

FINAL

**300 PIEDMONT AVENUE PROJECT
FINAL ENVIRONMENTAL IMPACT REPORT**

PREPARED FOR:

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

PREPARED BY:

ICF
201 Mission Street, Suite 1500
San Francisco, CA 94105

April 2024



ICF. 2024. 300 Piedmont Avenue Project Final Environmental Impact Report.
April. (ICF 104672.0.001.01.005). San Francisco, CA. Prepared for City of San
Bruno, San Bruno, CA.

Contents

Chapter 1 Introduction	1-1
1.1 Purpose and Content of this Final EIR	1-1
1.2 Project Description	1-2
1.3 Major Conclusions of the Environmental Analysis	1-3
1.4 Project Alternatives	1-7
1.5 Organization of the Final EIR	1-7
Chapter 2 Comments Received on the Draft EIR	2-1
2.1 Comment Letter S1: California Department of Transportation District 4	2-1
2.2 Comment Letter L1: San Francisco International Airport	2-4
2.3 Comment Letter L2: San Mateo Union High School District	2-21
2.4 Comment Letter I1: Lawrence Marsili	2-22
2.5 Comment Letter I2: Jeffery D.	2-23
2.6 Comment Letter I3: Lisa H	2-24
2.7 Comment Letter I4: Robert S	2-25
2.8 Comment Letter PC1: Commissioner Harman	2-26
2.9 Comment Letter PC2: Commissioner Kuhn	2-27
2.10 Comment Letter PC3: Commissioner Lethin	2-28
2.11 Comment Letter PC4: Commissioner Durazo	2-29
2.12 Comment Letter PC5: Commissioner Biasotti	2-30
2.13 Comment Letter PC6: Commissioner Madden	2-31
Chapter 3 Responses to Comments	3-1
3.1 State Agencies	3-1
3.1.1 S1, Caltrans	3-1
3.2 Local Agencies	3-3
3.2.1 L1, SFO	3-3
3.2.2 L2, SMUHSD	3-6
3.3 Individuals	3-6
3.3.1 I1, Lawrence Marsili	3-6
3.3.2 I2, Jeffery D.	3-7
3.3.3 I3, Lisa H.	3-7
3.3.4 I4, Robert S.	3-10
3.4 Planning Commission	3-11
3.4.1 PC1, Commissioner Harman	3-11
3.4.2 PC2, Commissioner Kuhn	3-12
3.4.3 PC3, Commissioner Lethin	3-13

3.4.4 PC4, Commissioner Durazo..... 3-14

3.4.5 PC5, Commissioner Biasotti 3-15

3.4.6 PC6, Commissioner Madden..... 3-15

Chapter 4 Revisions to the Draft EIR 4-1

4.1 Executive Summary..... 4-1

4.2 Project Description 4-1

4.3 Biological Resources 4-1

4.4 Hazards and Hazardous Materials 4-2

4.5 Public Services..... 4-3

4.6 Alternatives Analysis..... 4-3

4.7 Other CEQA Considerations..... 4-4

4.8 References 4-5

Attachment 1. Additional Transportation Information

Attachment 2. Revised Arborist Report

Tables

2-1	List of Commenters and Location of Responses	2-1
3-1	Updated Tree Removal Quantities	3-13

Acronyms and Abbreviations

AB	Assembly Bill
AHP	Affordable Housing Program
AIA	Airport Influence Area
ALUCP	Airport Land Use Compatibility Plan
BAAQMD	Bay Area Air Quality Management District
BMP	best management practice
BMR	below market rate
Caltrans	California Department of Transportation
CARB	California Air Resource Board
CEQA	California Environmental Quality Act
City	City of San Bruno
CNEL	Community Noise Equivalent Level
dB	decibel
dBA	A-weighted decibels
Draft EIR	draft environmental impact report
EIR	environmental impact report
FAA	Federal Aviation Administration
Final EIR	final environmental impact report
GHG	greenhouse gas
HOA	homeowner's association
Leq	equivalent sound level
PM _{2.5}	particles less than 2.5 microns in diameter
PM ₁₀	particles less than 10 microns in diameter
project	300 Piedmont Avenue Project
project site	300 Piedmont Avenue
project sponsor	SummerHill Homes
RHNA	Regional Housing Needs Allocation
SB	State Bill
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SMUHSD	San Mateo Union High School District
TDM	Transportation Demand Management
TSPC	Traffic, Safety and Parking Committee
VMT	vehicle miles traveled

This final environmental impact report (Final EIR) has been prepared by the City of San Bruno (City), as lead agency, in accordance with the requirements of the California Environmental Quality Act (CEQA) and the State CEQA Guidelines (CCR Section 15132). This Final EIR contains responses to comments received on the draft environmental impact report (Draft EIR) for the 300 Piedmont Avenue Project (project). The Final EIR consists of the Draft EIR and this document, which includes comments on the Draft EIR, responses to those comments, and revisions to the Draft EIR.

1.1 Purpose and Content of this Final EIR

The purpose of the responses-to-comments document is to address concerns raised about the environmental effects of the project and the process by which the City conducted the CEQA process. Section 15088 of the State CEQA Guidelines stipulates that responses should pertain to major or significant environmental issues raised by commenters. Under CEQA, the City is required, after completion of a Draft EIR, to consult with and obtain comments from public agencies having jurisdiction by law with respect to the proposed project and provide the general public with an opportunity to comment on the Draft EIR.

As required by CEQA, the Draft EIR was made available to the public and regulatory agencies for review and comment during a 45-day period between October 20, 2023 and December 5, 2023. A presentation summarizing the 300 Piedmont Avenue Project and the Draft EIR was provided, and staff were available to answer questions of a general nature at a Planning Commission meeting on October 26, 2023.

As the lead agency, the City is also required to respond to significant environmental issues raised in the review and consultation process. This responses-to-comments document has been prepared to respond to public agency and general public comments received on the Draft EIR, which was circulated for a 45-day public review period between October 20, 2023, and December 5, 2023. A Planning Commission meeting was held on October 26, 2023, to provide information about the Draft EIR, respond to general questions about the Draft EIR analysis, and accept oral comments on the Draft EIR. Consistent with Section 15132 of the State CEQA Guidelines, the Final EIR consists of the following contents:

1. The Draft EIR or a revision of that draft.
2. Comments and recommendations received on the Draft EIR either verbatim or in a summary.
3. A list of persons, organizations, and public agencies commenting on the Draft EIR.
4. The response of the lead agency to significant environmental points raised in the review and consultation process.
5. Any other information added by the lead agency.

1.2 Project Description

SummerHill Homes (project sponsor) is proposing to develop an approximately 40.2-acre site into a new 155-lot single-family, detached-home community with associated open space and infrastructure located at 300 Piedmont Avenue (project site) in the City. The City also proposes to construct new recreational amenities on a portion of the project site. The project would also demolish the former Crestmoor High School and other existing structures on the project site.

In addition, pursuant to a settlement agreement between the City and the San Mateo Union High School District, the owner of the project site, the EIR analyzes a variant to the project that reflects: (1) dedication of a 6.47-acre portion of the project site's wooded slope area to the City as publicly accessible open space, which would thereafter be maintained by the City; (2) retention of approximately 7.5 acres of sloped area as private open space; and (3) dedication of an approximately 4.6 acre space to the City for athletic field and recreational supportive uses. Overall, the variant would result in 12.24 acres of publicly accessible open space as compared to the 19.2 acres of publicly accessible open space and would shift maintenance obligations for 6.47 acres of sloped wooded area from the property owner to the City.

The project site currently contains the former and currently unoccupied Crestmoor High School, constructed in 1962, as well as playing fields, parking lots, a storage lot, school district maintenance facilities, and unimproved sloping wooded open space. The San Mateo Union High School District currently leases the playing fields on a short-term basis to private soccer clubs for youth soccer games and practices. The playing fields are improved with natural grass.

The residential component of the project would include 155 homes. The project would result in an effective density of 3.86 dwelling units per gross acre on the 40.2-acre project site. The proposed building heights for the homes would be up to 28 feet (two stories). The residential component of the project would be divided into two neighborhoods with varying lot sizes. One neighborhood would include 63 four-bedroom homes ranging from approximately 1,900 to 2,300 square feet of living space with typical lot sizes of 3,000 square feet. The second neighborhood would include 92 four-bedroom homes ranging from approximately 2,200 square feet to 2,700 square feet of living space with typical lots sizes of 2,850 and 3,375 square feet. In accordance with the City's Affordable Housing Program (AHP), the project includes 24 on-site below market rate (BMR) homes (8 at low-income level and 16 at moderate-income level) spread throughout the two neighborhoods, with 12 BMR homes in each neighborhood.

The proposed project would include dedication of approximately 6.91 acres of public open space to the City, which the City would own and maintain, as shown Draft EIR Chapter 2, Figure 2-2. The City would also construct improvements within about 5.3 acres of the 6.91 acres of the dedicated open space area in the northern area of the project site, including a sports field with permanent nighttime lighting fixtures. The other 1.61 acres along Courtland Drive would be improved by the City and would be available for recreational supportive uses. Parking would be provided along Courtland Drive, within the recreational parcel, and along the northern extent of the residential ring road.

The field would be striped to allow reconfiguration of fields to accommodate various sizes of fields. The Crestmoor Fields Master Plan was recently approved by the San Bruno City Council. The field design could use synthetic turf or natural grass and would allow for a maximum of six soccer fields in use at any one time. Another option would include striping for up to two little league baseball

fields and five soccer fields, allowing for a maximum of two little league games or five soccer games to occur at one time.

The project variant would include dedication of approximately 12.24 acres of land to the City for public open space (approximately 6.47 sloped acres and approximately 4.58 rough graded acres for the playing fields, and 1.19 acres for recreational supportive uses), while the private open space in the sloped wooded areas would be about 7.51 acres. The playing fields and other recreational uses would be the same as under the proposed project, except that the graded area in the dedicated open space for recreation use would be about 1.14 acres smaller than under the proposed project. A vegetation management plan would still be implemented in the portion of the wooded slope area dedicated to the City.

Vehicular circulation would be provided to the project site from Piedmont Avenue at the southern entrance and Courtland Drive at its northern entrance. Interstate 280 (I-280) runs directly east of Courtland Drive, with the San Bruno Chinese Church located between Courtland Drive and I-280 near the northern entrance to the project site. Courtland Drive, a private driveway with a public access easement that would become a public right-of-way of about 2.9 acres, would be reconstructed and realigned to meet the City's design standards as part of the project. Circulation in the proposed project would be provided via a ring road around the perimeter of the proposed residential lots, with east-west drives throughout. The project variant would be the same as the proposed project, except that under the project variant, Courtland Drive would be a public street parcel with no recreation-supportive improvements. Courtland Drive right-of-way would instead be 2.1 acres.

1.3 Major Conclusions of the Environmental Analysis

The Draft EIR identified the following significant impacts related to the project.

- **Impact AQ-1: Air Quality (cumulatively considerable net increase of any criteria pollutant).** Project construction activities, such as demolition, rough grading, and material hauling, would generate fugitive dust emissions (i.e., particles less than 2.5 microns in diameter [PM_{2.5}] and particles less than 10 microns in diameter [PM₁₀]). As noted in the Bay Area Air Quality Management District (BAAQMD) 2022 State CEQA Guidelines, projects implementing the BAAQMD-recommended basic best management practices (BMPs) for construction-related fugitive dust emissions are considered to have a less-than-significant criteria air pollutant impact related to construction-generated fugitive dust emissions (BAAQMD 2023b). As such, before the inclusion of feasible BAAQMD-identified BMPs, the proposed project's construction-generated fugitive dust emissions would be considered **significant**, and mitigation would be required. Mitigation measure AQ-1 requires the implementation of BAAQMD's basic BMPs. Thus, implementation of mitigation measure AQ-1 would reduce this impact to a less-than-significant level, and both the project and variant's impact with respect to construction-generated fugitive dust emissions would be **less than significant with mitigation**.
- **Impact BIO-1: Biological Resources (candidate, sensitive, or special-status species).** Construction or demolition activity, and operation of the proposed project and project variant may harm or result in mortality to San Francisco dusky-footed woodrats, or in nest abandonment, and is considered a significant impact under CEQA. Most nests are present in the wooded area and could potentially be removed or disturbed by vegetation management work

during construction. These impacts would be **potentially significant**. Mitigation measure BIO-1a would be implemented to reduce the potential for impacts on San Francisco dusky-footed woodrats. Tree removal and project and project variant construction could potentially remove habitat or disturb nests of nesting or migratory birds. Construction impacts would be **potentially significant**, because of the potential to remove active nests. Impacts would be less than significant after implementing mitigation measure BIO-1b. Tree removal or ground disturbance activities during construction and demolition could disturb active nests and result in mortality of roosting bats. Implementation of mitigation measure BIO-1c would reduce impacts under both the project and project variant to **less than significant with mitigation**.

- **Impact BIO-5: Biological Resources (local policies or ordinances)**. Activities such as grading, installation of utilities, and construction of new homes may damage adjacent tree crowns and roots adjacent to the project area, which could potentially damage heritage trees. This impact would be **potentially significant**. Mitigation measure BIO-5 includes guidelines that would be implemented to mitigate any potential impact on surrounding trees caused by the project or project variant. Through designation of a tree protection zone and modification of activities to reduce potential impacts, these impacts would be **less than significant with mitigation**.
- **Impact CUL-2: Cultural Resources (archaeological resources)**. The presence of two precontact midden deposits within 0.25 mile of the project site indicates increased potential for encountering as-yet undocumented archaeological deposits during construction-related ground disturbance, which would be **potentially significant**. Implementation of mitigation measure CUL-2a and mitigation measure CUL-2b would reduce this potentially significant impact on archaeological resources during construction of both the project and project variant to **less-than-significant with mitigation** by ensuring that project activities would not result in the inadvertent destruction of an archaeological resource.
- **Impact GEO-5: Geology, Soils, and Paleontological Resources (unique paleontological resource)**. While there are no known paleontological resources or unique geologic features on the project site, the site is underlain by the Merced Formation. This geologic unit is known to contain fossils. As a result, ground-disturbing activities such as grading and excavation in areas with native substrate may destroy or damage paleontological resources, which would be a **potentially significant** impact. Implementation of mitigation measure GEO-5 would ensure that workers are informed of the procedures to follow should they encounter subsurface paleontological resources. It also ensures that work is halted until all appropriate procedures are followed in the event that paleontological resources are discovered. Mitigation measure GEO-5 would reduce impacts from ground-disturbing activities under the project and the project variant. Impacts would be **less than significant with mitigation**.
- **Impact GHG-1: Greenhouse Gas Emissions (greenhouse gas emissions)**. Even with implementation of a Transportation Demand Management (TDM) program through mitigation measure TRA-2, the project and project variant would result in a cumulatively considerable impact with respect to operational greenhouse gas (GHG) emissions, and there are no feasible mitigation measures to reduce this impact. The project and project variant would exceed the threshold of 12.4 daily miles per resident, or 15 percent below the regional average vehicle miles traveled (VMT) for the region of 14.6 daily miles per resident. At 14.7 miles per resident, the project would result in a rate of VMT that exceeds the regional average by 0.1 mile per capita and exceeds the threshold by 2.3 miles per capita. There are no feasible mitigation measures to reduce project-generated VMT beyond mitigation measure TRA-2. Thus, the project and project

variant would not result in a VMT reduction relative to the regional average; rather, it would result in a VMT increase. This impact would be **significant and unavoidable**.

- **Impact GHG-2: Greenhouse Gas Emissions (applicable plan, policy, or regulation).** The California Air Resources Board (CARB) 2022 Scoping Plan identifies the state's path to keep California on track to meet its State Bill (SB) 32 GHG reduction target of at least 40 percent below 1990 emissions by 2030, as well as to achieve carbon neutrality by 2045 and a reduction in anthropogenic emissions to 85 percent below 1990 levels. The project would not be consistent with CARB's 2022 Scoping Plan, as it would not incorporate all of the Scoping Plan-identified project attributes. Specifically, the project and project variant would not provide residential parking supply at a ratio of less than one parking space per dwelling unit. It would not be feasible to reduce the residential parking supply at the project site, as described in Impact TRA-2. Moreover, the project and project variant would not meet the Scoping Plan-identified affordable housing standard. Thus, the project would be inconsistent with two of the CARB-identified project attributes related to VMT reduction. There are no feasible mitigation measures to reduce project-generated VMT beyond mitigation measure TRA-2. Therefore, the project and project variant would conflict with state, regional, or local plans to achieve the GHG reduction goals mandated by SB 32 for the year 2030 and Assembly Bill (AB) 1279 for the year 2030 and 2045. This impact would be **significant and unavoidable**.
- **Impact HAZ-5: Hazards and Hazardous Materials (Airport Land Use Plan).** The Airport Land Use Compatibility Plan (ALUCP) for San Francisco International Airport (SFO) indicates the project site's imaginary surface in the project area is between 162.3 and 200 feet above mean sea level (amsl). Given that the site itself ranges from 380 to 430 feet amsl, the ALUCP indicates the terrain penetrates the airspace surface. As a result, the proposed project and variant may pose airspace safety concerns and a **potentially significant** impact. Mitigation measure HAZ-5a would apply to the residential component of the project and would require either a finding of no-hazard from the Federal Aviation Administration or documentation that site conditions are such that notification is not required because there would be no safety hazard due to existing shielding. For the recreational component, mitigation measure HAZ-5b requires obtaining a finding of no-hazard from the Federal Aviation Administration due to the height of light standards and the addition of new lighting. These components would be the same under the proposed project and the project variant. As a result, this impact would be **less than significant with mitigation**.
- **Impact NOI-1: Noise (ambient noise).** Even though project construction activities are not predicted to exceed the San Bruno Municipal Code standards applicable to project construction, because construction could result in short-term increases in average ambient noise levels exceeding 10 A-weighted decibels (dBA) at nearby residences during worst-case construction noise-generating activities, this impact is considered **potentially significant** for both the proposed project and project variant. Mitigation measures NOI-1a and NOI-1b require implementation of several measures to reduce noise as experienced at nearby sensitive uses during construction. The mitigation measures are anticipated to reduce the increase in average noise levels at the nearest residences during construction of the project and variant to less than 10 dBA, which is below the significance criteria. As a result, this impact would be **less than significant with mitigation**.
- **Impact TRA-2: Transportation (State CEQA Guidelines).** The project would result in a significant impact related to State CEQA Guidelines Section 15064.3, subdivision (b) if it would lead to VMT per resident higher than 15 percent below the existing regional average of 14.6

VMT per resident. Because the City of San Bruno has not adopted separate VMT threshold standards, the EIR uses the OPR-recommended VMT per resident threshold of 15 percent reduction compared to the current regional (nine-county Bay Area) average. Using the C/CAG VMT Estimation Tool, the estimated VMT per resident with the project is estimated to be 14.7 daily miles per resident. This is well above the significance threshold and much closer to the current regional average; therefore, the project would result in a **potentially significant** impact. Mitigation measure TRA-2 would require the neighborhood homeowner's association (HOA) to implement a TDM program in conjunction with the development application. Because a VMT mitigation fee, bank, or exchange program does not currently exist, at this time additional mitigation through financial contribution is not feasible. As a result, the VMT impacts associated with the proposed project and the project variant would be **significant and unavoidable**.

