SAN BRUNO RECREATION AND AQUATIC CENTER PROJECT RESPONSE TO COMMENTS DOCUMENT

STATE CLEARINGHOUSE NO. 2019080096

LSA

May 2020

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STATE CLEARINGHOUSE NO. 2019080096

City of San Bruno
Community and Economic Development Department
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Project No. GRP1803

May 2020

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1.0 INTRODUCTION

1.1 PURPOSE OF THE RESPONSE TO COMMENTS DOCUMENT

This document has been prepared to respond to comments received on the Draft Environmental Impact Report (Draft EIR) prepared for the proposed San Bruno Recreation and Aquatic Center Project (proposed project). The Draft EIR identifies the likely environmental consequences associated with implementation of the proposed project, and recommends mitigation measures to reduce potentially significant impacts. This Response to Comments (RTC) Document provides responses to comments on the Draft EIR and makes revisions to the Draft EIR, as necessary, in response to those comments or to make clarifications in the Draft EIR. This document, together with the Draft EIR, constitutes the Final EIR for the proposed project.

1.2 ENVIRONMENTAL REVIEW PROCESS

According to the California Environmental Quality Act (CEQA), lead agencies are required to consult with public agencies having jurisdiction over a proposed project and to provide the general public with an opportunity to comment on the Draft EIR.

The City of San Bruno (City) circulated a Notice of Preparation (NOP) to help identify the types of impacts that could result from the proposed project, as well as potential areas of controversy. The NOP was published on August 5, 2019, and was distributed to public agencies, organizations, and individuals who requested to be notified of the potential impacts of the project. Comments received on the NOP were considered during preparation of the Draft EIR.

The Draft EIR was made available for a 45-day public review period which commenced on January 27, 2020, and a notice of its availability was distributed to local and State responsible and trustee agencies. The Draft EIR and an announcement of its availability were posted electronically on the City's website: www.sanbruno.ca.gov/gov/city_departments/commdev/planning_division/development_activity/san_bruno_recreation_and_aquatic_center.htm, and paper copies were available for public review at the San Bruno Community and Economic Development Department and San Bruno Public Library. The Notice of Availability (NOA) for the Draft EIR was provided to all individuals and organizations who made a written request for notice, was filed with the San Mateo County Clerk, and was posted at the project site.

The 45-day public comment period ended on March 11, 2020. During the Draft EIR public review period, the City received three comment letters (two from State agencies and one from an individual) and a letter from the State Clearinghouse acknowledging compliance with its review requirements for draft environmental documents. Copies of all written comments received during the comment period are included in Chapter 4.0 of this document.

1.3 DOCUMENT ORGANIZATION

This RTC Document consists of the following chapters:

- **Chapter 1.0: Introduction.** This chapter discusses the purpose and organization of this RTC Document, and the Final EIR, and summarizes the environmental review process for the project.

- **Chapter 2.0: Revised Project.** This chapter includes a description of the revisions to the proposed project that have been developed by the City since publication of the Draft EIR (the Revised Project). A comparison of the impacts and mitigation measures identified in the Draft EIR to those of the Revised Project is also included in this chapter.

- **Chapter 3.0: List of Commenters**. This chapter contains a list of agencies, individuals and organizations who submitted written comments on the Draft EIR during the public review period.

- **Chapter 4.0: Comments and Responses**. This chapter contains reproductions of all comment letters received on the Draft EIR. A written response for each CEQA-related comment received during the public review period is provided to describe the disposition of each significant environmental issue raised by commenters. Each response is keyed to the corresponding comment.

- **Chapter 5.0: Draft EIR Text Revisions**. Corrections and revisions to the Draft EIR that are necessary in light of the comments received and responses provided, or necessary to explain project refinements and amplify or clarify material in the Draft EIR, are contained in this chapter. Double underlined text represents language that has been added to the Draft EIR; text with ~~strikeout~~ has been deleted from the Draft EIR.

2.0 REVISED PROJECT

Since publication of the San Bruno Recreation and Aquatic Center Draft Environmental Impact Report (Draft EIR) in January 2020, the City has refined the following three elements of the project design, herein referred to as the Revised Project and more fully described in this chapter:

1. The total square footage of the proposed San Bruno Recreation and Aquatic Center (SBRAC) building would be increased by approximately 2,360 square feet, to a total of 49,360 square feet;
2. The portion of the reconfigured El Zanjon Creek located within the project site would be returned to a more natural state rather than rechannelized with a concrete base; and
3. The size and location of proposed storm drainage infrastructure improvements would be modified.

No other changes to the project evaluated in the Draft EIR are proposed. The Revised Project would constitute the design that would be reviewed and considered by City decision-makers for the Final EIR certification and project approval.

This chapter presents the changes to the project described and evaluated in the Draft EIR and summarizes the environmental impacts that would be associated with revisions to the project, as compared to the project impacts identified in the Draft EIR. This discussion demonstrates that the changes to the project do not amount to the addition of significant new information requiring recirculation of the Draft EIR as they would not result in any new or substantially more severe environmental impacts than those already identified in the Draft EIR, and that there are no new mitigation measures or alternatives which are considerably different from those analyzed in the Draft EIR that would substantially reduce one or more of the project's significant effects on the environment, but which the project sponsor (the City of San Bruno) has declined to adopt. Changes to the project and associated environmental impacts are also considered and incorporated into the responses to comments provided in Chapter 4.0 of this document.

2.1 PROJECT EVALUATED IN THE DRAFT EIR

As described in Chapter 3.0, Project Description of the Draft EIR, page 3-9, the proposed project would include the following components: 1) demolition of the existing Veterans Memorial building and pool; 2) construction of a new 47,000-square-foot SBRAC, future construction of an outdoor pool, and installation of associated water, sewer, and stormwater infrastructure; 3) the reconfiguration of adjacent existing parking areas and roadways within the park; and 4) the relocation of the existing channelized creek within a portion of the park.

The following summarizes the SBRAC and creek relocation components of the project as described and evaluated in the Draft EIR.

2.1.1 Recreation and Aquatic Center

The proposed project described and evaluated in the Draft EIR included demolition of the existing Veterans Memorial building and construction of a new SBRAC in generally the same location as the

existing Veterans Memorial building; however, the new SBRAC would have a larger footprint. The SBRAC would be two stories in height and approximately 47,000 square feet in size, for an increase in total floor area of approximately 17,000 square feet compared to existing conditions. The conceptual facility plan is shown in Figure 3-7, on page 3-12 of the Draft EIR. The first and second floor plans for the new facility are depicted in Figures 3-8 and 3-9 on pages 3-13 and 3-14 of the Draft EIR, respectively. Conceptual building elevations are shown in Figure 3-10 on page 3-15 of the Draft EIR.

As shown in Draft EIR Figure 3-8, the first floor of the new SBRAC would include space for a community lounge, lobby, gymnasium, an indoor pool, three classrooms, City staff offices, lockers, and storage and service areas. As shown in Draft EIR Figure 3-9, the second floor would include space for a community hall, group exercise room, walking track, fitness/cardio/weights and conference room. The new SBRAC would allow the City to provide approximately 109 hours of weekly recreational programming, 95 hours of weekly programming within the indoor pool facility, and 95 hours of weekly programming within the outdoor pool facility (seasonally).

2.1.2 Channelized Creek Relocation

The proposed project evaluated in the Draft EIR included reconfiguration of a portion of the existing channelized El Zanjon Creek, located within the project site. As shown in Figure 3-11 on page 3-16 of the Draft EIR, relocation would begin just north of the existing pedestrian bridge located directly adjacent to the existing Veterans Memorial building, and would generally be shifted south until it reaches the intersection of City Park Way and Crystal Springs Road. The proposed project, as evaluated in the Draft EIR, explained that the reconfigured creek would be re-channelized with concrete, similar to existing conditions.

2.1.3 Utilities and Infrastructure

As described on page 3-10 of the Draft EIR, the proposed storm drainage infrastructure would drain towards the concrete-lined drainage channel (El Zanjon Creek) within the site in a new 8- to 12-inch storm drain. From there, stormwater would drain from the drainage channel to the east, discharging into an existing underground storm drain box culvert at the eastern edge of the project site. As shown in Figure 3-12 on page 3-17 of the Draft EIR, five stormwater treatment areas are proposed on the project site. One of the stormwater treatment areas would be located south of the proposed SBRAC building, one would be located east of the parking lot, and three would be located north of the realigned El Zanjon Creek. The stormwater treatment areas would be vegetated with a layer of bioretention soil and a layer of permeable rock. Overflow would be discharged from the stormwater treatment areas to the onsite storm drain system which would connect to outfalls in the realigned, concrete lined El Zanjon Creek channel.

2.2 PROJECT REVISIONS

Revisions to the proposed project as described and evaluated in the Draft EIR are discussed below and are herein incorporated into the proposed project as part of the Final EIR.

2.2.1 Recreation and Aquatic Center

With implementation of the Revised Project, the proposed SBRAC building would total approximately 49,360 square feet in size, for an increase of 2,360 square feet (5 percent) compared to the project evaluated in the Draft EIR and 19,230 square feet compared to existing conditions. The increase in total gross building square footage is attributed to refinements in the second floor design including the expansion of the proposed fitness center by approximately 1,020 square feet and the inclusion of additional flex space. No increase in the proposed programming or use of the facility is anticipated beyond what was considered in the Draft EIR. RTC Figures 2-1 through 2-5 reflect the development program for the SBRAC facility as proposed by the Revised Project, including the Conceptual Site Plan (Draft EIR Figure 3-6); Conceptual SBRAC Facility Plan (Draft EIR Figure 3-7); Conceptual First Floor Plan (Draft EIR Figure 3-8); Conceptual Second Floor Plan (Draft EIR Figure 3-9); and Conceptual Building Elevations (Draft EIR Figure 3-10).

2.2.2 Channelized Creek Relocation

With implementation of the Revised Project, the portion of the reconfigured El Zanjon Creek located within the project site would be returned to a more natural state rather than re-channelized with a concrete base. This “naturalization” would include development of an earthen channel consisting of riparian plantings and approximately 18 inches of flow depth with 6 inches of freeboard for a total channel depth of 24 inches. Figure 3-11 in the Draft EIR reflects the creek realignment for the Revised Project and does not require revisions.

2.2.3 Utilities and Infrastructure

With implementation of the Revised Project, similar to the project evaluated in the Draft EIR, the proposed storm drainage infrastructure would convey on-site stormwater runoff in a new 6- to 24-inch storm drain system, which would discharge to El Zanjon Creek via four storm drain outfalls. From there, stormwater would drain northeasterly into an existing concrete lined drainage channel before discharging to an underground storm drain box culvert at the eastern edge of the project site. Nine (rather than five, as identified in the Draft EIR) stormwater treatment areas, consisting of lined bioretention areas and pervious pavement areas, are proposed with the Revised Project. One of the stormwater treatment areas would be located southwest of the proposed SBRAC building, one would be located between the east corner of the proposed SBRAC building and the south corner of the parking lot, one would be located adjacent to the City Park Way dropoff area, and five would be located between City Park Way and the realigned El Zanjon Creek. Pervious pavement would be located at the southeastern row of parking stalls within the proposed parking lot to the north of the SBRAC building. The stormwater treatment areas would be vegetated and allow for up to 12 inches of ponding with a layer of bioretention soil and a layer of permeable rock and subdrain. Overflow would be discharged from the stormwater treatment areas to the onsite storm drain system which would connect to outfalls in the realigned, earthen El Zanjon Creek channel.

RTC Figure 2-6 reflects the storm drainage infrastructure improvements as proposed by the Revised Project. This figure replaces Figure 3-12 in the Draft EIR.

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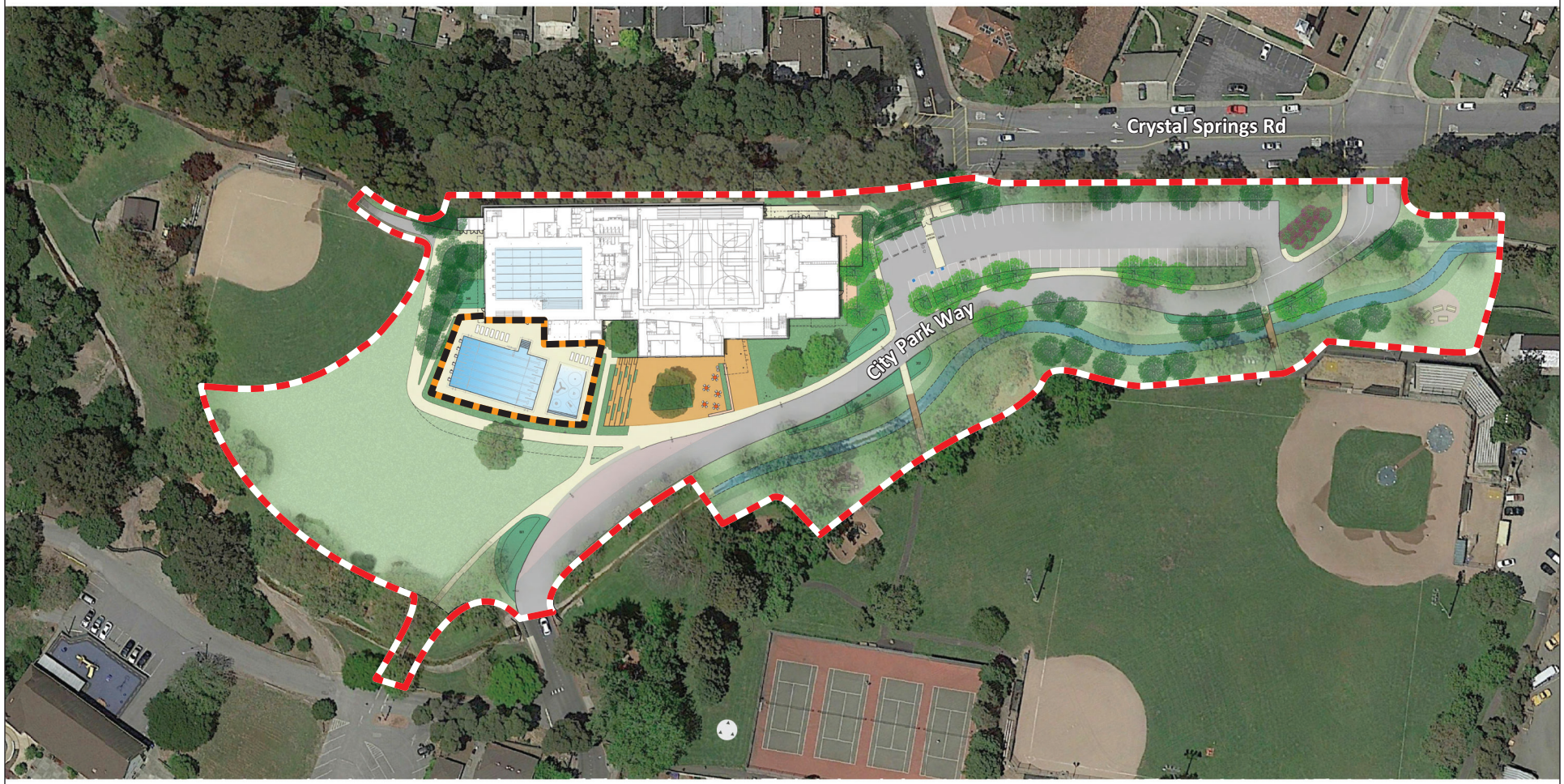

