residential uses and the floor area of nonresidential uses cannot be increased. Schools and hospitals may be enlarged if they provide additional exits in the expanded parts of the buildings. In all cases, however, reconstructed nonconforming uses shall comply with the noise compatibility and airspace protection policies of the ALUCP. If abandoned for 24 months or more, the sites and buildings could be reused only in conformance with the ALUCP.

4.2.3.3 Displacement within Safety Zone 3 (ITZ)

Peninsula Hospital is situated within Safety Zone 3 in the City of Burlingame (Exhibit 9). It is an existing facility and would not be subject to the policies of the ALUCP. As noted previously, the nonconforming use policies of the ALUCP would allow reconstruction and enlargement of nonconforming uses subject to specific conditions. No development displacement is anticipated in Safety Zone 3.

4.2.3.4 Displacement within Safety Zone 4 (OADZ)

The only planned land use within Safety Zone 4 that is incompatible with ALUCP safety compatibility policy is an existing elementary school which lies across the boundaries of Safety Zones 2 and 4 in the City of Millbrae (Exhibit 9). The school is an existing development, and the ALUCP does not prohibit reconstruction or expansion of existing nonconforming uses. No development displacement is anticipated in Safety Zone 4.

4.2.3.5 Displacement within Safety Zone 5 (SZ)

Safety Zone 5 is entirely on Airport property. The safety policies of the proposed ALUCP would have no displacement effects in this safety zone. The Airport is obligated to comply with FAA safety and design standards that are more restrictive than the ALUCP safety policies.

4.3 Potential Displacement Due to Airspace Protection Policies

This section describes the airspace protection policies of the ALUCP and the potential for those policies to displace potential future development from within the AIA to other areas.

4.3.1 LAND USES REGULATED BY AIRSPACE PROTECTION POLICIES

4.3.1.1 Height Limitations

The airspace protection and height limitation policies of the proposed ALUCP are nearly identical to those in the 1996 CLUP.²² The 1996 CLUP considers the construction of any object determined by the FAA to constitute a hazard to safe air navigation as an incompatible use, unless Caltrans has issued a permit for the construction. This policy is continued in the proposed ALUCP. The proposed ALUCP has supplemented this policy with a more detailed explanation of the FAA process for reviewing proposed construction. The proposed ALUCP also includes detailed airspace drawings indicating the maximum height at which structures can be considered compatible with the ALUCP. The ALUCP is also supported by an on-line tool, developed by the City and County of San Francisco, which enables users to determine the maximum allowable height of structures on any property in the Airport environs, based on the airspace protection surfaces.

The airspace mapping in the proposed ALUCP depicts the lowest surfaces providing required obstacle clearance for aircraft operating on any of the instrument departure or arrival procedures published for the Airport. These surfaces are established in accordance with FAA Order 8260.3B, *U.S. Standard for Terminal*

²² San Mateo County Comprehensive Airport Land Use Plan, C/CAG, December 1996; Chapter V, San Francisco International Airport, p. V-20.

Instrument Procedures (TERPS) and are often referred to as TERPS surfaces. The airspace mapping also includes airspace surfaces providing required obstacle clearance for One-Engine Inoperative (OEI) departure procedures from Runways 28L and 28R over the San Bruno Gap.²³ This is the route used by most international departures from SFO. **Exhibit 10** and **Exhibit 11** depict the lowest elevations from the combination of the OEI procedure surfaces and all TERPS surfaces. These surfaces indicate the maximum height at which structures can be considered compatible with Airport operations under the proposed ALUCP.

The aeronautical surfaces are mapped with respect to height above mean sea level. All surfaces generally slope upward away from the runways. The shades of color in Exhibits 10 and 11 represent the heights of the airspace surfaces above the ground. The variations in the heights of the airspace above the ground are caused by the combination of variations in terrain elevation and the changes in elevation of the airspace surfaces at varying distances from the Airport.

Adherence to these maximum compatible building heights would effectively limit the allowable heights of objects and structures beneath the SFO critical airspace surfaces. Some areas would be more constrained than others, depending upon the elevation of the site topography. **Table 6** identifies 13 areas of concern where the height of future objects and structures could be impacted by airspace surfaces less than 150 feet above the underlying terrain. These areas are depicted in Exhibits 5A through 5E in the Appendix to this document.

²³ Federal law requires operators of multi-engine aircraft to establish procedures at all airports at which they operate ensuring that their aircraft can safely climb and clear all obstacles in case of the loss of an engine on departure (14 CFR Part 121, §§ 181, 183, 191, 193, and 201). Known as One-Engine Inoperative (OEI) procedures, they describe routes, thrust settings, flap settings, and maximum payloads for each aircraft type using the airport. All departures must be operated according to these criteria to ensure safe climb performance in case of the sudden loss of power in one engine. If new obstacles are erected under OEI departure routes, the OEI procedures must be revised to ensure better climb performance to safely clear the new obstacle. If the required climb performance exceeds a certain limit, the only thing that can be done to ensure obstacle clearance is to reduce payload – passengers, cargo, or fuel. This can jeopardize the viability of long-haul routes, potentially compromising the utility of the Airport.

[DRAFT]

Table 6 Airspace Protection – Areas of Concern

AREA	CITY	ZONING DISTRICT	HEIGHT LIMIT (FEET)	AERONAUTICAL SURFACE HEIGHTS (FEET AGL) ¹	EXISTING LAND USES
1	Daly City	Public (Hospital)	Per discretionary review	80-120	Seton Medical Center
2	Daly City	Public, Multi-Family Residential	Per discretionary review	35-150	Existing cemeteries, trees at hilltop, existing townhomes
3	Daly City	Public	Per discretionary review	50-150	Existing cemeteries, trees at hilltop
4	Pacifica	Open Space	N/A	35-100	Two existing storage tanks
5	South San Francisco	School	N/A	35-120	Existing school
6	South San Francisco	Retail, Industrial, Transportation, and Utilities	80 – 120	90-150	Existing El Camino commercial corridor, with shops, restaurants, and shopping centers
7	San Bruno	Retail, Public, Transportation	50, taller heights through discretionary variance	60-120	The Shops at Tanoan, TowneCenter, San Bruno BART Station
8	San Bruno	Public, Retail, Industrial, Transportation, and Utilities, Multi-Family Residential	50, taller heights through discretionary variance	150 and higher	Existing El Camino commercial corridor
9	San Bruno	Retail, Industrial, Transportation, and Utilities, Multi-Family Residential	50, taller heights through discretionary variance	60 and higher	Transit-oriented development (TOD) along San Mateo Avenue corridor
10	San Bruno	Retail, Industrial, Transportation, and Utilities	50, taller heights through discretionary variance	80 and higher	San Bruno Avenue commercial area. Proposed TOD and relocated San Bruno Caltrain station
11	Millbrae and Burlingame	Public, Retail, Industrial, Transportation, and Utilities	Per discretionary review	60 and higher	El Camino Real commercial corridor, Millbrae BART/Caltrain station
12	Millbrae and Burlingame	Retail, Industrial, Transportation, and Utilities	Per discretionary review	35 and higher	Millbrae Avenue commercial corridor, BART/Caltrain TOD
13	Burlingame	Institutions - Other	"Per Part 77" ²	80 and higher	Mills Peninsula Hospital

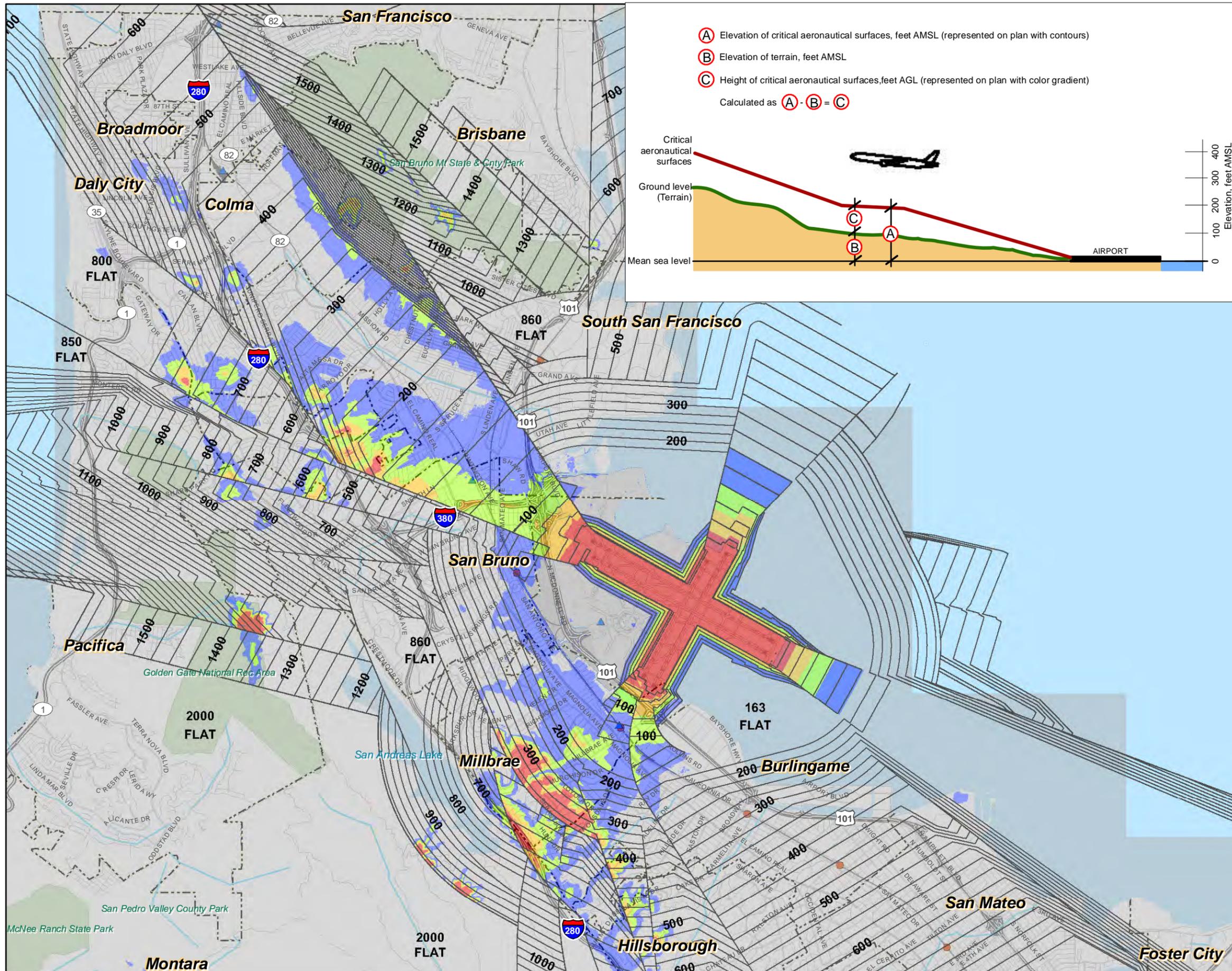
NOTES:

- 1/ AGL – above ground level. The height of the airspace above any point on the ground varies within the indicated range. This is because of the varied terrain elevations and the sloping aeronautical surfaces.
- 2/ The reference to Part 77 is quoted from the Burlingame zoning code. This most likely refers to 14 CFR Part 77 civil airport imaginary surfaces, the most commonly applied of the five types of obstruction standards identified in §77.17. At the subject location, the Part 77 horizontal surface covers the entire property at an elevation of 163 feet AMSL. The elevation of the property varies from approximately 23 to 63 feet AMSL; therefore the effective height limit is approximately 100 to 140 feet AGL.