- **Impacts TCR-1 and TCR-2: Tribal Cultural Resources (Tribal Cultural Resources).** The presence of two precontact midden deposits, one of which contained Native American human remains, within 0.25 mile of the project site indicates increased potential for encountering as-yet undocumented tribal cultural resources deposits during project-related ground disturbance. This impact would be **potentially significant** for both the proposed project and variant. Under the proposed project and variant, implementation of mitigation measures CULT-2a and CULT-2b (as described in Draft EIR Section 3.4) would reduce the project and variant impacts on tribal cultural resources to **less-than-significant with mitigation**.
- **Impact UT-1: Utilities (relocation of construction of a new or expanded facility).** The addition of wastewater from 155 residences on site would substantially increase the volume of wastewater conveyed through sewage pipes by quadrupling the number of homes discharging wastewater into sewer lines. Therefore, there is a potential for additional flows to both exacerbate existing degraded conditions (aging pipes, root intrusion) as well as not to meet fire flow requirements. This impact would be **potentially significant**. Future water use at the fields would be similar to or less than current use. If turf is synthetic, then water use would decrease. If turf is natural grass, then water use would likely stay the same with irrigation, restroom use, and other incidental water consumption. However, without the improvement related to the residential development, impacts related to water pressure under both the project and variant would be **potentially significant**. Mitigation measures UT-1a and UT-1b would be implemented to reduce the impacts to **less than significant with mitigation**.
- **Cumulative Greenhouse Gas Emissions Impacts.** Even with implementation of a TDM program through mitigation measure TRA-2, the proposed project and project variant would result in a **cumulatively considerable** impact with respect to GHG emissions during operations, and there are no feasible mitigation measures to reduce this impact.
- **Cumulative Transportation Impacts.** The proposed project and variant VMT per resident would be 14.7 VMT per resident, which exceeds the threshold of 15 percent below the existing regional average of 14.6 VMT per resident. With implementation of the TDM program under Mitigation Measure TRA-2, alternative modes would be encouraged, the use of single-occupant vehicles would be discouraged, and the impact of additional vehicles generated by the project would be lessened. However, as explained in Impact TRA-2, impacts would be significant and unavoidable. As a result, the proposed project's and project variant's contribution would be **cumulatively considerable**.

1.4 Project Alternatives

The EIR discusses and analyzes the No Project Alternative, Increased Density with ADUs and Open Space and Recreation Alternative, and Reduced Density with Open Space and Recreation Alternative. Furthermore, the EIR analyzes the impacts of the alternatives and compares the significant impacts of the alternatives to the significant environmental impacts of the project as proposed. These alternatives are described in more detail in Draft EIR Chapter 5, *Alternatives*.

- **Increased Density with ADUs and Open Space and Recreation Alternative.** The Increased Density with ADUs and Open Space and Recreation alternative would increase housing density to reduce per-capita VMT. This alternative would construct 287 units located in two neighborhoods.
- **Reduced Density with Open Space and Recreation Alternative.** The Reduced Density with ADUs and Open Space and Recreation alternative would result in 112 units at the project site and include BMR homes spread throughout the two neighborhoods.
- **No Project Alternative.** The No Project Alternative compares the impacts of the proposed project to what would be reasonably expected to occur in the foreseeable future if the proposed project is not approved and development continues to occur in accordance with existing plans and consistent with available infrastructure and community services (State CEQA Guidelines Section 15126.6(e)(2)).

1.5 Organization of the Final EIR

This document addresses substantive comments received during the public review period and consists of five sections.

- **Chapter 1, *Introduction*.** Reviews the purpose and contents of the responses-to-comments document.
- **Chapter 2, *List of Commenters*.** Lists the public agencies and City of San Bruno Planning Commissioners who submitted and made comments on the Draft EIR.
- **Chapter 3, *Responses to Comments*.** Contains each comment letter and written responses to the individual comments. Specific comments within each comment letter have been bracketed and enumerated in the margin of the letter. Each commenter has been assigned a discrete comment letter number, as listed in Chapter 2. Generally, the responses provide explanatory information or additional discussion of the text contained in the Draft EIR. In some instances, the response supersedes or supplements the text of the Draft EIR for accuracy or clarification. This chapter shows revisions to the Draft EIR in response to comments. Where a comment repeats a previous comment, the response refers to the response previously given.
- **Chapter 4, *Other Revisions to the Draft EIR*.** Provides a listing of the text changes to the Draft EIR that resulted from City-initiated changes. New text that has been added to the Draft EIR is indicated with underlining. Text that has been deleted is indicated with ~~strikethrough~~.

Chapter 2

Comments Received on the Draft EIR

This chapter includes a list of the public agencies, planning commissioners, and individuals who commented on the draft environmental impact report (Draft EIR) (Table 2-1), as well as the actual comment letters submitted. The comment letters have been numbered as shown in Table 2-1 and include letters and emails. The individual comments within each letter have been numbered in the margin. There is a response for each comment in Chapter 3, *Responses to Comments*.

Table 2-1. List of Commenters

Letter #	Commenter
State Agencies	
S1	California Department of Transportation District 4
Local Agencies	
L1	San Francisco International Airport
L2	San Mateo Union High School District
Individuals	
I1	Lawrence Marsili
I2	Jeffery D.
I3	Lisa H
I4	Robert S.
Planning Commission	
PC1	Commissioner Harman
PC2	Commissioner Kuhn
PC3	Commissioner Lethin
PC4	Commissioner Durazo
PC5	Commissioner Biasotti
PC6	Commissioner Madden

2.1 Comment Letter S1: California Department of Transportation District 4

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



December 5, 2023

SCH #: 2023040239
GTS #: 04-SM-2023-00549
GTS ID: 29603
Co/Rt/Pm: SM/280/R19.785

Michael Smith, Senior Planner
City of San Bruno
567 El Camino Real
San Bruno, CA 94066

Re: Crestmoor, 300 Piedmont Avenue Project – Draft Environmental Impact Report (DEIR)

Dear Michael Smith:

- S1-1 Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Crestmoor, 300 Piedmont Avenue 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.
- S1-1 The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the October 2023 Draft DEIR.
- Project Understanding**
The proposed project would redevelop the approximately 40.2-acre former Crestmoor High School site located at 300 Piedmont Avenue with a new 155-lot single family detached home community with associated open space and infrastructure. This project site is in vicinity of I-280.
- S1-2 **Travel Demand Analysis**
With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Michael Smith, Senior Planner
 December 5, 2023
 Page 2

S1-2
 Cont.

The project's Vehicle Miles Traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. Per the DEIR, this project is found to have a significant and unavoidable VMT impact. Caltrans commends the Lead Agency in developing the Transportation Demand Management (TDM) program to reduce VMT.

Using Caltrans' Smart Mobility Framework Guide 2020 ([link](#)), the proposed project site is identified as a Suburban Community where community design is moderate and regional accessibility is strong. In addition to the proposed TDM program in the DEIR, please consider the measures listed below quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Increased density
- Increased location efficiency
- Increased mixed-use development
- Increased transit accessibility
- Orientation of Project towards non-auto corridor
- Location of project near bicycle network
- Pedestrian network improvements
- Bus rapid transit
- Provide local shuttles to increase transit outreach

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, refer to the California Air Pollution Control Officers Association (CAPCOA) Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity ([link](#)).

S1-3

Lead Agency

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

S1-4

Construction-Related Impacts

Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)). Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the STN.

"Provide a safe and reliable transportation network that serves all people and respects the environment"

Michael Smith, Senior Planner
December 5, 2023
Page 3

S1-5 [Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Melissa Hernandez, Associate Transportation Planner, via LDR-D4@dot.ca.gov. For future early coordination opportunities or project referrals, please contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

"Provide a safe and reliable transportation network that serves all people and respects the environment"

2.2 Comment Letter L1: San Francisco International Airport

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA



San Francisco International Airport

December 5, 2023

Michael Smith
 City of San Bruno
 Community and Economic Development Department
 567 El Camino Real
 San Bruno, California 94066

TRANSMITTED VIA EMAIL ONLY
 msmith@sanbruno.ca.gov

Subject: Comments on Draft Environmental Impact Report: 300 Piedmont Avenue Project, San Bruno, California

L1-1

Thank you for notifying the San Francisco International Airport (SFO or the Airport) of the availability of the Draft Environmental Impact Report (DEIR) for the 300 Piedmont Avenue Project (Proposed Project), located in the City of San Bruno (City). We appreciate this opportunity to review and provide comments on the DEIR.

As stated in the DEIR, the Proposed Project is located at 300 Piedmont Avenue (Assessor’s Parcel Number 019-170-020) on an approximately 40-acre site. Existing single-family subdivisions are to the north, west, and south, and a wooded hillside and Interstate 280 are to the east. The site is developed with buildings and facilities associated with the former Crestmoor High School, which closed in 1980.

The Proposed Project consists of demolishing the existing structures and establishing a new 155-lot single-family detached home community with associated open space and infrastructure. The Proposed Project would include approximately 19.2 acres of publicly accessible open space. Of this acreage, approximately 6.9 acres would be owned and maintained by the City, and approximately 12.3 acres would be owned and maintained by the Homeowners Association (HOA). A portion of the City-owned open space would be developed as multi-use sports fields with permanent lighting.

The DEIR also evaluates a variant to the Proposed Project. The variant would differ as follows: (1) there would be approximately 19.75 acres of publicly accessible open space (12.24 acres owned by the City and 7.51 acres owned by the HOA); and (2) the primary stormwater treatment basin for the residential component would be on a 0.75-acre parcel on private property that would be owned and maintained by the HOA instead of being located within an easement on City-owned property. All other components would remain the same as under the Proposed Project.

Airport Influence Areas

L1-2

The Proposed Project site is within two Airport Influence Areas (AIAs): Area A – Real Estate Disclosure Area (all of San Mateo County) and Area B – Policy/Project Referral Area (a smaller subarea in the northern part of San Mateo County), as defined by the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP). Within Area A, the real estate disclosure requirements of state law apply (see attachment). A property owner offering a property for sale or lease must disclose the presence of planned or existing airports within two miles of the property. Within Area B, the Board of Directors of the City/County Association of Governments of San Mateo County, acting as the designated Airport Land Use Commission (ALUC), shall review

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO
 LONDON N. BREED MALCOLM YEUNG EVERETT A. HEWLETT, JR. JANE NATOLI JOSE F. ALMANZA MARK BUELL IVAR C. SATERO
 MAYOR PRESIDENT VICE PRESIDENT AIRPORT DIRECTOR
 Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

*Michael Smith, City of San Bruno
December 5, 2023
Page 2 of 5*

L1-2
Cont.

proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals (see attachment). The real estate disclosure requirements in Area A also apply in Area B.

SFO ALUCP Policies

The Proposed Project site is located outside of the 65 decibel Community Noise Equivalent Level (CNEL) contour and all safety compatibility zones and, therefore, the Proposed Project would not appear to be inconsistent with the Noise and Safety Compatibility Policies adopted in the SFO ALUCP.

L1-3

As described in Exhibit IV-17 of the SFO ALUCP (see attachment), the critical aeronautical surfaces at the Proposed Project location are at an elevation of approximately 880 feet above mean sea level (AMSL) as defined from the origin of the North American Vertical Datum of 1988 (NAVD88). The Proposed Project site is at an elevation of about 433 feet AMSL. The maximum height of the single-family residences would be 28 feet (an elevation of about 461 feet AMSL), which would be lower than the elevation of the lowest critical aeronautical surface. In addition, the maximum height of the light standards at the multi-use sports fields would be 80 feet (an elevation of about 513 feet AMSL), which would also be lower than the elevation of the lowest critical aeronautical surface. Therefore, the Proposed Project would not appear to be inconsistent with Airspace Protection Policy AP-3 (Maximum Compatible Building Height) of the SFO ALUCP, subject to the issuance of a Determination of No Hazard from the Federal Aviation Administration (FAA) for any proposed structures (see below), and determinations from the City/County Association of Governments of San Mateo County as the designated ALUC.

This evaluation does not waive the requirement for the Proposed Project sponsor to undergo FAA airspace review as described in 14 Code of Federal Regulations Part 77 for both (1) the permanent structures and (2) any equipment taller than the permanent structures required to construct those structures. The DEIR states that the Proposed Project sponsor and the City shall obtain a Determination of No Hazard from the FAA, when notification under Part 77 is required, for the residential component and the recreational component, respectively (see Mitigation Measures M-HAZ-5a and M-HAZ-5b on pages 3.8-12 through 3.8-13 of the DEIR).

Airspace Protection Policy AP-4 (Other Flight Hazards Are Incompatible) states that “(a) [s]ources of glare, such as highly reflective buildings or building features, or bright lights ... which would interfere with the vision of pilots making approaches to the Airport,” are incompatible with the SFO ALUCP. The DEIR states that the proposed lighting associated with the recreational use would be downward-facing as they are meant to illuminate the field during game play. In addition, the City would provide proof of consistency with FAA rules and regulations and with any performance standards identified in Airspace Protection Policy AP-4 to the ALUC (see Impact HAZ-5 on pages 3.8-11 through 3.8-13 of the DEIR).

Housing Density Outside the Noise Compatibility Zones

L1-4

As the Airport stated in previous comment letters addressed to the City (May 4, 2023) and to the ALUC (August 10, 2023), the General Plan designation for the Proposed Project site is Low Density Residential, which allows a maximum density of eight units per acre. Given the size of the site (approximately

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

*Michael Smith, City of San Bruno
December 5, 2023
Page 3 of 5*

L1-4
Cont.

40 acres), it would be possible under existing zoning regulations to develop much denser housing at this site (up to 320 units), providing twice as many units as currently proposed. Developing only 155 units (3.9 units per acre) on this site represents a missed opportunity to provide housing in a location that is consistent with federal and State land use compatibility statutes to safeguard public health and safety, which is reflected in the Noise Compatibility Policies adopted in the SFO ALUCP.

Increasing the residential density allowed on this site would reduce the City's Regional Housing Needs Assessment (RHNA) obligations at other sites and would alleviate development pressures at incompatible sites like the Tanforan Mall, where there would be unmitigable noise effects on residents leading to environmental justice issues if the City proceeds with adding housing. In previous conversations with the City regarding Tanforan Mall, City staff shared that their community is entirely developed and that Tanforan Mall represents the only site large enough to accommodate a substantial proportion of the City's RHNA obligations. Tanforan Mall is only four acres larger than the Proposed Project site, and the portion of Tanforan that would be dedicated to housing is about eight acres compared to 22 acres at the Proposed Project site. Using even half of the assumed density for the incompatible Tanforan Mall site would yield nearly 1,400 housing units. The attached overlay figure of the Tanforan Mall plan atop the Proposed Project site demonstrates the site's scale and ability to accommodate substantially more housing development.

The DEIR concludes that the addition of 155 housing units on the site would result in a significant and unavoidable impact related to greenhouse gas emissions (see Impacts GHG-1 and GHG-2 on pages 3.7-11 through 3.7-18 of the DEIR). Increasing the amount of housing on the site above 155 units would not change a less-than-significant impact to a significant and unavoidable impact; the impact from 155 units has already been determined to be significant and unavoidable. Furthermore, while the Proposed Project site is not currently well served by local mass transit, an increase in housing density would, by definition, increase trip density and make such service more viable than it would be under a single-family residential development scheme.

The Airport strongly urges the City to consider the Proposed Project site and other compatible sites for maximum density, including via upzoning, before exploring the introduction of housing into incompatible sites.

Recommended DEIR Text Revisions

L1-5

Chapter 3.8, Hazards and Hazardous Materials, of the DEIR discusses local regulations that are applicable to the Proposed Project. The Airport recommends the following revision (new text shown in double underline) to the last paragraph beginning at the bottom of page 3.8-5 of the DEIR:

The proposed project site is inside Airport Influence Areas A and B as defined by the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP). Each airport/land use compatibility plan (ALUCP) is required to contain policies and criteria to address three key issues: (a) aircraft noise impacts, (b) safety compatibility criteria, and (c) height of structures/airspace protection (Ricondo & Associates 2012).

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

Michael Smith, City of San Bruno
 December 5, 2023
 Page 4 of 5

The Airport recommends the following revisions (deletions shown in ~~striketrough~~ and new text shown in double underline) to the first paragraph under the "Airports" heading on page 3.8-7 of the DEIR and the addition of two paragraphs immediately thereafter:

The closest airport to the project is SFO, which is located adjacent to San Bruno, just east of Highway 101. SFO is approximately 1.6 miles east of the project site and has a total of four runways (City of San Bruno 2009). The project is inside ~~the~~ Airport Influence Areas (AIA) A and B as defined by the SFO ALUCP (~~Sinha 2023~~). The policies/policy that apply/applies in AIA A and B are/is (C/CAG 2012):

IP-1. Airport Influence Area A – Real Estate Disclosure Area: Within Area A
the real estate disclosure requirements of state law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property.² The law requires that, if the property is within an "airport influence area" designated by the airport land use commission, the following statement must be included in the notice of intention to offer the property for sale:

NOTICE OF AIRPORT IN VICINITY

This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.

The Airport recommends the following revisions (deletions shown in ~~striketrough~~ and new text shown in double underline) to the second paragraph under Impact HAZ-5 on pages 3.8-11 to 3.8-12 of the DEIR:

Flight hazards include tall objects as well as visual and electronic forms of interference. The project site is inside AIA B as defined by the SFO ALUCP. The critical aeronautical surfaces at the proposed project location are at an elevation of approximately 860 feet AMSL~~amsl~~ (C/CAG 2012). The school site elevation is about 430 feet AMSL~~amsl~~, and the maximum height of the single-family residences would be 28 feet. Therefore, the elevation~~height~~ of the residences would be below ~~the elevation of the~~ critical aeronautical surfaces. The field elevation is about 380 feet AMSL~~amsl~~, and the tallest light standard would be 80 feet, meaning that the elevation of the lighting structures would also be below ~~the elevation of the~~ critical aeronautical surfaces identified in the ALUCP. A crane may also be used to install the light standards but would be a temporary use. Therefore, the proposed project and variant would not conflict with the Airspace Compatibility Policies of the SFO ALUCP.

L1-5
 Cont.

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

*Michael Smith, City of San Bruno
December 5, 2023
Page 5 of 5*

* * *

The Airport appreciates your consideration of these comments. If I can be of assistance, please do not hesitate to contact me at (650) 821-6678 or at nupur.sinha@flysfso.com.

Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE68A4CE495...

Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport

Attachments

Airport Influence Area and Airspace Protection Policies of the SFO ALUCP
Overlay of Tanforan Preliminary Project Application at 300 Piedmont Avenue

cc: Audrey Park, SFO
Chris DiPrima, SFO
Alex D. McIntyre, City of San Bruno
Darcy Smith, City of San Bruno
Michael Laughlin, City of San Bruno
Matt Neuebaumer, City of San Bruno
Matt Maloney, ABAG
Mark Shorett, ABAG

4.2 Airport Influence Area (AIA)

The AIA for SFO includes two parts: Area A and Area B. Area A is the larger of the two areas and encompasses all of San Mateo County. Area B lies within Area A and includes land exposed to aircraft noise above CNEL 65 dB or lying below critical airspace.

Area A, depicted on **Exhibit IV-1**, includes the entire county, all of which is overflown by aircraft flying to and from SFO at least once per week at altitudes of 10,000 feet or less above mean sea level (MSL). (Appendix L explains the rationale for defining the AIA Area A boundary.)

Area B of the AIA, depicted on **Exhibit IV-2**, is based on a combination of the outer boundaries of the noise compatibility and safety zones, the 14 CFR Part 77 conical surface, and the TERPS approach and One-Engine Inoperative (OEI) departure surfaces.¹ As depicted on Exhibit IV-2, the Area B boundary has been adjusted to follow streets, highways, and corporate boundaries to make it easier to identify and implement. See **Exhibit IV-3** for a close-up view of the northwestern half of Area B and **Exhibit IV-4** for a close-up view of the southeastern half.

The following AIA policies (IP) shall apply to the ALUCP.

IP-1 AIRPORT INFLUENCE AREA A – REAL ESTATE DISCLOSURE AREA

Within Area A, the real estate disclosure requirements of state law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property.² The law requires that, if the property is within an “airport influence area” designated by the airport land use commission, the following statement must be included in the notice of intention to offer the property for sale:

NOTICE OF AIRPORT IN VICINITY

This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example: noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.

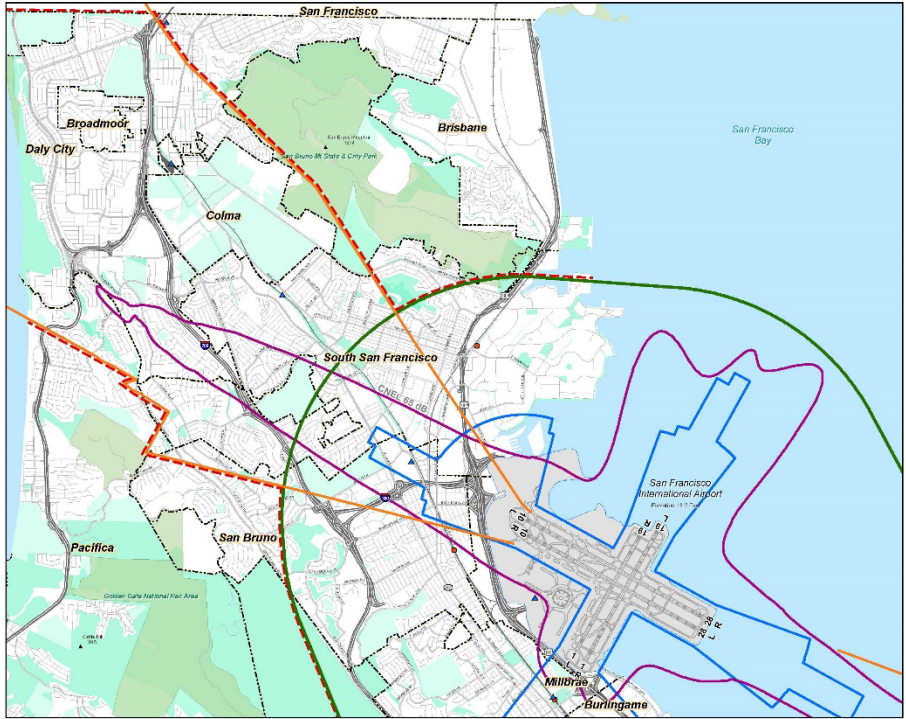
¹ On the northwest side, the Area B boundary corresponds to the 800-foot elevation line of the TERPS approach surface and the OEI departure surface. On the southeast side, the Area B boundary corresponds with the transitional surfaces rising from the flat, central portion of the TERPS surface having an elevation of 210 feet MSL. See Exhibits IV-17 and IV-18 for a detailed depiction of the airspace surfaces.

² California Business and Professions Code, Section 11010(b)(13).

[IV-2]

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

DocuSign Envelope ID: 80372E85-53B7-4E67-B055-370FAE201DFCA



DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

THE CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

NOVEMBER 2012

IP-2 AIRPORT INFLUENCE AREA B – POLICY/PROJECT REFERRAL AREA

Within Area B, the Airport Land Use Commission (the C/CAG Board) shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals. The real estate disclosure requirements in Area A also apply in Area B. For the purposes of this policy, parcels along the edge of the Area B Boundary that are split by the boundary shall be considered as fully being within Area B.

Portions of unincorporated San Mateo County and the following municipalities are located within Area B:

- Daly City – small part of the city in the Serramonte area
- Colma –the entire town
- Pacifica – north and northeast of the city
- South San Francisco – all but north and west sides of the city
- San Bruno – all but northwest corner of the city
- Millbrae – the entire city
- Burlingame – the entire city
- Hillsborough – the northern part of the town, north of Chateau Drive
- San Mateo – a few blocks in the City of San Mateo
- Foster City – the northern part of the City
- Unincorporated San Mateo County: California Golf Club, Country Club Park, Burlingame Hills, and San Francisco International Airport

The following special districts are located within Area B of the AIA:

- North San Mateo County Sanitation District
- Peninsula Health Care District
- San Mateo County Flood Control District
- San Mateo County Harbor District
- San Mateo County Mosquito & Vector Control District
- Westborough County Water District

The following school districts and community college district are located within Area B:

- Bayside Elementary School District
- Brisbane Elementary School District
- Burlingame Elementary School District

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

[IV-11]

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

THE CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

NOVEMBER 2012

- Hillsborough City Elementary School District
- Jefferson Elementary School District
- Jefferson Union High School District
- Millbrae Elementary School District
- Pacifica School District
- San Bruno Park Elementary School District
- San Mateo County Community College District
- San Mateo Foster City Elementary School District
- San Mateo Union High School District
- South San Francisco Elementary School District

4.3 Noise Compatibility Policies

The airport noise compatibility policies described in this section have a two-fold purpose:

1. To protect the public health, safety, and welfare by minimizing the exposure of residents and occupants of future noise-sensitive development to excessive noise.
2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs complies with all requirements necessary to ensure compatibility with aircraft noise in the area. The intent is to avoid the introduction of new incompatible land uses into the Airport's "noise impact area" so that the Airport will continue to be in compliance with the State Noise Standards for airports (California Code of Regulations, Title 21, Sections 5012 and 5014).³

The following noise compatibility policies (NP) shall apply to the ALUCP.

NP-1 NOISE COMPATIBILITY ZONES

For the purposes of this ALUCP, the projected 2020 CNEL noise contour map from the Draft Environmental Assessment for the Proposed Runway Safety Area Program shall define the boundaries within which noise compatibility policies described in this Section shall apply.⁴ **Exhibit IV-5** depicts the noise compatibility zones. More detail is provided on **Exhibit IV-6**. The zones are defined by the CNEL 65, 70 and 75 dB contours.

³ In 2002, the San Mateo County Board of Supervisors declared that the Airport had eliminated its "noise impact area," as defined under state law -- California Code of Regulations, Title 21, Sections 5012 and 5014.

⁴ URS Corporation and BridgeNet International. *Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport*, June 2011.

[IV-12]

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

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

THE CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

NOVEMBER 2012

and associated with human disease of varying severity.

- b. Biosafety Level 3 practices, safety equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, research, or production facilities in which work is done with indigenous or exotic agents with a potential for respiratory transmission, and which may cause serious and potentially lethal infection.
- c. Biosafety Level 4 practices, safety equipment, and facility design and construction are applicable for work with dangerous and exotic agents that pose a high individual risk of life-threatening disease, which may be transmitted via the aerosol route and for which there is no available vaccine or therapy.

4.5 Airspace Protection

The compatibility of proposed land uses with respect to airspace protection shall be evaluated in accordance with the policies set forth in this section. These policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to potential safety hazards that could be created through the construction of tall structures.
2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs avoids compromising the airspace in the Airport vicinity. This avoids the degradation in the safety, utility, efficiency, and air service capability of the Airport that could be caused by the attendant need to raise visibility minimums, increase minimum rates of climb, or cancel, restrict, or redesign flight procedures.

4.5.1 FEDERAL REGULATIONS REGARDING TALL STRUCTURES

14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use and Preservation of the Navigable Airspace*, governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. **Appendix F** describes the FAA airspace review process and the extent of FAA authority related to airspace protection.

4.5.2 PART 77, SUBPART B, NOTIFICATION PROCESS

Federal regulations require any person proposing to build a new structure or alter an existing structure with a height that would exceed the elevations described in CFR Part 77, Subpart B, Section 77.9, to prepare an FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, and submit the notice to the FAA. The regulations apply to buildings and other structures or portions of structures, such as mechanical equipment, flag poles, and other projections that may exceed the aforementioned elevations.

[IV-34]

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

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

THE CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

NOVEMBER 2012

Exhibit IV-10 depicts the approximate elevations at which the 14 CFR Part 77 notification requirements would be triggered; see **Exhibit IV-11** for a close-up view of the northern half and **Exhibit IV-12** for a close-up view of the southern half of the area. These exhibits are provided for informational purposes only. Official determinations of the areas and elevations within which the federal notification requirements apply are subject to the authority of the FAA. The FAA is empowered to require the filing of notices for proposed construction based on considerations other than height. For example, in some areas of complex airspace and high air traffic volumes, the FAA may be concerned about the potential for new construction of any height to interfere with electronic navigation aids. In these areas, the FAA will want to review all proposed construction projects.

The FAA has developed an on-line tool for project sponsors to use in determining whether they are required to file a Notice of Proposed Construction or Alteration. Sponsors of proposed projects are urged to refer to this website to determine whether they are required to file Form 7460-1 with the FAA:

<https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm>

4.5.3 AIRSPACE MAPPING

Part 77, Subpart C, establishes obstruction standards for the airspace around airports including approach zones, conical zones, transitional zones, and horizontal zones known as “imaginary surfaces.” **Exhibit IV-13** depicts the Part 77 Civil Airport Imaginary Surfaces at SFO. The imaginary surfaces rise from the primary surface, which is at ground level immediately around the runways. The surfaces rise gradually along the approach slopes associated with each runway end and somewhat more steeply off the sides of the runways. The FAA considers any objects penetrating these surfaces, whether buildings, trees or vehicles travelling on roads and railroads, as obstructions to air navigation. Obstructions may occur without compromising safe air navigation, but they must be marked, lighted, and noted on aeronautical publications to ensure that pilots can see and avoid them.

Close-up views of the north and south sides of the Part 77 surfaces are provided in **Exhibit IV-14** and **Exhibit IV-15**, respectively. Additionally, **Exhibit IV-16** provides an illustration of the outer approach and transitional surfaces located on the southeast side of the Part 77 surfaces.

Together with its tenant airlines, SFO has undertaken a mapping effort to illustrate the critical aeronautical surfaces that protect the airspace required for multiple types of flight procedures such as those typically factored into FAA aeronautical studies, as shown on **Exhibit IV-17** and **Exhibit IV-18**. These aeronautical surfaces include those established in accordance with FAA Order 8260.3B, *U.S. Standard for Terminal Instrument Procedures (TERPS)*, and a surface representing the airspace required for One-Engine Inoperative (OEI) departures from Runway 28L (to the west through the San Bruno Gap).¹⁶ The exhibits depict the lowest elevations from the combination of the OEI procedure surface and all TERPS surfaces. The surfaces are defined with Required Obstacle Clearance (ROC) criteria to ensure safe separation of aircraft using the procedures from the underlying obstacles. Any proposed structures penetrating these surfaces are likely to receive Determinations of Hazard (DOH) from the FAA through the 7460-1 aeronautical study process. These surfaces indicate the maximum height at which structures can be considered compatible with Airport operations.

¹⁶ See Appendix F, Section F.3.2 for a discussion of one-engine inoperative procedures.

Exhibit IV-19, which is provided for information purposes only, depicts a profile view of the lowest critical airspace surfaces along the extended centerline of Runway 10L-28R – the TERPS Obstacle Departure Procedure (ODP) surface, representing standard all-engines departures, and the approximate OEI surface developed by SFO through independent study in consultation with the airlines serving SFO. The exhibit also shows the terrain elevation beneath the airspace surfaces and various aircraft approach and departure profiles, based on varying operating assumptions. The exhibit illustrates a fundamental principle related to the design of airspace protection surfaces. The surfaces are always designed below the actual aircraft flight profile which they are designed to protect, thus providing a margin of safety. Note that the ODP climb profile is above the ODP airspace surface, and the OEI climb profile is above the OEI airspace surface.

4.5.4 AIRSPACE PROTECTION POLICIES

The following airspace protection policies (AP) shall apply to the ALUCP.

<p>AP-1 COMPLIANCE WITH 14 CFR PART 77, SUBPART B, NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION</p> <p>AP-1.1 Local Government Responsibility to Notify Project Sponsors</p> <p>Local governments should notify sponsors of proposed projects at the earliest opportunity to file Form 7460-1, <i>Notice of Proposed Construction or Alteration</i>, with the FAA for any proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10. Under Federal law, it is the responsibility of the project sponsor to comply with all notification and other requirements described in 14 CFR Part 77. This requirement applies independent of this ALUCP.</p> <p>AP-1.2 FAA Aeronautical Study Findings Required Before Processing Development Application</p> <p>The sponsor of a proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10, shall present to the local government permitting agency with his or her application for a development permit, a copy of the findings of the FAA’s aeronautical study, or evidence demonstrating that he or she is exempt from having to file an FAA Form 7460-1. It is the responsibility of the local agency to consider the FAA determination study findings as part of its review and decision on the proposed project.</p>
<p>AP-2 COMPLIANCE WITH FINDINGS OF FAA AERONAUTICAL STUDIES</p> <p>Project sponsors shall be required to comply with the findings of FAA aeronautical studies with respect to any recommended alterations in the building design and height and any recommended marking and lighting of their structures for their proposed projects to be deemed consistent with this ALUCP.</p>

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

THE CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

NOVEMBER 2012

AP-3 MAXIMUM COMPATIBLE BUILDING HEIGHT

In order to be deemed consistent with the ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.

For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 *Notice of Proposed Construction or Alteration*, if required, and to comply with the determinations resulting from the FAA's aeronautical study.

For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which **has not** received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.

AP-4 OTHER FLIGHT HAZARDS ARE INCOMPATIBLE

Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action.

Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

- (a) Sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport.
- (b) Distracting lights that that could be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting.
- (c) Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport.
- (d) Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar.
- (e) Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in

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

[IV-59]

DocuSign Envelope ID: 60373E85-53B7-4E87-B056-3F0FAB30DFCA

THE CITY/COUNTY ASSOCIATION OF GOVERNMENTS OF SAN MATEO COUNTY

NOVEMBER 2012

flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight.¹⁷

(f) Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, statute, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

4.5.5 iALP AIRSPACE TOOL

In consultation with C/CAG, SFO developed the iALP Airspace Tool, a web-based, interactive tool to evaluate the relationship of proposed buildings with the Airport's critical airspace surfaces. The iALP Airspace Tool is designed to assist planners, developers, and other interested persons with the implementation of the airspace protection policies of the SFO ALUCP. The tool helps users determine: (1) the maximum allowable building height at a given site, and/or (2) whether a building penetrates a critical airspace surface, and by how much, given the proposed building height.

A more detailed description of the iALP Airspace Tool and a tutorial explaining how to use it is presented in **Appendix J**. Use of this tool, however, does not relieve a project sponsor of the duty to comply with all federal regulations, including the obligation to file Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA.

¹⁷ This is a threshold established by the California Energy Commission in its review of power plant licensing applications. See *Blythe Solar Power Project Supplemental Staff Assessment, Part 2*, CEC-700-2010-004-REV1-SUP-PT2, July 2010. California Energy Commission. Docket Number 09-AFC-6, p. 25. This criterion is based on guidance established by the Australian Government Civil Aviation Authority (Advisory Circular AC 139-05(0), June 2004). The FAA's Airport Obstructions Standards Committee (AOSC) is studying this matter but has not yet issued specific guidance.

[IV-60]

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

2.3 Comment Letter L2: San Mateo Union High School District

San Mateo Union High School District

Randall Booker, Superintendent
 Kirk Black, Ed.D., Deputy Superintendent Human Resources and Student Services
 Yancy Hawkins, CPA, Associate Superintendent, Chief Business Officer
 Julia Kempkey, Ed.D., Assistant Superintendent of Curriculum and Instruction



December 1, 2023

City of San Bruno Community and Economic Development Department
 Attn: Michael Smith
 567 El Camino Real
 San Bruno, CA 94066
msmith@sanbruno.ca.gov

Dear Michael,

This comment is pursuant to the 300 Piedmont Avenue Project Draft Environmental Impact Report (EIR) dated October 2023, specifically section 4.5.2 Evaluation of Alternative (page 4-14). In section 2.5.2, the EIR notes the following:

L2-1

- Recreation. The No Project Alternative would not include housing or increased activity at the project site; therefore, this alternative would not increase demand for recreational facilities associated with new residents. The proposed project would result in fewer recreational fields compared to existing conditions. Under the No Project Alternative, all existing fields would remain, avoiding the temporary loss of fields during construction and permanent loss of one City of San Bruno Alternatives Analysis 300 Piedmont Avenue Project Draft Environmental Impact Report 4-16 October 2023 field area. However, although the existing recreational facilities would continue to operate, the fields would not include lighting or other improvements to increase usage and accessibility. The No Project Alternative would have reduced impacts compared to the proposed project and project variant.

The San Mateo Union High School District (SMUHSD) has two current leases for the fields at the former Crestmoor High School allowing those fields to be used for recreational purposes. The term of those leases is July 1, 2023 through June 30, 2024. The leases have no provision for extension. Any agreement for future use of the fields at the former Crestmoor High School would require action from the SMUHSD Board of Trustees. Also, as of the writing of this comment letter, SMUHSD has not approved budget for the operations and maintenance of the fields of the fields at the former Crestmoor High School after June 30, 2024.