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RTC FIGURE 2-1

0 50 100
FEET

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Project Site Boundary

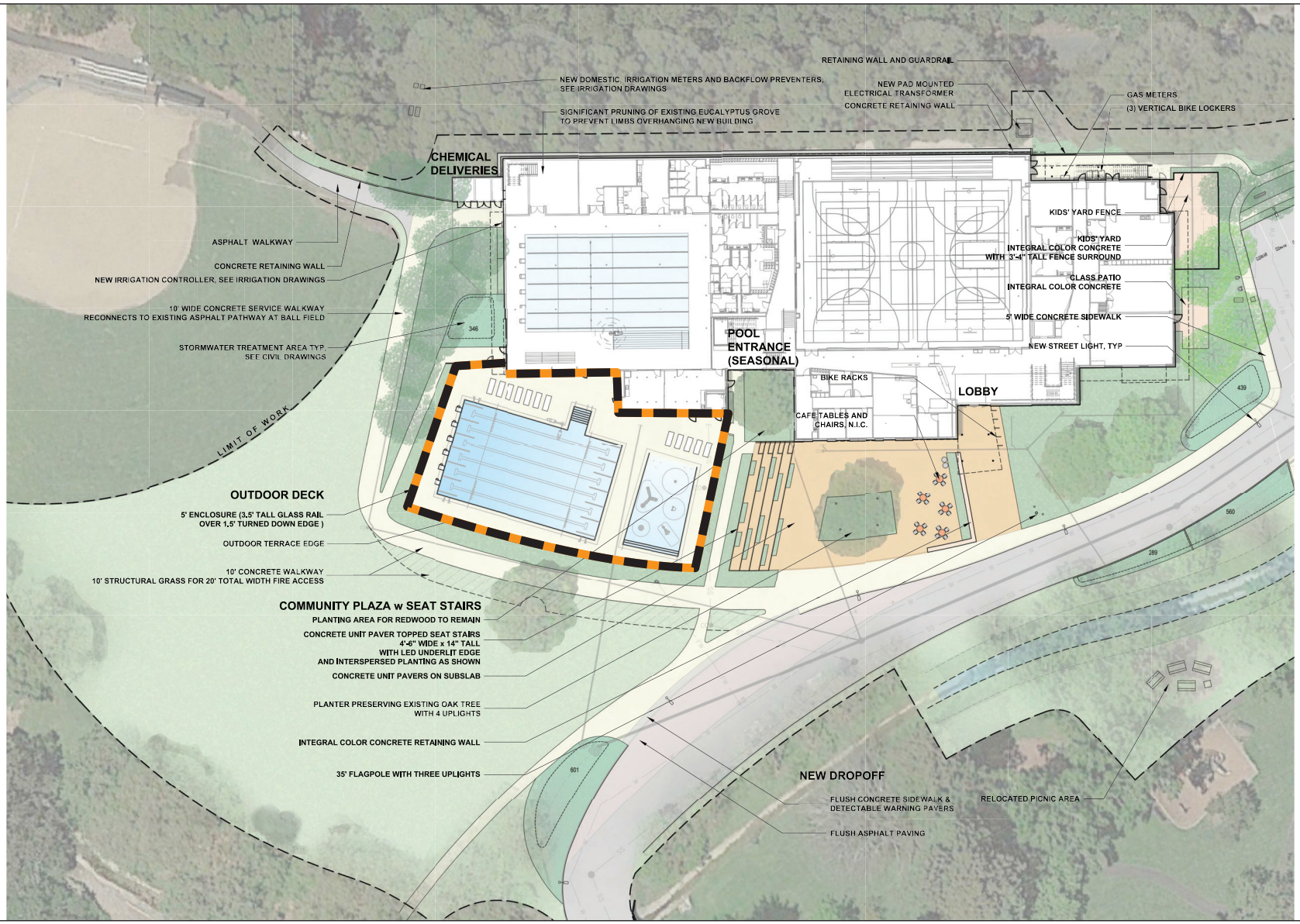
Phase 2

San Bruno Recreation and Aquatic Center Project
Response to Comments Document

Revised Conceptual Site Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\RTC Figure 2-1.ai (4/21/2020)



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RTC FIGURE 2-2

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FEET

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Phase 2

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Revised Conceptual SBRAC Facility Plan

SOURCE: CITY OF SAN BRUNO, 2020.

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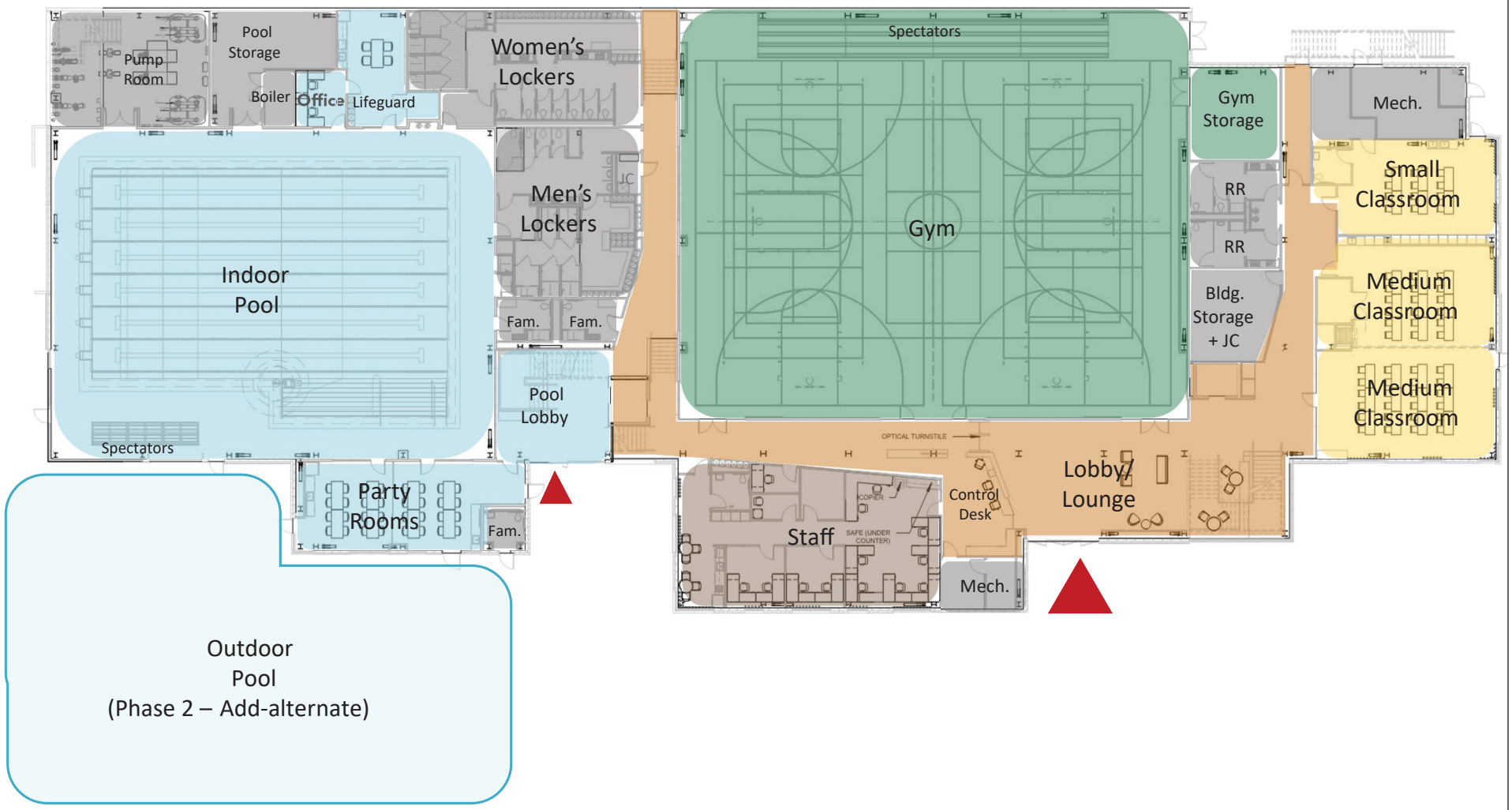

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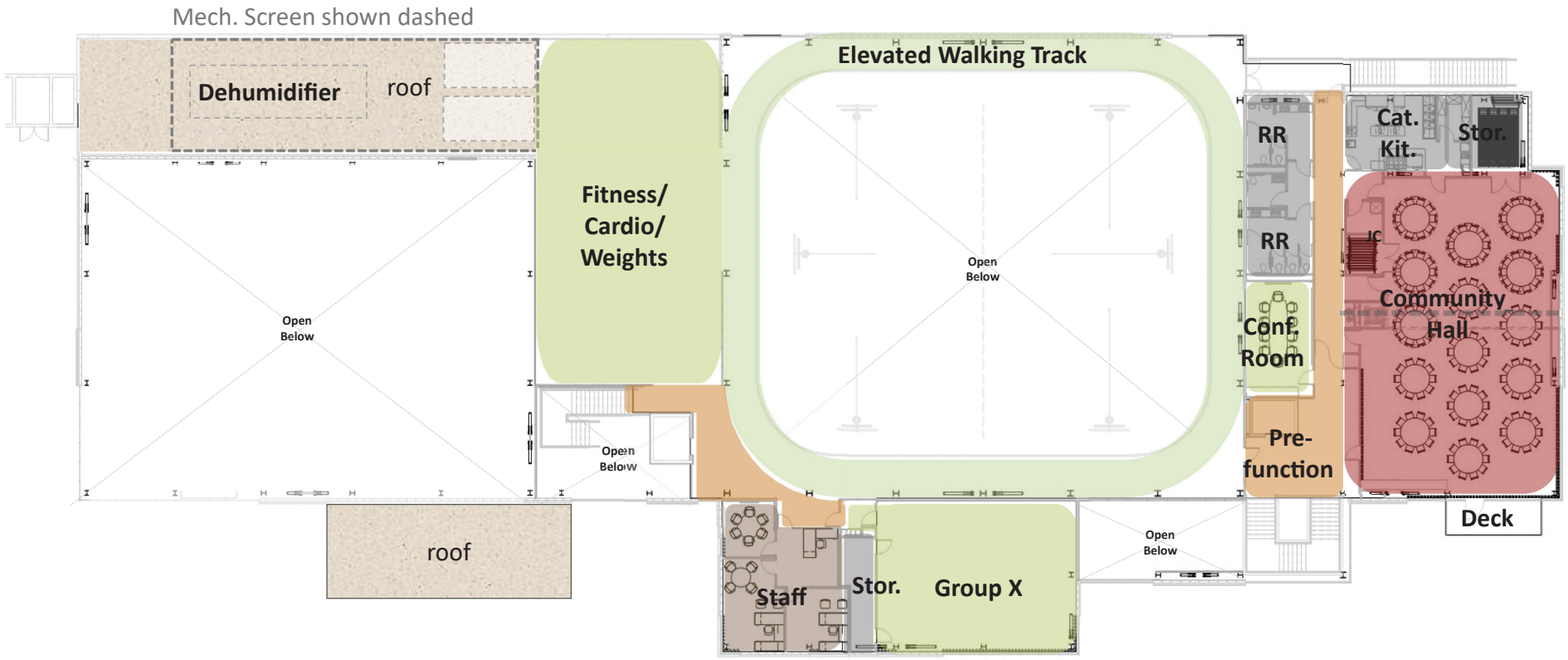
RTC FIGURE 2-3

NOT TO SCALE

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Revised Conceptual First Floor Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\RTC Figure 2-3.ai (4/21/2020)



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RTC FIGURE 2-4

NOT TO SCALE

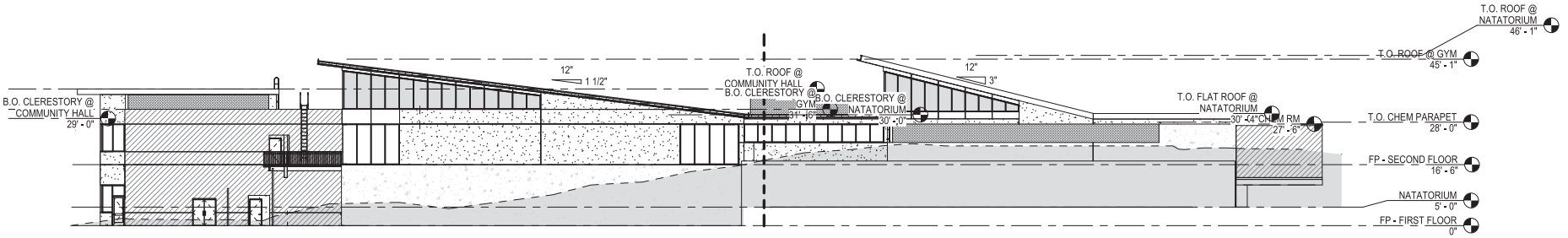
San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Revised Conceptual Second Floor Plan

SOURCE: CITY OF SAN BRUNO, 2020.

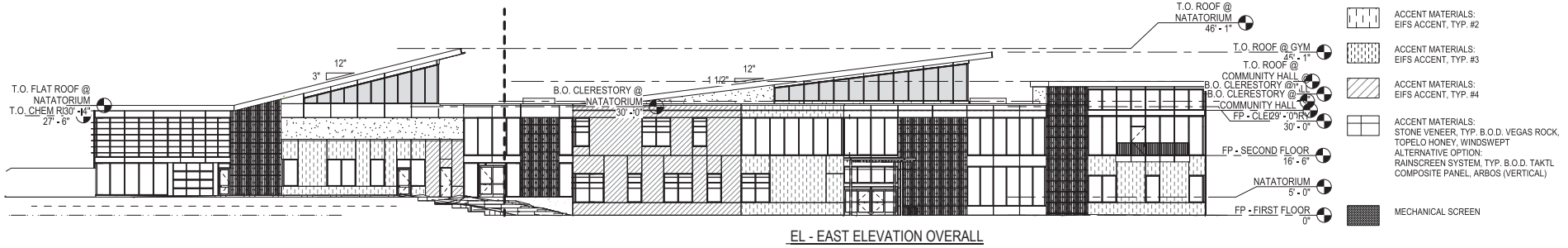
P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\RTC Figure 2-4.ai (4/21/2020)

EL - SOUTH ELEVATION OVERALL

EL - NORTH ELEVATION OVERALL



EL - WEST ELEVATION OVERALL



EL - EAST ELEVATION OVERALL

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RTC FIGURE 2-5

NOT TO SCALE

San Bruno Recreation and Aquatic Center Project
Response to Comments Document

Revised Conceptual Building Elevations

SOURCE: CITY OF SAN BRUNO, 2020.