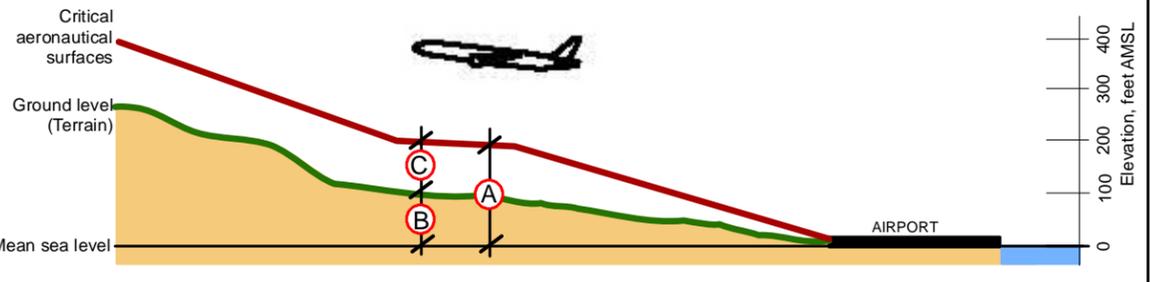
SOURCE: Jacobs Consultancy Team, July 2009

PREPARED BY: Ricondo & Associates, Inc., March 2012

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- (A) Elevation of critical aeronautical surfaces, feet AMSL (represented on plan with contours)
 - (B) Elevation of terrain, feet AMSL
 - (C) Height of critical aeronautical surfaces, feet AGL (represented on plan with color gradient)
- Calculated as $(A) - (B) = (C)$



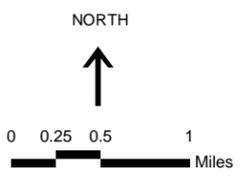
LEGEND

- (A) — 100 — Elevation of critical aeronautical surfaces, feet Above Mean Sea Level (AMSL), North American Vertical Datum of 1988 (NAVD88)
- (C) **Height of Critical Aeronautical Surfaces, Feet Above Ground Level (AGL)**
 - 35 and lower
 - 35- 65
 - 65 - 100
 - 100 - 150
 - 150 and more
- Airport Property
- BART Station
- CALTRAIN Station
- Regional Park or Recreation Area
- Municipal Boundary
- Railroad
- Freeway
- Road

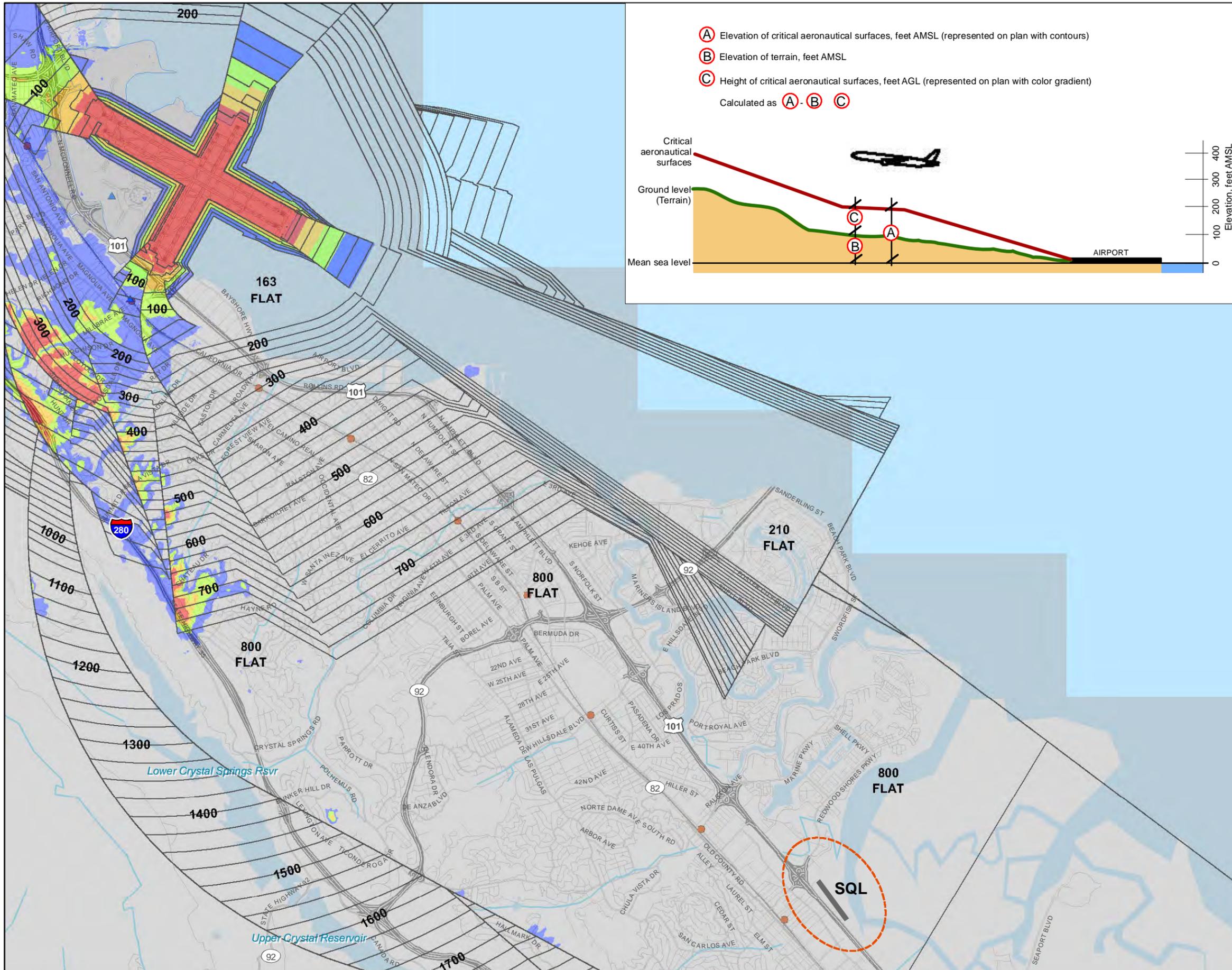
Notes:

- This map is intended for informational and conceptual planning purposes, generally representing the aeronautical surfaces considered most critical by San Francisco International Airport (SFO) and its constituent airlines. It does not represent actual survey data, nor should it be used as the sole source of information regarding compatibility with airspace clearance requirements in the development of data for an FAA Form 7460-1, Notice of Proposed Construction or Alteration. SFO does not certify its accuracy, information, or title to the properties contained in this plan. SFO does make any warrants of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.
- This map does not replace the FAA's obstruction evaluation / airport airspace analysis (OE/AAA) review process. Proposing construction at elevations and heights that are lower than the critical aeronautical surfaces shown on this map, (a) does not relieve the construction sponsor of the obligation to file an FAA Form 7460-1, and (b) does not ensure that the proposal will be acceptable to the FAA, SFO, air carriers, or other agencies or stakeholders. SFO, San Mateo County, and local authorities having jurisdiction reserve the right to re-assess, review, and seek modifications to projects that may be consistent with this critical aeronautical surfaces map but that through the FAA OE/AAA process are found to have unexpected impacts to the safety or efficiency of operations at SFO.

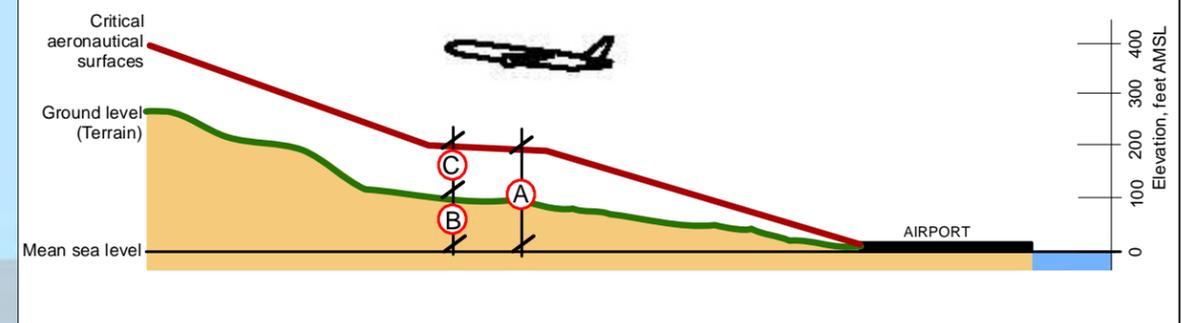
Sources: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009



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- (A) Elevation of critical aeronautical surfaces, feet AMSL (represented on plan with contours)
 - (B) Elevation of terrain, feet AMSL
 - (C) Height of critical aeronautical surfaces, feet AGL (represented on plan with color gradient)
- Calculated as $(A) - (B) = (C)$



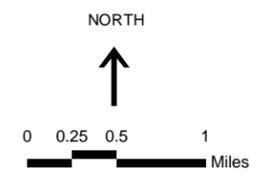
LEGEND

- (A) — 100 — Elevation of critical aeronautical surfaces, feet Above Mean Sea Level (AMSL), North American Vertical Datum of 1988 (NAVD88)
- (C) **Height of Critical Aeronautical Surfaces, Feet Above Ground Level (AGL)**
 - 35 and lower
 - 35- 65
 - 65 - 100
 - 100 - 150
 - 150 and more
- Airport Property
- BART Station
- CALTRAIN Station
- Regional Park or Recreation Area
- Municipal Boundary
- Railroad
- Freeway
- Road

Notes:

- This map is intended for informational and conceptual planning purposes, generally representing the aeronautical surfaces considered most critical by San Francisco International Airport (SFO) and its constituent airlines. It does not represent actual survey data, nor should it be used as the sole source of information regarding compatibility with airspace clearance requirements in the development of data for an FAA Form 7460-1, Notice of Proposed Construction or Alteration. SFO does not certify its accuracy, information, or title to the properties contained in this plan. SFO does make any warrants of any kind, express or implied, in fact or by law, with respect to boundaries, easements, restrictions, claims, overlaps, or other encumbrances affecting such properties.
- This map does not replace the FAA's obstruction evaluation / airport airspace analysis (OE/AAA) review process. Proposing construction at elevations and heights that are lower than the critical aeronautical surfaces shown on this map, (a) does not relieve the construction sponsor of the obligation to file an FAA Form 7460-1, and (b) does not ensure that the proposal will be acceptable to the FAA, SFO, air carriers, or other agencies or stakeholders. SFO, San Mateo County, and local authorities having jurisdiction reserve the right to re-assess, review, and seek modifications to projects that may be consistent with this critical aeronautical surfaces map but that through the FAA OE/AAA process are found to have unexpected impacts to the safety or efficiency of operations at SFO.