Sincerely,

Yancy Hawkins

Yancy Hawkins
 Associate Superintendent, Chief Business Officer

650 North Delaware Street, San Mateo, CA 94401-1732 (650) 558-2299 (650) 762-0249 FAX
 Adult School - Aragon - Burlingame - Capuchino - Hillsdale - Middle College - Mills - Peninsula - San Mateo
 An Equal Opportunity Employer

2.4 Comment Letter I1: Lawrence Marsili

Nov. 06. 2023 03:01 PM

PAGE. 1/ 1

FAX TRANSMISSION

Date: November 6, 2023

To: Mr. Michael Smith, Senior Planner for City of San Bruno Community
Development Dept., fax: 650 873-6749

From: Mr. Lawrence Marsili, 2391 Bennington Dr., San Bruno, CA 94066
650 583-9429

Ref: Crestmoor, 300 Piedmont Avenue Project

Subject: Comments on Draft EIR

I1-1

Message: Assuming the project goes ahead as planned for development I would like to address the demolition & construction heavy vehicle routes to and from the project site.

The demolition and construction heavy vehicles should be restricted to using only those avenues, streets, drives & ways that now have center dividing double yellow lines. Those large demolition & construction heavy vehicles should not use the residential side streets (eg. Bennington Dr.) as shortcuts to and from the project site.

2.5 Comment I2: Jeffery D

Comment Summary: Planning Commission 300
Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

I2-1	<p>Jeffrey D.</p>	<p>The commenter is a Madison Avenue resident. They have no concerns about construction and understands there needs to be disruption for progress.</p> <p>The commenter is concerned about traffic impacts to the neighboring community. During construction, will there be designated trucking routes? Will there be designated routes for employees? There will be 24,000 cubic yards of off-haul, and the trucks associated with that. The contractor controls it. Will the routes be in the contract?</p> <p>The commenter is concerned about when the development is done. The EIR mentions Madison Avenue once as a bordering street. For access street, the EIR names other streets, but not Madison Avenue. There was an increase in traffic with Peninsula High School, and the project would include more traffic.</p> <p>The commenter is concerned with the speed of existing traffic from San Bruno Avenue to Princeton Drive to Madison Avenue, then taking a left on Piedmont. Planning staff referred the commenter to Public Works regarding the speed of vehicles and traffic calming measures.</p>
------	-------------------	---

2.6 Comment I3: Lisa H

Comment Summary: Planning Commission 300 Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

13-1	Lisa H.	The commenter is a Madison Avenue resident at the intersection with Bennington Drive. Trees and the school are behind their house. They are not used to construction, and they work at home. She shares Jeffrey D.'s concern that Madison Avenue is not mentioned in the EIR.
13-2		Below the site, what is the noise? They had not considered vibration.
13-3		What are the impacts on real estate? How much will the homes cost?
13-4		They commented on the less than significant conclusion for erosion but wondered about it being in their backyard. What if the trees are cut down and it rains?
13-5		There is wildlife in this area that should be considered.
13-6		Commenter stated that 21 months is a long time if they cannot work. They asked if the City is considering noise mitigation like triple-pane windows.
13-7		The houses are really nice. How will joyful noise affect them?
13-8		Commenter expressed concern that traffic is not considered. Commissioner Kuhn responded that a traffic management plan would be followed during construction. Commenter stated that they do not care about traffic but is more concerned about what is going on behind their house and past experiences with building and renovations on Madison.

2.7 Comment Letter I4: Robert S

From: Robert S. <LAKETAHOEFAN@hotmail.com>
Sent: Sunday, October 15, 2023 7:25 PM
To: Michael Smith <MSmith@sanbruno.ca.gov>
Subject: Hello

Hello:

Please pass on my concerns to the City Counsel.....

I4-1 I just wanted to voice some concern over the Crestmoor Soccer Field Project. First, San Bruno has an aging population that will mean that younger people will gain housing as the older population dies off of old age. This means that there might be a need for another high school in the future at Crestmoor. Companies Google, YouTube and Tanforan are all expanding so this too will bring in younger families. Genentech and the biotech industry is expanding in South San Francisco as well. So with this in mind, why would the Crestmoor Property be considered surplus?

I4-2 Additionally, San Bruno Park might be considered too small for its growing population so Crestmoor might be made into an additional park with picnic pads. Additionally, if the property at Crestmoor is used for soccer, a large Soccer stadium (with seating) might be built. Some sort of running track should exist but can be relocated on the property.

Thanks for listening.

Rob

2.8 Comment PC1: Commissioner Harman

Comment Summary: Planning Commission 300 Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

PC1-1	Commissioner Harman	Commissioner expressed that the project site is not a good location for transit-oriented development, but at the same time the literature on infill development is clear: it is relative to if the project does not exist. The way that VMT is evaluated for the project distorts the conclusions among the alternatives. They understand this is a weakness in the law but would be loathe to support Alternative 1. The No Project alternative would actually generate more VMT overall since it might mean that people are traveling to jobs in San Bruno from somewhere even farther away like Gilroy.
PC1-2		They are concerned about losing two fields, and this concern has come up in the community.

2.9 Comment PC2: Commissioner Kuhn

Comment Summary: Planning Commission 300 Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

PC2-1	Commissioner Kuhn	Does the EIR consider the net loss in recreational acreage? The EIR consultant clarified in the hearing that it does.
PC2-2		Was Madison Avenue part of the transportation study? The EIR consultant clarified that it was part of the stop warrant analysis, which is not in the EIR. There are four intersections that are most impacted, and all other intersections (including Madison) would experience less traffic than these four studied intersection.
PC2-3		The Commissioner understands the study of speeding is out of the scope of the environmental study and asked planners regarding future traffic calming. Planning staff referred to the Traffic Calming Committee.
PC2-4		Is the closure of the school considered a loss? The EIR consultant clarified the school has already been deemed surplus property by the District and that the EIR evaluates whether there are adequate school facilities for new students associated with the project and whether those new students would result in changes to physical facilities.

2.10 Comment PC3: Commissioner Lethin

Comment Summary: Planning Commission 300 Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

PC3-1	Commissioner Lethin	The Commissioner asked about tree removal and effects to the natural areas. The EIR consultant provided a description of the vegetation management plan to be implemented in the sloped area as well as tree removal and replacement on site.
PC3-2		The Commissioner asked whether the noise evaluation considered topography. The EIR consultant explained noise generated on site would be attenuated by changes in topography between the site and neighboring receptors, and the study considered this attenuation.
PC3-3		The Commissioner asked about the stormwater retention area and noted that one area seems to have less space for recreation. The EIR consultant referred to the comparison of recreation in the
PC3-3 Cont.		presentation and that the variant does provide less open space to the City.

2.11 Comment PC4: Commissioner Durazo

Comment Summary: Planning Commission 300
Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

PC4-1

Vice Chair Durazo

The Vice Chair asked about what the implication of the variant is for the stormwater treatment area in terms of its location on public or private property and who maintains it. What is known regarding commitments of funding and maintenance by the City? The EIR consultant clarified that in both instances the basin would be maintained by the HOA.

2.12 Comment PC5: Commissioner Biasotti

Comment Summary: Planning Commission 300
Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

PC5-1	Commissioner Biasotti	The Commissioner wanted to verify public comments are being captured. Planning staff confirmed they and the EIR consultant are taking notes, and there will be meeting minutes.
-------	-----------------------	---

2.13 Comment PC6: Commissioner Madden

Comment Summary: Planning Commission 300
Piedmont/Crestmoor Draft EIR Comment Meeting

Date: October 26, 2023

PC6-1		Chair Madden	The Chair discussed typical noise from construction and noted there should not be pile driving so neighbors may mostly hear noise from vehicle back up alarms.
PC6-2		The Chair expressed concerns similar to Jeffrey D. regarding off-hauling, road damage repair, cleaning asphalt, and that contractors will follow a haul route.	
PC6-3		The Chair expressed concern about traffic volume and speed.	
PC6-4		The Chair clarified if the peak traffic and duration of peak traffic would be the same during buildout as associated with the recreational component as it is now. The EIR consultant clarified this is true, setting aside unknown, speculative future users of the recreation field.	

This chapter includes responses for each of the numbered comments identified in the comment letters in Chapter 2, *Comments Received on the Draft EIR*. The responses also identify if revisions to the draft environmental impact report (Draft EIR) are required. These changes and staff-initiated changes are included in Chapter 4, *Text Revisions to the Draft EIR*.

3.1 State Agencies

3.1.1 S1, Caltrans

S1-1

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis and instead is an introduction to the comment letter. Therefore, no substantive response is required.

S1-2

The comment's acknowledgement that the Crestmoor, 300 Piedmont Avenue Project (project)'s analysis of vehicle miles traveled (VMT) and travel demand is consistent with the Office of Planning and Research's technical advisory. The acknowledgement that the proposed project would have significant and unavoidable impact with respect to VMT is consistent with the EIR's analysis; therefore, the comment requires no substantive response.

Regarding recommended mitigation measures to consider along with the proposed Transportation Demand Management (TDM) program in the EIR, the strategies in the proposed TDM program were selected from and quantified using the CAPCOA Handbook mentioned in the comment.

All of the strategies listed as suggestions in the comment were considered but ruled out as mitigation for one or more reasons.

- **Increased density.** The EIR considers an alternative with increased density as explained in response to comment L1-3.
- **Increased location efficiency, increased mixed-use development.** These strategies involve a change in the nature of the project and would also conflict with the project objectives to redevelop the site with a residential neighborhood and provide recreation fields. Additionally, a mixed-use development would be inconsistent with the General Plan designation and zoning. While the proposed project includes a General Plan Amendment and zoning map amendment, these amendments are to modify provisions regarding open space. The residential designation of the site would remain and would not accommodate mixed use. As a result, this is not considered feasible mitigation.
- **Improved bicycle network and transit access (increased transit accessibility and bus rapid transit).** The nearest transit stop is 0.5 mile away and there are no existing bicycle

facilities within 0.5 mile. This project alone as a singular project site cannot provide a useful bike or transit network. Shuttles to transit are also impractical for single-family homes in this location given the availability of low-cost parking at regional rail stations and because the ease of driving would likely minimize the demand for shuttles that could be perceived as less convenient due to frequency. Moving the project itself closer to the bicycle network and transit access would conflict with a key project objective of redeveloping the underutilized site of the former Crestmoor High School. As a result, improved bicycle network and transit access through moving the proposed project is not considered feasible mitigation.

- **Pedestrian network improvements.** Pedestrian network improvements are already part of the proposed project. The project would provide sidewalks and crosswalks throughout the two residential neighborhoods and improve the condition of the sidewalks and crosswalks adjacent to the recreation area. As a result, improvement of the pedestrian network does not need to be included as mitigation.

S1-3

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis and instead explains the City of San Bruno's responsibility for project mitigation. Therefore, no substantive response is required.

S1-4

The comment states that a California Department of Transportation (Caltrans) transportation permit is required for the movement of oversized or excessive load vehicles on state roadways.

The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis and instead explains oversized and excessive load permit requirements and the potential need to develop a Transportation Management Plan with Caltrans. The requirements are noted, and the developer of each project component (i.e., residential and recreational) would be responsible for obtaining all necessary permits and approvals.

S1-5

The comment expresses appreciation for the opportunity to comment and involvement in the environmental review process. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No substantive response is required.

3.2 Local Agencies

3.2.1 L1, SFO

L1-1

The comment repeats information found in the project description to demonstrate understanding of the project. The comment does not contain questions or concerns regarding the adequacy of the Draft EIR analysis. No substantive response is required.

L1-2

Refer to response to comment L1-5.

L1-3

The commenter's statement regarding the Community Noise Equivalent Level (CNEL) contour is consistent with the conclusion in Impact NOI-3 in the Draft EIR. On pages 3.11-27 through 3.11-38, the Draft EIR states, "Because the project site is outside of all airport contours according to the ALUCP (as shown in Appendix F, Noise Technical Report, Figure 6), the project would not conflict with the land use restrictions in the ALUCP."

The commenter's statements regarding critical aeronautical surfaces are also generally consistent with the analysis in Impact HAZ-5 on Draft EIR pages 3.8-11 through 3.8-12, save for minor differences in elevation that have no bearing on the impact conclusion. That discussion in the Draft EIR concludes, "Therefore, the proposed project and variant would not conflict with the Airspace Compatibility Policies of the SFO ALUCP."

The commenter's statement regarding Federal Aviation Administration (FAA) airspace review is consistent with the analysis in Impact HAZ-5 on Draft EIR pages 3.8-12 through 3.8-13, including mitigation measures HAZ-5a and HAZ-5b, which address FAA airspace review for the residential and recreation components, respectively, of the project.

The commenter's statements regarding Airport Land Use Compatibility Plan (ALUCP) Policy AP-4 and the field lighting are consistent with the analysis on Draft EIR page 3.8-12.

Because the information provided by the commenter is consistent with the information in the Draft EIR, no revisions or additional responses are necessary.

L1-4

Alternative 4 contemplates a project with residences constructed at the maximum density across the project site. As explained on Draft EIR page 4-20, this would include approximately 321 units on the site, one unit more than suggested by the commenter. As explained on pages 4-20 through 4-21 of the Draft EIR, this alternative does not meet a critical objective of the proposed project (i.e., providing recreational fields and other public facilities and amenities to provide recreational opportunities) and would not avoid or substantially reduce a significant impact of the proposed project. Therefore, the alternative does not meet CEQA requirements for alternatives and was, therefore, rejected from further consideration.

Note that Alternative 1 contemplates increased density compared to the proposed project and was carried forward for full evaluation in the Draft EIR. It includes a total of 287 units, as described on Draft EIR page 4-4, constructed within the same neighborhoods as the proposed project. As explained in the Draft EIR, this alternative meets all requirements under CEQA related to alternatives, including meeting most of the basic project objectives, avoiding or substantially reducing a significant impact of the proposed project, and being potentially feasible. The City of San Bruno does have the potential for development of high-density residential projects within its jurisdictional boundaries; however, the proposed project location does not include qualities common to maximum density residential projects. Higher density residential projects are typically found within urban development areas that include easy pedestrian access to commercial opportunities and services, such as alternative modes of transportation (e.g., BART). Therefore, while the Draft EIR does not consider a maximum density alternative as suggested by the commenter, it does bring forward an increased density alternative catering to the limitations of the proposed project site location. The opinions presented by the commenter supporting increased density are included in the record for consideration by decision-makers.

L1-5

The following revisions have been made in response to this comment on pages 3.8-5 through 3.8-6 of the Draft EIR.

The proposed project site is inside Airport Influence Areas A and B as defined by the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP). Each airport/land use compatibility plan (ALUCP) is required to contain policies and criteria to address three key issues: (a) aircraft noise impacts, (b) safety compatibility criteria, and (c) height of structures/airspace protection (Ricondo & Associates 2012).

Note that the project area's location in Airport Influence Area (AIA) A is already stated elsewhere in the Draft EIR. For example, Draft EIR page 3.10-2 states:

The project site falls within Airport Influence Areas (AIA) A and B of San Francisco International Airport (SFO). Area A includes the entirety of San Mateo County, all of which is overflown by aircraft flying to or from SFO at least once per week at altitudes of 10,000 feet or fewer above mean sea level. Area B lies within Area A and contains areas exposed to aircraft noise above the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour or lying below critical airspace (City/County Association of Governments of San Mateo County 2012).

Therefore, the addition of the information about the project area being within AIA A is not new information. It also does not change any of the impact analysis in the Draft EIR.

The following revision has also been made to page 7-13 of the Draft EIR to correct the author of a reference, consistent with the revision to the author on pages 3.8-5 through 3.8-6 described above.

Ricondo & Associates. 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. Available: Consolidated_CCAG_ALUCP_November-20121.pdf.

The following revisions were made to page 3.8-7 of the Draft EIR in response to this comment.

Airports

The closest airport to the project is SFO, which is located adjacent to San Bruno, just east of Highway 101. SFO is approximately 1.6 miles east of the project site and has a total of four runways (City of San Bruno 2009). The project is inside the Airport Influence Area (AIA) A as defined by the SFO ALUCP. The policy that applies in AIA A is (C/CAG):

IP-1, Airport Influence Area A – Real Estate Disclosure Area: Within Area A, the real estate disclosure requirements of state law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property. The law requires that, if the property is within an “airport influence area” designated by the Airport Land Use Commission, the following statement must be included in the notice of intention to offer the property for sale:

NOTICE OF AIRPORT IN VICINITY

This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.

The project is inside the Airport Influence Area (AIA) B as defined by the SFO ALUCP (Sinha 2023). The policy that applies in AIA B is (C/CAG 2012).

IP-2, Airport Influence Area B – Policy/Project Referral Area: Within Area B, the Airport Land Use Commission (the C/CAG Board) shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals. The real estate disclosure requirements in Area A also apply in Area B. For the purposes of this policy, parcels along the edge of the Area B Boundary that are split by the boundary shall be considered as fully being within Area B.

Note that the description of policy IP-2 already includes the real estate disclosure requirement added for AIA A; therefore, this addition does not change any of the analysis or conclusions in the Draft EIR.

The following revisions have been made to pages 3.8-11 through 3.8-12 of the Draft EIR in response to this comment.

Flight hazards include tall objects as well as visual and electronic forms of interference. The project site is inside AIA B as defined by the SFO ALUCP. The critical aeronautical surfaces at the proposed project location are at an elevation of approximately 860 feet amsl (C/CAG 2012). The school site elevation is about 430 feet amsl, and the maximum height of the single-family residences would be 28 feet. Therefore, the elevation height of residences would be below the elevation of the critical aeronautical surfaces. The field elevation is about 380 feet amsl, and the tallest light standard would be 80 feet, meaning that the elevation of the lighting structures would also be below the elevation of the critical aeronautical surfaces identified in the ALUCP. A crane may also be used to install the light standards but would be a temporary use. Therefore, the proposed project and variant would not conflict with the Airspace Compatibility Policies of the SFO ALUCP.

These revisions clarify the analysis and do not change any of the conclusions in the Draft EIR. The City declines to implement the changes the commenter requested to *amsl* because they are editorial in nature.

L1-6

This comment consists of attachments provided as background to substantive comments in the comment letter. The responses above (L1-2 through L1-5) provide responses to the substantive comments.

3.2.2 L2, SMUHSD

L2-1

The information provided by San Mateo Union High School District (SMUHSD) regarding the leases for the fields at the former Crestmoor High School site is consistent with the information about the No Project Alternative in Draft EIR Section 4.5.1, *Description of Alternative*. The text on page 4-14 of the draft EIR also explains why the City has determined that the No Project Alternative includes continued leasing of playing fields on a short-term basis under CEQA based on past use by AYSO and Lowen, despite the lack of a renewal provision in the lease. The following text can be found on Draft EIR page 4-14 in Section 4.5.1, *Description of Alternative*.

San Mateo Union High School District (SMUHSD) currently has a lease agreement of the Crestmoor fields with AYSO and Lowen from July 1, 2023, that expires on June 30, 2024, and use of the fields beyond that date would require separate action of the Board of Trustees (Hawkins pers. comm.). However, AYSO and Lowen's use of the recreation fields predated July 1, 2023, and the City is unaware of any intent by the SMUHSD to decline to approve another lease. Additionally, SMUHSD declared Crestmoor High School surplus property in March 2019, and prior to entering into a purchase agreement with the applicant had entered into a contract to sell the property with another developer (SMUHSD 2022). Therefore, should the City deny the project, it is reasonable to assume SMUHSD would continue to try to sell the property. However, actual development of the property is not included in the No Action Alternative because the characteristics, timing, and other details of such a development would be speculative. As a result, given past use by AYSO and Lowen, the No Project Alternative presumes that SMUHSD would continue to lease the playing fields on a short-term basis to private soccer clubs for youth soccer games and practices.