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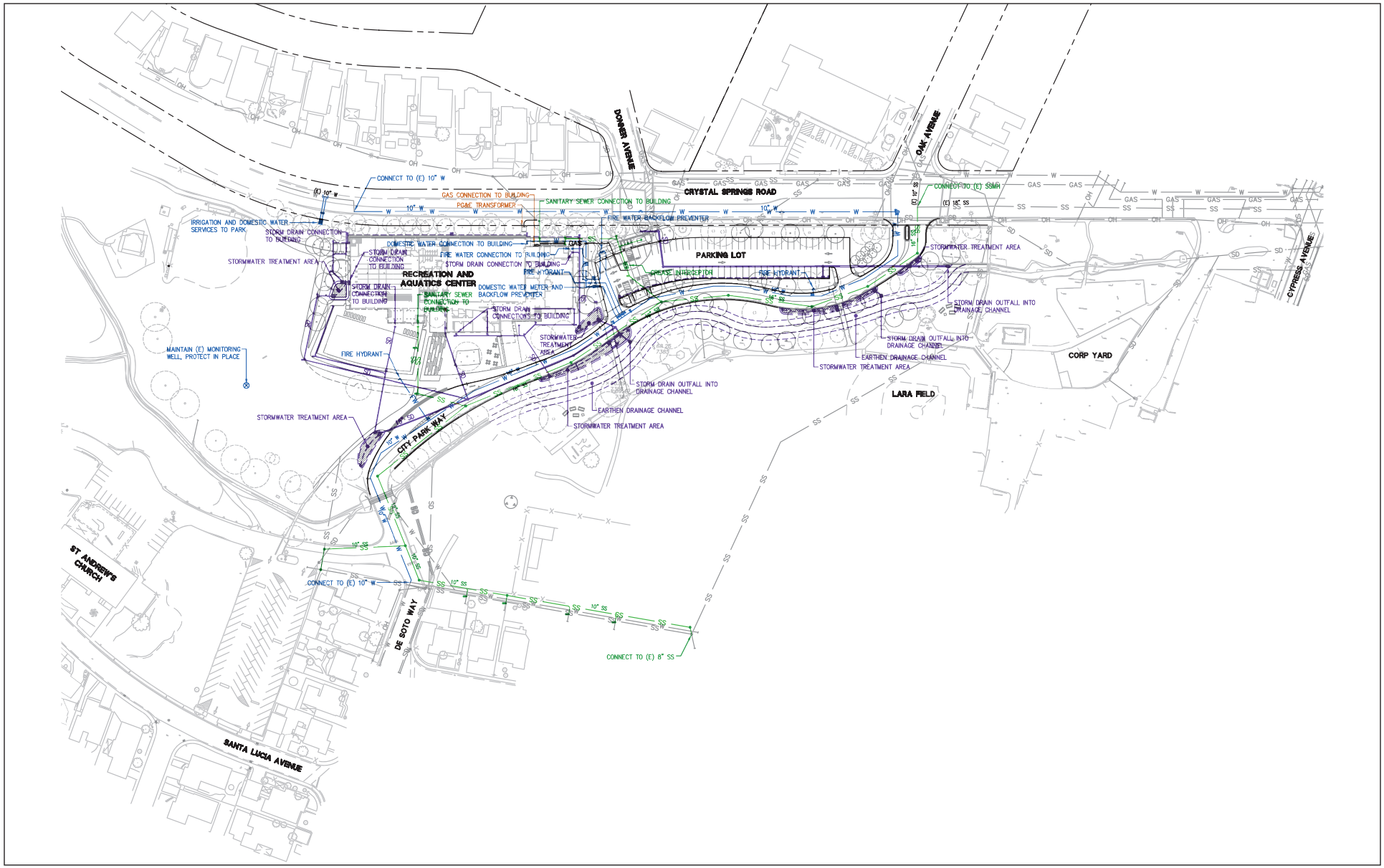

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RTC FIGURE 2-6

0 60 120
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San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Revised Utility Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\RTC Figure 2-6.ai (4/21/2020)

2.3 ENVIRONMENTAL EFFECTS OF THE REVISED PROJECT

The project revisions described above are relatively minor in nature, would not substantially increase the use or programming of the proposed SBRAC facility beyond what was considered and evaluated in the Draft EIR, would not increase the overall footprint of the proposed building or other improvements, and would improve overall conditions of the portion of the creek channel located within the project site. Therefore, as further explained below, the Revised Project does not add significant new information to the Draft EIR or substantially alter the analysis or conclusions in the Draft EIR.

A brief summary of how these revisions relate to the individual topics addressed in the Draft EIR is provided below. Due to the minor nature of the revisions, the topics that were evaluated in the Initial Study (included as Appendix B of the Draft EIR), but scoped out of the Draft EIR's main text, are not discussed below, and none of the "no impact" or "less-than-significant impact" conclusions previously identified for these topics would change.

Refer to Chapter 5.0 for specific text changes to the Draft EIR that result from revisions to the project.

2.3.1 Biological Resources

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to biological resources, which is discussed in Section 4.1, Biological Resources, of the Draft EIR. The proposed building and pavement footprints would remain the same and no additional trees or other sensitive habitats or vegetation would be removed or disturbed. In addition, proposed changes associated with restoration of the realigned creek channel to a more natural state would represent an improvement compared to existing conditions and the proposed project conditions evaluated in the Draft EIR. Restoration of the creek with an earthen base would improve the riparian corridor and habitat value in this area of the park. Modifications to the size and location of proposed stormwater drainage infrastructure and bioretention areas would not affect biological resources as these improvements would not be located in sensitive areas or require additional vegetation or tree removal.

Similar to the proposed project, the Revised Project could result in impacts to special-status species, federally protected water resources, riparian habitat, and nesting and native birds, although these impacts would not be more severe than those identified in the Draft EIR. Therefore, implementation of Draft EIR Mitigation Measures BIO-1a, BIO-1b, BIO-2a, BIO-2b, BIO-3a, BIO-3b, BIO-3c (as modified and shown in Chapter 5.0 of this RTC Document), and BIO-4 would be required for development of the Revised Project to ensure that all impacts to biological resources would be reduced to a less-than-significant level.

2.3.2 Cultural Resources

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to cultural resources, which is discussed in Section 4.2, Cultural Resources, of the Draft EIR. The proposed construction area and building and pavement footprints would remain the same and no additional areas outside of the development footprints analyzed in the Draft EIR would be subject to excavation activities or other substantial ground disturbance. Disturbance in and around the creek alignment would be the same as identified and analyzed in the Draft EIR. Based on the archaeological field survey conducted as part of the Draft EIR analysis (refer to Draft EIR page 4.2-2), modifications to the size and location of proposed stormwater drainage infrastructure and bioretention areas would not affect cultural resources as these improvements would not be located in archaeologically sensitive areas.

Similar to the proposed project, the Revised Project would result in impacts to historic architectural and archaeological resources, although these impacts would not be more severe than those identified in the Draft EIR. Implementation of Draft EIR Mitigation Measure CUL-1 would be required for development of the Revised Project to reduce impacts related to demolition of the existing Veterans Memorial building, although this impact would remain significant and unavoidable. Implementation of Draft EIR Mitigation Measure CUL-2 would also be required for development of the Revised Project to ensure that impacts to archaeological resources would be reduced to a less-than-significant level.

2.3.3 Transportation and Circulation

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to transportation and circulation, which is discussed in Section 4.3, Transportation and Circulation, of the Draft EIR. To support this conclusion, a supplemental Traffic Analysis[1] was prepared and is included as Appendix A to this RTC Document. As discussed in the supplemental transportation analysis, the increased building square footage would generate a total of 68 additional daily vehicle trips, with 4 additional trips (3 inbound and 1 outbound) occurring during the AM peak hour and 5 additional trips (2 inbound and 3 outbound) occurring during the PM peak hour.

These additional trips would contribute to the significant operational impact identified for the proposed project at the Crystal Springs Road and Oak Avenue/City Park Way intersection (Intersection #3) during Existing Plus Project and Cumulative Plus Project conditions in the Draft EIR analysis; however, the level of service at this intersection would remain substantially the same with the minor number of additional trips associated with the Revised Project and this impact would not be more severe than identified in the Draft EIR. Similar to the proposed project, Draft EIR Mitigation Measure TRA-1 would be required to reduce this impact to a less-than-significant level. Additionally, although the average peak hour delay at each of the six other study intersections evaluated in the Draft EIR would slightly increase with the additional project trips, the level of service at these

[1] Hexagon Transportation Consultants, Inc., 2020. *Additional Traffic Analysis for the Proposed San Bruno Community Center in San Bruno, California*. April 7.

intersections would remain unchanged and, similar to the proposed project, impacts at these intersections would be less than significant with development of the Revised Project.

All other aspects of the proposed project related to transportation and circulation would remain unchanged with the increase in square footage associated with the Revised Project and the proposed modifications to the creek and storm drainage infrastructure improvements identified for the Revised Project would not affect on- or off-site circulation patterns. Similar to the proposed project, the Revised Project would generate new pedestrian trips, although these impacts would not be more severe than those identified in the Draft EIR and Draft EIR Mitigation Measure TRA-2 would be required to reduce impacts related to pedestrian circulation to a less-than-significant level.

Finally, the supplemental Traffic Analysis included an evaluation of vehicle miles traveled (VMT), which was not required at the time that the Draft EIR was prepared. The analysis concluded that, compared to existing conditions, VMT associated with the proposed project would likely be reduced given that San Bruno residents would have better access to recreational programming within their community and would pay lower membership fees and facility rates as compared to non-residents. Refer to Response C-2 in Chapter 4.0 and Appendix A of this RTC Document for further discussion.

2.3.4 Air Quality

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to air quality, which is discussed in Section 4.4, Air Quality, of the Draft EIR. Although construction activities, and therefore construction period air quality emissions, would slightly increase due to the larger building size and resulting increase in construction equipment operations that generate such emissions, these additional emissions would represent a small portion of overall project emissions.

As shown in Table 4.4.E on page 4.4-22 of the Draft EIR, construction period emissions associated with the proposed project would be well below the construction period emissions thresholds established by the Bay Area Air Quality Management District (BAAQMD). Additional emissions associated with the increased construction activities for the Revised Project would not substantially increase such that these thresholds would be exceeded. Similar to the proposed project, Draft EIR Mitigation Measure AIR-1 would be required to reduce construction-period air quality emissions to a less-than-significant level and this impact would not be more severe than the impact identified in the Draft EIR. Similarly, construction-period exposure of surrounding sensitive receptors to toxic air contaminants would slightly increase with the additional construction activities associated with the increased building size. However, as shown on Table 4.4.H on page 4.4-28 of the Draft EIR, with implementation of Mitigation Measure AIR-2, this impact would be well below the BAAQMD's established thresholds. With implementation of Draft EIR Mitigation Measure AIR-2, the Revised Project's contribution to this impact would be minimal and this impact would not be more severe than the impact identified in the Draft EIR.

As shown on Table 4.4.F on page 4.4-25 of the Draft EIR, operational emissions generated by the proposed project would also be well below the BAAQMD's daily and annual thresholds. The majority of these emissions are attributed to mobile sources which, as discussed above under Section 2.3.3, would not substantially increase with the Revised Project. Therefore, with development of the

Revised Project, operation-period emissions would continue to be well below established thresholds and this impact would not be more severe than the less-than-significant impact identified in the Draft EIR.

In addition, proposed modifications to the creek and storm drainage infrastructure improvements identified for the Revised Project would not increase the severity of construction or operation period air quality emissions as these improvements are substantially similar to those proposed by the project evaluated in the Draft EIR and also do not require the use of heavy equipment during construction or include stationary or mobile sources of emissions. All other impacts associated with air quality emissions would continue to be less than significant with the Revised Project.

2.3.5 Noise

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to noise, which is discussed in Section 4.5, Noise, of the Draft EIR. The proposed building and pavement footprints and proximity to nearby residential land uses would remain the same and any minor increase in noise levels associated with construction activities or increased use and resulting small increase in vehicle trips to and from the site would not be perceptible. Modifications to the creek and size and location of proposed stormwater drainage infrastructure and bioretention areas would not affect construction or operation period noise levels.

Similar to the proposed project, the Revised Project would result in temporary and permanent impacts related to noise, although these impacts would not be more severe than those identified in the Draft EIR. Therefore, implementation of Draft EIR Mitigation Measures NOI-1 and NOI-2 would be required for development of the Revised Project to ensure that all impacts would be reduced to a less-than-significant level.

2.3.6 Geology and Soils

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to geology and soils, which is discussed in Section 4.6, Geology and Soils of the Draft EIR. The proposed building design, footprint, and program for construction would be substantially similar to the proposed project. Modifications to the creek and size and location of proposed stormwater drainage infrastructure and bioretention areas would also not be affected by or exacerbate hazards related to geology or soils.

Similar to the proposed project, the Revised Project could expose occupants to seismic hazards related to liquefaction and construction activities could result in impacts to unknown paleonto-logical resources, although these impacts would not be more severe than those identified in the Draft EIR. Therefore, implementation of Draft EIR Mitigation Measures GEO-1 and GEO-2 would be required for development of the Revised Project to ensure that all impacts would be reduced to a less-than-significant level.

2.3.7 Hazards and Hazardous Materials

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to hazards and hazardous materials, which is discussed in Section 4.7, Hazards and Hazardous Materials, of the Draft EIR. The proposed building footprint and program for demolition and construction would be substantially similar to the proposed project. Operation of the proposed SBRAC building would also be substantially the same. Modifications to the size and location of proposed stormwater drainage infrastructure and bioretention areas would also not be affected by or exacerbate issues related to hazards.

Similar to the proposed project, the Revised Project could result in the release of hazardous materials during demolition activities and result in temporary or permanent increases in fire risks, although these impacts would not be more severe than those identified in the Draft EIR. Therefore, implementation of Draft EIR Mitigation Measures HAZ-1 and HAZ-2 would be required for development of the Revised Project to ensure that all impacts would be reduced to a less-than-significant level.

2.3.8 Hydrology and Water Quality

Proposed project revisions associated with the increase in the SBRAC building square footage would not change the conclusions of the Draft EIR analysis as it relates to hydrology and water quality, which is discussed in Section 4.8, Hydrology and Water Quality, of the Draft EIR. The proposed building and pavement footprints and program for construction would be substantially similar to the proposed project. Operation of the proposed SBRAC building would also be substantially the same.

Naturalization of the creek within the project site would likely improve the hydrological function of this waterway by slowing water flows, increasing infiltration and improving overall water quality; therefore, the Revised Project would represent an improvement compared to proposed project conditions. As discussed above under Section 2.2.3, the size and location of storm drainage infrastructure and bioretention areas would be modified with the Revised Project, as compared to the project evaluated in the Draft EIR. The total number of stormwater treatment areas would increase from five to nine; however, similar to the proposed project, the stormwater treatment areas would be designed to meet the requirements of the Municipal Regional Permit.

Similar to the proposed project, the Revised Project would alter the drainage pattern of the site which could impede or redirect flood flows and could result in the release of pollutants to surface waters during a construction-period flooding event, although these impacts would not be more severe than those identified in the Draft EIR. Therefore, implementation of Draft EIR Mitigation Measures HYD-1 and HYD-2 would be required for development of the Revised Project to ensure that all impacts would be reduced to a less-than-significant level.

2.4 CONCLUSION

In general, and as detailed above, the Revised Project does not add significant new information to the EIR and would not substantially change the construction and operational impacts and related mitigation measures identified in the Draft EIR. The Revised Project would result in a small increase in the type and duration of construction activities and would result in a small increase in operation

period vehicle trips to and from the site; however, these revisions would not affect the impact conclusions presented in the Draft EIR. Compared to the project evaluated in the Draft EIR, the Revised Project would improve conditions within El Zanjon Creek.

The Revised Project would result in minor changes to the project analyzed in the Draft EIR and would not result in new or more significant environmental impacts that were not identified in the Draft EIR. Per CEQA Guidelines Section 15088.5, recirculation of a Draft EIR prior to certification is required only when "significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification." "Significant new information" is defined as:

1. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.

2. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.

3. A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project's proponents decline to adopt it.

4. The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

The Revised Project does not trigger any of these conditions, as no significant new information as defined in CEQA Guidelines Section 15088.5, including new impacts, mitigation measures, or project alternatives, has been added to the Draft EIR after publication of the Notice of Availability. The Revised Project represents a refinement of the overall project design and is substantially similar to the project described and evaluated in the Draft EIR, and does not result in any new significant environmental impacts or any substantial increase in the severity of previously identified environmental impacts. The information and analysis contained in the Draft EIR and this RTC document is adequate for the purposes of CEQA and recirculation of the EIR is not required due to the Revised Project.

3.0 LIST OF COMMENTERS

This chapter presents a list of comment letters received during the public review period (i.e., January 27, 2020 to March 11, 2020) and describes the organization of the letters and comments that are provided in Chapter 4.0, Comments and Responses, of this document.