Sources: San Francisco International Airport, Jacobs Consultancy, and Planning Technology Inc., 2009



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4.3.1.2 Other Prohibited Flight Hazards

Some uses not involving tall objects or structures may pose hazards to critical airspace. The ALUCP considers and uses or land use features which may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight as incompatible uses. These include the following:

1. Sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport;
2. Distracting lights that that could be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting;
3. Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport;
4. Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar;
5. Sources of thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in flight;
6. Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars.

This policy is a continuation of a similar policy established in the 1996 CLUP.²⁴ Because no change in policy is involved, no displacement effects related to this policy would be caused by implementation of the updated ALUCP. Furthermore, any potentially hazardous aspects of these features can be avoided through building design or site planning modifications.

4.3.2 DISPLACEMENT ANALYSIS – AIRSPACE PROTECTION

While the proposed ALUCP continues the key airspace protection policies of the 1996 CLUP, it provides much more complete information about the potential effects of those policies than the 1996 CLUP. This section presents an overview of the potential effects of the airspace protection policies in areas subject to the lowest height limitations under the proposed ALUCP – the areas of concern listed in Table 4. Those areas are almost fully developed. Any future development will include infill and redevelopment of existing uses, which could include the reuse of existing buildings or demolition and reconstruction.

4.3.2.1 Potential Displacement in Daly City – Areas 1, 2, and 3

Areas 1, 2, and 3, listed in Table 4 and depicted on Exhibit 5B, are located in Daly City. Area 1 is designated for public use and is occupied by Seton Medical Center. The ALUCP airspace protection policy would limit new structures and appurtenances to existing structures to heights ranging from 80 to 120 feet above ground

²⁴ San Mateo County Comprehensive Airport Land Use Plan, C/CAG, December 1996; Chapter V, San Francisco International Airport, p. V-19.

level, depending on the exact location. The current zoning requirement in the area sets no maximum height limits, per se. Building heights are limited through a discretionary review process.

Area 2 is designated in the Daly City General Plan for public and multi-family residential uses. The area is currently developed with cemeteries and townhomes. Maximum heights allowed under the ALUCP range from 35 to 150 feet, while the zoning regulations limit building heights through a discretionary review process. No undeveloped land in the area is available for new construction. Should redevelopment of the townhomes be considered in the future, new construction could be limited to 35 feet, as the townhomes are on a ridgeline and are likely subject to the lowest height limit, when measured from ground level.

Area 3 is designated for public use and is occupied by a cemetery. The maximum height limits of the ALUCP in this area range from 50 to 150 feet above the ground. Because the site is fully developed as a cemetery, no development displacement is likely in this area.

4.3.2.2 Potential Displacement in Pacifica – Area 4

Area 4 in Pacifica, depicted on Exhibit 5B in the Appendix, is designated for open space use. The maximum height of structures in this area could not exceed 35 to 100 feet. Two storage tanks are currently on the property. The ALUCP height limits would have no adverse consequences in this area since it is reserved for open space.

4.3.2.3 Potential Displacement in South San Francisco – Areas 5 and 6

Area 5, depicted on Exhibit 5B in the Appendix, is developed with a school. The critical airspace surfaces are 35 to 120 feet above the site, although over the large majority of the site, the airspace is 60 feet or more above the ground. As a fully developed site, this area would not be subject to displacement of potential future development.

Area 6, depicted on Exhibit 5C in the Appendix, is designated for retail, industrial, transportation, and utilities uses. Maximum zoning height limits in this area range from 80 to 120 feet. The ALUCP airspace surfaces are 90 to 120 feet above the ground. The area is fully developed, so the proposed ALUCP airspace surfaces would be applied only to future redevelopment

Based on this information, there is no basis to anticipate any displacement of development from South San Francisco because of the proposed ALUCP height limitations would create no development displacement from South San Francisco.

4.3.2.4 Potential Displacement in San Bruno – Areas 7 through 10

Exhibit 5D in the Appendix depicts Areas 7 through 10 in San Bruno. Area 7 is designated in the San Bruno General Plan for retail, public, and transportation uses. Development in the area includes the Shops at Tanforan, TowneCenter, and the San Bruno BART Station. The Crossings development is just to the west across El Camino Real. The airspace surfaces in the area range from 60 to 120 feet above the ground. While the maximum zoning height limit in San Bruno is 50 feet, greater heights are allowed through discretionary approvals. In fact, an undeveloped hotel site in The Crossings Specific Plan, at the corner of Interstate 380 and El Camino Real, has been approved for a height of 90 feet. Some future redevelopment or new development

in this area may be subject to stricter height limitations with the proposed ALUCP. The effects will be limited to specific sites and are unlikely to be severe enough to displace development to other parts of the city.

Area 8 is located along El Camino Real south of Interstate 380. The area is designated for public, retail, industrial, transportation, and utilities, and multi-family residential uses. The area is developed with a mix of commercial uses. The current zoning ordinance limits heights in this area to 50 feet, although exceptions are allowed through discretionary variances. The airspace surface is 150 feet or more above this area, so it should lead to no displacement effects for potential future redevelopment projects.

Area 9 extends along the commuter rail lines north and south of Interstate 380. The area is designated for retail, industrial, transportation and utilities, and multi-family residential land uses. The airspace surfaces in most of this area range from 80 to 150 feet above the ground. In a small part of the area, the airspace surface is 60 to 80 feet above the ground. The area is nearly fully developed, although some redevelopment projects are proposed in the area. It appears that the airspace height limits are sufficiently high to allow development in the underlying area without causing any displacement of development.

Area 10 is along San Bruno Avenue, west of U.S. Highway 101 and east of the commuter rail tracks. The area is designated for retail, industrial, transportation, and utilities uses. Existing land use in the area includes mixed commercial development. A relocated Caltrain station is proposed in the area, as is redevelopment for transit-oriented development (TOD) near the station. The airspace protection surfaces are 80 to over 150 feet above the ground in Area 10. The airspace height limits are high enough to allow for redevelopment without causing displacement of potential development to other parts of the city.

4.3.2.5 Potential Displacement in Millbrae and Burlingame – Areas 11 through 13

Areas 11 and 12 lie in Millbrae and Burlingame and Area 13 in Burlingame, as depicted in Exhibit 5E in the Appendix. Area 11 is designated for public, retail, industrial, transportation, and utilities uses. Existing land uses in the area include the El Camino Real commercial corridor and the Millbrae BART/Caltrain station. Current zoning sets maximum building heights based on discretionary review. The airspace surfaces in the ALUCP range from 60 feet above the ground to higher than 150 feet above the ground. In most of the area, the airspace is 80 feet or more above the ground. This height limit would accommodate most redevelopment likely to occur along the corridor without causing displacement effects.

Area 12 is in Millbrae and Burlingame. Existing land uses in the area include the Millbrae Avenue commercial corridor and BART/Caltrain Station-area transit-oriented development (TOD). The maximum building heights established by zoning are determined through discretionary review. Future uses designated for this area include retail, industrial, transportation, and utilities. The airspace protection surfaces of the proposed ALUCP range from 35 feet to over 150 feet above the ground, although in most of the area the airspace is 60 feet or more above the ground. (The lowest airspace surfaces are over small areas along U.S. Highway 101.) Within most of Area 12, future redevelopment could be accommodated with heights of sufficient height that development displacement should not be a risk.

Area 13 in Burlingame is designated for institutional use and is currently occupied by Mills Peninsula Hospital. Maximum building heights are limited in accordance with 14 CFR Part 77. This appears to mean that the 14

CFR Part 77 airspace obstruction standards are used as maximum permissible building heights. The airspace surfaces in the proposed ALUCP lie from 80 feet to over 150 feet above the ground in this area. The proposed airspace protection surfaces would constrain vertical expansion of the hospital, if that should ever be contemplated, but would not cause any displacement of development.

4.4 Development Displacement: Conclusions

Whether actual shifts in population and land use development would occur in areas surrounding the Airport depend on a number of factors, including the actual need for development, the rate, timing, location, and extent of development, economic and market conditions, the nature and type of the project or projects, and project-level impacts to the environment and associated mitigation.

The analysis in this Section has determined that any development displacement that could be caused by the proposed ALUCP is likely to be minor. The greatest effects would be caused by noise policies limited future redevelopment for housing within the CNEL 70 dB contour. Any displacement effects attributable to the safety and airspace protection policies appear to be negligible.

It is recognized that attempts to accurately forecast the actual effects of potential future shifts in land use development and population arising from implementation of the ALUCP are subject to considerable uncertainty. In the future, if such shifts do occur, like other land use development projects, they will be subject to the appropriate project-level environmental review under CEQA.²⁵

The ultimate authority for implementation of the ALUCP rests with local governments, as the zoning and land use permitting authorities. These local governments have multiple options with regard to how to implement the new policies and criteria in the ALUCP. Thus, the potential displacement effects discussed in this analysis could change depending on the specific implementation actions taken by the local governments.

²⁵ See California Code of Regulations, Title 14, §15145.

5. Environmental Factors Potentially Affected

The ALUCP establishes land use criteria for implementation by local agencies and does not propose or entail any new development, construction or changes to existing land uses or the environment. The ALUCP proposes limits on the type and the height of future uses to be developed in proximity to SFO, so as to avoid the creation of noise and safety compatibility conflicts with ongoing airport activities. No physical construction would result from the adoption of the proposed ALUCP or from subsequent implementation of the land use restrictions and policies. Similarly, no change in aircraft or airport operations would result from adoption of the Compatibility Plan.

5.1 Environmental Analysis Checklist

The following Environmental Analysis Checklist is based on the CEQA Guidelines, Appendix G, Environmental Checklist Form. A narrative description of the analysis undertaken in support of the impact determinations follows the checklist in Section 4.3, Narrative Evaluation of Potential Environmental Impacts.

The following instructions are quoted from the checklist in the CEQA guidelines.

Environmental Analysis Checklist General Instructions

- A. All answers must take account of the whole action involved, including off-site as well as onsite, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- B. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by information sources cited by the lead agency [C/CAG]. (See "No Impact" portion of Response Column Heading Definition section below.)
- C. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- D. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

- E. The explanation of each issue should identify:
- The basis/rationale for the stated significance determination; and
 - The mitigation measure identified, if any, to reduce the impact to less than significant.
- F. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

Response Column Heading Definitions

- A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- B. "Potentially Significant Unless Mitigation Incorporated" applies where the implementation of mitigation measures would reduce an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency [C/CAG] must describe the mitigation measure(s), and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
- C. "Less Than Significant Impact" applies where the project creates no significant impacts.
- D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project specific screening analysis).