The commenter has not raised a specific issue with the definition of the No Action Alternative, the recreation analysis, or suggested revisions to the Draft EIR. Therefore, no additional response is required. However, the information provided by the commenter is included in the record for consideration by decision-makers.

3.3 Individuals

3.3.1 I1, Lawrence Marsili

I1-1

Construction activity would result in an increase in vehicle and truck trips and vehicular parking demand associated with construction workers. These types of construction-related transportation impacts would be temporary, generally short term, and conducted in accordance with City requirements.

San Bruno Avenue is a designated truck route as provided in Section 7.24.010 of the San Bruno Municipal Code. Additionally, Section 7.24.020 of the code confirms that heavy vehicle restrictions do not apply to "commercial vehicles... or vehicles for hire or advertised for hire coming from an unrestricted street having ingress and egress by direct route to and from a restricted street when necessary for the purpose of making pickups or deliveries of goods, wares and merchandise from or to any building or structure located on the restricted street; for the purpose of delivering materials

to be used in the actual and bona fide repair, alteration, remodeling or construction of any building or structure upon the restricted street for which a building permit has previously been obtained."

A truck routing plan would be required for approval of the construction permit and would be followed during the construction period. As required by Section 7.24.020, the truck routes will be direct routes to and from San Bruno Avenue.

Mitigation is required only for significant impacts under CEQA per State CEQA Guidelines Section 15126.4(a)(1). No significant impacts have been identified related to potential trucking routes, such as noise or traffic safety. However, the commenter's suggestion about restricting heavy vehicles to roadways with dividing double yellow lines is noted and included in the record for consideration by decision-makers.

3.3.2 I2, Jeffery D.

I2-1

See response to comment I1-1 regarding the truck-routing concerns. Truck-routing restrictions would not apply to construction workers traveling in passenger vehicles.

Note that traffic volume, insofar as it relates to traffic congestion, is no longer a metric for determining significant transportation impacts under CEQA, as explained on Draft EIR page 3.15-3. However, the intersection of Madison Avenue and Piedmont Avenue was one of the study intersections analyzed in the transportation analysis. The analysis studied trip assignment through this intersection and conducted an all-way stop control warrant, which found that the current configuration without control is appropriate for the anticipated "Existing + Project" volume of traffic and pedestrian activity. See Attachment 1 for the traffic control warrants.

The proposed project is not expected to increase the prevalence or severity of speeding near the project site. Concerns about existing speeding activity should be brought to the San Bruno Traffic, Safety and Parking Committee.

3.3.3 I3, Lisa H.

I3-1

Refer to response to comment I2-1.

I3-2

Existing noise levels in the project vicinity, including those "below the site," were measured on April 15, 2023, at the locations presented in Figure 3.11-1 on page 3.11-13 of the Draft EIR. Measured existing noise levels are shown in Table 3.11-8 on page 3.11-14 of the Draft EIR. In addition, topography is considered in the noise evaluation of estimated construction noise levels at nearby existing residences, as described on page 3.11-20 of the Draft EIR.

An analysis of construction vibration is presented on page 3.11-27 of the Draft EIR. As stated in this section and in the Noise and Vibration Impact Analysis included as Appendix F, vibration from construction was evaluated, and the nearest structures would be exposed to vibration levels below the applicable damage and annoyance thresholds.

13-3

Impacts on property values are economic in nature and are generally outside the scope of CEQA (see State CEQA Guidelines Section 15131) and are, therefore, properly excluded from the EIR. As a result, the cost of homes is also outside the scope of the EIR. Note that the project includes affordable housing, which is discussed in Section 3.12, *Population and Housing*, of the EIR. Any City of San Bruno housing development projects that include five or more units and all new nonresidential developments throughout the City are subject to the City's affordable housing program. The proposed project is consistent with these regulations, and any further housing development in the City would be subject to the same requirements.

13-4

The potential for vegetation management in the sloped area above Madison Avenue to ultimately result in erosion impacts is addressed in Impact GEO-2 under *Operation*, beginning on page 3.6-8 of the Draft EIR (see also Impact WQ-1, beginning on page 3.9-8 of the Draft EIR). As explained in the impact discussion, "the project design would follow recommendations outlined in the project-specific geotechnical report (Appendix E, Final Geotechnical and Geological Investigation). This would include protecting fill slopes against erosion by hydroseeding or hydromulching with deeply rooted, fast-growing vegetation after construction is complete. If that vegetation would not establish prior to rains, the recommendation is to protect slopes using measures like hay bales and silt fences (Appendix E)."

The project also includes a storm drainage system. As explained on page 3.9-10 of the Draft EIR, "As part of the project, stormwater would be conveyed from multiple points across the residential area and conveyed into a bioretention area in a private storm drain easement within the dedicated open space. The stormwater treatment basins and onsite detention would be sized to contain the runoff so that it would be at a minimum at existing conditions or below them for a 25- year storm."

Additionally, as described in Section 8.1.5 of the report in Appendix E, remedial grading would be conducted on slopes to address instability.

The potential for future instability in the existing landslide areas can be mitigated by minor remedial grading. Prior to grading these areas, the depth of the loose material should be determined with probes and hand-auger borings. Loose/disturbed soil should be excavated by hand so the remaining thickness of the loose/disturbed soil is less than 12 inches. The soil exposed at the excavation subgrade should be moisture-conditioned to near optimum and compacted with a large vibratory plate (Turtle) to at least 90 percent relative compaction. The fill should then be placed in lifts not exceeding 8 inches in loose thickness, moisture-conditioned to near optimum moisture content, and compacted in accordance with recommendations presented above in Table 5. The surface of the regraded areas should be relatively uniform and should match the adjacent grades on the slope face. Hydroseeding or hydromulching with deeply rooted, fast-growing vegetation should be performed after construction is complete. If the vegetation will not be established prior to the rainy season, slopes should be protected using measures such as netting, hay bales, and/or silt fences.

Finally, note that not all trees would be removed in this area, and those removed would be eucalyptus (nonnative) and trees that are dead, in declining health, or hazardous, as explained on Draft EIR page 2-13.

The vegetation management plan also provides for ongoing vegetation removal. Eucalyptus trees may be removed from the area subject to the vegetation management plan. Stumps of removed eucalyptus may be treated with herbicides to control resprouting because they can readily resprout when cut, grazed, or burned. Monterey pines, or any other trees, that are dead or in declining health

should also be considered for removal. Trees that are otherwise healthy can be selected for removal if they are deemed a fire hazard after other methods for fuel reduction (e.g., crown raising) have been considered.

I3-5

Section 3.3, *Biological Resources*, of the Draft EIR considers impacts on all known biological resources, including wildlife, in the project area. Mitigation measures BIO-1a, BIO-1b, and BIO-1c (described on Draft EIR pages 3.3-7 through 3.3-12) all pertain to the protection of wildlife species and mitigate Impact BIO-1 (described on page 3.3-7) to less-than-significant levels.

I3-6

Construction noise is evaluated based on construction schedule and equipment information, and was determined to be significant before mitigation, as described in Impact NOI-1 beginning on page 3.11-18 of the Draft EIR. Although triple-pane windows are not required, other mitigation is required and would reduce this impact to less than significant. Specifically, mitigation measure NOI-1a (described on Draft EIR pages 3.11-20 and 3.11-21) would be required, which includes various noise reduction measures be incorporated during project construction to reduce construction noise to the extent feasible. In addition, mitigation measure NOI-1b (as described on Draft EIR page 3.11-21) would also apply, which would require the implementation of temporary noise barriers if it is determined that 10 decibels (dB) or greater increases over the background ambient noise level are occurring at nearby residences during construction, if feasible. With implementation of these mitigation measures together, noise impacts from project construction were determined to be less than significant. Triple-pane windows would not be appropriate mitigation. First, they are not necessary to reduce impacts to less than significant. Additionally, such a measure would require permanent modifications to existing housing to address a temporary impact, and it is uncertain whether it would be feasible to replace windows on private residences. Lastly, the cost and time to do so are unknown. Therefore, the City declines to include installing triple-pane windows as part of noise mitigation.

I3-7

Regarding the comment related to joyful noise (e.g., noise from typical activities such as children playing or families gathering) affecting the neighbors, this kind of noise could be generated both from the playing fields and the residences. Playing field noise is addressed beginning on page 3.11-26 of the Draft EIR under Impact NOI-1. As discussed in this analysis, noise from children playing was modeled, and the estimated results indicated that noise from the proposed playing fields is not expected to exceed City of San Bruno noise standards or substantially exceed existing ambient noise levels at the nearest residences to the proposed playing fields. This impact was determined to be less than significant. Regarding joyful noise from residences, the project residences would generally be located farther from existing residences and would also result in less noise from people talking or gathering than the playing field. The EIR focuses on significant impacts of the proposed project, as provided for in State CEQA Guidelines Section 15126.2(a). The noise generated by new residences would be less than the less-than-significant noise generated by the playing fields.

I3-8

See responses to comments I1-1 and I2-1.

3.3.4 I4, Robert S.

I4-1

Impact PS-3, beginning on page 3.13-11 of the Draft EIR, addresses the potential for schools to have capacity for students generated as a result of the proposed project. That impact discussion notes that enrollment has been decreasing in recent years and accounts for anticipated future population growth as a result of the proposed project. The Draft EIR also discusses cumulative impacts in Chapter 5, *Other CEQA Considerations*, which addresses population growth in relation to nearby projects combined with impacts of the proposed project. On page 5-15, the Draft EIR concludes that buildout of the General Plan would result in less-than-significant impacts on schools. Additionally, note that SMUHSD declared Crestmoor High School surplus property in March 2019, as indicated on Draft EIR page 4-14, and the school has been closed since 1980, as indicated on Draft EIR page ES-1. Therefore, no issues regarding school capacity are anticipated. Additionally, as explained on pages 3.13-4 through 3.13-5 of the Draft EIR, fees are collected to address school facilities. The specific fees for the San Bruno Park School District and San Mateo Union High School District are described on Draft EIR pages 3.13-6 and 3.13-7.

I4-2

The commenter suggests making the project site into a park or potentially a soccer stadium with seating and a running track. To be carried forward for evaluation in the Draft EIR, one requirement for an alternative is that it must meet the most basic project objectives (State CEQA Guidelines Section 15126(a)). The following are objectives of the proposed project, as listed on pages 2-5 and 2-6 of the Draft EIR.

- Redevelop an underutilized site with a residential neighborhood that provides a variety of home sizes at a density that is compatible with the surrounding neighborhood.
- Provide housing at a range of income levels (including low- and moderate-income households) that would assist the City in meeting its Regional Housing Needs Allocation (RHNA) targets.
- Provide housing at a range of income levels (including low- and moderate-income households) that would assist the City of San Bruno in meeting its RHNA targets.
- Provide new single-family detached homes that would provide housing for families at a variety of income levels (including low- and moderate-income households) in the city.
- Provide a variety of home sizes at a range of sales prices and at a density that is complementary with the existing surrounding neighborhood.
- Develop enough residential units to have an economically viable and feasible project.

By eliminating the residential component, this alternative would not fully meet the basic objectives of the project and, therefore, is not considered a reasonable alternative to the project. The commenter suggests picnic tables. Note, as well, that the latest conceptual design of the recreational component includes two plazas with picnic tables, as well as some seating areas, as shown on Figure 2-5 of the Draft EIR.

3.4 Planning Commission

3.4.1 PC1, Commissioner Harman

PC1-1

As suggested by the commenter, the VMT evaluation in the Draft EIR was conducted consistent with current guidance, as described on pages 3.15-15 through 3.15-16 of the Draft EIR. The transportation analysis team does not know where future residents will relocate from and, thus, cannot make assumptions about the No Project Alternative as suggested in the comment. However, in finding that VMT impacts of the project would be significant and unavoidable, the Draft EIR also notes the following on page 3.15-18 to articulate a similar sentiment to the commenter regarding the site-specific and regional perspectives on VMT.

Within the nine-county Bay Area, San Mateo County is a good place to build housing from a VMT perspective. Jobs are abundant and thus, commute lengths for people who live in the county are generally shorter than elsewhere in the region. However, the project consists of low-density single-family homes located in a primarily single-use neighborhood with few convenient walking or biking options to access shopping, work, education, or other opportunities. The project is also not located near any high-quality transit lines, nor does it add a mix of land uses or amenities that could reduce the number of vehicle trips or trip lengths for the existing or future residents of the neighborhood. These environmental characteristics result in project trips being made almost exclusively by car, and so, even though trip lengths may be shorter than the regional average, the share of trips made by car (instead of walk, bike, or transit) prevents the site from complying with state goals to reduce VMT below current levels.

Regarding Alternative 1, note that the State CEQA Guidelines require that an EIR identify an “environmentally superior alternative,” other than the No Project Alternative, among the alternatives discussed in the EIR (State CEQA Guidelines Section 15126.6(e)(2)). While the Draft EIR determines that Alternative 1 is the environmentally superior alternative on page 4-16, the City is not required to adopt it. Rather, if a proposed project would result in significant environmental impacts that would not be avoided or substantially lessened by mitigation measures, the City must consider any environmentally superior alternatives identified in the EIR and find that they are “infeasible” before approving the proposed project if it decides to approve the proposed project (Public Resources Code Sections 21002, 21081(a)(3); State CEQA Guidelines Section 15091(a)(3)).

Thus, if the City decides to adopt the proposed project, it would first be required to make findings pursuant to CEQA that the environmentally superior alternative(s) identified in the EIR, such as Alternative 1, are “infeasible.” The reasons for such findings would need to be explained in the City’s decision and would need to be supported by substantial evidence. For example, if an alternative was rejected on the basis that it fails to meet certain project objectives, then the City would need to provide evidence of this failure. Public Resources Code Section 21061.1 states that, “[f]easible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors.” A determination of feasibility, therefore, necessarily involves a series of judgment calls concerning potential costs, environmental effectiveness and potential environmental side effects, social policy considerations, technical realities, and potential time constraints. As a result, input such as that provided by the commenter is included in the record for consideration by decision-makers and may be the kind of input that can be considered at the time of decision-making in deciding whether any of the alternatives are infeasible.

PC1-2

Recreational impacts as framed in Appendix G of the 2023 State CEQA Guidelines relate to the use of existing neighborhood and regional parks such that substantial deterioration occurs, and that construction or expansion of a recreational facility would adversely affect the environment. These impacts are discussed in Section 3.14, *Recreation*, of the Draft EIR. The Draft EIR analyzes potential game relocations based on the reduction in field size during project operation on pages 3.14-6 and 3.14-7. This impact was determined to be less than significant. The general concern about the loss of two fields as a result of the project is noted and included in the record for consideration by decision-makers.

3.4.2 PC2, Commissioner Kuhn

PC2-1

Recreational impacts as framed in Appendix G of the 2023 State CEQA Guidelines relate to the use of existing neighborhood and regional parks such that substantial deterioration occurs, and that construction or expansion of a recreational facility would adversely affect the environment. These impacts are discussed in Section 3.14, *Recreation*, of the Draft EIR. The Draft EIR analyzes potential game relocations based on the reduction in field size during project operation on pages 3.14-6 and 3.14-7. This impact was determined to be less than significant.

PC2-2

Note that traffic volume, insofar as it relates to traffic congestion, is no longer a metric for determining significant transportation impacts under CEQA, as explained on Draft EIR page 3.15-3. However, the intersection of Madison Avenue and Piedmont Avenue was one of the study intersections analyzed in the transportation analysis. The analysis studied trip assignment through this intersection and conducted an all-way stop control warrant, which found that the current configuration without control is appropriate for the anticipated “Existing + Project” volume of traffic and pedestrian activity. See Attachment 1 for the traffic control warrants.

PC2-3

The proposed project is not expected to increase the prevalence or severity of speeding near the project site. As indicated in the comment, concerns about existing speeding activity should be brought to the San Bruno Traffic, Safety and Parking Committee.

PC2-4

Refer to response to comment I4-1. As discussed throughout Draft EIR pages 3.13-11 through 3.13-12, impact PS-3 evaluates the capacity of nearby school facilities to accommodate a student population beyond the growth anticipated under the project and finds the impact to be less than significant.

3.4.3 PC3, Commissioner Lethin

PC3-1

Since the Planning Commission hearing, the applicant provided the City with a revised Arborist Report prepared in January 2024. It is included in this Final EIR as Attachment 1. The applicant has also updated its tree removal plans as shown in Table 3-1. The revisions made to the Draft EIR to reflect this update are provided in Chapter 4, *Revisions*, of this Final EIR.

Table 3-1 Updated Tree Removal Quantities

Tree Category	Draft EIR Quantity Removed	Updated Quantity Removed
Heritage Tree	162	182
Non-Heritage Tree	88	89
Total	250	271

The proposed project and the project variant would require removal of 271 trees, about 182 of which are heritage trees. The Draft EIR addresses impacts on heritage trees under Impact BIO-5 (described on page 3.3-13) and mitigation measure BIO-5 (described on pages 3.3-14 and 3.3-15). As explained under Impact BIO-5, the applicant has indicated that 315 replacement trees would be provided for the project and project variant, which would be in accordance with the recommendations of the City. The project would obtain a tree removal permit and would, therefore, not conflict with the San Bruno Tree Ordinance. Any subsequent removal of trees as part of vegetation management or ongoing maintenance of the site would also be subject to San Bruno Tree Ordinance requirements, and permits would be obtained as needed. With mitigation, this impact is reduced to less-than-significant levels, and the updated tree counts do not change the less-than-significant determination in the Draft EIR.

Additionally, not all trees would be removed in this area, and those removed would be eucalyptus (nonnative) and trees that are dead, in declining health, or hazardous, as explained on Draft EIR page 2-13.

The vegetation management plan also provides for ongoing vegetation removal. Eucalyptus trees may be removed from the area subject to the vegetation management plan. Stumps of removed eucalyptus may be treated with herbicides to control resprouting because they can readily resprout when cut, grazed, or burned. Monterey pines, or any other trees, that are dead or in declining health should also be considered for removal. Trees that are otherwise healthy can be selected for removal if they are deemed a fire hazard after other methods for fuel reduction (e.g., crown raising) have been considered.

PC3-2

The noise analysis considered the project site's topography. For example, regarding noise measurements during soccer games, the Draft EIR states the following on page 3.11-15.

Inspection of Appendix D-10 of the Noise Technical Report (included in Appendix F, Noise Technical Report, of this EIR) indicates that, during the 9:00 a.m. and 10:00 a.m. hours of Saturday, April 15, when soccer games were taking place, the measured ambient noise levels at the nearest residence to the north (monitoring site LT-4), were unchanged. This is believed to be due to the considerable grade separation (approximately 40 feet) between the soccer fields and nearest residences to the north.