3.1 ORGANIZATION OF COMMENT LETTERS AND RESPONSES

Chapter 4.0 includes a reproduction of each comment letter received on the Draft EIR. The written comments are coded alphabetically for each commenter and individual comments within each letter are numbered consecutively. For instance, comment A-1 is the first numbered comment in Letter A.

3.2 LIST OF COMMENTERS ON THE DRAFT EIR

The following comment letters were submitted to the City during the public review period.

A State of California Governor's Office of Planning and Research, State Clearinghouse and Planning Unit; Scott Morgan, Director, March 12, 2020

B State of California Department of Toxic Substances Control, Site Mitigation and Restoration Program, Isabella Roman, Environmental Scientist, February 25, 2020

C State of California Department of Transportation, District 4, Local Development – Intergovernmental Review, Mark Leong, District Branch Chief, March 10, 2020

D Pat Norman, February 2, 2020

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4.0 COMMENTS AND RESPONSES

Written responses to the comment letters received on the Draft EIR during the public review and comment period from January 27, 2020, to March 11, 2020, are provided in this chapter. The letters are provided in their entirety and are immediately followed by responses keyed to the specific comments within each letter.

Please note that text within the letters that has not been numbered does not raise environmental issues or relate to the adequacy of the information or analysis within the Draft EIR and, therefore, no comment is enumerated or response required, per CEQA Guidelines Section 15132. In addition, when general support or opposition is given for the project, that comment is noted but no further analysis is provided in the response, as the commenter is not questioning the adequacy of the information or analysis within the Draft EIR.

Where comments on the Draft EIR concern issues requiring technical expertise, the responses to comments, like the initial analysis in the Draft EIR, rely on the knowledge and professional analysis of qualified experts.

Where revisions to the Draft EIR text are called for, the page is set forth followed by the appropriate revision. Added text is indicated with double underlined text, and deleted text is shown in ~~strikeout~~. Text revisions to the Draft EIR are summarized in Chapter 5.0 of this Response to Comments Document.

Letter
A

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Gavin Newsom
Governor

Kate Gordon
Director

March 12, 2020

Darcy Smith
San Bruno, City of
567 El Camino Real
San Bruno, CA 94066

Subject: City of San Bruno Recreation and Aquatic Center Project
SCH#: 2019080096

Dear Darcy Smith:

The State Clearinghouse submitted the above named EIR to selected state agencies for review. The review period closed on 3/11/2020, and the comments from the responding agency (ies) is (are) available on the CEQA database for your retrieval and use. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

1

Check the CEQA database for submitted comments for use in preparing your final environmental document: https://ceqanet.opr.ca.gov/2019080096/3 . Should you need more information or clarification of the comments, **we recommend that you contact the commenting agency directly**.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Resources Agency

COMMENTER A
Scott Morgan, Director
State of California Governor's Office of Planning and Research
State Clearinghouse and Planning Unit
March 12, 2020

Response A-1: This letter acknowledges that the City has complied with State Clearinghouse review requirements for draft CEQA documents, and indicates that the Draft EIR was distributed to State agencies for review. The one State agency letter received by the State Clearinghouse is included and responded to in this RTC Document as Letter C.

Letter
B

From: Roman, Isabella@DTSC <Isabella.Roman@dtsc.ca.gov>
Sent: Tuesday, February 25, 2020 10:10 AM
To: Darcy Smith <dsmith@sanbruno.ca.gov>
Subject: San Bruno Recreation and Aquatic Center Project DEIR Comment

Hello,

I represent a responsible agency reviewing the Draft Environmental Impact Report for the San Bruno Recreation and Aquatic Center Project. 1

The text doesn't provide a discussion of past land uses. Past land uses could have resulted in hazardous materials releases within the project area that should be investigated prior to the proposed development project for public health protection. Past land uses could indicate the need for conducting a Phase 1 Environmental Site Assessment (ESA), Phase 2 ESA or other environmental sampling activities. Additionally, the text describes fill, of unknown quality, discovered during geotechnical work. I would recommend conducting a Phase 1 ESA or Phase 2 ESA prior to construction work in order to properly characterize the fill and soil. 2

The text (page 206) describes the possibility for contaminated soil to be encountered during construction activities, but says this is not a concern due to the Stormwater Pollution Prevention Plan that is required to be prepared. While the SWPPP is instrumental in preventing the spread of contamination via certain pathways, the SWPPP would have minimal impact on preventing construction worker exposure to potentially contaminated soil. This also wouldn't prevent the soil disturbed during construction activities from reaching nearby receptors, including two schools, from being exposed via air transport. Depending on results of environmental sampling and/or investigations into past land uses (as pointed out in the previous paragraph), this could further indicate the need for dust control and air monitoring, a soil management plan and a health and safety plan to prevent and minimize exposure to the surrounding community and construction workers. 3

The extent of soil disturbance is also not described in the text. This is also an important factor when determining the need for dust control, air monitoring, soil management, soil characterization activities etc. Please add information describing the anticipated extent of soil disturbance. Please also describe whether any soil import or disposal activities are anticipated. 4

Letter
B
cont.

The first sentence of Section 4.7.1.1 on page 200 describes, "The closest potential sources of hazardous materials within the vicinity of the site include gasoline stations and automobile repair facilities located approximately 0.4 miles east…" These gas stations are the closest known sources of hazardous materials that could have an impact on the project site. It is important to note that there is a potential for the project site to itself be contaminated, unless proven otherwise. 5

Please feel free to reach out if you have any questions or concerns.

Sincerely,

Isabella Roman

Environmental Scientist

Site Mitigation and Restoration Program

Department of Toxic Substances Control

700 Heinz Avenue Suite 200

Berkeley, CA 94710

(510)-540-3879

COMMENTER B
Isabella Roman, Environmental Scientist
State of California Department of Toxic Substances Control
Site Mitigation and Restoration Program
February 25, 2020

Response B-1: This comment, which notes that the commenter represents a responsible agency, is noted.

Response B-2: This comment states that past land uses at the project site should be discussed, and that past land uses could indicate the need for conducting a Phase I Environmental Site Assessment (ESA), Phase II ESA, or other environmental sampling activities prior to construction of the proposed project. This comment also states that fill of unknown quality was discovered during geotechnical work at the project site. To address this comment, page 4.7-1 of the Draft EIR beginning after the heading for Section 4.7.1.1, Potential Sources of Hazardous Materials At and Near the Project Site, is revised as follows:

> Until at least 1939, the project site was undeveloped land in a sparsely developed area. In a 1949 topographic map, the project site was depicted as City Park, with no buildings and an intermittent creek crossing from east to west. The existing two-story Veteran Memorial Building at the project site was built in two stages between 1946 and 1958. The detached pool facility consisting of an L-shaped in-ground pool and single-story changing room building were constructed circa 1959. Various repairs, remodeling, and fencing improvements were performed at the Community Center and pool between 1981 and 2013.[1] Based on these past land uses, it is unlikely that hazardous materials releases have occurred at the project site.
>
> [1] LSA, 2019. Historical Resource Evaluation of the War Memorial Community Center and San Bruno Park Pool Facility, San Bruno, San Mateo County, California, April 4.

The Preliminary Geotechnical Investigation[1] prepared for the project identified that artificial fill was depicted on a regional map along the northern boundary of the project site; however, the Preliminary Geotechnical Investigation did not actually identify fill material in any of the geotechnical borings, including borings located near the northern boundary of the project site where fill material was indicated on the regional map.

[1] ROMIG Engineers, Inc., 2019. *Preliminary Geotechnical Investigation, San Bruno Recreation & Aquatic Center, 251 City Park Way, San Bruno, California 94066*. May 9.

Therefore, the following statement was erroneously included and is deleted from pages 4.7-1 through 4.7-2 of the Draft EIR:

> ~~Fill material was encountered beneath the project site during geotechnical investigation activities. There is no documentation available regarding the source and quality of this fill material. It is common for fill material historically placed along the margins of San Francisco Bay to include construction debris and rubble in the fill. It is possible that these fill materials could be impacted with hazardous materials.~~

Response B-3: This comment states that a Stormwater Pollution Prevention Plan (SWPPP) would not prevent potential exposure of construction workers or nearby sensitive receptors to potentially contaminated soils and dust, and that depending on the past land uses of the project site and results of environmental sampling, there may be a need for dust control and air monitoring, a soil management plan, and a health and safety plan to minimize and prevent exposure of construction workers and the surrounding public. As discussed in Response B-2 above, it is unlikely that hazardous materials releases have occurred at the project site based on the past land uses of the project site, and potentially contaminated fill material has not been identified within the project site. As identified in Mitigation Measure AIR-1 on pages 4.4-22 through 4.4-23 of the Draft EIR, dust control measures would be required during construction activities in accordance with existing Bay Area Air Quality Management District (BAAQMD) regulations. Therefore, exposure of construction workers and the surrounding public to potentially contaminated soil and dust is not likely to occur.

Response B-4: It is currently anticipated that approximately 8,400 cubic yards of soils would be excavated across the site, and a total of approximately 5,250 cubic yards would be off-hauled. These specific calculations were not yet available at the time that the Draft EIR was prepared; therefore, page 3-19 of the Draft EIR is revised as follows:

> The preliminary demolition plan is shown in Figure 3-13. The existing Veterans Memorial building and pool would be demolished and the new SBRAC facility would be constructed generally in the same location. The proposed project would also include the removal of the existing retaining wall and excavation into/at the toe of the hillside west of the existing Veterans Memorial building to accommodate the foundation of the proposed SBRAC; the specific location and extent of work would be identified as part of the final design phase. <u>It is currently anticipated that approximately 8,400 cubic yards of soils would be excavated across the site, and a total of approximately 5,250 cubic yards would be off-hauled.</u> Approximately 64 trees (including 52 protected heritage trees and 12 non-protected trees) are

expected to be removed from the project site, and 52 trees would be replanted as a part of the proposed project.

As discussed above in Response B-3, contaminated soils associated with past and current land uses are unlikely to be encountered at the site and import of soils/fill materials would not be required. Therefore, impacts associated with construction-worker exposure to or accidental release of hazardous materials during the site preparation and excavation phases of the project are not anticipated.

Analysis of construction-period fugitive dust emissions utilized model default assumptions based on the total site preparation area because the specific amount of soil excavation for the proposed project was not available at the time that the Draft EIR was prepared (see Draft EIR pages 4.4-21 through 4.4-23 in Section 4.4, Air Quality and pages 6 through 8 of Appendix H; also refer to Section 4.8, Greenhouse Gas Emissions, page 4-15 of the Initial Study). As shown in Table 4.4.E on page 4.4-22 of the Draft EIR, average daily fugitive dust emissions would be low and would be mitigated to a less-than-significant level with implementation of Mitigation Measure AIR-1. Although excavation of up to 8,400 cubic yards of soils across the site would represent an increase in the average daily fugitive dust emissions compared to the default model results identified in Draft EIR Table 4.4.E, this increase would not be substantial and this impact would continue to be less than significant.

Truck trips associated with the off-haul of excavated soils were not specifically identified in the construction-period transportation, air quality, greenhouse gas emissions, and noise analyses; the number of truck trips associated with the off-haul of approximately 5,250 cubic yards of soils would equate to approximately 265 truck trips. As shown in Table 4.4.E, construction exhaust emissions would be well below the emissions thresholds of the BAAQMD. Addition of these trucks trips would not increase emissions such that the established thresholds would be exceeded; therefore, the addition of these truck trips would not substantially change the analysis or conclusions of the Draft EIR analysis for the topic of air quality. For the topic of greenhouse gas emissions (which was discussed in Section 4.8 of the Initial Study), with the addition of the off-haul trucks trips, project construction impacts associated with greenhouse gas emissions would remain less than significant as the BAAQMD does not have an adopted threshold of significance for construction-related greenhouse gas emissions.

For the topic of noise, as discussed on pages 4.5-14 through 4.5-15 of the Draft EIR, adjacent Crystal Springs Road carries approximately 9,390 average daily vehicle trips. The following equation was used to determine potential impacts associated with the additional haul trucks:

Change in $L_{dn} = 10 \log_{10} [V_{e+ht}/V_{existing}]$
where: $V_{existing}$ = the existing daily volume
V_{e+ht} = existing daily volumes plus haul trucks
Change in L_{dn} = the increase in noise level due to haul trucks

The results of the calculations show that an increase of approximately 0.2 dBA Ldn would be expected. As a noise level increase of less than 1 dBA would not be perceptible to the human ear, short-term construction-related noise impacts associated with the proposed project would continue to be less than significant.

Finally, given the existing traffic volumes on Crystal Springs Road, the additional truck trips associated with soil off-haul during the temporary construction period would not substantially increase traffic volumes on area roadways, particularly as daily trips would be spread out over the site preparation phase. Therefore, the addition of truck trips would not result in transportation or circulation-related impacts.

The above additional analysis does not add significant new information to the EIR and would not substantially change the conclusions or analysis contained in the Draft EIR. Construction-period transportation, air quality, greenhouse gas emissions, and noise impacts associated with the proposed project would not substantially increase or be more severe than identified in the Draft EIR and would continue to be less than significant.

Response B-5: This comment states that there is the potential for the project site itself to be contaminated, unless proven otherwise. As discussed in Response B-2 above, there is no evidence of soil contamination, and it is unlikely that hazardous materials releases have occurred at the project site based on the past land uses of the project site, and potentially contaminated fill material has not been identified within the project site. Therefore, it is unlikely that the project site itself is contaminated.

Letter
C

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-5528
TTY 711
www.dot.ca.gov

Making Conservation a California Way of Life.

March 10, 2020

SCH #2019080096
GTS # 04-SM-2019-00306
GTS ID: 16687
SM/82/17.81

Darcy Smith, Director
Community and Economic Development
567 El Camino Real
San Bruno, CA 94066

San Bruno Recreation and Aquatic Center

Dear Darcy Smith:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the San Bruno Recreation and Aquatic Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the January 2020 Draft Environmental Impact Report (DEIR).

Project Understanding

The project would include the following components: 1) demolition of the existing Veterans Memorial City Recreation Center building and Pool; 2) construction of a new City of San Bruno Recreation and Aquatics Center (SBRAC); and 3) the reconfiguration of the existing channelized creek within a portion of the park. The new SBRAC would be constructed in the same location as the existing Veterans Memorial building, though with a larger footprint. The two existing parking lots within the park would be reconfigured, providing a total of 166 new parking spaces. Regional access is provided via Interstate (I)-280 and State Route (SR)-82 and is less than ½ mile from either route.

1

Travel Demand Analysis

While Caltrans strongly recommends the Lead Agency provide a vehicle miles traveled (VMT) analysis of transportation impacts, please be advised that use of the VMT metric after July 1, 2020 is required by CEQA for land use projects per California Code of Regulations, Title 14, Division 6, Chapter 3, Section 15064.3(c).

2

With the enactment of Senate Bill (SB) 743, Caltrans is focusing on transportation infrastructure that supports smart growth and efficient development to ensure alignment with State policies using efficient development patterns, innovative travel demand reduction strategies, multimodal improvements, and VMT as the primary transportation impact metric. A travel demand analysis should include:

- A VMT analysis pursuant to the City's guidelines or, if the City has no guidelines, the Office of Planning and Research's Guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential safety issues for all road users should be identified and fully mitigated.

- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

- Clarification of the intensity of events/receptions to be held at the location and how the associated travel demand and VMT will be mitigated.

2 cont.