5.2 Environmental Factors Potentially Affected

The proposed project would have less than significant impacts to the environmental factors listed below. The following sections discuss the proposed project and each of the environmental factors in detail.

- Aesthetics/Visual Quality
- Agriculture Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation/Circulation
- Utilities and Service Systems

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Aesthetics / Visual Quality				
Would the proposed project:				
(a) Have a substantial adverse effect on a scenic vista?			X	
(b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
(c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
(d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

Thresholds (a) - (d): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the proposed ALUCP would not directly affect a scenic vista, damage scenic resources, degrade the existing visual character or quality of the site or its surroundings, or create a new source of light or glare, and, as such, would not directly impact the environment or result in any direct impacts to aesthetics. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions’ respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of any infrastructure, that would result in significant impacts to aesthetics or visual quality. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of future development, and any indirect environmental effects of that development, are uncertain. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

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ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Agriculture Resources				
Would the proposed project:				
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?			X	
(b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X	
(c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?			X	

Thresholds (a) - (c): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the proposed ALUCP would not: (a) directly convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (collectively, "Farmland") to a non-agricultural use; or (b) conflict with existing zoning for agricultural use, or a Williamson Act contract; or (c) involve other changes in the existing environment that, due to their location or nature, could result in the conversion of Farmland to a non-agricultural use. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would result in significant impacts to agriculture resources. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to agriculture resources.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect is unlikely to affect agricultural resources because of the heavily urbanized development pattern within the AIA, which limits the potential for new development. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

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ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Air Quality				
Would the proposed project:				
(a) Conflict with or obstruct implementation of the applicable air quality plan?			X	
(b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
(c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
(d) Expose sensitive receptors to substantial pollutant concentrations?			X	
(e) Create objectionable odors affecting a substantial number of people?			X	
<p>Thresholds (a) - (e): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not directly conflict with or obstruct implementation of the applicable air quality plan; violate any air quality standard or contribute substantially to an existing or projected air quality violation; result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; expose sensitive receptors to substantial pollutant concentrations; or create objectionable odors affecting a substantial number of people; and, as such, would not directly impact the environment or result in any direct impacts to air quality. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.</p> <p>Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would result in significant impacts to air quality. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to air quality.</p> <p>The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to affect air quality because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.</p>				

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ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Biological Resources				
Would the proposed project:				
(a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
(b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X	
(c) Have a substantial adverse effect on federally-protected wetlands, as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X	
(d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
(e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	
(f) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X	

Thresholds (a) - (f): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not directly impact biological resources or their habitat, or conflict with applicable policies protecting biological resources or an adopted or approved habitat conservation plan, and, as such, would not directly impact the environment or result in any direct impacts to biological resources. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause significant impacts to biological resources. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement

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housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to biological resources.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to affect biological resources because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Cultural Resources				
Would the proposed project:				
(a) Cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?			X	
(b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines §15064.5?			X	
(c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	
(d) Disturb any human remains, including those interred outside of formal cemeteries?			X	

Thresholds (a) - (d): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not directly cause a substantial adverse change in the significance of a historical resource or an archaeological resource; directly destroy a unique paleontological resource or site or unique geologic feature; or disturb any human remains, including those interred outside of formal cemeteries, and, as such, would not directly impact the environment or result in any direct impacts to cultural resources. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause significant impacts to cultural resources. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to cultural resources.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is uncertain but is unlikely to affect cultural resources because of the heavily urbanized development pattern within the AIA which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

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ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Geology and Soils				
Would the proposed project:				
(a) Expose people or structures to potential substantial adverse effects, including the risk or loss, injury or death involving: <ul style="list-style-type: none"> i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? ii. Strong seismic ground shaking? iii. Seismic-related ground failure, including liquefaction? iv. Landslides? 			X	
(b) Result in substantial soil erosion or the loss of topsoil?			X	
(c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			X	
(d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
(e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of wastewater?			X	
<p>Thresholds (a) - (e): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. The project will not change topography or ground surface features, will not create cut or fill slopes, and involves no grading. The project does not involve land disturbance and, therefore, will not result in a change in deposition, siltation, or erosion, or in an increase in wind erosion or blown sand. The ALUCP would not expose people or structures to adverse effects involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction, or landslides; result in substantial soil erosion or the loss of topsoil; be located on a geologic unit or soil that is unstable, potentially resulting in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse; cause development to be located on expansive soil; or cause the use of soils incapable of adequately supporting the use of septic tanks. As such, the proposed ALUCP would not directly impact the environment or result in any direct impacts to geology and soils. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed</p>				

in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would result in significant impacts to geology and soils. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to geology and soils.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to affect geology because of the heavily urbanized development pattern within the AIA which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Hazards and Hazardous Materials				
Would the proposed project:				
(a) Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials?			X	
(b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
(c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?			X	
(d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X	
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of the public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X	
(f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			X	
(g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
(h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildland are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	

Thresholds (a) - (h): The proposed ALUCP establishes policies to reduce hazards to aircraft in flight and to reduce the severity of the consequences of aircraft accidents within the proposed safety zones.

The proposed ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Moreover, the proposed ALUCP does not involve the transport, use, or disposal of hazardous materials;

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the emission or handling of hazardous or acutely hazardous materials, substances, or waste; or the location of a building, structure, or public facility on a hazardous materials site compiled by the State of California pursuant to Government Code section 65962.5. Therefore, the ALUCP would not affect the incidence of hazardous material safety hazards in the area; result in hazardous emissions within one-quarter mile of an existing or proposed school; affect any sites included on a list of hazardous materials sites; create a significant hazard to the public or the environment; or affect emergency response plans or the incidence of wildland fires in the area.

The proposed ALUCP would decrease airport-related safety hazards by limiting development within the AIA; therefore, if adopted, the ALUCP would result in a beneficial impact by reducing the exposure of people to airport-related safety hazards, including aircraft accidents, consistent with the objectives of the State Aeronautics Act.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would result in significant impacts to hazards and hazardous materials. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to hazards and hazardous materials.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to affect hazards and hazardous materials because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

In summary, the ALUCP would not directly impact the environment or result in any direct impacts relating to hazards and hazardous materials; and the proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Hydrology and Water Quality				
Would the proposed project:				
(a) Violate any water quality standards or waste discharge requirements?			X	
(b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
(c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X	
(d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X	
(e) Create or- contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X	
(f) Otherwise substantially degrade water quality?			X	
(g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X	
(h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
(i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?			X	

(j) Inundation by seiche, tsunami or mudflow?

X

Thresholds (a) - (j): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not violate any water quality standards; affect groundwater supplies; substantially alter drainage patterns; or expose people or structures to a significant risk involving flooding, seiche, tsunami or mudflow; and, as such, would not directly impact the environment or result in any direct impacts to hydrology and water quality. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would result in significant impacts to hydrology and water quality. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to hydrology and water quality.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to affect hydrology and water quality because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, the limited scope of land use restrictions in the proposed ALUCP, and the minimal potential for development displacement. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Land Use and Planning				
Would the project:				
(a) Physically divide an established community?			X	
(b) Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X	
(c) Conflict with any applicable habitat conservation plan or natural community conservation plan?			X	

Thresholds (a) and (c): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not physically divide an established community or conflict with any applicable habitat conservation plan or natural community conservation plan, and, as such, would not directly impact the environment or result in any direct impacts to land use and planning, with respect to thresholds (a) and (c).

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause potentially significant impacts to land use and planning. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to land use and land use planning.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to have any effect that would divide an established community or conflict with a habitat or natural community conservation plan because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

Threshold (b): The ALUCP does not directly or indirectly conflict with any applicable land use plan, policy, or regulation of a local agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect.

To the extent that the ALUCP conflicts with other land use plans, policies, or regulations (i.e., those not adopted for the purpose of avoiding or mitigating an environmental effect), those conflicts would necessitate either an amendment to the applicable land use plans or an overrule by the respective local government. The local agency may, consistent with Government Code section 65302.3, alleviate any conflict that exists between the ALUCP and its planning documents by amending its plans after adoption of the ALUCP by C/CAG. Alternatively, if the local agency does not concur with a provision of the ALUCP, it may take steps to overrule the Airport Land Use Commission (C/CAG) pursuant to section 21676 of the Public Utilities Code. Such actions are within the responsibility and jurisdiction of the local governments, and not the Airport Land Use Commission (C/CAG).

If implemented by the local agency, the proposed ALUCP, would prohibit the development of particular land uses permitted under the general plans within certain areas of the AIA, conditionally limit the future development of these uses in other areas, and permit these uses without limitation in yet other areas. Thus, the proposed ALUCP would be consistent with certain

aspects of the current general plans, while conflicting with other aspects. (See Section 4 for an analysis of these effects.)

As discussed in Section 4.1 schools, hospitals, nursing homes, places of public assembly would be incompatible within the CNEL 70 dB contour. Residential uses, with certain exceptions, would also be incompatible within the CNEL 70 dB contour. As discussed in Section 4.2, all structures would be incompatible within Safety Zone 1. Certain land uses, including children's schools, large child daycare facilities, hospitals, nursing homes, hazardous uses, and critical public utilities would be incompatible within Safety Zone 2. Within Safety Zones 3 and 4, biosafety level 3 and 4 facilities, children's schools, large child day care centers, hospitals, and nursing homes would be incompatible. As discussed in Section 4.3, the height limits established in local zoning ordinances and in at least one approved specific plan would allow structures tall enough to penetrate the critical airspace surfaces defined in the ALUCP.

Sections 4.1, 4.2, and 4.3 explain that the general plans and, in some cases the specific plans, in the affected cities – Burlingame, Millbrae, San Bruno, South San Francisco – all have land use designations within at least one safety zone or the CNEL 70 dB contour where future development of these incompatible uses is allowed. In addition, Burlingame, Daly City, Millbrae, and San Bruno permit building heights that could allow penetrations of the critical airspace surfaces defined in the ALUCP. The affected areas in each city are relatively small, and the impact of these general plan inconsistencies is further lessened because the areas are nearly fully developed. Nonetheless, the local governments would have to take action to make their general plans, specific plans, and zoning ordinances consistent with the updated ALUCP or to overrule the updated ALUCP as provided by law.

The communities around SFO are fully developed. As such, the public facilities and community infrastructure needed to serve those communities, including schools, hospitals, places of worship, and public utilities are already in place. Where those existing uses occur within the CNEL 70 dB contour or the Safety Zones, they would become nonconforming uses and could continue in place.²⁶ Any future community needs for new children's schools, critical public utilities, hospitals, nursing homes, and public assembly areas would be dependent upon currently unanticipated shifts in population and demand. Therefore, to the extent the proposed ALUCP would prohibit the new development of these uses within the Safety Zones and the CNEL 70 dB contour, the impact may be reasonably considered less than significant.