For calculating construction noise, the Draft EIR explains the following on page 3.11-18.

Calculations assume a standard spherical spreading loss of 6 dB per doubling of distance for maximum noise levels and a conservative 10 dBA offset to account for the substantial intervening vegetation and topography existing between the project site and nearest residences.

The Draft EIR explains the following on page 3.11-20.

Although the predicted average noise level of 63 dBA includes a 10 dB offset to account for the combination of vegetation and topography between the proposed residential construction area and the nearest residences, the area of the proposed residential construction is fairly flat and elevated relative to the neighboring residences. As a result, topographic shielding at the nearest residences during site grading activities occurring in more central areas of the site will be substantially greater than 10 dBA.

For the recreation and open space component, the Draft EIR states the following on page 3.11-22.

For the recreational and open space component, it is expected that the worst-case construction phase in terms of noise generation would be during grading. At the residences located to the immediate north of the proposed playing fields (at a distance of approximately 50 feet), using the Table 3.11-11 data and assuming 15 dBA of attenuation provided by intervening topography, predicted maximum noise levels would be approximately 61 to 70 dBA L_{max} . Although construction noise would be temporary in nature, these estimated noise levels from construction activity could substantially exceed baseline ambient noise levels at the nearest residences to the north (monitoring sites LT-3 and LT-4 in Table 3.11-8).

The Draft EIR then explains the following later on the same page.

Although the predicted average noise level of 69 dBA includes a 15 dB offset to account for the combination of vegetation and topography between the proposed residential construction area and the nearest residences, the area of the proposed recreational and open-space construction is fairly flat and elevated relative to the neighboring residences. As a result, topographic shielding at the nearest residences during site grading activities occurring farther south from the northern project site boundary would be substantially greater than 15 dBA.

PC3-3

As illustrated in Figure 2-7 and Figure 2-8 of the Draft EIR, as indicated for Parcel M, the proposed project would provide 5.3 acres in the playing field area, while the project variant would provide 4.58 acres in the playing field area. Note that the City's conceptual design, as shown in Figure 2-5, accounts for the playing field area as shown in Figure 2-7 for the proposed project. The applicant has submitted the stormwater basin location with its application, placing it adjacent to the recreation area. This is the reason why the City is evaluating these locations for the stormwater basin under the proposed project and the project variant.

3.4.4 PC4, Commissioner Durazo

PC4-1

As illustrated in Figure 2-7 and Figure 2-8 of the Draft EIR, the stormwater basin would be maintained by the homeowner's association (HOA) under the proposed project and the project variant. As indicated on Draft EIR page 2-12, "The proposed project would treat stormwater with low impact development measures and would include a large bioretention area at the northwest end of the project site within the public open space dedicated to the City before being discharged to an

existing storm sewer main along Keefe Court.” Regarding the project variant, Draft EIR page 2-12 states, “The project variant would include a primary stormwater treatment basin located within a triangular-shaped 0.75-acre parcel that would be owned and maintained by the HOA.”

3.4.5 PC5, Commissioner Biasotti

PC1-5

Planning staff and the EIR consultant took notes of both public and Planning Commission comments at the Planning Commission hearing, and they are responded to in this Final EIR consistent with State CEQA Guidelines Section 15088(a).

3.4.6 PC6, Commissioner Madden

PC6-1

The commenter states that the project would not involve pile driving, and that neighbors may mostly hear other construction noises, such as noise from vehicle back-up alarms. The commenter is correct that the project would not involve pile driving, which is one of the noisiest kinds of construction activity. As discussed on pages 3.11-18 through 3.11-20 of the Draft EIR, construction equipment (shown in Table 3.11-11) would generate noise that may be audible at the nearest residences, although it is not expected to exceed the quantitative noise standards contained in the City of San Bruno Municipal Code (i.e., individual construction equipment is not expected to result in noise levels greater than 85 A-weighted decibels (dBA) equivalent sound level (Leq) at a distance of 100 feet). Intervening topography would help reduce construction noise at many neighboring residences, but noise from construction activities (including back-up alarms, which are required for safety) would likely still be audible at the nearest sensitive land uses. Because a 10-dB over ambient increase may occur during construction, construction noise impacts were determined to be significant, and mitigation measures NOI-1a and NOI-1b would be required to reduce construction noise impacts to less-than-significant levels. Refer also to response to comment I3-6.

PC6-2

See response to comment I2-1 regarding haul routes. Regarding the potential to damage or dirty pavement, the City as a general condition of its Grading Permit requires that, “The Contractor shall maintain the streets, sidewalks and all other public rights-of-way in a clean, safe and usable condition. All spills of soil, rock or construction debris shall be removed from the public right of way throughout construction and upon completion of the project. All adjacent property, private or public, shall be maintained in a clean, safe and usable condition.”¹ Therefore, damage to roadways would be repaired, and roadways would be kept clean.

PC6-3

Refer to response to comment I2-1.

¹ City of San Bruno. 2019. Grading Permit Conditions. <https://www.sanbruno.ca.gov/DocumentCenter/View/973/Grading-Permit---General-Conditions-PDF>. Accessed January 2, 2024.

PC6-4

Regarding future field use, the Draft EIR states the following on page 2-7.

Although it is foreseeable that the existing leagues that use the fields would continue to use the field once improved, the City also anticipates that other groups would use the facilities in the future. However, at this time, the City has no certain future users and therefore the parameters and characteristics of this additional use (e.g., intensity, time of day, day of week) cannot be defined at this time.

Specific to transportation, the Draft EIR explains the following on page 3.15-14.

Although it is foreseeable that the existing leagues that use the fields would continue to use the field once improved, the City also anticipates that other groups would use the facilities in the future, thereby potentially increasing use of the facilities. This could result in additional trips to the site at other times of the day and week. However, at this time, the City has no certain future users and therefore the parameters and characteristics of this additional use (e.g., intensity, time of day, day of week) cannot be defined at this time and cannot be further analyzed. Trip generation associated with the recreation/open space area includes trips made by users, spectators, and maintenance and management personnel. Because the number and timing of trips associated with the recreation/open space area is already captured in background trips, the recreation/open space area was not added into the travel demand analysis. The analysis in this EIR represents the level of recreation activity expected, based on existing and past use and is a conservative analysis from a VMT perspective. If fewer sports games were scheduled for the site, VMT associated with the recreation/open space area could be lower than existing levels.

This section includes revisions identified by the City of San Bruno (City) as needed to clarify the draft environmental impact report (EIR), in addition to revisions described in Chapter 3 of this Final EIR in response to comments on the Draft EIR. None of these revisions results in new or more severe environmental impacts.

4.1 Executive Summary

Table ES-1 was revised to correct a typographical error.

Impacts TCR-1 and ~~TRC~~TCR-2: Would the project cause a substantial Potentially significant adverse change in the significance of a tribal cultural resource that is (a) listed or eligible for listing in the CRHR or in a local register of historical resources, as defined in PRC Section 5020.1(k), or (b) determined by the lead agency to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1?

4.2 Project Description

The following revision was made to the discussion under Section 2.3.5, *Landscaping*, to reflect updated tree removal numbers provided by the applicant.

Under both the proposed project and project variant, approximately ~~250~~271 trees would be removed, and 315 trees would be planted.

While tree removal would increase compared to that analyzed in the Draft EIR, the increase is small and does not change the analysis under Impact BIO-5, which concludes that compliance with the heritage tree ordinance and Mitigation Measure BIO-5 would reduce impacts to less than significant.

4.3 Biological Resources

The following revision was made to the discussion under Impact BIO-5, beginning on page 3.3-13 of the Draft EIR, to reflect updated tree removal numbers provided by the applicant and as provided in Attachment 2.

Trees on the site that qualify as protected heritage trees under the city's heritage tree ordinance would be removed as part of the project. According to the most recent landscape plan, for the residential component of both the proposed project and the project variant, about ~~271~~250 trees would be removed from the site, about ~~182~~162 of which are heritage trees.

While tree removal would increase compared to that analyzed in the Draft EIR, the increase is small and does not change the analysis, which concludes that compliance with the heritage tree ordinance and Mitigation Measure BIO-5 would reduce impacts to less than significant.

The following revisions were made to the discussion under Impact BIO-5 to correct typographical errors:

While the residential area is adjacent to natural areas, the proposed project and variant contain a 70-foot area zoned as defensible space. Plant palettes for the residential component contain some native plants (e.g., ~~Rosa Californica~~) but also contain numerous nonnative plants (e.g., ~~Pittosporum tobira~~, ~~Lomandra confertifolia~~, ~~3-3-13 Nerium oldeander~~). As a result, there is likely a conflict with policy ERC-10. However, the site already contains nonnative plants (~~Deodar cedar~~ *Cedrus deodara*, *Platanus × hispanica*, *Eucalyptus camaldulensis*, *Pinus radiata*, and *Festuca perennis*). Therefore, there would be no environmental impact resulting from the conflict with this General Plan policy.

4.4 Hazards and Hazardous Materials

The following revision was made on pages 3.8-5 through 3.8-6 in response to comment L1-5.

The proposed project site is inside Airport Influence Areas A and B as defined by the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP). Each airport/land use compatibility plan (ALUCP) is required to contain policies and criteria to address three key issues: (a) aircraft noise impacts, (b) safety compatibility criteria, and (c) height of structures/airspace protection (Ricondo & Associates 2012).

The following revisions were made to page 3.8-7 of the Draft EIR in response to comment L1-5.

Airports

The closest airport to the project is SFO, which is located adjacent to San Bruno, just east of Highway 101. SFO is approximately 1.6 miles east of the project site and has a total of four runways (City of San Bruno 2009). The project is inside the Airport Influence Area (AIA) A as defined by the SFO ALUCP. The policy that applies in AIA A is (C/CAG):

IP-1, Airport Influence Area A – Real Estate Disclosure Area: Within Area A, the real estate disclosure requirements of state law apply. Section 11010 of the Business and Professions Code requires people offering subdivided property for sale or lease to disclose the presence of all existing and planned airports within two miles of the property. The law requires that, if the property is within an “airport influence area” designated by the Airport Land Use Commission, the following statement must be included in the notice of intention to offer the property for sale:

NOTICE OF AIRPORT IN VICINITY

This property is presently located in the vicinity of an airport, within what is known as an airport influence area. For that reason, the property may be subject to some of the annoyances or inconveniences associated with proximity to airport operations (for example, noise, vibration, or odors). Individual sensitivities to those annoyances can vary from person to person. You may wish to consider what airport annoyances, if any, are associated with the property before you complete your purchase and determine whether they are acceptable to you.

The project is inside ~~the Airport Influence Area (AIA) B~~ as defined by the SFO ALUCP (Sinha 2023). The policy that applies in AIA B is (C/CAG 2012).

IP-2, Airport Influence Area B – Policy/Project Referral Area: Within Area B, the Airport Land Use Commission (the C/CAG Board) shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezonings, and land development proposals. The real estate disclosure requirements in Area A also apply in Area B. For the purposes of this policy,

parcels along the edge of the Area B Boundary that are split by the boundary shall be considered as fully being within Area B.

The following revisions have been made to pages 3.8-11 through 3.8-12 of the Draft EIR in response to comment L1-5.

Flight hazards include tall objects as well as visual and electronic forms of interference. The project site is inside AIA B as defined by the SFO ALUCP. The critical aeronautical surfaces at the proposed project location are at an elevation of approximately 860 feet amsl (C/CAG 2012). The school site elevation is about 430 feet amsl, and the maximum height of the single-family residences would be 28 feet. Therefore, the elevation height of residences would be below the elevation of the critical aeronautical surfaces. The field elevation is about 380 feet amsl, and the tallest light standard would be 80 feet, meaning that the elevation of the lighting structures would also be below the elevation of the critical aeronautical surfaces identified in the ALUCP. A crane may also be used to install the light standards but would be a temporary use. Therefore, the proposed project and variant would not conflict with the Airspace Compatibility Policies of the SFO ALUCP.

4.5 Public Services

The last paragraph on page 3.13-11 was revised to correct a typographical error.

This indicates that the addition of 31 students after this substantial decrease in study-student enrollment would be within the student count that can be accommodated by existing facilities.

4.6 Alternatives Analysis

The following revision was made on page 4-2 to Section 4.3 of the Draft EIR to include an unintentionally omitted significant impact to the list of the proposed project's and project variant's significant impacts.

The following significant impacts were identified for the proposed project and project variant.

- **Impact AQ-2:** Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is a nonattainment area for an applicable federal or state ambient air quality standard.
- **Impact BIO-1:** A substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service.

The following information was added to the evaluation of Alternative 3 on page 4-20 of the Draft EIR to account for the unintentional omission of Impact AQ-2 from the list of significant impacts.

It is not clear if Alternative 3 would avoid or substantially reduce any significant impacts of the proposed project.

- **Impact AQ-2:** Alternative 3 would have the same project site as the proposed project and would require the same kind of ground disturbance as the proposed project, resulting in similar fugitive dust impacts as the proposed project.
- **Impact BIO-1, Impact BIO-5:** Alternative 3 would have the same project site as the proposed project and would require the same kind of structure removal and vegetation removal as the proposed project, resulting in similar impacts to the proposed project.

The following information was added to the evaluation of Alternative 4 on page 4-21 of the Draft EIR to account for the unintentional omission of Impact AQ-2 from the list of significant impacts.

Additionally, it is not clear if Alternative 4 would avoid or substantially reduce any significant impacts of the proposed project.

- **Impact AQ-2:** Alternative 4 would have the same project site as the proposed project and would require the same kind of ground disturbance as the proposed project, resulting in similar fugitive dust impacts as the proposed project.
- **Impact BIO-1, Impact BIO-5:** Alternative 4 would have the same project site as the proposed project and require the same kind of structure removal and vegetation removal as the proposed project, resulting in similar impacts to the proposed project.

The following information was added to the evaluation of Alternative 5 on page 4-22 of the Draft EIR to account for the unintentional omission of Impact AQ-2 from the list of significant impacts.

Additionally, it is not clear if Alternative 5 would avoid or substantially reduce any significant impacts of the proposed project.

- **Impact AQ-2:** Alternative 5 would have the same project site as the proposed project and would require the same kind of ground disturbance as the proposed project, resulting in similar fugitive dust impacts as the proposed project.
- **Impact BIO-1, Impact BIO-5:** Alternative 5 would have the same project site as the proposed project and require the same kind of structure removal and vegetation removal as the proposed project, resulting in similar impacts to the proposed project.

4.7 Other CEQA Considerations

The first paragraph on page 5-8 was revised to clarify that this is a general statement rather than a statement or conclusion about the impacts of the proposed project.

As discussed in Section 3.2, BAAQMD's emissions thresholds (Table 3.2-6) represent the average daily emissions that a project may generate, contributing to a cumulative impact on regional air quality. Therefore, exceedances of the BAAQMD project-level thresholds would indicate that impacts would be cumulatively considerable for project activities in the San Francisco Bay Area Air Basin (SFBAAB). As discussed under Impact AQ-2 in Section 3.2, project construction and operation would not generate regional criteria pollutant emissions in excess of applicable BAAQMD thresholds.

Section 5.3, *Significant and Unavoidable Impacts*, starting on page 5-19, was revised to correct an error regarding Impact NOI-1. That impact is less than significant with mitigation, as explained in Section 3.11, *Noise*.

State CEQA Guidelines Section 15126.2(b) requires EIRs to include a discussion of the significant environmental effects that cannot be avoided if the proposed project is implemented. The following impacts are considered significant and unavoidable; that is, no feasible mitigation is available to reduce the project's impacts to a less-than-significant level.

- **Impact GHG-1 (project and cumulative):** Generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.
- **Impact GHG-2 (project and cumulative):** Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.
- ~~**Impact NOI-1 (project):** Generation of increased ambient noise levels in the project vicinity in excess of applicable standards.~~

- **Impact TRA-2 (project and cumulative):** Conflict or be inconsistent with State CEQA Guidelines Section 15064.3, subdivision (b).

4.8 References

The following revision was made to page 7-13 of the Draft EIR to correct the author of a reference, consistent with the revision to the author on pages 3.8-5 through 3.8-6 described above in response to comment L1-5.

Ricondo & Associates. 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. Available: Consolidated_CCAG_ALUCP_November-20121.pdf.

Attachment 1

Additional Transportation Information



Major Street Whitman Way
 Minor Street Courtland Drive

Project Crestmoor
 Scenario Existing Plus Project
 Peak Hour PM

Turn Movement Volumes

	NB	SB	EB	WB
Left	18	0	0	137
Through	0	0	53	107
Right	102	0	52	0
Total	120	0	105	244

Major Street Direction

	North/South
x	East/West

Intersection Geometry

Number of Approach Lanes for Minor Street	1
Total Approaches	3

Worst Case Delay for Minor Street

Stopped Delay (seconds per vehicle)	8.2
Approach with Worst Case Delay	WB
Total Vehicles on Approach	244

Warrant 3A, Peak Hour			
	Peak Hour Delay on Minor Approach (vehicle-hours)	Peak Hour Volume on Minor Approach (vph)	Peak Hour Entering Volume Serviced (vph)
Existing Plus Project	0.6	120	469
Limiting Value	4	100	650
Condition Satisfied?	Not Met	Met	Not Met
Warrant Met	<u>NO</u>		



Major Street Whitman Way
 Minor Street Courtland Drive

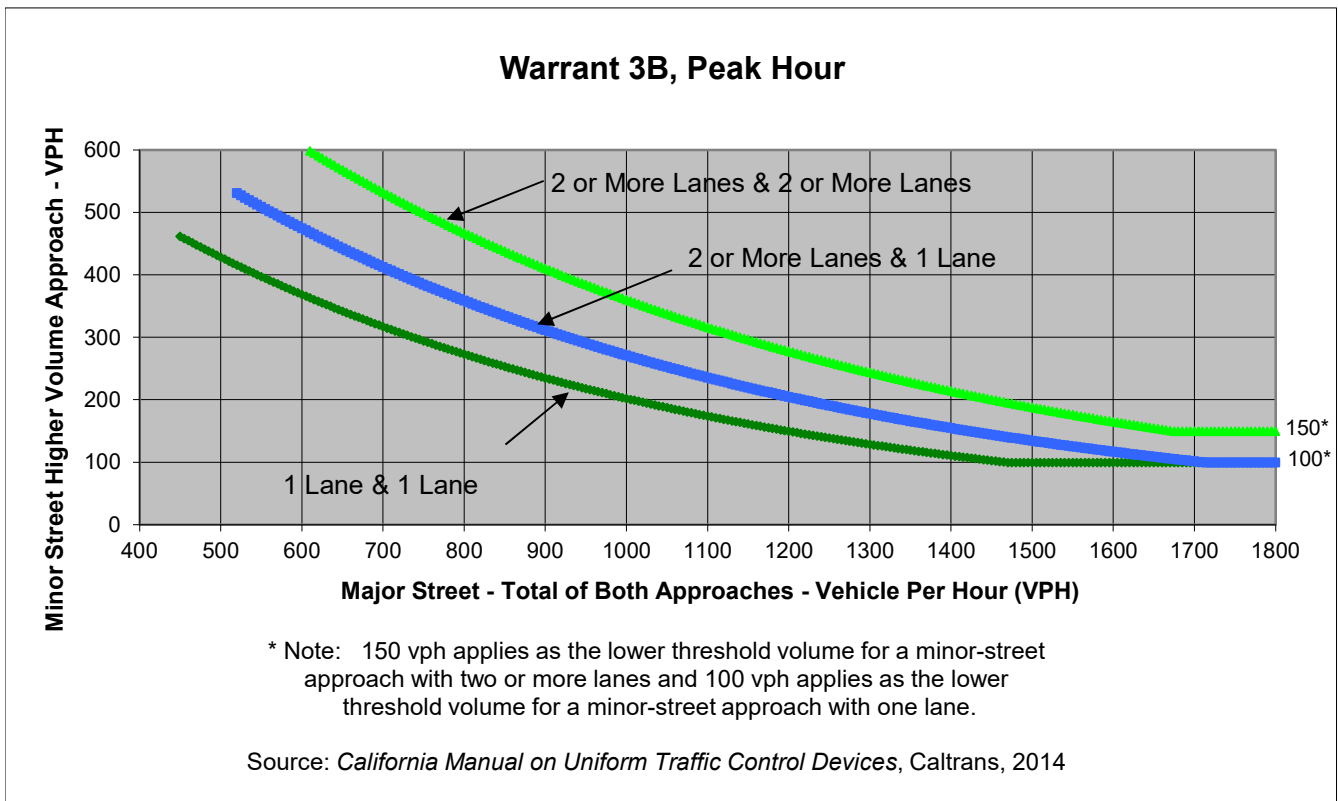
Project Crestmoor
 Scenario Existing Plus Project
 Peak Hour PM

Turn Movement Volumes

	NB	SB	EB	WB
Left	18	0	0	137
Through	0	0	53	107
Right	102	0	52	0
Total	120	0	105	244

Major Street Direction

 North/South
 x East/West



	Major Street	Minor Street	Warrant Met
	Whitman Way	Courtland Drive	
Number of Approach Lanes	1	1	<u>NO</u>
Traffic Volume (VPH) *	349	120	

* Note: Traffic Volume for Major Street is Total Volume of Both Approaches.
 Traffic Volume for Minor Street is the Volume of High Volume Approach.