With respect to the local and regional roadway system, provide project related trip generation, distribution, and assignment estimates. To ensure that queue formation does not create traffic conflicts, the project-generated trips should be added to the existing, future and cumulative scenario traffic volumes for the intersections and freeway ramps listed below. Potential queuing issues should be evaluated including on-ramp storage capacity and analysis of freeway segments near the project; turning movements should also be evaluated. In conducting these evaluations, it is necessary to use demand volumes rather than output volumes or constrained flow volume.

- Intersections and Ramps:

3

- El Camino Real and Crystal Springs Ave: Provide a completed 95%th queuing analysis for this intersection, including queue length and storage capacity.
- El Camino Real and Santa Lucia Ave: Because vehicular access to the project site would also be provided via Santa Lucia Ave, this intersection should be analyzed using 95%th queuing analysis, including queue length and storage capacity.

3 cont.

Multimodal Planning

The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained.

4

Vehicle Trip Reduction

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4c: Suburban Communities (Dedicated Use Areas)** where location efficiency factors, such as community design, are often weak and regional accessibility varies. Given the place, type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below can promote smart mobility and reduce regional VMT.

- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Secured bicycle storage facilities;
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

5

Transportation Demand Management programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of transportation, reduce regional VMT, and lessen future transportation impacts on State facilities.

Letter
C
cont.

For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

5 cont.

Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

6

Lead Agency

As the Lead Agency, the City of San Bruno is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

7

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at 510-286-5614 or laurel.sears@dot.ca.gov.

Sincerely,

Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

c: State Clearinghouse

Darcy Smith, Director
Community and Economic Development
567 El Camino Real
San Bruno, CA 94066

COMMENTER C
Mark Leong, District Branch Chief
State of California Department of Transportation
District 4, Local Development – Intergovernmental Review
March 10, 2020

Response C-1: This introductory comment, which includes a summary of the commenter's understanding of the proposed project, is noted. However, it should be clarified that there would be 162 parking spaces provided by the proposed project, not all of which would be new spaces. As stated on page 3-10 of the Draft EIR, the existing 73-space lot within the project site would be reconfigured to provide 71 spaces, for a net loss of two spaces.

Response C-2: This comment requests a vehicle miles traveled (VMT) analysis for the proposed project yet acknowledges that CEQA Guidelines Section 15064.3(c) does not require use of a VMT metric until July 1, 2020. The comment also requests an analysis of pedestrian, bicycle, and transit access to the site and mitigation measures for any safety issues that are identified. The transportation study prepared for the proposed project (included as Appendix G and summarized in Section 4.3, Transportation and Circulation of the Draft EIR) includes an analysis of pedestrian, bicycle, and transit access to the site. No issues or recommendations were identified with regard to bicycle and transit access. With regard to pedestrian access, the study recommends better signage, a sidewalk extension, and better maintenance of on-site paths (refer to Mitigation Measures TRA-1 and TRA-2 on pages 4.3-24 and 4.3-28, respectively of the Draft EIR). The transportation study does not include an analysis of VMT since such analysis is not required until July 2020. Nevertheless, the City's transportation consultant, Hexagon Transportation Consultants, believes that the project would result in a reduction to VMT. There is an existing recreation center with pool on the site. However, these facilities are nearing the end of their useful lives. The proposed project would provide modern facilities that serve the same purpose as the existing facilities. In the process, the facilities would be enlarged by approximately 19,230 square feet (refer to Chapter 2.0, Revised Project of this RTC Document for a discussion of the proposed and revised project building square footage) to serve more people. The facility is designed to serve the residents of San Bruno. It can be presumed that these same residents are accessing recreational facilities outside the City because of limitations in the size and programming of the existing facilities on site. Bringing those same activities to within the City boundaries would reduce the recreational trip lengths of San Bruno residents, thus reducing VMT. In addition, San Bruno residents would pay lower membership fees and facility rates as compared to non-residents, further incentivizing localized use of the facility. Appendix A of this RTC Document includes supplemental analysis related to VMT.

Response C-3: This comment requests queuing analysis be completed at the intersections of El Camino Real and Crystal Springs [Road] and El Camino Real and Santa Lucia Avenue. The transportation study includes a level of service analysis at the intersection of El Camino Real and Crystal Springs Road, identified as Intersection #5 in the Draft EIR. The proposed project is estimated to add only two vehicles to any movement at this intersection during the peak hours, which would have an imperceptible impact on queueing.

The transportation study does not include an analysis of the intersection of El Camino Real and Santa Lucia Avenue. Although vehicles could use Santa Lucia Avenue to travel to the project site, the traffic study did not assign any vehicles to travel this route. If the vehicles that were assigned to the intersection of El Camino Real and Crystal Springs Road were instead assigned to El Camino Real and Santa Lucia Avenue, the project would add only two vehicles to any movement during the peak hours, which would be an imperceptible increase.

Response C-4: This comment requests an analysis of pedestrians, bicyclists, and transit users. The transportation study includes such analyses. Please see Response C-2.

Response C-5: The comment requests that a transportation demand management (TDM) plan be implemented for the project, and the comment suggests some elements that should be included in the plan. The project site is well-located to serve the community of San Bruno. Trips for patrons of the facility are expected to be short, which makes them conducive to walking and bicycling. The site is easily and safely accessible by walking and biking. It is also expected that carpooling by patrons would occur without incentives, as many activities would cater to children or to seniors who cannot drive. Employees of the recreation center would receive the same trip reduction incentives as all City employees, which include short- and long-term secured on-site bicycle parking, as well as participation in a commuter benefits program through ClipperDirect, which allows employees to contribute pre-tax salary to transit passes. The City also participates in carpool rewards, biking education classes, and free shuttle services through Commute.org.

In addition, it should be noted that implementation of a formal TDM plan or other measures to reduce vehicle trips are not required to reduce potential impacts of the project. Transportation-related impacts would be reduced to less than significant levels with implementation of Mitigation Measure TRA-1 and impacts associated with operation period air quality and greenhouse gas emissions would be less than significant and do not require mitigation.

Response C-6: This comment requests that the project pay impact fees to fund necessary improvements to the transportation system. The recreation center is a City project; therefore, payment of impact fees is not applicable (the City would be paying fees to itself). The City would fund and construct necessary transportation improvements through its normal process.

Response C-7: This comment states that the City of San Bruno is responsible for ensuring that all project mitigation measures are funded and built. Improvements to the pedestrian network recommended in Mitigation Measures TRA-1 and TRA-2 are the responsibility of the City of San Bruno and would be paid for and implemented by the City as part of project development.

Letter
D

-----Original Message-----
From: pnorman101@yahoo.com <pnorman101@yahoo.com>
Sent: Sunday, February 2, 2020 11:09 AM
To: Darcy Smith <dsmith@sanbruno.ca.gov>
Subject: New Recreation Center

Hello,

I am curious why the recent projects that have been approved and built in San Bruno seem to have the same look and colors, and are so trendy rather than timeless ?
I recently saw the rendering of the Burlingame rec center and wow! it is much more aesthetically, timeless appeal! The landscape surrounding both rec centers are similar, but the Burlingame rendering fits the landscape. Have there been any other developers or designers for the San Bruno rec center?

As a long time resident (46 years) I was hoping with the gentrification going on around this city, San Bruno would see this as an opportunity turn this old town into a more appealing place to live, spend a little more money beautifying this city and maintaining it. It needs it!

I will continue to hope for a better San Bruno.

Pat Norman

1

COMMENTER D
Pat Norman
February 2, 2020

Response D-1: This comment, which addresses the merits of the proposed project and not the adequacy of the information or analysis contained in the Draft EIR, is noted. This comment will be considered by City decision-makers prior to making a determination regarding project approval.

5.0 DRAFT EIR TEXT REVISIONS

This chapter presents specific changes to the text of the Draft EIR that are being made to clarify any errors, omissions, or misinterpretation of materials in the Draft EIR in response to comments received during the public review period. Where revisions to the main text are called for, the page and paragraph are set forth, followed by the appropriate revision. Added text is indicated with double underlined text, and deleted text is shown in ~~strikeout~~. Page numbers correspond to the page numbers of the Draft EIR.

The revisions to the Draft EIR derive from two sources: 1) revisions made in response to comments raised in one or more of the comment letters received by the City on the Draft EIR; and 2) staff-initiated changes that reflect changes to the proposed project as identified in Chapter 2.0 of this RTC Document. In no case do these revisions amount to significant new information because, as demonstrated above in Chapter 2.0, the Revised Project would not result in a greater number of impacts or impacts of a greater severity than those set forth in the Draft EIR.

5.1 COMMENT LETTER TEXT REVISIONS

These revisions derive from comments raised in one or more of the comment letters received on the Draft EIR as shown in Chapter 4.0, Comments and Responses.

5.1.1 Draft EIR Chapter 4.0, Section 4.1, Hazards and Hazardous Materials

Page 4.7-1, at the beginning of Section 4.7.1.1, Potential Sources of Hazardous Materials at an Near the Project Site of the Draft EIR is revised to add text as follows:

> Until at least 1939, the project site was undeveloped land in a sparsely developed area. In a 1949 topographic map, the project site was depicted as City Park, with no buildings and an intermittent creek crossing from east to west. The existing two-story Veteran Memorial Building at the project site was built in two stages between 1946 and 1958. The detached pool facility consisting of an L-shaped in-ground pool and single-story changing room building were constructed circa 1959. Various repairs, remodeling, and fencing improvements were performed at the Community Center and pool between 1981 and 2013.[1] Based on these past land uses, it is unlikely that hazardous materials releases have occurred at the project site.
>
> [1] LSA, 2019. Historical Resource Evaluation of the War Memorial Community Center and San Bruno Park Pool Facility, San Bruno, San Mateo County, California, April 4.

Pages 4.7-1 through 4.7-2 of the Draft EIR are revised to delete text as follows:

> ~~Fill material was encountered beneath the project site during geotechnical investigation activities. There is no documentation available regarding the source and quality of this fill material. It is common for fill material historically placed along the margins of San Francisco Bay to include construction debris and rubble in the fill. It is possible that these fill materials could be impacted with hazardous materials.~~

5.2 STAFF-INITIATED TEXT REVISIONS

These revisions derive from the changes to the proposed project described in Chapter 2.0, Revised Project.

5.2.1 Draft EIR Chapter 1.0, Introduction

Page 1-1 of the Draft EIR is revised as follows:

> The proposed project would include the following components: 1) demolition of the existing Veterans Memorial building and pool; 2) construction of a new 49,260~~47,000~~-square-foot San Bruno Recreation and Aquatic Center (SBRAC), future construction of an outdoor pool, and installation of associated water, sewer, and stormwater infrastructure; 3) the reconfiguration of adjacent existing parking areas and roadways within the park; and 4) the relocation and naturalization of the existing channelized creek within a portion of the park.

5.2.2 Draft EIR Chapter 2.0, Summary

Page 2-1 of the Draft EIR is revised as follows:

> The proposed project would include the following components: 1) demolition of the existing Veterans Memorial building and pool; 2) construction of a new 49,260~~47,000~~-square-foot San Bruno Recreation and Aquatic Center (SBRAC), future construction of an outdoor pool, and installation of associated water, sewer, and stormwater infrastructure; 3) the reconfiguration of adjacent existing parking areas and roadways within the park; and 4) the relocation and naturalization of an existing channelized creek (El Zanjon Creek) within a portion of the park.
>
> The new SBRAC would be constructed in generally the same location as the existing Veterans Memorial building; however, it would have a larger footprint. The SBRAC would be two stories in height and approximately 49,260~~47,000~~ square feet in size. The first floor of the new SBRAC would include space for a community lounge, lobby, gymnasium, an indoor pool, three classrooms, City staff offices, a Police office, lockers, and storage and service areas. The second floor would include space for a community hall, group exercise room, walking track, fitness/ cardio/weights and conference room. The proposed building would be designed to operate as an emergency resource center and would either include a permanent generator or space for a portable emergency generator. An outdoor pool would be constructed in a later phase of the project. An outdoor plaza would also be located along City Park Way.

Pages 2-1 through 2-2 of the Draft EIR are further revised as follows:

> This reconfiguration would also include the relocation of the channelized creek, as it currently runs through the parking area and adjacent to City Park Way. Relocation would begin just north of the existing pedestrian bridge located directly adjacent to the existing Veterans Memorial building, and would generally be shifted south until it reaches the intersection of City Park Way and Crystal Springs Road. ~~Currently, t~~The reconfigured creek is planned to be naturalized ~~channelized, similar to existing conditions~~.

The first bullet of Mitigation Measure BIO-3c as shown in Table 2.A on page 2-9 of the Draft EIR is revised as follows:

Table 2.A: Summary of Impacts and Mitigation Measures

Environmental Impacts	Level of Significance Without Mitigation	Mitigation Measures	Level of Significance With Mitigation
BIO-3: The proposed project would realign a segment of El Zanjon Creek, resulting in temporary impacts to regulated waters and the riparian habitat of the creek channel.	S	**BIO-3c:** The City shall implement the following water quality protection measures as best management practices during project construction to protect aquatic life in and the water quality of the El Zanjon Creek channel: • Materials used for work in and below top-of-bank of the current and the proposed new creek channel shall be non-toxic to aquatic life. ~~Any concrete used in the relocated channel shall be allowed to cure sufficiently (typically 30 to 60 days unless an approved sealant is used) prior to contact with surface waters from the creek to avoid leaching of lime into receiving waters.~~	LTS

5.2.3 Draft EIR Chapter 3.0, Project Description

Page 3-9 of the Draft EIR is revised as follows:

> The proposed project would include the following components: 1) demolition of the existing Veterans Memorial building and pool; 2) construction of a new 49,260~~47,000~~ square-foot San Bruno Recreation and Aquatic Center (SBRAC), future construction of an outdoor pool, and installation of associated water, sewer, and stormwater infrastructure; 3) the reconfiguration of adjacent existing parking areas and roadways within the park; and 4) the relocation and naturalization of the existing channelized creek within a portion of the park. The overall conceptual site plan is depicted in Figure 3-6.

Page 3-9 of the Draft EIR is further revised as follows:

> The new SBRAC would be constructed in generally the same location as the existing Veterans Memorial building; however, it would have a larger footprint. The SBRAC would be two stories in height and approximately 49,260~~47,000~~ square feet in size.

Page 3-10 of the Draft EIR is revised as follows:

> The existing 73-space parking lot adjacent to the existing Veterans Memorial building would be reconfigured by separating the parking from City Park Way, thus creating a designated parking lot with 71 spaces (for a loss of 2 spaces) and separate, realigned City Park Way. This reconfiguration would also include the relocation and naturalization of the channelized creek, as

it currently runs through this parking/road area, which is described below. Conceptual parking and roadway improvements are shown in Figure 3-11.

Page 3-10 of the Draft EIR is further revised as follows:

As noted above and shown in Figure 3-11, a portion of the channelized creek running through the park would be relocated in order to accommodate the parking lot reconfiguration. Relocation would begin just north of the existing pedestrian bridge located directly adjacent to the existing Veterans Memorial building, and would generally be shifted south until it reaches the intersection of City Park Way and Crystal Springs Road. ~~Currently, t~~The reconfigured creek is planned to be naturalized ~~channelized, similar to existing conditions~~. This would include an earthen channel consisting of riparian plantings and approximately 18 inches of flow depth with 6 inches of freeboard for a total channel depth of 24 inches.