Any conflicts between the ALUCP and local general plans also are considered less than significant under CEQA because state law (Gov. Code §65302.3) requires that the applicable general plan be consistent with an adopted ALUCP; and, in the event of an inconsistency, must be amended promptly (or go through the special process required to overrule the Airport Land Use Commission pursuant to section 21676 of the Public Utilities Code). The Airport Land Use Commission (C/CAG) finds that, even by adopting the ALUCP, any conflicts with local general plans can be avoided or substantially lessened by the respective local agencies taking prompt action to amend their plans so that they are consistent with the adopted ALUCP. The Airport Land Use Commission (C/CAG) further finds that such amendments are within the responsibility and jurisdiction of the respective local agencies, and not the Airport Land Use Commission (C/CAG). Finally, the Airport Land Use Commission (C/CAG) finds that such amendments can and should be adopted by the local agencies consistent with section 65302.3 of the Government Code.

Pursuant to Public Utilities Code section 21670 et seq., the ALUCP is intended to protect public health, safety, and welfare, through the establishment of land use measures that minimize the public's exposure to excessive noise and safety hazards; and is guided by the California Airport Land Use Planning Handbook. As required by state law, the ALUCP sets policies and criteria consistent with the State Aeronautics Act and the parameters identified in the California Airport Land Use Planning Handbook. By its nature and pursuant to state law, adoption of the ALUCP may necessitate restrictions on land uses within the AIA. These factors do not decrease the potential impact that the ALUCP may have on future land uses and development, but they are, nonetheless, important considerations.

²⁶ Nonconforming uses could be reconstructed and enlarged, subject to specific conditions, under the proposed ALUCP. The dwelling unit density of residential uses and the floor area of nonresidential uses cannot be increased. Schools and hospitals may be enlarged if they provide additional exits in the expanded parts of the buildings. In all cases, however, reconstructed nonconforming uses shall comply with the noise compatibility and airspace protection policies of the ALUCP. If abandoned for 24 months or more, the sites and buildings could be reused only in conformance with the ALUCP.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Mineral Resources				
Would the proposed project:				
(a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?			X	
(b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?			X	

Thresholds (a) and (b): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or result in the loss of availability of a locally-important mineral resource recovery site. As such, the ALUCP would not directly impact the environment or result in any direct impacts to mineral resources. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions’ respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other types of land uses, or the expansion of any infrastructure, that would cause significant impacts to mineral resources. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to mineral resources.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to affect mineral resources because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, the limited scope of land use restrictions in the proposed ALUCP, and the minimal potential for shifts in development patterns. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

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ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Noise				
Would the proposed project result in:				
(a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
(b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
(c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
(d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
(e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	
(f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?			X	

Thresholds (a) - (f): Airports are industrial uses and have the potential to create airport-related noise. Pursuant to the State Aeronautics Act, the ALUCP establishes the criteria by which the public's exposure to airport-related noise would be evaluated. These criteria are intended to reduce the public's exposure to noise by limiting residential densities and concentrations of people in locations near the Airport.

The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment, and does not include any changes in aircraft or airport operations that would generate additional noise. Moreover, the ALUCP would reduce exposure to airport-related noise by limiting development of new noise-sensitive uses within the SFO AIA. Therefore, the ALUCP would not result in the exposure of people to increased noise or vibration levels, and would not directly impact the environment or result in any direct impacts related to noise. The proposed ALUCP would result in

[DRAFT]

a beneficial impact by reducing the potential number of future dwellings and other noise-sensitive use within the Airport noise contours, which is an important objective of the State Aeronautics Act and the State Noise Standards.²⁷ The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would result in significant noise impacts. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public use structures that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to noise.

The ALUCP may indirectly influence future land use development in the vicinity of the Airport by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to cause any new noise impacts because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

²⁷ Public Utilities Code, §21670; Title 21, Subchapter 6, §5000.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Population and Housing				
Would the proposed project:				
(a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension or roads or other infrastructure)?			X	
(b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?			X	
(c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?			X	

Threshold (a): The ALUCP imposes limited restrictions on the development of certain land uses that are noise-sensitive and that would pose significant risks to public health, safety and welfare in the case of aircraft accident. The ALUCP does not expand areas designated for future residential development nor does it involve any development or construction of public infrastructure that could induce new development. Thus, the ALUCP would not directly or indirectly induce population growth.

Thresholds (b) and (c): The proposed ALUCP would continue the policy of the 1996 CLUP that considers residential uses incompatible within the CNEL 70 and 75 dB noise contours, although this policy would apply to a larger area because to the larger noise contours in the proposed ALUCP. The proposed ALUCP also establishes safety zones and policies applicable to those safety zones. Residential uses are considered incompatible within Safety Zone 1 in the cities of South San Francisco, San Bruno and Millbrae. Thus, implementation of the ALUCP by the local cities would prohibit new housing development within the larger CNEL 70 dB contour (subject to specific exceptions) and within Safety Zone 1.

The off-Airport areas within the CNEL 75 dB contour and Safety Zone 1 that are designated for residential use in the Millbrae and San Bruno general plans are a small fraction of the residential-designated areas in each city. As discussed in Sections 4.1 and 4.2, these areas are already fully developed, and the residential uses that would become nonconforming after implementation of the ALUCP would be allowed to remain within only limited restrictions.²⁸ Therefore, any shift in residential development patterns and population caused by the ALUCP policies applying within the CNEL 75 dB contour and Safety Zone 1 should be less than significant.

Within the CNEL 70 dB contour, new housing development would be limited to existing lots zoned for residential use. Where allowed, new housing within the CNEL 70 dB noise contour would have to be sound attenuated to achieve an indoor noise level of 45 dB or less from exterior noise. Land within the CNEL 70 dB contour, which extends into San Bruno and South San Francisco, is fully developed. The effect of the ALUCP policy within the CNEL 70 dB contour would be to prevent the residential redevelopment of areas currently designated for commercial, industrial, or mixed use.

In the City of South San Francisco, two housing opportunity sites in the South El Camino Real Area are intersected by the

²⁸ Nonconforming residential uses could be reconstructed and enlarged if no additional units are added to the nonconforming structures. If abandoned for 24 months, the property could only be developed for uses compatible with the ALUCP.

updated CNEL 70 dB contour in the proposed ALUCP. The sites are currently occupied by low intensity commercial uses, and the City of South San Francisco has identified the sites as areas where future mixed use development would be desirable. The City of South San Francisco estimates the sites could accommodate 386 new dwelling units. Much of the combined land area of the sites will be within the CNEL 70 dB contour. Using similar methods of estimation as the City of South San Francisco, the displacement analysis in Section 4 estimates that 64 dwelling units may be accommodated on the portion of the site outside the CNEL 70 dB contour. A total of 322 potential future dwelling units would then be displaced by implementation of the ALUCP update.

This displacement does not, however, prevent the City of South San Francisco from meeting its 2007–2014 Regional Housing Needs Allocation (RHNA) balance. To achieve its RHNA allocation, 820 units remain to be built by 2014. South San Francisco estimates that 1,244 dwelling units could be developed on 19 housing opportunity sites within the city. If this total is reduced by 322, due to the estimated ALUCP displacement effect, a capacity of 922 units would remain on the other housing opportunity sites.

The surrounding communities of Brisbane, Colma, Daly City, and San Bruno have also identified housing opportunity sites where 2,314 more dwelling units could be accommodated, potentially absorbing some of the displaced residential development in the City of South San Francisco. Adding the capacity remaining in South San Francisco, after eliminating the potential displaced units, all five cities have a total capacity of 3,236 units.

The proposed ALUCP has only a limited effect on existing land uses through the nonconforming use policies. Nonconforming uses would be allowed to be reconstructed or expanded, subject to specified conditions.²⁹ If abandoned for 24 months, nonconforming buildings could be reused only in compliance with the ALUCP. No significant displacement of existing housing or populations is anticipated under the proposed ALUCP. (See Section 4, Analysis of Potentially Displaced Development, for a detailed discussion of potential displacement.)

In summary, implementation of the ALUCP may result in a reduction of the potential build-out dwellings and population compared to what could otherwise occur in under the local agencies' current general plans. Based on the displacement analysis described in Section 4, any reduction in the potential future housing supply is likely to be minor. Any potential reduction would result from the ALUCP policies limiting the redevelopment of commercial and industrial areas for residential use within Safety Zone 1 and the CNEL 70 dB contour. If any reduction occurs, it would affect a small fraction of the available housing stock. Importantly, any reduction would have been caused by C/CAG's intent to achieve the objectives of the State Aeronautics Act, which call for the Airport Land Use Commission to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public airports to the extent that these areas are not already devoted to incompatible uses.³⁰ It is, therefore, reasonable to conclude that any reduction in housing availability would advance a legitimate interest in the protection of the public health safety and welfare.

²⁹ Nonconforming uses could be reconstructed and enlarged, subject to specific conditions, under the proposed ALUCP. The dwelling unit density of residential uses and the floor area of nonresidential uses cannot be increased. Schools and hospitals may be enlarged if they provide additional exits in the expanded parts of the buildings. In all cases, however, reconstructed nonconforming uses shall comply with the noise compatibility and airspace protection policies of the ALUCP.

³⁰ Public Utilities Code §21670.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Public Services				
Would the proposed project:				
(a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:			X	
(b) Fire protection?			X	
(c) Police protection?			X	
(d) Schools?			X	
(e) Parks?			X	
(f) Other public facilities?			X	

Threshold (a): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities and would not result in the need for new or physically altered governmental facilities. As such, the ALUCP would not directly impact the environment or result in any direct impacts related to public services. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

As discussed in Section 4.1, schools, hospitals, nursing homes, and places of public assembly would be incompatible within the CNEL 70 dB contour. As discussed in Section 4.2, all structures would be incompatible within Safety Zone 1, and children's schools, large child daycare facilities, hospitals, and nursing homes would be incompatible within Safety Zones 2, 3, and 4. In addition, critical public utilities would be incompatible within Safety Zone 2. As discussed in Section 4.3, the height limits established in local zoning ordinances and in at least one approved specific plan would allow structures tall enough to penetrate the critical airspace surfaces defined in the ALUCP.

The communities around SFO are fully developed. As such, the public facilities and community infrastructure needed to serve those communities, including schools, hospitals, places of worship, and public utilities are already in place. Where those

existing uses occur within the CNEL 70 dB contour or the Safety Zones, they would become nonconforming uses and could continue in place.³¹ Any future community needs for new children's schools, critical public utilities, hospitals, nursing homes, and public assembly areas would be dependent upon currently unanticipated shifts in population and demand. Therefore, to the extent the proposed ALUCP would prohibit the new development of these uses within the Safety Zones and the CNEL 70 dB contour, the impact may be reasonably considered less than significant.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause potentially significant impacts to public services. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to public services.

The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to cause any impacts on public services because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

³¹ Nonconforming uses could be reconstructed and enlarged, subject to specific conditions, under the proposed ALUCP. The dwelling unit density of residential uses and the floor area of nonresidential uses cannot be increased. Schools and hospitals may be enlarged if they provide additional exits in the expanded parts of the buildings. In all cases, however, reconstructed nonconforming uses shall comply with the noise compatibility and airspace protection policies of the ALUCP. If abandoned for 24 months or more, the sites and buildings could be reused only in conformance with the ALUCP.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Recreation				
(g) Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
(h) Does the proposed project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?			X	

Thresholds (a) and (b): The proposed ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the proposed ALUCP would not increase the use of existing neighborhood and regional parks or other recreational facilities and does not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment, and, as such, would not directly impact the environment or result in any direct impacts to recreation. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions’ respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.