All Way Stop Control Results	Minimum Value	Location		
		1. Courtland / Rosewood	2. Piedmont / Madison	3. Crestmoor / Piedmont
Warrant B - Crash History				
CAMUTCD Language: Condition B: Five or more reported crashes in a 12-month period that are susceptible to correction by a multi-way stop installation. Such crashes include right-turn and left-turn collisions as well as right-angle collisions.				
Total in a 12-month period	5	0	0	0
* Values that meet the minimum requirement are in bold				
Warrant C - Eight Hour Volume				
CAMUTCD Language:				
Condition C1: The vehicular volume entering the intersection from the major street approaches (total of both approaches) averages at least 300 vehicles per hour for any 8 hours of an average day; AND				
Condition C2: The combined vehicular, pedestrian, and bicycle volume entering the intersection from the minor street approaches (total of both approaches) averages at least 200 units per hour for the same 8 hours, with an average delay to minor-street vehicular traffic of at least 30 seconds per vehicle during the highest hour.				
Condition C3: If the 85th-percentile approach speed of the major-street traffic exceeds 40 mph, the minimum vehicular volume warrants are 70 percent of the values provided in Items 1 and 2.				
C.1 Major Street Entering Vehicles (Both Approaches)	300	280	75	169
C.2 Minor Street Entering Vehicles, Pedestrians, and Bicycles (Both Approaches)	200	33	11	36
C2. Minor Street Peak Hour Vehicle Delay (seconds)	30	10 (EB)	9 (EB)	9 (WB)
Or				
C3. Major Street 85th-percentile Speed	40	30 (NB)	30 (NB)	30 (SB)
C3.(C1 Major Street Vehicular Volume)	210	280	75	169
C3. (C2 Minor Street Veh, Ped, Bike Volume)	140	33	11	36
C3. (C2 Minor Street Delay)	21	10 (EB)	9 (EB)	9 (WB)
* Values that meet the minimum requirement are in bold				
Warrant D - Combination of Above				
CAMUTCD Language:				
Condition D: Where no signal criterion is satisfied, but where Criteria B, C1., and C2 are all satisfied to 80 percent of the minimum values. Criterion C3 is excluded from this condition.				
B. Crashes in 12-month period susceptible to correction	4	0	0	0
C.1 Major Street Entering Vehicles (Both Approaches)	240	280	75	169
C.2 Minor Street Entering Vehicles, Pedestrians, and Bicycles (Both Approaches)	160	33	11	36
C2. Minor Street Peak Hour Vehicle Delay (seconds)	24	10 (EB)	9 (EB)	9 (WB)
* Values that meet the minimum requirement are in bold				

Or

AND

AND

Or

AND

AND

AND

Or

AND

AND

AND

Attachment 2
Revised Arborist Report




Arborist Report

**300 Piedmont Avenue
San Bruno, CA**

Prepared for:
SummerHill Homes
777 South California Avenue
Palo Alto, CA 94304

Prepared by:
HortScience | Bartlett Consulting
2250 Ninth St. Suite 112
Berkeley, CA 94710

June 7, 2022
Revised January 2024



Arborist Report
300 Piedmont Avenue
San Bruno, CA

Table of Contents

	Page
Introduction and Overview	1
Tree Assessment Methods	1
Description of Trees	2
City of San Bruno Heritage Tree Status	6
Suitability for Preservation	6
Evaluation of Impacts & Recommendation for Action	8
Tree Preservation Guidelines	9

List of Tables

Table 1. Species present and tree condition.	2
Table 2. Suitability for preservation.	7

Exhibits

Tree Assessment Plan

Tree Assessment Form

Tree Disposition

Arborist Report

300 Piedmont Avenue
San Bruno, CA

Introduction and Overview

SummerHill Homes is planning to redevelop the subject property located at 300 Piedmont Avenue in San Bruno CA. HortScience | Bartlett Consulting, Divisions of The F.A. Bartlett Tree Expert Company, was asked to prepare an **Arborist Report** for this project for submittal to the City of San Bruno. The property consists of an unoccupied high school campus with associated buildings, parking lots, sports fields, and landscaping.

This report provides the following information:

1. An assessment of the health, structural condition, protected status, and suitability for preservation of the trees located on and adjacent to the proposed project area based on a visual inspection from the ground.
2. An assessment of the trees that would be preserved and removed based on preliminary development plans.
3. Preliminary guidelines for tree preservation during the design, construction, and maintenance phases of development.

Tree Assessment Methods

Trees were assessed on May 11, 12, and 16, 2022. The survey was limited to trees greater than 3 in. diameter. Chain-link fencing generally defined the project area. "Forest areas" were present on the east and west sides of the site. Trees located approximately 15 - 20 feet beyond the forest area edge were included. The assessment procedure was a visual assessment from the ground, consisting of the following steps:

1. Identifying the tree species.
2. Attaching a numerically coded metal tag to the trunk of each tree.
3. Recording the tree's location on a map.
4. Measuring the trunk diameter at a point 54-inches above grade.
5. Evaluating the health and structural condition using a scale of 0 – 5:
 - 5** - A healthy, vigorous tree, reasonably free of signs and symptoms of disease, with good structure and form typical of the species.
 - 4** - Tree with slight decline in vigor, small amount of twig dieback, or minor structural defects that could be corrected.
 - 3** - Tree with moderate vigor, moderate twig and small branch dieback, thinning of crown, poor leaf color, moderate structural defects that might be mitigated with regular care.
 - 2** - Tree in decline, epicormic growth, extensive dieback of medium to large branches, significant structural defects that cannot be abated.
 - 1** - Tree in severe decline, dieback of scaffold branches and/or trunk; most of foliage from epicormic shoots (secondary shoots that arise along the trunk and branches); extensive structural defects that cannot be abated.
 - 0** – Tree is dead.
6. Commenting on the presence of defects in structure, insects or diseases and other aspects of development.
7. Evaluating suitability for preservation as low, moderate and high.

Some trees located in "forest areas" were inaccessible. Such trees were included in the assessment and tagged on the fence or nearby branches. Assessment of trunk diameter, tree health and structural condition was limited to what could be observed from the school site.

Description of Trees

Three hundred sixty-one (361) trees representing 21 species were evaluated (Table 1). Coast live oak and toyon are native to the San Bruno area. Some trees of these species may be indigenous to the site. Other trees were generally ornamental, non-native species commonly observed in the region. Among the 361 trees, 22 were near the southeast corner were identified as potentially being off-site. These trees were included in the assessment because either the property line was unclear or they were close to the property line. Overall, 29 (8%) trees were in good condition, 97 (27%) were fair, 225 (62%) were poor, and ten (3%) were dead (Table 1).

Descriptions of each tree are found in the **Tree Assessment**, and approximate locations are plotted on the **Tree Assessment Map** (see Exhibits).

**Table 1. Species present and tree condition.
300 Piedmont Avenue. San Bruno CA.**

Common Name	Scientific Name	Condition				Total
		Dead (0)	Poor (1-2)	Fair (3)	Good (4-5)	
Blackwood acacia	<i>Acacia melanoxylon</i>	-	1	6	-	7
Blue Atlas cedar	<i>Cedrus atlantica</i> 'Glauca'	-	7	13	7	27
Lawson false cypress	<i>Chamaecyparis lawsoniana</i>	-	1	1	1	3
Japanese cedar	<i>Cryptomeria japonica</i>	-	-	1	-	1
Bronze loquat	<i>Eriobotrya deflexa</i>	1	-	1	1	3
Lemon-scented gum	<i>Eucalyptus citriodora</i>	-	-	1	-	1
Blue gum	<i>Eucalyptus globulus</i>	-	1	-	-	1
Manna gum	<i>Eucalyptus viminalis</i>	-	2	2	-	4
Toyon	<i>Heteromeles arbutifolia</i>	-	2	1	-	3
Glossy privet	<i>Ligustrum lucidum</i>	-	17	-	-	17
Cajeput paperbark tree	<i>Melaleuca quinquenervia</i>	-	1	3	-	4
Myoporum	<i>Myoporum laetum</i>	1	20	-	-	21
Olive	<i>Olea europaea</i>	-	-	1	-	1
Monterey pine	<i>Pinus radiata</i>	7	82	14	5	108
Victorian box	<i>Pittosporum undulatum</i>	-	11	-	-	11
London plane	<i>Platanus x hispanica</i>	-	20	2	2	24
White poplar	<i>Populus alba</i>	1	4	2	-	7
Plum	<i>Prunus domestica</i>	-	1	-	-	1
Coast live oak	<i>Quercus agrifolia</i>	-	53	43	13	109
Cork oak	<i>Quercus suber</i>	-	2	5	-	7
Chinese elm	<i>Ulmus parvifolia</i>	-	-	1	-	1
Total		10	225	97	29	361

The former school site was located near the top of a ridge between Interstate 280 to the east and a residential neighborhood on the other sides. Most of the trees and associated canopy cover were located along the property boundary and adjacent to roadways. Several long, irregular rows were present between sports fields, or in planters in parking areas.

Coast live oak and Monterey pine were the most frequently occurring species, each with approximately 30% of the population. One hundred and nine (109) coast live oaks were present along the edges of the site (Photo 1). Many younger trees were growing within the hedgerow south of the running track. The oaks varied in development from young to mature with trunk diameters ranging from 4 to 30 in. Most individuals were young to semi-mature with fewer mature specimens leading to an average diameter of 10 in. Thirteen (12%) trees were in good condition, 43 (39%) were fair, and 53 (49%) were poor. Trees generally had rounded or vase form with multiple attachments arising between 5 and 9 feet. Many trees a history of pruning including crown-raising and rounding over.



Photo 1. Coast live oak #242 was the largest of its species on site, with trunk diameters of 30 and 14 inches. View is from the southwest.

Trees in poor and fair condition were characterized by past branch failures, trunk wounds and poor structure. Several were growing through fences at edges of the site.

One hundred and eight (108) Monterey pine were present, most along the undeveloped edges of the site. Diameters ranged from 5 to 59 inches, with an average of 28 inches. Many trees were over-mature with overextended branches and pine bark beetle infestation. Condition was poor overall (82 trees, or 76%). Several of the larger trees in poor condition were growing at the front of school buildings (Photo 2). Trees #1, 2, 25, 216, 217, 311, and 313 were dead. Fourteen pines were fair. Pines #100, 303, 317, 355 and 357 were younger, vigorous trees in good condition, with diameters from 8 to 18 inches.



Photo 2. Monterey pines #5 – 1 (L to R) were growing near the front of the school. Pines #1 and 2 at right were dead. London plane #67 is visible at left (red arrow).

Twenty-seven (27) blue Atlas cedars were growing in rows or groups around the campus (Photo 3, page 4). About half were in fair condition (13 trees), with the rest divided evenly between poor and good (7 trees each). Trees were mature and multi-stemmed, with trunk diameters from 6 to 28 inches. Overall the cedars were some of the most vigorous trees on site.

Twenty-four (24) London planes were present, many growing in rows along parking lots at the south end of campus. Most of these were in poor structural condition (20 trees), having been pollarded in the past (Photo 4). Trees were young to semi-mature, with diameters ranging from 8 to 18 inches. Planes #177 and 178 were in fair condition; #176 and 179 were good.



Photo 3. Blue Atlas cedars #38 – 34 (R to L) were growing on a slope north of the main school building. Japanese cedar #39 is at left (yellow arrow).

Photo 4 (right). London planes #63 and 64 at right had been pollarded (inset below) and not maintained. Trees had many extended weak branch attachments from the reaction growth.



Twenty-one (21) myoporum were growing in hedges and along slopes between playing fields. Nearly all were in poor condition, multiple attachments at the base and very sparse crowns (20 trees). Myoporum #97 was dead.

Seventeen (17) glossy privet were present, most of them crowded together in a raised planter adjacent to an old community pool in an open courtyard. All were in poor condition, with stem decay and history of limb removal. Stem sizes ranged from 7 to 16 inches.

Eleven (11) Victorian box were growing in hedges around a play field. All were multi-stemmed with trunks from 1 to 6 inches. Many showed branch dieback and several had yellowing foliage. Condition was poor.

Seven blackwood acacia were assessed. Six acacias were in fair condition; tree #20 was poor. Several vigorous trees were growing in raised planters in a school courtyard. Stems sizes ranged from 3 to 8 inches. None of the acacia were in good condition.

Seven white poplar were growing near slopes crowded with other trees at the northwest side of the site. All had a narrow fastigiate form. The poplars were young, with diameters from 7 to 10 inches. Poplars #234 and 239 were fair, and #233, 235, 241 and 359 were poor. Tree #237 was dead.

Seven cork oak were growing in planters in school courtyards. Five were in fair condition. Oaks #131 and 132 were in poor condition with sparse crowns. Trees were semi-mature, with trunks from 11 to 17 inches.

No other species was represented by more than four trees. Included in this group were:

- Manna gum #221, 224, 229, and 231 were growing in a wooded area to the northwest of the playing fields. Diameters ranged from 5 to 38 inches. Trees #224 and 231 were fair; #221 was poor, and #229 was suppressed and in very poor condition.
- Semi-mature cajeput paperbark trees #152 – 155 were growing together in a small courtyard. Diameters ranged from 16 – 20 inches. All had multiple or codominant attachments and raised crowns. #152, 153 and 155 were fair; #154 was poor. It was leaning and very crowded by the other trees.
- Lawson false cypress #249, 251 and 258 were growing along Courtland Drive. Tree #251 was in good condition with trunk diameters from 12 to 18 inches and a vigorous crown. Tree #249 was in fair condition with trunks from 10 to 22 inches and sparser foliage. Lawson cypress #258 was 23 inches. It was in poor condition with dieback and history of limb removal.
- Bronze loquat #151 and 157 were growing in small outdoor courtyards within the school building. Loquat #151 was in good condition and #157 was fair. Both were 11 inches. Loquat #156 had a 9 inch diameter and was dead.
- Toyon #173 (very poor), 340 (fair) and 354 (poor) were growing in crowded conditions on slopes or near fences. Diameters ranged from 6 to 12 inches. None of the toyon were in good condition.
- Blue gum #281 was growing near a fence on Courtland Drive. It was 26 inches and had been topped, resulting in a sparse small crown. It was in poor condition.
- Olive #159 had codominant stems of 3 and 5 inches. It was in fair condition and crowded by other trees in a school courtyard.

- Chinese elm #160 was nearby in the same courtyard. It was a young tree of 3 inches in fair condition. It was leaning northeast.
- Plum #89 was in poor condition and crowded by shrubs. It had codominant stems of 6 inches.
- Japanese cedar #39 was in fair condition and had codominant stems of 13 and 16 inches. It was growing on a slope and had a strong corrected lean. (Photo 3).
- Lemon-scented gum #68 had a diameter of 37 inches, located in a parking lot planting area near Courtland Drive. Its base was pillowing over a curb and it was in fair condition with a vigorous crown.

City of San Bruno Heritage Tree Status

San Bruno has several criteria to determine if a tree has Heritage status:

- Any native bay (*Umbellularia californica*), buckeye (*Aesculus* species), oak (*Quercus* species), redwood (*Sequoia sempervirens*), or pine (*Pinus radiata*) tree that has a diameter of 6 in. or more measured at 54 in. above natural grade;
- Any tree or stand of trees designated by resolution of the city council to be of special historical value or of significant community benefit;
- A stand of trees, the nature of which makes each dependent on the others for survival; or
- Any other tree with a trunk diameter of 10 in. or more, measured at 54 in. above natural grade.

The City's Heritage Tree Ordinance declares such trees, whether located on City or private property, to be an asset to the community at large and provides penalties for removing or improperly pruning these trees. In addition, all public trees are protected. A permit is required for the pruning or removal of any Heritage trees. Based on my observations, 268 of the 361 trees assessed met these criteria (see **Tree Assessment Form**).

Trees removed with a valid tree removal permit shall be replaced in accordance with the recommendation of the City Arborist. Tree replacement shall be a minimum of either two 24-inch box size trees or one 36-inch box size tree for each Heritage tree removed. A \$450 refundable deposit is also required for each tree removal. If a Heritage tree is not replaced, there is an in-lieu fee of \$450 per tree removed.