Page 3-10 of the Draft EIR is further revised as follows:

The proposed storm drainage infrastructure would ~~drain towards the concrete-lined drainage channel within the site~~ convey on-site stormwater runoff in a new 6- to 24-~~8- to 12-~~inch storm drain system, which would discharge to El Zanjon Creek via four storm drain outfalls. From there, stormwater would drain northeasterly into an existing concrete lined drainage channel before discharging into an ~~from the drainage channel to the east, discharging into an existing~~ underground storm drain box culvert at the eastern edge of the project site. As shown in Figure 3-12, ~~five~~ nine stormwater treatment areas, consisting of lined bioretention areas and pervious pavement areas, are proposed on the project site. One of the stormwater treatment areas would be located southwest of the proposed SBRAC building, ~~one would be located~~ between the east corner of the proposed SBRAC building and the south corner of the parking lot, one would be located adjacent to the City Park Way dropoff area, and ~~three~~ five would be located between City Park Way and~~north of~~ the realigned El Zanjon Creek. Pervious pavement would be located at the southeastern row of parking stalls within the proposed parking lot to the north of the SBRAC building. The stormwater treatment areas would be vegetated and allow for up to 12 inches of ponding with a layer of bioretention soil and a layer of permeable rock. Overflow would be discharged from the stormwater treatment areas to the onsite storm drain system which would connect to outfalls in the realigned~~, concrete lined~~ El Zanjon Creek channel.

Figure 3-6 on page 3-11 of the Draft EIR is revised as shown in RTC Figure 2-1 in Chapter 2.0 of this RTC Document and on the following pages.

Figure 3-7 on page 3-12 of the Draft EIR is revised as shown in RTC Figure 2-2 in Chapter 2.0 of this RTC Document and on the following pages.

Figure 3-8 on page 3-13 of the Draft EIR is revised as shown in RTC Figure 2-3 in Chapter 2.0 of this RTC Document and on the following pages.

Figure 3-9 on page 3-14 of the Draft EIR is revised as shown in RTC Figure 2-4 in Chapter 2.0 of this RTC Document and on the following pages.

Figure 3-10 on page 3-15 of the Draft EIR is revised as shown in RTC Figure 2-5 in Chapter 2.0 of this RTC Document and on the following pages.

Figure 3-12 on page 3-16 of the Draft EIR is revised as shown in RTC Figure 2-6 in Chapter 2.0 of this RTC Document and on the following pages.

Figure 3-13 on page 3-20 of the Draft EIR is revised to remove the notation that the realigned creek would be "reconstructed" and replaced with the notation that the creek would be "naturalized," as shown on the following pages. No other substantive changes to Draft EIR Figure 3-13 are required.

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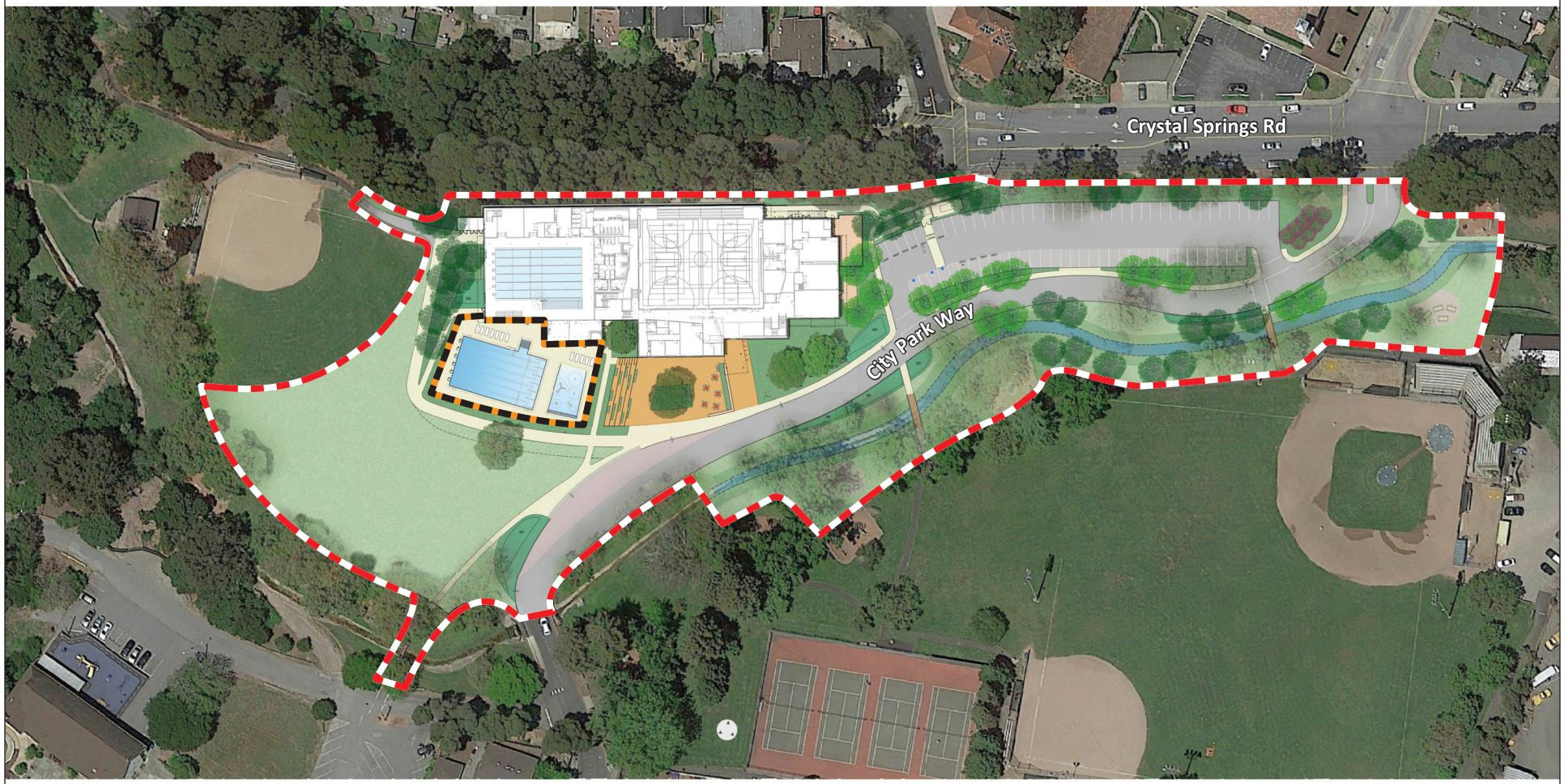


LSA

REVISED FIGURE 3-6

0 50 100
FEET

N

Project Site Boundary

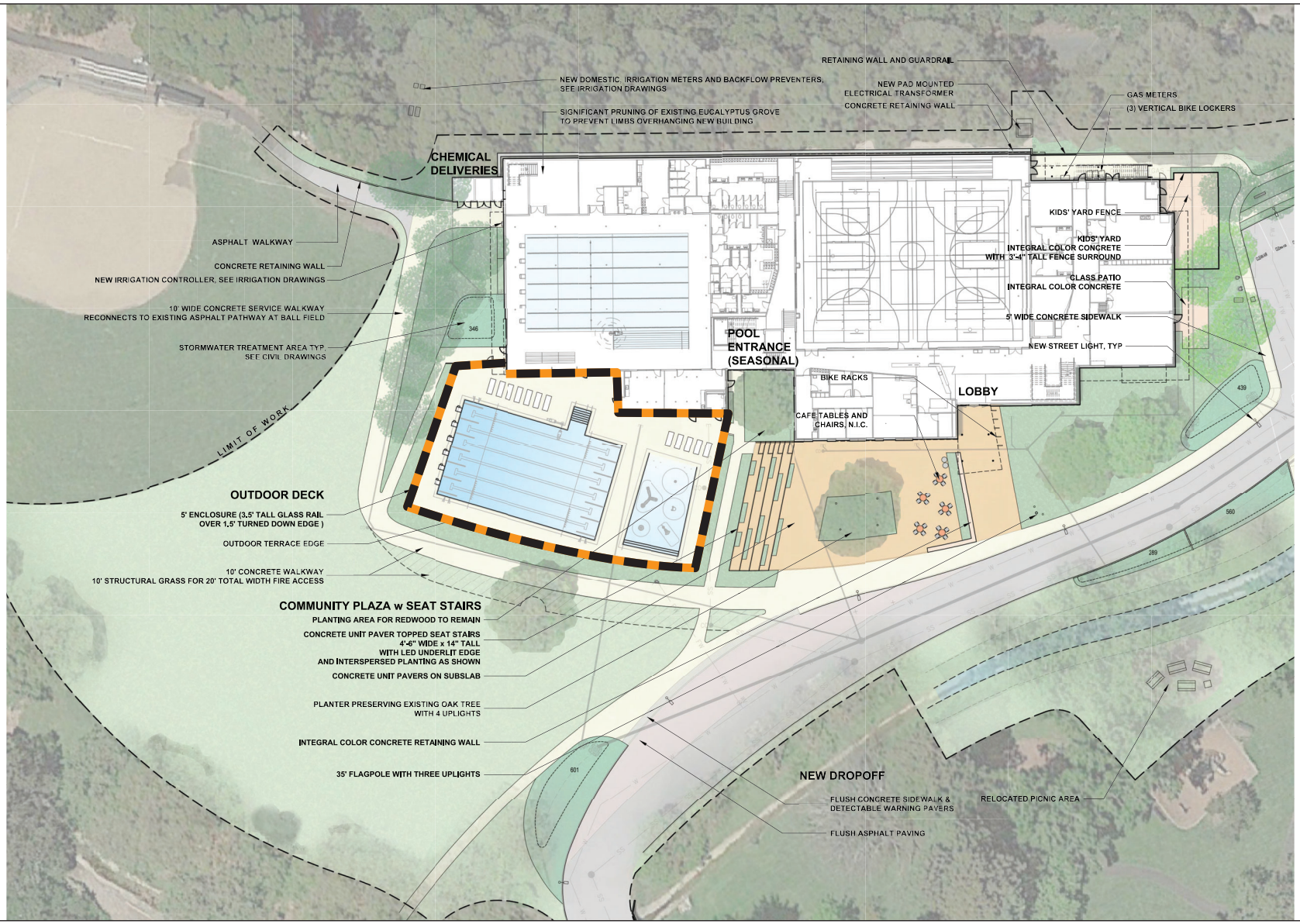
Phase 2

San Bruno Recreation and Aquatic Center Project
Response to Comments Document

Conceptual Site Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-6.ai (4/21/2020)



LSA

REVISED FIGURE 3-7

0 20 40
FEET

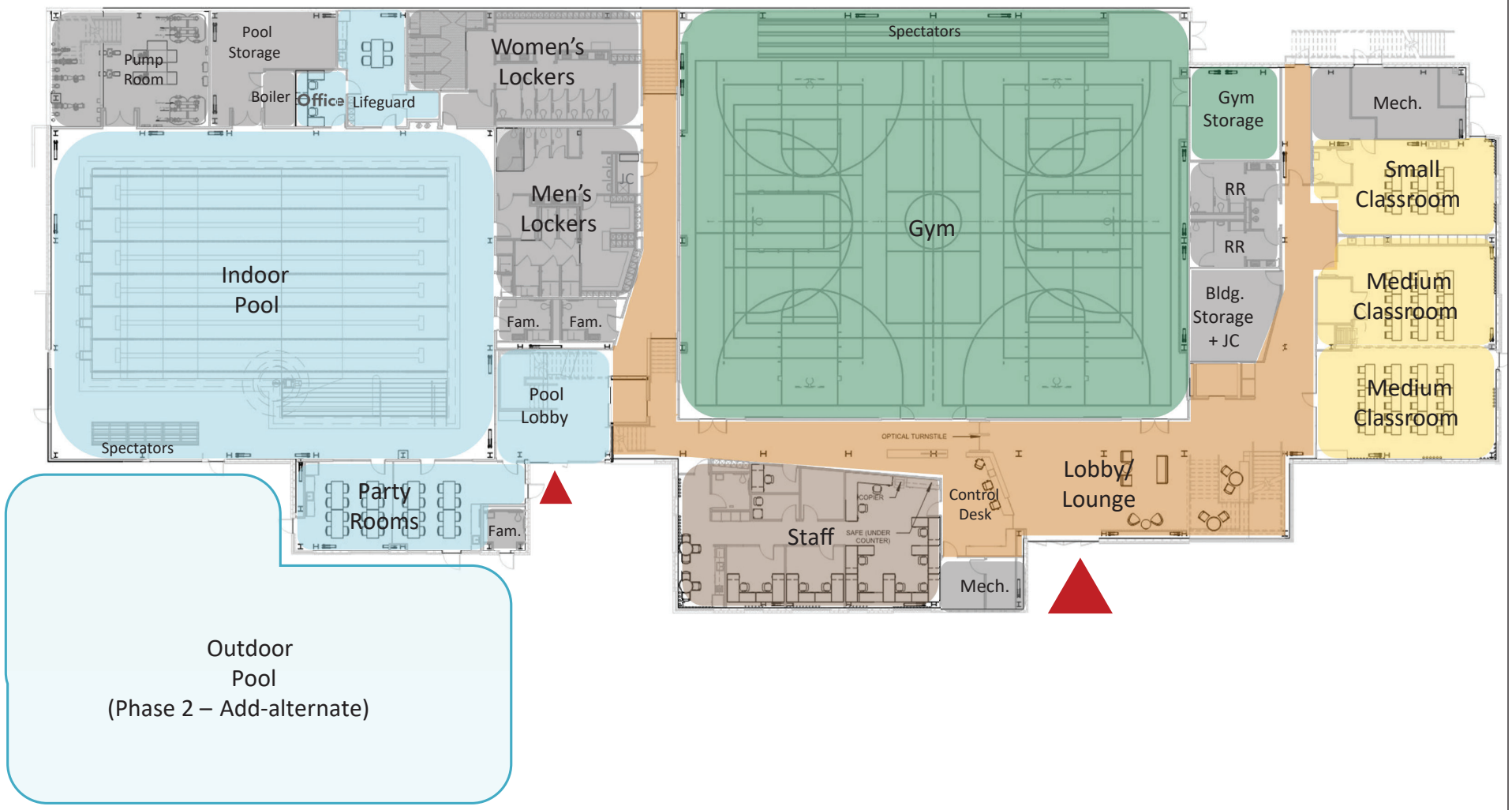
N

Phase 2

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Conceptual SBRAC Facility Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-7.ai (4/21/2020)