Nothing in the ALUCP would result in indirect impacts such as the construction of housing or other development or the expansion of infrastructure that would cause potentially significant impacts to recreation. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to recreation.

The ALUCP may indirectly influence future development near the Airport by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development are uncertain. Any potential indirect effect that may arise is uncertain but is unlikely to cause any impacts on recreation because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

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ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Transportation and Traffic				
Would the proposed project:				
(a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?			X	
(b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion/management agency for designated roads or highways?			X	
(c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X	
(d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
(e) Result in inadequate emergency access?			X	
(f) Result in inadequate parking capacity?			X	
(g) Conflict with adopted policies, plans or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?			X	
<p>Thresholds (a) - (g): The proposed ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not cause an increase in traffic, substantially increase design hazards, result in inadequate emergency access or parking capacity, or conflict with applicable alternative transportation plans. As such, the ALUCP would not directly impact the environment or result in any direct impacts related to traffic. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.</p>				
<p>Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause significant impacts to traffic and transportation. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to traffic and transportation.</p>				

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The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is unlikely to cause any transportation or traffic impacts because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Utilities and Service Systems				
Would the proposed project:				
(a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
(b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environment effects?			X	
(c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effect?			X	
(d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlement needed?			X	
(e) Result in a determination by the wastewater treatment provider which serves or may serve the project?			X	
(f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
(g) Comply with federal, state and local statutes and regulations related to solid waste?			X	
<p>Thresholds (a) - (g): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP would not result in the construction of new wastewater or stormwater facilities, and would not require additional water supplies, or wastewater or landfill capacity, and, as such, would not directly impact the environment or result in any direct impacts to utilities and service systems. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.</p>				
<p>Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause significant impacts to utilities and service systems. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to utilities and service systems.</p>				
<p>The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is</p>				

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unlikely to cause any new noise impacts because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.

ISSUES	POTENTIALLY SIGNIFICANT IMPACT	POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
Mandatory Findings of Significance				
(a) Does the proposed project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?			X	
(b) Does the proposed project have impacts that are individually limited, but cumulatively considerable?			X	
(c) Does the proposed project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	
<p>Thresholds (a) - (c): The ALUCP does not propose or entail any new development, construction, or physical changes to existing land uses or the environment. Therefore, the ALUCP does not have the potential to degrade the quality of the environment; substantially reduce the habitat of a fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; reduce the number or restrict the range of a rare or endangered plant or animal; or eliminate important examples of the major periods of California history or prehistory; have impacts that are individually limited, but cumulatively considerable; or have environmental effects which will cause substantial adverse effects on human beings. As such, the ALUCP would not directly impact the environment. The proposed ALUCP would not increase the intensity of development allowed in any part of the AIA above the levels projected in the local jurisdictions' respective general plans, the environmental effects of which were already analyzed in the certified general plan environmental documentation.</p> <p>Nothing in the ALUCP would result in indirect impacts such as the construction of housing, development of other land uses, or the expansion of infrastructure, that would cause significant impacts to wildlife, their habitats, important examples of California history, or human beings. The ALUCP would not result in the displacement of existing housing, commercial, industrial, or public uses that would necessitate the construction of replacement housing, facilities, or infrastructure in other areas, and which could result in potentially significant impacts to wildlife, their habitats, important examples of California history, or human beings.</p> <p>The ALUCP may indirectly influence future land use development in the vicinity of SFO by facilitating development in some locations and constraining development in others. The specific characteristics, timing, and location of any future development, and any indirect environmental effects of that development, are uncertain. Any potential indirect effect that may arise is uncertain but is unlikely to cause any new environmental impacts because of the heavily urbanized development pattern within the AIA, which limits the potential for new development, and the limited scope of land use restrictions in the proposed ALUCP. If future shifts in development indirectly result from implementation of the ALUCP, those subsequent actions will be subject to further project-level environmental review in compliance with CEQA.</p> <p>Moreover, because the ALUCP is regulatory in nature and will not result in any new development, construction, or physical changes to existing land uses or the environment, it has no potential to create cumulatively significant environmental impacts. Indeed, the ALUCP serves as a mitigation plan designed to avoid certain noise and safety impacts that might otherwise be cumulatively significant.</p>				

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6. Determination

On the basis of this evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures described on the attached sheet have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a significant effect(s) on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets, if the effect is a "potentially significant impact" or "potentially significant unless mitigated." An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because all potentially significant effects (a) have been analyzed adequately in an earlier EIR pursuant to applicable standards; and (b) have been avoided or mitigated pursuant to that earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project.

September 13, 2012

Signature:

Bob Grassilli, Chair
City/County Association of Governments of San Mateo County
Telephone: (650) 599-1406

6.1 Fish and Game Determination

Based on the information presented in this Initial Study and the record as a whole, there is no substantial evidence before C/CAG that the ALUCP will have the potential to adversely affect, either individually or cumulatively, fish or wildlife resources or the habitat upon which each depends. Therefore, a finding of *de minimis* impact pursuant to 14 Cal. Code Regs. §753.5(c) is appropriate. Additionally, because there is no substantial evidence that the project will result in changes to the resources listed in 14 Cal. Code Regs. §753.5(d)(1)(A) through (G), there is no presumption of adverse effect as set forth in 14 Cal. Code Regs. §753.5(d).

7. References and Preparers

7.1 References

The following reference materials are hereby incorporated by reference and made a part of this Initial Study.

1. *Burlingame Bayfront Specific Plan*, City of Burlingame Planning Department, August 2006.
2. California Environmental Quality Act (CEQA), Public Resources Code, §21000 et seq.
3. California State Aeronautics Act, Public Utilities Code, §§ 21001 et seq.
4. City of Millbrae Municipal Code, Title 10, Planning and Zoning, Chapter 10.05 Zoning, 2011
5. City of San Bruno Municipal Code, Title 12 Land Use, Article 3 Planning and Zoning, 2011
6. City of South San Francisco Municipal Code, Title 20 Zoning, 2011
7. *Comprehensive Airport Land Use Compatibility Plan for San Francisco International Airport*, February 2012
8. *East of 101 Area Plan*, City of South San Francisco, July 1994.
9. *Millbrae Station Area Specific Plan*, City of Millbrae, November 24, 1998
10. *North Burlingame/Rollins Road Specific Plan*, City of Burlingame Planning Department, February 2007.
11. *San Bruno Transit Corridors Plan*, City of San Bruno, March 2012.
12. State of California Department of Transportation Division of Aeronautics, *California Airport Land Use Planning Handbook*,
<<http://www.dot.ca.gov/hq/planning/aeronaut/documents/AirportLandUsePlanningHandbook.pdf>>
(Updated October 2011)
13. *U.S. Navy Site and Its Environs Specific Plan*, City of San Bruno, August 2005.

7.2 Preparers

Ricondo & Associates, Inc. provided consulting services for this Initial Study. Authors of the study were:

- Mark R. Johnson, AICP, Director
- Patrick M. Hickman, RLA, LEED AP, Consultant
- Thao Nguyen, Consultant

Appendix A

Airspace Analysis – Potential Areas of Concern



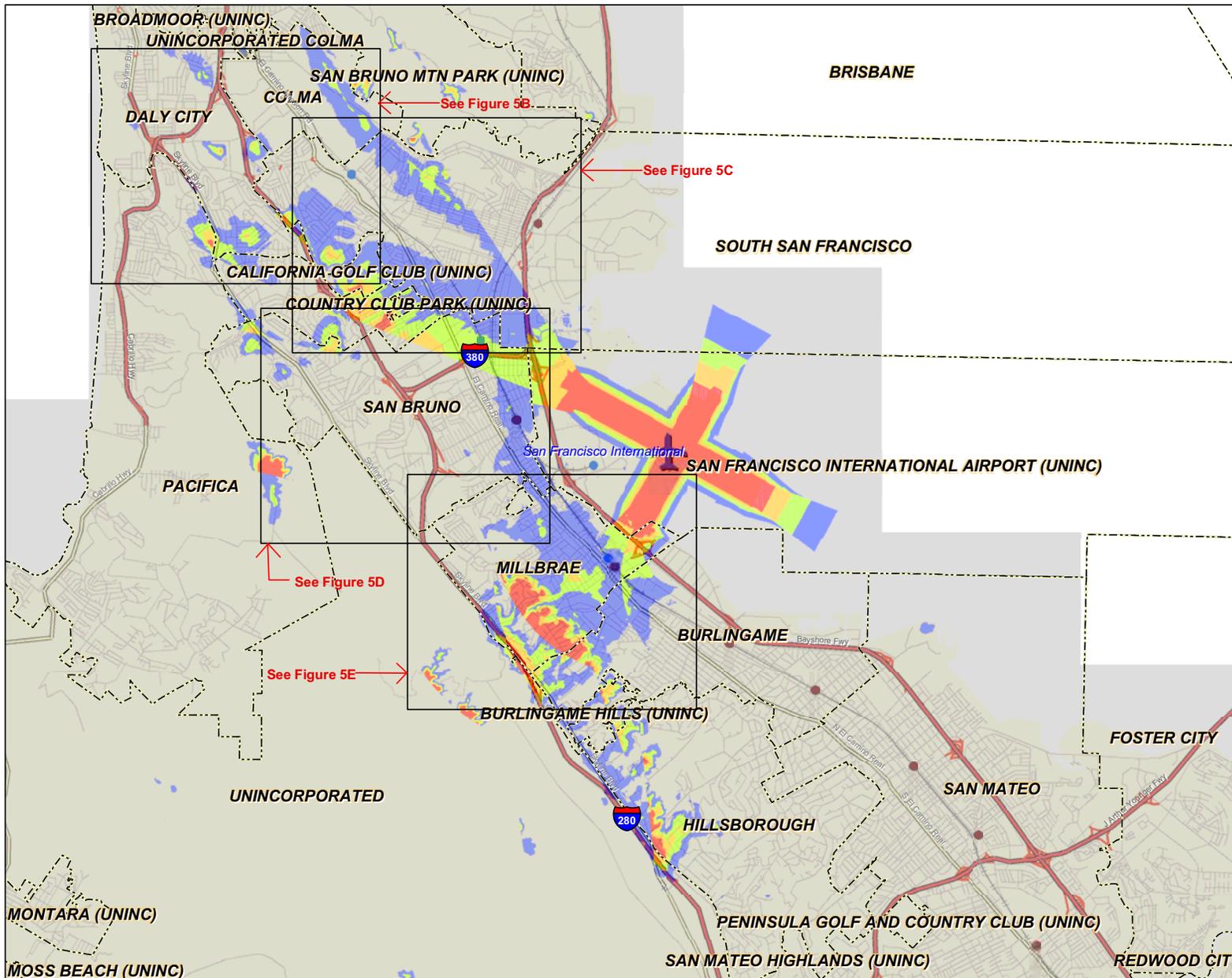
Appendix A Airspace Analysis – Potential Areas of Concern

The map of airspace protection surfaces proposed in the ALUCP as maximum building height limits was prepared in 2009 by the SFO planning staff and consultant. The map was developed by combining a series of obstacle clearance surfaces that were mapped in accordance with the FAA Order 8260.3B, *U.S. Standard for Terminal Instrument Procedures (TERPS)*. The SFO staff and consultant also consulted with airlines operating at the airport to develop three-dimensional airspace maps of the One-Engine Inoperative (OEI) obstacle clearance surfaces developed by the airlines based on their flight procedures for one-engine inoperative departures. The final composite map depicts the lowest airspace surfaces derived from the combination of the TERPS and OEI airspace surfaces.

After developing the composite airspace surfaces map, the consultants to SFO and C/CAG assessed the relationship of the airspace surfaces to the underlying terrain and to the maximum height limits permitted under the zoning codes of affected local governments. The zoning information is complex. In some cases, different height limits apply within different parts of the district. Other districts set nominal height limits but allow for the discretionary approval of buildings of greater height. In some cases, height limits are derived from maximum floor area ratios, where the building height would be a function of the size of the building and the size of the lot.

The consultants prepared a series of detailed maps depicting areas where the airspace surfaces 150 feet or less above ground level (AGL). Thirteen separate areas where the zoning regulations could allow buildings penetrating the critical airspace surfaces, listed in Table 4 in Section 4.3 of the Initial Study, were analyzed. The maps on the following pages depict those areas.

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LEGEND
Composite Aeronautical Surfaces Above Ground Level

- 0 - 35'
- 35' - 50'
- 50' - 60'
- 60' - 80'
- 80' - 100'
- 100' - 120'
- 120' - 150'
- 150' and more

—100— Elevation of composite lowest TERPS and OEI surfaces, feet Above Mean Sea Level (AMSL), North American Datum of 1988 (NAVD88)

----- City boundary

DRAFT JULY 15, 2009

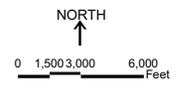
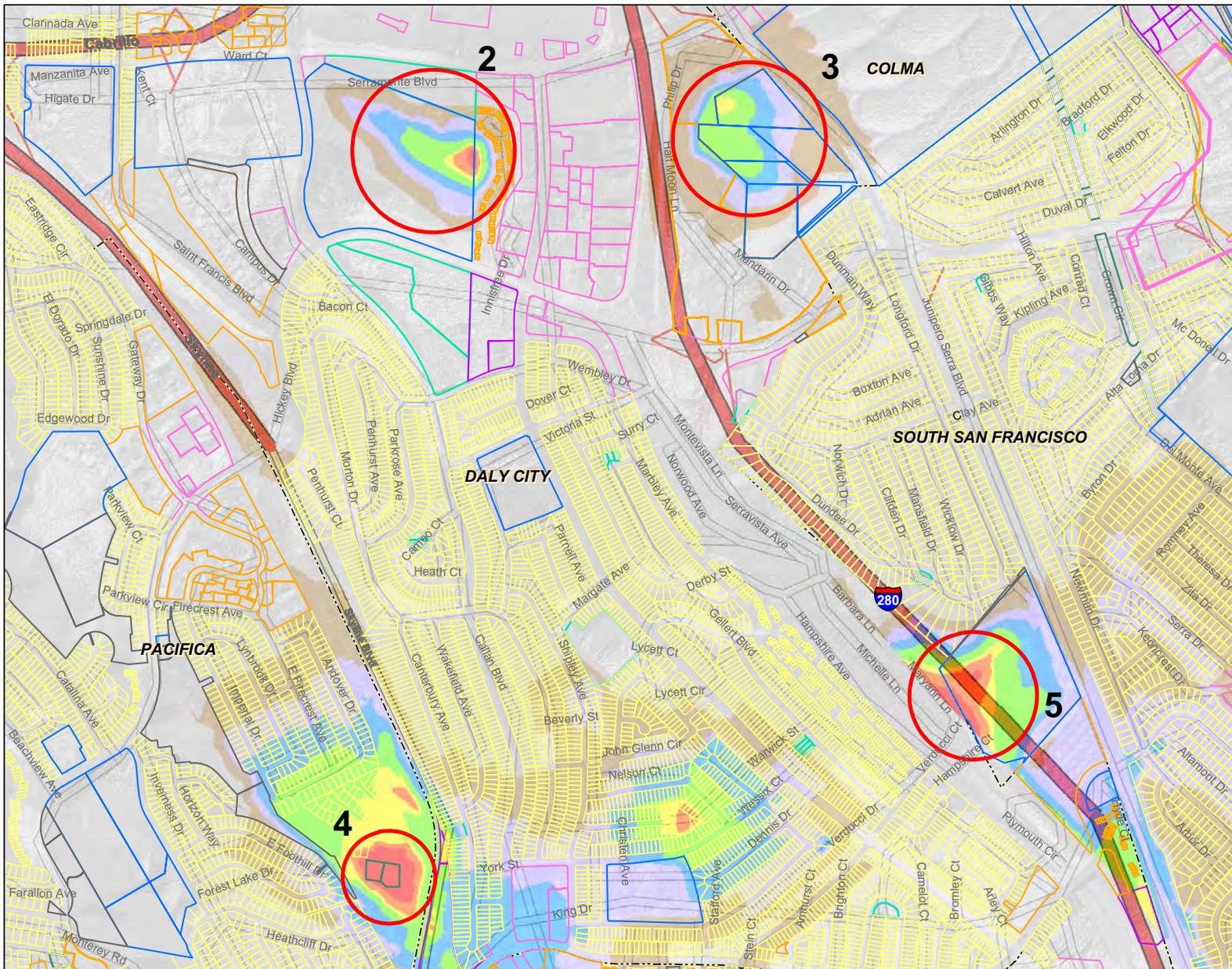


Figure 5A
**COMPOSITE AERONAUTICAL SURFACES
 ELEVATION ABOVE GROUND LEVEL**
 Comprehensive Airport Land Use Plan
 For The Environs of San Francisco International Airport
 June 2009
C/CAG
 City/County Association of Governments
 of San Mateo County, California

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- LEGEND**
- Composite Aeronautical Surfaces Above Ground Level**
- 0 - 35'
 - 35' - 50'
 - 50' - 60'
 - 60' - 80'
 - 80' - 100'
 - 100' - 120'
 - 120' - 150'
 - 150' and more
- 100— Elevation of composite lowest TERPS and OEI surfaces, feet Above Mean Sea Level (AMSL), North American Datum of 1988 (NAVD88)
- City boundary
- Land Use**
- Vacant
 - Public
 - Multi-Family Residential
 - Single Family Residential
 - Retail
 - Industrial, Transportation, and Utilities
 - Local Park, Golf Course, Cemetery
 - Open Space
- Potential area of concern

DRAFT JULY 23, 2009

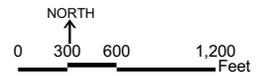
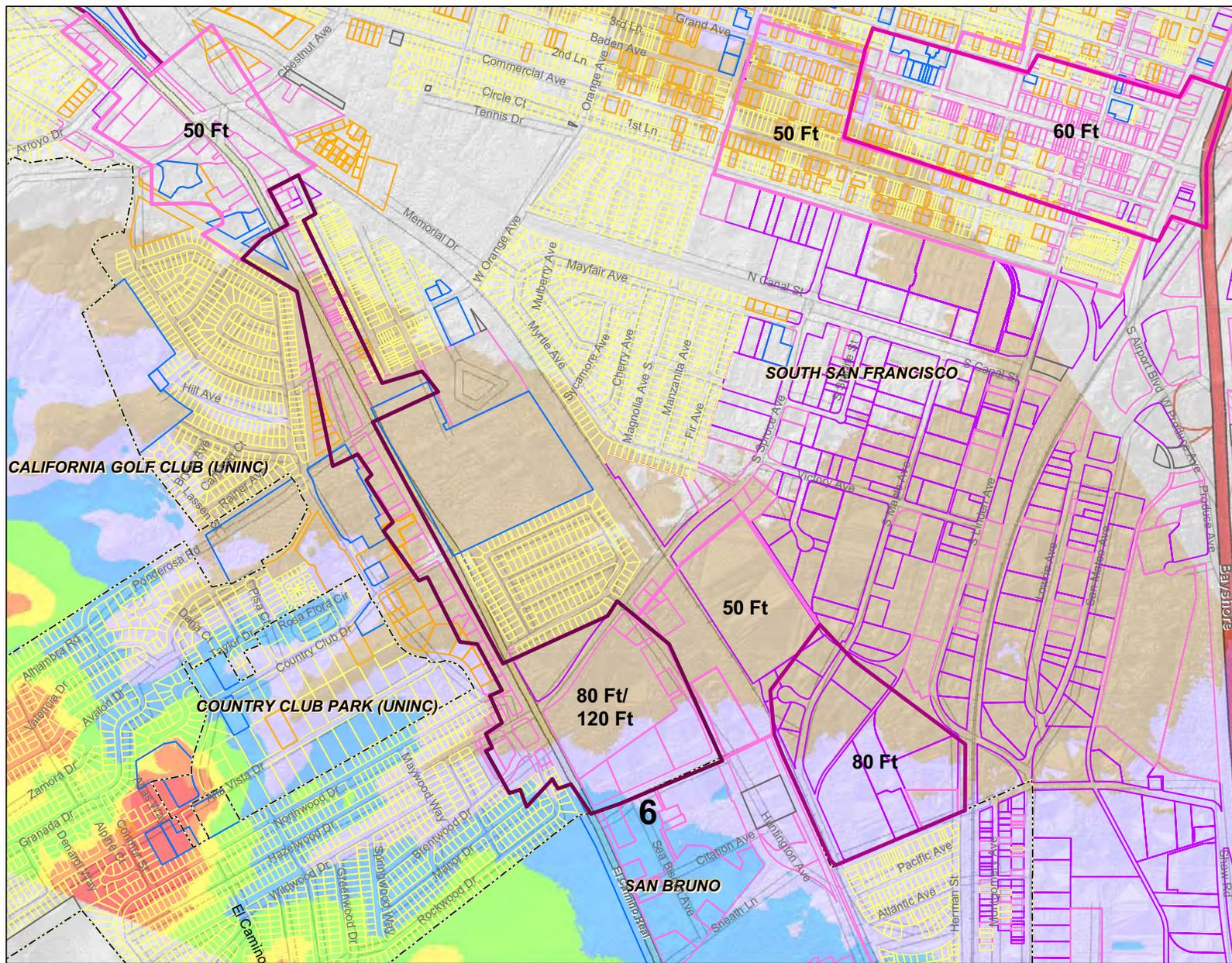


Figure 5B
**COMPOSITE AERONAUTICAL SURFACES
 ELEVATION ABOVE GROUND LEVEL
 DALY CITY AND PACIFICA FOCUS AREA**
 Comprehensive Airport Land Use Plan
 For The Environs of San Francisco International Airport
 June 2009