LSA

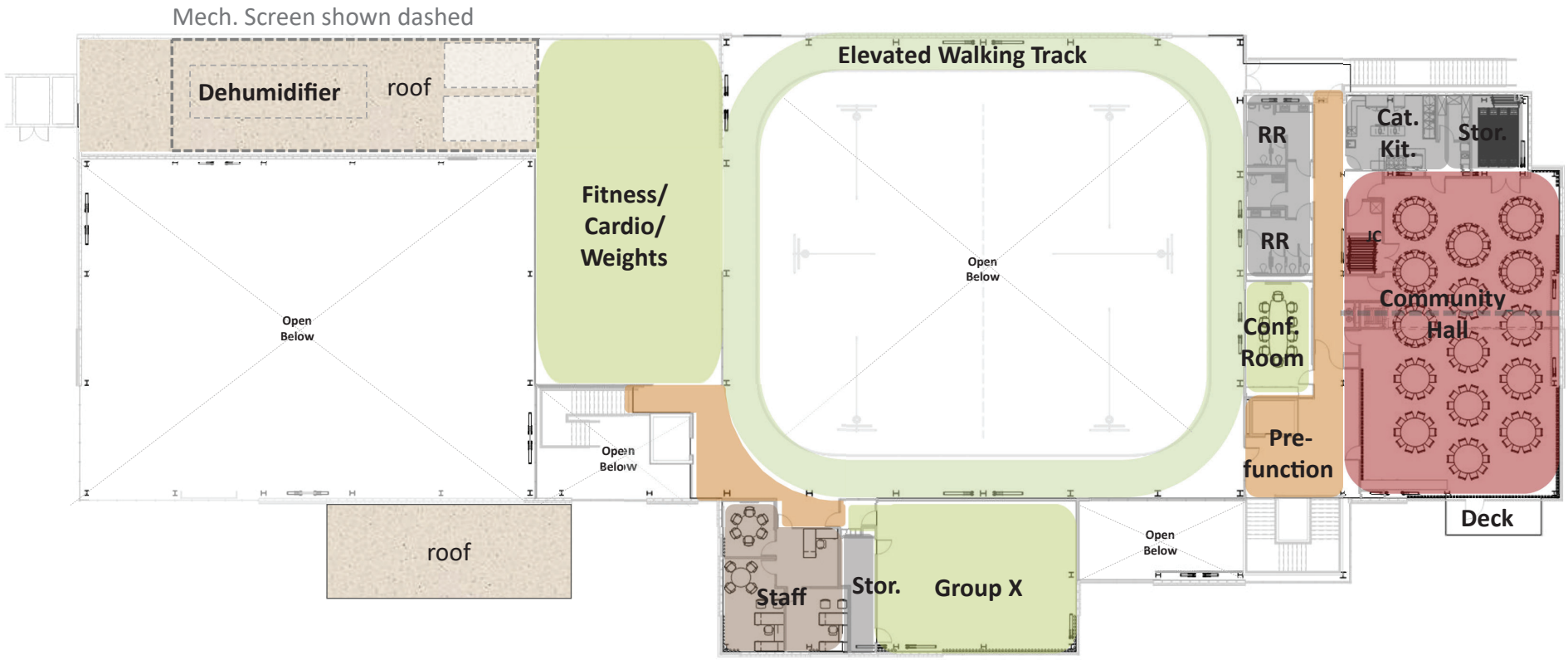
REVISED FIGURE 3-8

NOT TO SCALE

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Conceptual First Floor Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-8.ai (4/21/2020)



LSA

REVISED FIGURE 3-9

NOT TO SCALE

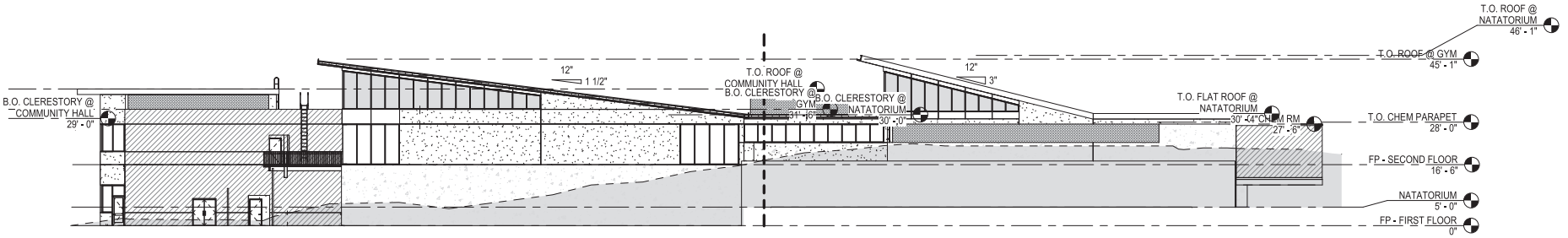
San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Conceptual Second Floor Plan

SOURCE: CITY OF SAN BRUNO, 2020.

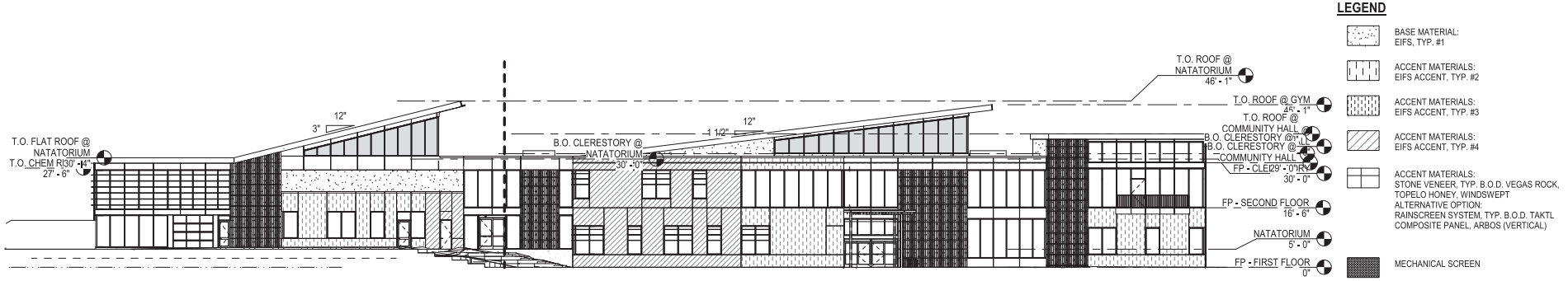
P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-9.ai (4/21/2020)

EL - SOUTH ELEVATION OVERALL

EL - NORTH ELEVATION OVERALL



EL - WEST ELEVATION OVERALL



EL - EAST ELEVATION OVERALL

LSA

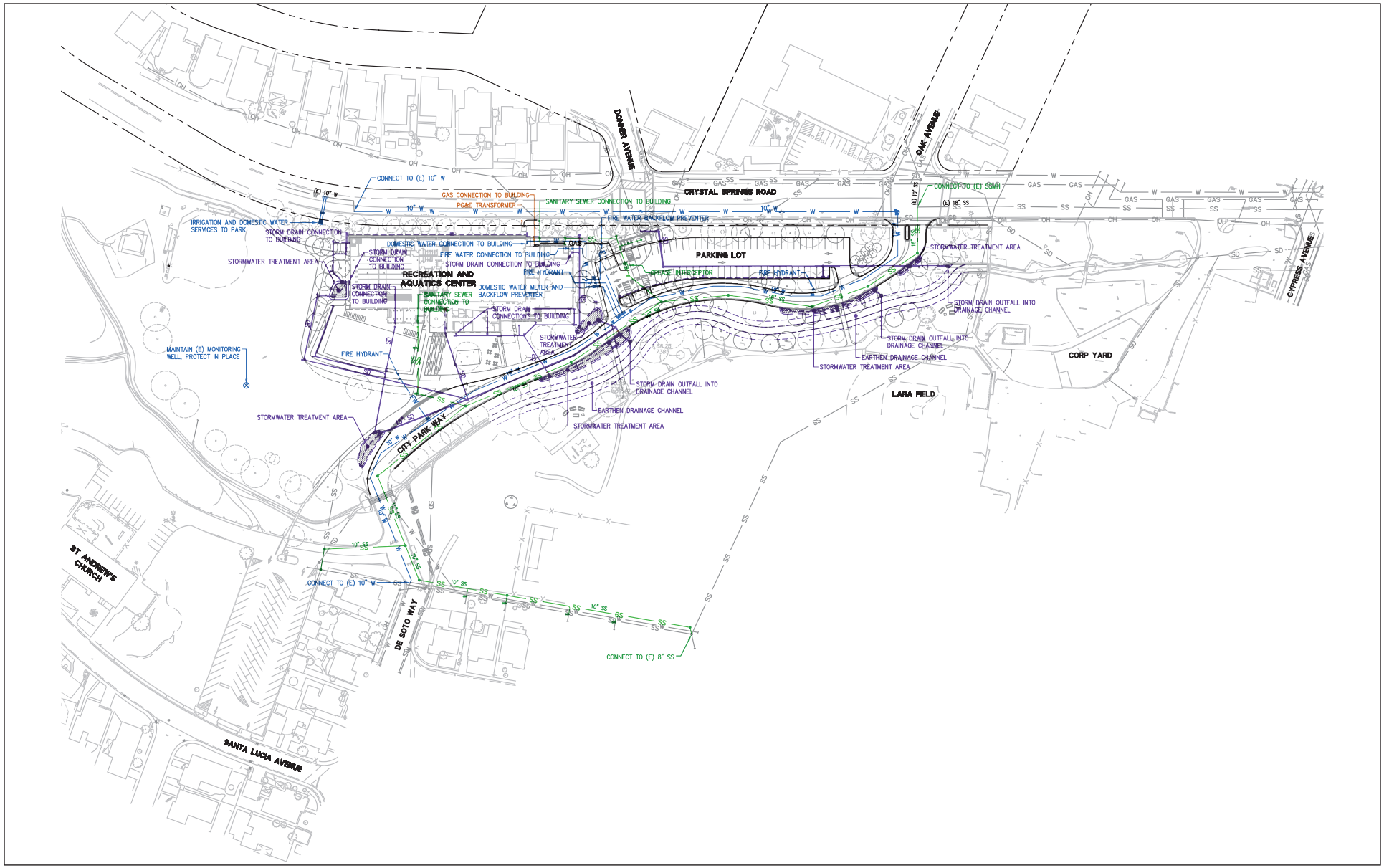
REVISED FIGURE 3-10

NOT TO SCALE

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Conceptual Building Elevations

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-10.ai (4/21/2020)



LSA

REVISED FIGURE 3-12

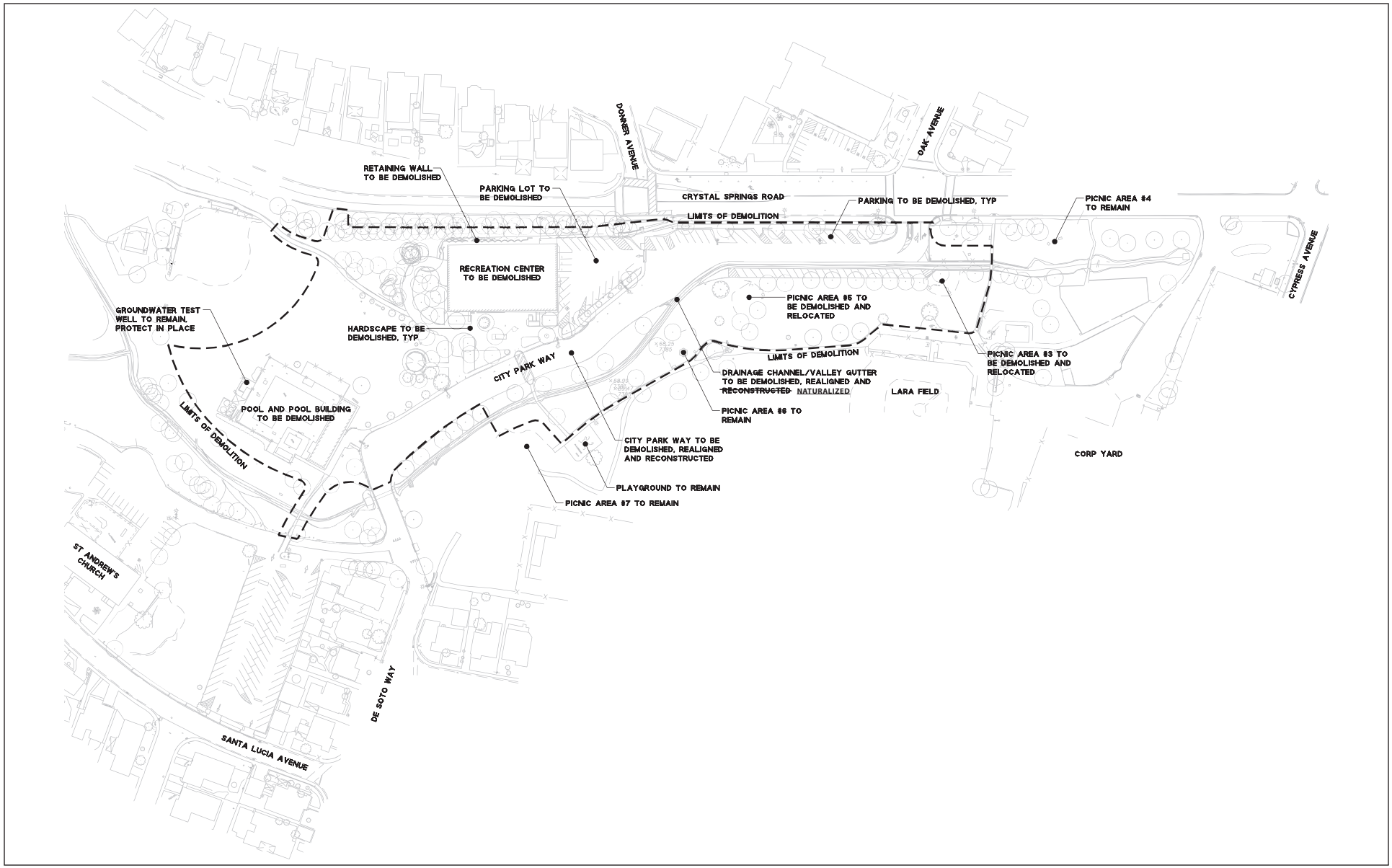
0 60 120
FEET

N

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Proposed Utility Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-12.ai (4/21/2020)



LSA

REVISED FIGURE 3-13

NOT TO SCALE

N

San Bruno Recreation and Aquatic Center Project
Response to Comments Document
Demolition Plan

SOURCE: CITY OF SAN BRUNO, 2020.

P:\GRP1803 San Bruno Rec Center\PRODUCTS\RTC\RTC Figures\Revised Figure 3-13.ai (4/21/2020)

5.2.4 Draft EIR Chapter 4.0, Section 4.1, Biological Resources

Page 4.1-12 of the Draft EIR is revised as follows:

Wetlands and Riparian Habitat. Approximately 450 linear feet of the El Zanjon Creek channel running through the park would be relocated to accommodate the proposed parking lot reconfiguration and provide a separation between the creek and vehicle parking stalls. Relocation would begin just north of the existing pedestrian bridge east of the existing Veterans Memorial building. The creek channel would generally be shifted south until it reaches the intersection of City Park Way and Crystal Springs Road. ~~Currently, t~~The reconfigured creek is planned to be naturalized ~~channelized, similar to existing conditions~~. This would include an earthen channel consisting of riparian plantings and approximately 18 inches of flow depth with 6 inches of freeboard for a total channel depth of 24 inches. Relocation of the channel away from the existing roadway and parking stalls would reduce the potential for contaminants from vehicles to enter the channel and eliminate the existing safety risk to visitors parking in the channel during periods of heavy flows, improving water quality within the creek.

With the exception of one white alder and two cottonwood trees, no wetlands or native riparian habitat are present along the segment of El Zanjon Creek to be relocated. Placement of fill in the creek, modification of its bed or bank, or removal of creekside vegetation is subject to regulation by the CDFW, Regional Water Board, and Corps. The proposed project is designed to realign El Zanjon Creek with no net loss of channel area or function and the channel in this location would be restored to a more natural state. Therefore, no permanent adverse effects on State or federally regulated wetlands are anticipated. However, an estimated 2,760 square feet (0.063 acre) of regulated waters would be temporarily disturbed as part of the channel realignment, and temporary construction activities could result in degradation of water quality and loss of habitat values of the creek channel. Because the creek channel is a regulated water body, temporary impacts would be potentially significant.