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- LEGEND**
- Composite Aeronautical Surfaces Above Ground Level**
- 0 - 35'
 - 35' - 50'
 - 50' - 60'
 - 60' - 80'
 - 80' - 100'
 - 100' - 120'
 - 120' - 150'
 - 150' and more

—100— Elevation of composite lowest TERPS and OEI surfaces, feet Above Mean Sea Level (AMSL), North American Datum of 1988 (NAVD88)

----- City boundary

- Land Use**
- Vacant
 - Public
 - Multi-Family Residential
 - Single Family Residential
 - Retail
 - Industrial, Transportation, and Utilities
 - Local Park, Golf Course, Cemetery
 - Open Space

- South San Francisco Height Zoning Areas**
- Building base height limit at 80' AGL / Building height limit with discretionary approval at 120'
 - Building base height limit at 80' AGL
 - Building base height limit at 60' AGL
 - Building base height limit at 50' AGL

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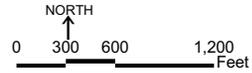
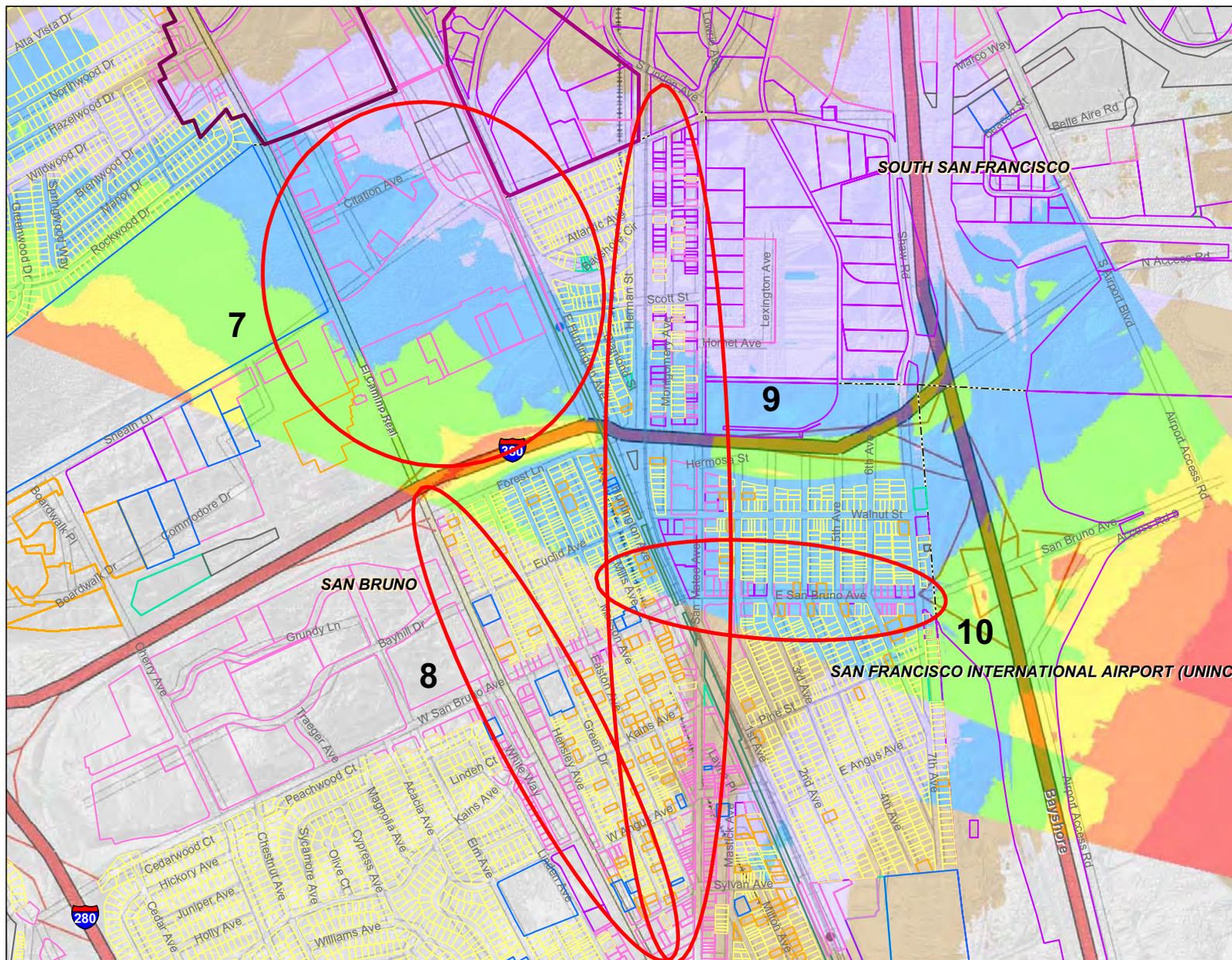


Figure 5C
**COMPOSITE AERONAUTICAL SURFACES
 ELEVATION ABOVE GROUND LEVEL
 SOUTH SAN FRANCISCO FOCUS AREA**
 Comprehensive Airport Land Use Plan
 For The Environs of San Francisco International Airport
 June 2009
C/CAG
 City/County Association of Governments
 of San Mateo County, California

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- LEGEND**
- Composite Aeronautical Surfaces Above Ground Level**
- 0 - 35'
 - 35' - 50'
 - 50' - 60'
 - 60' - 80'
 - 80' - 100'
 - 100' - 120'
 - 120' - 150'
 - 150' and more

—+60— Elevation of composite lowest TERPS and OEI surfaces, feet Above Mean Sea Level (AMSL), North American Datum of 1988 (NAVD88)

- City boundary
- Land Use**
- Vacant
 - Public
 - Multi-Family Residential
 - Single Family Residential
 - Retail
 - Industrial, Transportation, and Utilities
 - Local Park, Golf Course, Cemetery
 - Open Space

— Potential area of concern

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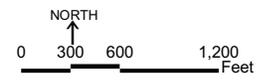
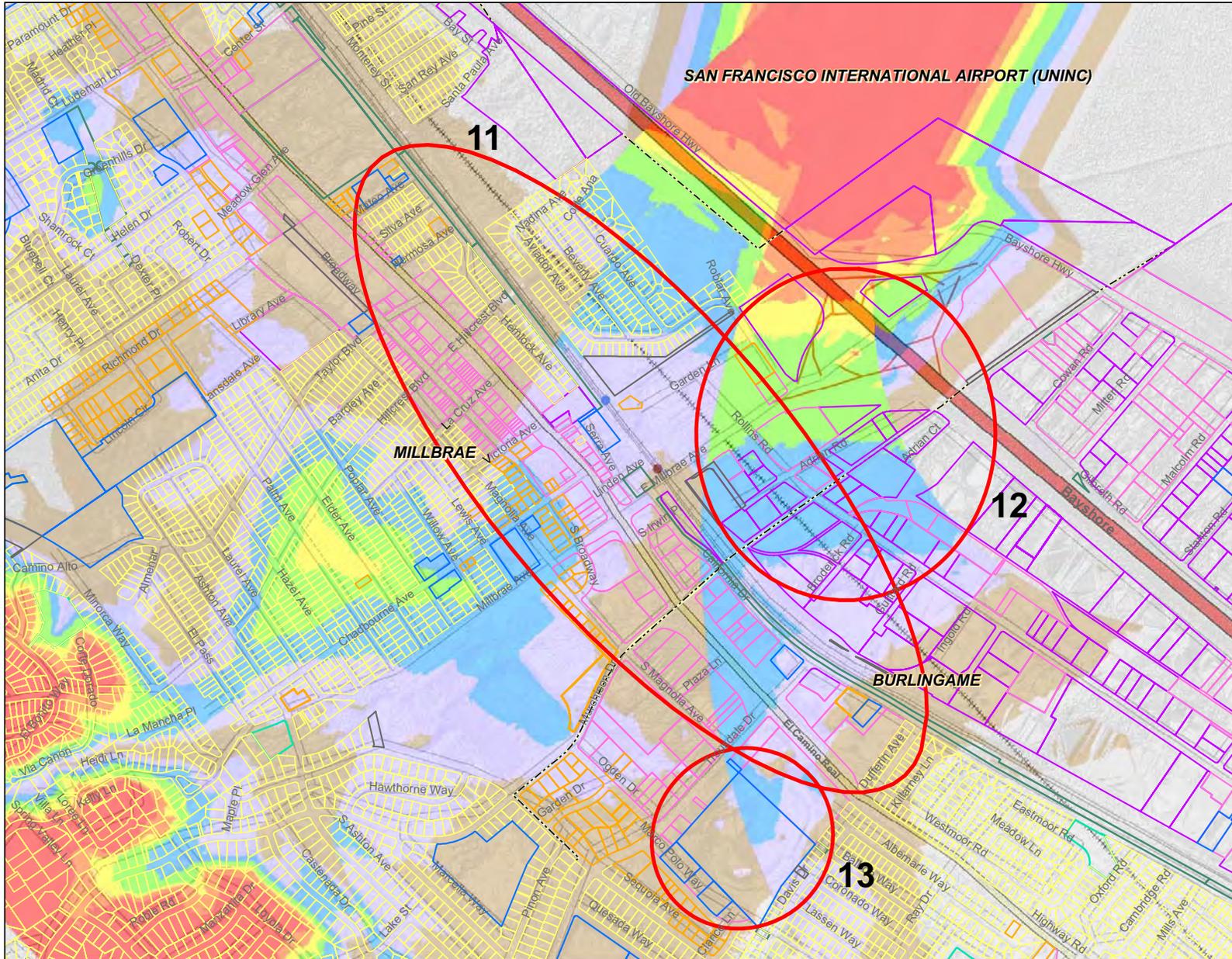


Figure 5D
COMPOSITE AERONAUTICAL SURFACES ELEVATION ABOVE GROUND LEVEL SAN BRUNO FOCUS AREA
 Comprehensive Airport Land Use Plan
 For The Environs of San Francisco International Airport
 June 2009
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LEGEND

Composite Aeronautical Surfaces Above Ground Level

- 0 - 35'
- 35' - 50'
- 50' - 60'
- 60' - 80'
- 80' - 100'
- 100' - 120'
- 120' - 150'
- 150' and more

— 100' — Elevation of composite lowest TERPS and OEI surfaces, feet Above Mean Sea Level (AMSL), North American Datum of 1988 (NAVD88)

----- City boundary

Land Use

- Vacant
- Public
- Multi-Family Residential
- Single Family Residential
- Retail
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Open Space

— Potential area of concern

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NORTH

0 300 600 1,200 Feet

Figure 5E
**COMPOSITE AERONAUTICAL SURFACES
 ELEVATION ABOVE GROUND LEVEL
 MILLBRAE AND BURLINGAME FOCUS AREA**
 Comprehensive Airport Land Use Plan
 For The Environs of San Francisco International Airport
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