Page 4.1-14 of the Draft EIR is revised as follows:

- Materials used for work in and below top-of-bank of the current and the proposed new creek channel shall be non-toxic to aquatic life. ~~Any concrete used in the relocated channel shall be allowed to cure sufficiently (typically 30 to 60 days unless an approved sealant is used) prior to contact with surface waters from the creek to avoid leaching of lime into receiving waters.~~

5.2.5 Draft EIR Chapter 4.0, Section 4.3, Transportation and Circulation

Page 4.3-18 of the Draft EIR is revised as follows:

The proposed project would include redevelopment of the project site with the proposed ~~47,000~~ 49,260 square-foot SBRAC, an increase of approximately ~~17,000~~ 19,260 square feet compared to the existing Veterans Memorial Building. The trip generation is based on the added square footage of the proposed project.[1] Based on the project description and ITE trip generation rates, the proposed new recreation center would generate a total of 490 new daily vehicle trips, with 30 new trips (20 inbound and 10 outbound) occurring during the AM peak

hour and 39 new trips (18 inbound and 21 outbound) occurring during the PM peak hour, as shown in Table 4.3.E.[1]

[1] The project evaluated in the Draft EIR considered development of a new 47,000-square-foot SBRAC facility, for an increase of 17,000 square feet. Since publication of the Draft EIR, the project has been revised to include an additional 2,260 square feet of fitness and flex space, or a total increase of 19,260 square feet in recreational space compared to existing conditions and a total building size of 49,260 square feet. Because this would result in a minor increase in average vehicle delay at study intersections and the level of service results in this analysis would not change, the increase in building square footage would not change the significance conclusions in this section. Refer to Chapter 2.0 of the Response to Comments Document included in the Final EIR for additional information.

5.2.6 Draft EIR Chapter 4.0, Section 4.4, Air Quality

Page 4.4-22 of the Draft EIR is revised as follows:

Construction emissions were estimated for the project using the California Emissions Estimator Model (CalEEMod) version 2016.3.2, consistent with BAAQMD recommendations. The proposed project would include the demolition of the existing approximately 30,700-square-foot Veterans Memorial building, which was added to the CalEEMod analysis. Project construction would occur for 20 to 24 months. To be conservative, this analysis assumes construction would occur for approximately 20 months. Construction-related emissions are presented in Table 4.4.E. CalEEMod output sheets are included in Appendix F.[1]

[1] The project evaluated in the Draft EIR considered development of a new 47,000-square-foot SBRAC facility, for an increase of 17,000 square feet. Since publication of the Draft EIR, the project has been revised to include an additional 2,260 square feet of fitness and flex space, or a total increase of 19,260 square feet in recreational space compared to existing conditions and a total building size of 49,260 square feet. Because the construction emissions results in this analysis are well below established thresholds, the increase in building square footage would not change the significance conclusions in this section. Refer to Chapter 2.0 of the Response to Comments Document included in the Final EIR for additional information.

The footnote on page 4.4-24 of the Draft EIR is revised as follows:

[20] Similar to the TIA, this analysis relies on a trip generation rate of 28.82 trips per 1,000 square feet of building area; however, the analysis assumes an increase of approximately 16,300-square-feet of new recreational space whereas the TIA assumed an increase of 17,000 square feet. Therefore, this analysis assumes a slightly lower daily trip generation rate of 470 daily trips as compared to the 490 daily trips estimated in the TIA. However, based on the emissions results identified in this analysis, changes associated with the difference in trip generation rates would be minimal and would not change the significance conclusions identified in this section. In addition, since publication of the Draft EIR, the project has been revised to include an additional 2,260 square feet of fitness and

flex space, or a total increase of 19,260 square feet in recreational space compared to existing conditions. Similarly, because the operation period emissions results in this analysis are well below established thresholds, the increase in building square footage would not change the significance conclusions in this section. Refer to Chapter 2.0, Revised Project of the Response to Comments Document included in the Final EIR for additional information.

5.2.7 Draft EIR Chapter 4.0, Section 4.5, Noise

The footnote on page 4.5-16 of the Draft EIR is revised as follows:

[5] Similar to the TIA, this analysis relies on a trip generation rate of 28.82 trips per 1,000 square feet of building area; however, the analysis assumes an increase of approximately 16,300-square-feet of new recreational space whereas the TIA assumed an increase of 17,000 square feet. Therefore, this analysis assumes a slightly lower daily trip generation rate of 470 daily trips as compared to the 490 daily trips estimated in the TIA. However, based on the ~~emissions~~ traffic noise results identified in this analysis, changes associated with the difference in trip generation rates would be minimal and would not change the significance conclusions identified in this section. In addition, since publication of the Draft EIR, the project has been revised to include an additional 2,260 square feet of fitness and flex space, or a total increase of 19,260 square feet in recreational space compared to existing conditions. Similarly, because the operation period traffic noise results in this analysis are well within the acceptable range, the increase in building square footage and resulting increase in use would not change the significance conclusions in this section. Refer to Chapter 2.0 of the Response to Comments Document included in the Final EIR for additional information.

5.2.8 Draft EIR Chapter 4.0, Section 4.8, Hydrology and Water Quality

Page 4.8-16 of the Draft EIR is revised as follows:

Stormwater discharges in the City are regulated by the MRP. Because the proposed project is considered a regulated project under the MRP, a Stormwater Management Plan must be prepared and BMPs and hydromodification management measures implemented to manage increases in runoff flow and volume and reduce pollutants in stormwater discharged from the project site. ~~Five~~Nine stormwater treatment areas are proposed on the project site to comply with the requirements of the MRP. One of the stormwater treatment areas would be located southwest of the proposed SBRAC building, ~~one would be located~~ between the east corner of the proposed SBRAC building and the south corner of the parking lot, one would be located adjacent to the City Park Way dropoff area, and ~~three~~ five would be located between City Park Way and~~north of~~ the realigned El Zanjon Creek. Pervious pavement would be located at the southeastern row of parking stalls within the proposed parking lot to the north of the SBRAC building. The stormwater treatment areas would be vegetated and allow for up to 12 inches of ponding with a layer of bioretention soil and a layer of permeable rock. Overflow would be discharged from the stormwater treatment areas to the onsite storm drain system which would connect to outfalls in the realigned~~, concrete lined~~ El Zanjon Creek channel.

Pages 4.8-17 through 4.8-18 of the Draft EIR are revised as follows:

In accordance with the requirements of Provision C.3 of the MRP, the City must incorporate additional stormwater control and treatment measures (including hydromodification management measures) into the project design to control and treat stormwater runoff prior to its discharge into El Zanjon Creek; and the City must account for the presence of a municipal groundwater production well, shallow groundwater, and permeable soils if infiltration features would be utilized for stormwater control and treatment to ensure that infiltration of stormwater would not impact groundwater quality. As stated above, ~~five~~ nine stormwater treatment areas are proposed on the project site to comply with the requirements of the MRP. Treatment of stormwater runoff prior to infiltration would ensure that the use of infiltration features would not impact groundwater quality.

The proposed project would include relocation of a portion of El Zanjon Creek to an earthen ~~concrete-lined trapezoidal~~ channel that would be located south of the existing creek. All construction activities within the banks of surface waters would require compliance with resource agency permit requirements. These requirements, which would be specified by the appropriate resource agency (i.e., the Water Board), could include erosion and sedimentation control measures such as protection of the creek banks with gravel/rock, geotextile/burlap fabric, temporary vegetation (e.g., non-invasive, non-persistent grass species), and mulching, and use of silt traps/fences that would reduce potential impacts on water quality during construction and subsequent to construction activities along the banks of surface waters and within surface waters. All construction activities within the banks of surface waters would require a United States Army Corps of Engineers Section 404 permit and associated Section 401 Water Quality Certification and WDRs from the Regional Water Board. The work within a stream or on a streambank would also require a California Department of Fish and Wildlife Section 1602 Streambed Alteration Agreement. These permit applications must include a discussion of construction BMPs, including erosion and sediment control BMPs, which would minimize impacts on water quality. The permits would include any additional requirements for protection of water quality as deemed necessary by the reviewing agencies. Also refer to the discussion of regulatory permitting in Section 4.1, Biological Resources of this EIR.

5.2.9 Draft EIR Chapter 5.0, Alternatives

Page 5-1 of the Draft EIR is revised as follows:

The proposed project would include the following components: 1) demolition of the existing Veterans Memorial building and pool; 2) construction of a new 49,260~~47,000~~ square-foot San Bruno Recreation and Aquatic Center, future construction of an outdoor pool, and installation of associated water, sewer, and stormwater infrastructure; 3) the reconfiguration of adjacent existing parking areas and roadways within the park; and 4) the relocation and naturalization of the existing channelized creek within a portion of the park. The proposed project has been described and analyzed in the previous chapters with an emphasis on determining and evaluating potential significant impacts resulting from the project and identifying mitigation measures to avoid or reduce these impacts to a less-than-significant level. The following identifies and discusses three feasible alternatives to the proposed project, compares the

impacts of each alternative to the impacts of the project, and determines whether the alternatives meet the project objectives.

Page 5-4 of the Draft EIR is revised as follows:

Under the No Project alternative, the project site would not be redeveloped, and El Zanjon Creek and existing vegetation would not be realigned or disturbed. In addition, the existing creek channel within the project site would not be improved and restored to a more natural condition. Impacts to biological resources identified for development of the proposed project would not occur. Specifically, impacts related to special-status species, federally protected water resources, riparian habitat, and nesting and native birds would not result from implementation of the No Project alternative and implementation of Mitigation Measures BIO-1a, BIO-1b, BIO-2a, BIO-2b, BIO-3a, BIO-3b, BIO-3c, and BIO-4 would not be required. In addition, none of the existing heritage trees on the site would be removed. Similar to the proposed project, there would be no impacts related to local policies protecting biological resources or any adopted habitat conservation plans or adopted natural community conservation plans. Ultimately, implementation of the No Project alternative would avoid all impacts to biological resources associated with development of the proposed project.

Pages 5-5 through 5-6 of the Draft EIR are revised as follows:

Under the No Project alternative, the project site would be subject to existing hydrologic conditions and would not include the realignment or naturalization of El Zanjon Creek. Therefore, under the No Project alternative, the proposed project's significant impacts associated with alteration of existing drainage patterns and flood hazards would not occur. Therefore, implementation of Mitigation Measures HYD-1 and HYD-2 would not be required. In addition, the less-than-significant impacts related water quality standards, groundwater supplies, and compliance with water quality control plans would not occur. Ultimately, implementation of the No Project alternative would avoid all impacts related to hydrology and water quality associated with development of the proposed project. However, it should be noted that under current conditions, vehicular traffic crosses through the existing shallow creek bed to access immediately adjacent existing parking spaces, likely resulting in the transmission of polluted surface runoff into this water body. This condition would be improved with development of the proposed project; however, this improvement in existing conditions would not occur with development of the No Project alternative.

Pages 5-6 through 5-7 of the Draft EIR are revised as follows:

The potential impacts associated with the Existing Creek Alignment alternative are described below. As discussed, the Existing Creek Alignment alternative would include a new recreation center similar in size and planned programming to the proposed project and maintain the existing alignment of El Zanjon Creek and City Park Way, resulting in a reduction of parking spaces. Impacts related to federally protected waters and riparian habitat would be avoided with implementation of the Existing Creek Alignment alternative as El Zanjon Creek would not be modified. However, under existing conditions, El Zanjon Creek regularly floods and impacts access and parking. Without improvements proposed as part of the project, this condition would

continue. In addition, under current conditions, vehicular traffic crosses through the existing shallow creek bed to access immediately adjacent existing parking spaces, likely resulting in the transmission of polluted surface runoff into this water body. This condition would remain under the Existing Creek Alignment alternative. Finally, the existing creek would not be restored to a more natural condition under this alternative.

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APPENDIX A

ADDITIONAL TRAFFIC ANALYSIS MEMORANDUM

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HEXAGON TRANSPORTATION CONSULTANTS, INC.

April 7, 2020

Ms. Kelly Beggs
Good City Company
751 Laurel Street, Suite 622
San Carlos, CA 94070

Re: Additional Traffic Analysis for the Proposed San Bruno Community Center in San Bruno, California.

Dear Ms. Beggs:

Hexagon Transportation Consultants, Inc. has completed additional traffic analysis for the San Bruno Community Center in San Bruno, California. Hexagon prepared a transportation impact report for the development in January 2020. Since the completion of the report, the project size has increased by up to 2,360 square feet (s.f.). The following describes the increased number of trips. The analysis shows that the increase will not result in vehicle miles traveled (VMT) or level of service (LOS) impacts.

Project Trip Generation

Through empirical research, data have been collected that quantify the estimated amount of traffic produced by many types of land uses. The data are published in the Institute of Transportation Engineers' (ITE) manual entitled *Trip Generation, 10th Edition* (2017). The magnitude of traffic added to the roadway system by a particular development is estimated by multiplying the applicable trip generation rates by the size of the development. The average trip generation rates for a Recreational Community Center (Land Use 495) were applied to the project. According to the ITE Trip Generation Manual, a recreational community center is described as a stand-alone public facility that often includes classes and clubs, swimming pools, athletic courts, exercise equipment, locker rooms, and a restaurant or snack bar.

The project intends to increase the proposed recreation center of approximately 17,000 square feet by up to an additional 2,360 s.f. Based on the project description and ITE trip generation rates, the increased square footage would generate a total of 68 additional daily vehicle trips, with 4 additional trips (3 inbound and 1 outbound) occurring during the AM peak hour and 5 additional trips (2 inbound and 3 outbound) occurring during the PM peak hour (see Table 1).

Table 1
Additional Project Trip Generation Estimates

Land Use	Increase in Size		Daily Trip Rate	Daily Trips	AM Peak Hour Trip Rate	AM Peak Hour Trips In	AM Peak Hour Trips Out	AM Peak Hour Trips Total	PM Peak Hour Trip Rate	PM Peak Hour Trips In	PM Peak Hour Trips Out	PM Peak Hour Trips Total
Proposed Community Center Addition												
Community Center[1]	2.36	ksf	28.82	68	1.76	3	1	4	2.31	2	3	5
Additonal Project Trips				**68**		**3**	**1**	**4**		**2**	**3**	**5**
Original Proposed Community Center												
Community Center[1]	17.00	ksf	28.82	490	1.76	20	10	30	2.31	18	21	39
Total Project Trips	**19.36**	**ksf**		**558**		**23**	**11**	**34**		**20**	**24**	**44**

Notes:
1. Recreational Community Center (Land Use 495) average rates published in ITE's Trip Generation Manual, 10th Edition, 2017.

VMT Analysis

The January 2020 transportation study does not include an analysis of VMT since such analysis is not required until July 2020. Nevertheless, Hexagon believes that the project, with the additional 2,360 s.f., would result in a reduction to VMT. There is an existing recreation center with pool on the site. However, these facilities are nearing the end of their useful lives. The project would provide modern facilities that serve the same purpose as the existing facilities. In the process, the facilities would be enlarged by up to 19,360 square feet to serve more people. The facility is designed to serve the residents of San Bruno. It can be presumed that these same residents are accessing recreational facilities outside the City because of limitations in the size of the existing buildings on site. Bringing those same activities to within the City boundaries will reduce the recreational trip lengths of San Bruno residents, thus reducing VMT.

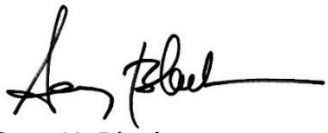
Traffic Operations

The results of the January 2020 intersection level of service analysis showed that all study intersections would continue to operate at LOS D or better during both the AM and PM peak hours of traffic, except the Oak Avenue/City Park Way and Crystal Springs Road intersection, which operates at LOS F during the AM peak hour and LOS E during the PM peak hour. The original project was found to create a significant impact at this intersection. The slightly larger project would create the same significant impact. Mitigation was identified as the addition of a traffic signal.

With the additional 4 trips (3 inbound and 1 outbound) during the AM peak hour and 5 trips (2 inbound and 3 outbound) during the PM peak hour, the levels of service at the other study intersections would remain unchanged compared to the original traffic study.

We appreciate the opportunity to submit this additional traffic analysis. If you have any questions, please do not hesitate to call.

Sincerely,
HEXAGON TRANSPORTATION CONSULTANTS, INC.



Gary K. Black
President

Jocelyn Lee
Engineer

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