Suitability for Preservation

Trees that are preserved on sites where development or other improvements are planned, must be carefully selected to make sure that they may survive construction impacts, adapt to a new environment and perform well in the landscape. Our goal is to identify trees that have the potential for long-term health, structural stability and longevity. Evaluation of suitability for preservation considers several factors:

- **Tree health**
Healthy, vigorous trees are better able to tolerate impacts such as root injury, demolition of existing structures, changes in soil grade and moisture, and soil compaction than are non-vigorous trees. Trees in good condition are in better health than those in poor condition.
- **Structural integrity**
Trees with significant amounts of wood decay and other structural defects that cannot be corrected are likely to fail. Such trees should not be preserved in areas where damage to

people or property is likely. Defects such as codominant or multiple stems, lean and other deviations from the vertical, heavy branches and decay are problematic and may increase the potential for a tree to fail. For example, London plane #58 displayed major structural defects and decay. I do not recommend this tree for preservation.

- **Species response**

There is a wide variation in the response of individual species to construction impacts and changes in the environment. In our experience, coast live oak and London plane are tolerant of construction impacts, particularly if trees are irrigated properly. Blue atlas cedar are moderately tolerant. Monterey pine, blackwood acacia and blue gum have poor tolerance of construction impacts.

- **Tree age and longevity**

Old trees, while having significant emotional and aesthetic appeal, have limited physiological capacity to adjust to an altered environment. Young trees are better able to generate new tissue and respond to change.

- **Species invasiveness**

Species which spread across a site and displace desired vegetation are not always appropriate for retention. This is particularly true when indigenous species are displaced. The California Invasive Plant Inventory Database (www.cal-ipc.org) lists species identified as being invasive. San Bruno is part of the Central West Floristic Province. Myoporum is listed as having moderate invasive potential; blackwood acacia, blue gum, glossy privet, and olive have a limited invasive potential. Victorian box is on the watch list.

Each tree was rated for suitability for preservation based upon its age, health, structural condition and ability to safely coexist within a development environment (Table 2).

**Table 2. Tree suitability for preservation.
300 Piedmont Avenue. San Bruno CA.**

High	Trees with good health and structural stability that have the potential for longevity at the site. Twenty-four (24) trees were rated as having high suitability for preservation: 13 coast live oaks, seven blue Atlas cedars, London planes #176 and #179, bronze loquat #151, and Lawson false cypress #251.
Moderate	Trees in fair health and/or possessing structural defects that may be abated with treatment. Trees in this category require more intense management and monitoring, and may have shorter life-spans than those in the "high" category. Seventy-three (73) trees were rated as having moderate suitability for preservation: 41 coast live oaks, 13 blue Atlas cedars, five cork oaks, four Monterey pines, three cajeput paperbark trees, London planes #177 and #178, bronze loquat #157, Chinese elm #160, Japanese cedar #39, Lawson false cypress #249, and toyon #340.
Low	Trees in poor health or possessing significant defects in structure that cannot be abated with treatment. These trees can be expected to decline regardless of management. The species or individual tree may possess either characteristics that are undesirable in landscape settings or be unsuited for use areas. Two hundred fifty-four trees (254) were rated as having low suitability for preservation:

97 Monterey pines, 55 coast live oaks, 20 myoporum, 20 London planes, 17 glossy privet, 11 Victorian box, seven blackwood acacia, six white poplar, seven blue Atlas cedar, four manna gum, cork oak #131 and #132, toyon #173 and #354, blue gum #281, cajeput paperbark tree #154, Lawson false cypress #258, lemon-scented gum #68, olive #159, and plum #89.

Note: Table does not include Monterey pines #1, 2, 25, 216, 217, 311, 313; myoporum #97; bronze loquat #156; and white poplar #237. These trees were dead.

We consider trees with high suitability for preservation to be the best candidates for preservation during development. We do not generally recommend retention of trees with low suitability for preservation in areas where people or property will be present. Retention of trees with moderate suitability for preservation depends upon the intensity of proposed site changes.

Evaluation of Impacts and Recommendations for Action

Appropriate tree retention develops a practical match between the location and intensity of construction activities and the quality and health of trees. The tree assessment was the reference point for tree condition and quality. Impacts from the proposed project were assessed using the Conceptual Site Plan SP1.0 (SummerHill Homes, March 7, 2022; #2021-262) and the 300 Piedmont Avenue Tree Overlay Plan (CBG Civil Engineers, January 8, 2024).

The site plan proposes demolition of the school buildings and grounds, and construction of 155 new residential lots with connecting streets A through J within the development. The Courtland Drive alignment would remain generally in place except in the northeast corner of the site. The entire roadway will be widened. A C3 stormwater treatment area would be constructed on the hillside to the northwest. Outer areas of the property and wooded hillsides would become Open Space maintained by a homeowners association. Northern and western portions of the site would be dedicated to the City as Open Space. The site will be redeveloped from the western edge of Courtland Drive to approximately the existing perimeter road and fence lines to the north, west and south. Potential impacts to trees will be severe. Activities such as grading, installation of utilities and construction of new homes may damage adjacent tree crowns and roots adjacent to the project area.

Based on my assessment of trees and evaluation of the plans, 271 trees would be removed, 182 of them Heritage. Ninety (90) would be preserved, including 86 Heritage trees. Trees to be preserved are located at the edges of the site. Disposition status of individual trees is shown in the ***Tree Disposition Form***, see Exhibits).

The almost uniformly poor condition of Monterey pines on the hillsides severely limits efforts to preserve trees. Pines in poor condition can be expected to decline and die. As a result, failure potential will increase. There were numerous unsurveyed trees outside the immediate project area that were also dying or in poor condition. Any trees that could fall onto developed areas should be removed.

Successful retention of all trees to be preserved is predicated on strict adherence to the ***Tree Preservation Guidelines*** (page 9). Some amount of canopy and root pruning may be required for these trees during construction.

Tree Preservation Guidelines

The goal of tree preservation is not merely tree survival during development but maintenance of tree health and beauty for many years. Trees retained on sites that are either subject to extensive injury during construction or are inadequately maintained become a liability rather than an asset. The response of individual trees will depend on the amount of excavation and grading, the care with which demolition is undertaken, and the construction methods. Coordinating any construction activity inside the **Tree Protection Zone** can minimize these impacts.

Design recommendations

1. Establish a **Tree Protection Zone** around each tree to be preserved. For trees outside the project area, the **Tree Protection Zone** shall be the existing fence line on all sides.
2. Ensure adequate but not excessive water is supplied to on-site trees to be preserved; in most cases occasional irrigation will be required. Avoid directing runoff toward trees.
3. Use only herbicides safe for use around trees and labeled for that use, even below pavement.

Pre-demolition and pre-construction treatments and recommendations

1. Trees to be preserved may require pruning to provide clearance for construction activities. All pruning shall be done by a State of California Licensed Tree Contractor (C61/D49). All pruning shall be done by Certified Arborist or Certified Tree Worker in accordance with the Best Management Practices for Pruning (International Society of Arboriculture, 2002) and adhere to the most recent editions of the American National Standard for Tree Care Operations (Z133.1) and Pruning (A300).
2. The project's security fence shall define the **Tree Protection Zone**. Fences are to remain until all grading and construction is completed. Where demolition must occur close to trees, such as removing curb and pavement, install trunk protection devices such as winding silt sock wattling around trunks or stacking hay bales around tree trunks.
3. All tree work shall comply with the Migratory Bird Treaty Act as well as California Fish and Wildlife code 3503-3513 to not disturb nesting birds. To the extent feasible tree pruning and removal should be scheduled outside of the breeding season. Breeding bird surveys should be conducted prior to tree work. Qualified biologists should be involved in establishing work buffers for active nests.
4. Any approved grading, construction, demolition or other work within the **Tree Protection Zone** should be monitored by the Consulting Arborist.
5. Prior to grading or trenching, trees may require root pruning outside the **Tree Protection Zone**. Any root pruning required for construction purposes shall receive the prior approval of, and be supervised by, the Consulting Arborist.
6. All grading within the dripline of trees shall be done using the smallest equipment possible. The equipment shall operate perpendicular to the tree and operate from outside the **Tree Protection Zone**. Any modifications must be approved and monitored by the Consulting Arborist.
7. Roots should be cut with a saw to provide a flat and smooth cut. If roots 2 inches and greater in diameter are encountered during site work and must be cut to complete the construction, the Consulting Arborist must be consulted to evaluate effects on the health and stability of the tree and recommend treatment.

Recommendations for tree protection during construction

1. Any approved grading, construction, demolition or other work within the **Tree Protection Zone** should be monitored by the Consulting Arborist.
2. All contractors shall conduct operations in a manner that will prevent damage to trees to be preserved.
3. Tree protection devices are to remain until all site work has been completed within the work area. Fences or other protection devices may not be relocated or removed without permission of the Consulting Arborist.
4. Construction trailers, traffic and storage areas must remain outside **Tree Protection Zone** at all times.
5. Any root pruning required for construction purposes shall receive the prior approval of and be supervised by the Consulting Arborist. Roots should be cut with a saw to provide a flat and smooth cut. Removal of roots larger than 2 inches in diameter should be avoided.
6. If roots 2 inches and greater in diameter are encountered during site work and must be cut to complete the construction, the Consulting Arborist must be consulted to evaluate effects on the health and stability of the tree and recommend treatment.
7. C3 area and western edge of site grading: Trees to be removed at top of slope shall be cut at or just above the base. Leave remaining root systems or portions of roots in place to help stabilize hillside and minimize erosion on slopes below grading areas.
8. Any brush clearing required within the **Tree Protection Zone** shall be accomplished with hand-operated equipment.
9. Trees to be removed shall be felled so as to fall away from **Tree Protection Zone** and avoid pulling and breaking of roots of trees to remain. If roots are entwined, the Consulting Arborist may require first severing the major woody root mass before extracting the trees, or grinding the stump below ground.
10. All down brush and trees shall be removed from the **Tree Protection Zone** either by hand, or with equipment sitting outside the **Tree Protection Zone**. Extraction shall occur by lifting the material out, not by skidding across the ground.
11. Prior to grading or trenching, trees may require root pruning outside the **Tree Protection Zone**. Any root pruning required for construction purposes shall receive the prior approval of, and be supervised by, the Consulting Arborist.
12. Spoils from trench, footing, utility or other excavation shall not be placed within the **Tree Protection Zone**, neither temporarily nor permanently.
13. All grading within the dripline of trees shall be done using the smallest equipment possible. The equipment shall operate perpendicular to the tree and operate from outside the **Tree Protection Zone**. Any modifications must be approved and monitored by the Consulting Arborist.
14. If injury should occur to any tree during construction, it should be evaluated as soon as possible by the Consulting Arborist so that appropriate treatments can be applied.

15. No excess soil, chemicals, debris, equipment or other materials shall be dumped or stored within the **Tree Protection Zone**.
16. Any additional tree pruning needed for clearance during construction must be performed by a Certified Arborist and not by construction personnel.

Maintenance of impacted trees

Our procedures included assessing trees for observable defects in structure. This is not to say that trees without significant defects will not fail. Failure of apparently defect-free trees does occur, especially during storm events. Wind forces, for example, can exceed the strength of defect-free wood causing branches and trunks to break. Wind forces coupled with rain can saturate soils, reducing their ability to hold roots, and blow over defect-free trees. Although we cannot predict all failures, identifying those trees with observable defects is a critical component of enhancing public safety.

Furthermore, trees change over time. Our inspections represent the condition of the tree at the time of inspection. As trees age, the likelihood of failure of branches or entire trees increases. Annual tree inspections are recommended to identify changes to tree health and structure. In addition, trees should be inspected after storms of unusual severity to evaluate damage and structural changes. Initiating these inspections is the responsibility of the client and/or tree owner.

Preserved trees will experience a physical environment different from that pre-development. As a result, tree health and structural stability should be monitored. Occasional pruning, fertilization, mulch, pest management, replanting and irrigation may be required. In addition, provisions for monitoring both tree health and structural stability following construction must be made a priority.

If you have any questions about my observations or recommendations, please contact me.

HortScience | Bartlett Consulting



Pam Nagle
Consulting Urban Forester
ISA Certified Arborist #WE-9617A
Registered Consulting Arborist #805
ISA Tree Risk Assessment Qualified



Exhibits

Tree Assessment Plan

Tree Assessment Form

Tree Disposition





- Notes:**
- Base map provided by: Google Earth
 - Numbered tree locations are approximate.
 - No Scale

Prepared for:
 SummerHill Homes
 Palo Alto, CA

Tree Assessment Plan
300 Piedmont Avenue
San Bruno, CA



325 Ray Street
 Pleasanton, California 94566
 Phone 925.484.0211
 Fax 925.484.0596

May 2022

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
1	Monterey pine	30	-	0	-	Topped at ~30'; dead.
2	Monterey pine	27	-	0	-	1-sided to W.; dead.
3	Monterey pine	39	Yes	2	Low	Correcting bow E; at base; history of limb removal; overextended
4	Monterey pine	32	Yes	2	Low	Correcting lean E.; overextended limbs; history of limb removal; sparse.
5	Monterey pine	59	Yes	2	Low	Multiple attachments at 7'; history of limb removal; trunks sweep S; and correct; crowded; pine pitch canker prevalent among
6	Monterey pine	40	Yes	2	Low	Overextended branches; sparse; heavy sap bleeding on trunk.
7	Monterey pine	27	Yes	2	Low	Overextended branches; narrow raised crown; crowded.
8	Monterey pine	27	Yes	2	Low	Trunk bows E; at base and corrects; high raised crown; overextended branches; crowded.
9	Monterey pine	31	Yes	2	Low	Multiple narrow attachments at ~20'; overextended branches;
10	Monterey pine	41	Yes	2	Low	Large upward lateral over road; overextended branches.
11	Monterey pine	29	Yes	2	Low	Raised crown; overextended branches; sparse.
12	Monterey pine	42	Yes	2	Low	History of limb removal; overextended branches; extensive branch dieback; sparse.
13	London plane	14	Yes	2	Low	In unmaintained lawn planter; abandoned pollard w/decay at
14	London plane	11	Yes	2	Low	In 8' unmaintained lawn planter; corrected lean E.; abandoned pollard w/ attachments at 8'; vigorous.
15	London plane	10	Yes	2	Low	In 8' unmaintained lawn planter; sinuous trunk; abandoned pollard w/ attachments at 9'; branch dieback.
16	London plane	8	No	2	Low	In 8' unmaintained lawn planter; abandoned pollard w/ attachments at 7'; poor form and structure.
17	London plane	17	Yes	2	Low	In 8' unmaintained lawn planter; abandoned pollard w/ attachments at 8'; vigorous sprouts.
18	London plane	16	Yes	2	Low	In 8' unmaintained lawn planter; abandoned pollard w/ attachments at 8'; less dense crown.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
19	London plane	17	Yes	2	Low	In unmaintained lawn; abandoned pollard w/ attachments at 8'.
20	Blackwood acacia	6,6,5	No	2	Low	In unmaintained lawn; multiple attachments at base; vigorous low oval crown.
21	Monterey pine	34	Yes	2	Low	Raised crown; 1-sided to S.; overextended branches; crowded.
22	Monterey pine	30	Yes	1	Low	Codominant stems at 10'; history of limb removal; overly raised crown; low live crown ratio; very sparse; crowded.
23	Monterey pine	35	Yes	2	Low	Overly raised crown; history of limb removal; poor form and structure.
24	Monterey pine	24	Yes	2	Low	Overly raised crown; overextended branches; low live crown ratio.
25	Monterey pine	33	-	0	-	Codominant stems at 7'; dead.
26	Monterey pine	35	Yes	2	Low	Raised crown; 1-sided to S.; leans N.E.; overextended branches; vigorous.
27	Monterey pine	26	Yes	2	Low	On slope; overly raised crown; overextended branches.
28	Monterey pine	28	Yes	1	Low	On slope; leans N.E.; overly raised crown; little live foliage.
29	Monterey pine	33	Yes	2	Low	On slope; overly raised crown; overextended branches.
30	Monterey pine	38,36	Yes	2	Low	At top of slope; codominant stems at 3'; pine pitch canker at union; overly raised crown; crowded.
31	Blue atlas cedar	28,9	Yes	3	Moderate	In mulch bed; multiple narrow attachments w/ seams; slightly thin crown; crowded.
32	Blue atlas cedar	19,14,10	Yes	3	Moderate	In raise mulch bed; cavity N; side; multiple attachments at 3,5'; slightly thin crown; roots escaping below low wood retaining wall.
33	Blue atlas cedar	19,9,8,5,5	Yes	3	Moderate	In raise mulch bed w/ deck; multiple attachments at 2'; slightly thin crown; crowded.
34	Blue atlas cedar	19,19,17,16,11,11,11	Yes	4	High	On slope; multiple attachments at 2'; limb failure S; side; large spreading crown; vigorous.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
35	Blue atlas cedar	18,16,16,1 6,15,15,14 ,13,13	Yes	4	High	On slope; multiple attachments 1'; basal cavity S.E.; large spreading crown; vigorous.
36	Blue atlas cedar	24,22,19,1 5,13,12,10 ,10,5,5	Yes	3	Moderate	On slope; multiple attachments at 1'; history of limb failure; history of limb removal S; side; vigorous; large spreading crown.
37	Blue atlas cedar	38,12,10,1 0,10,10,10	Yes	3	Moderate	On slope; multiple attachments at 3'; narrow attachments w/ fused stems; large vigorous crown.
38	Blue atlas cedar	36,25,12,6 ,6	Yes	3	Moderate	On slope; multiple narrow attachments at 1' w/ fused stems; large vigorous crown.
39	Japanese cedar	16,13	Yes	3	Moderate	On slope; strong correcting lean S.E.; codominant stems at 1'; vigorous.
40	Monterey pine	42	Yes	2	Low	In unmaintained lawn; large surface roots with mechanical damage; overextended branches; poor form and structure; thin crown.
41	Monterey pine	33	Yes	2	Low	In unmaintained lawn; large surface roots with mechanical damage; overextended branches; thin crown.
42	Monterey pine	42	Yes	2	Low	In unmaintained lawn; large surface roots with mechanical damage; overextended branches; more vigorous.
43	Monterey pine	28	Yes	2	Low	In unmaintained lawn; large surface roots with mechanical damage; 1-sided to S.; overextended branches; sparse.
44	Monterey pine	39	Yes	2	Low	In unmaintained lawn; leans and 1-sided to N.E.; overly raised crown; overextended branches; crowded.
45	Monterey pine	46	Yes	2	Low	In unmaintained lawn; leans and 1-sided to S.E.; overextended branches; sparse; crowded.
46	Monterey pine	41	Yes	2	Low	In unmaintained lawn; crown bows and 1-sided to N.W.; overextended branches; crowded.
47	Monterey pine	41	Yes	2	Low	In unmaintained lawn; crown bows and 1-sided to N.; overextended branches; crowded.
48	Monterey pine	37	Yes	1	Low	On steep slope; large buttress roots E.; seams E; and W; trunk; overly raised crown; overextended branches.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
49	Monterey pine	48	Yes	2	Low	On slope; multiple narrow attachments at 6'; leans S.W.; overextended branches; vigorous.
50	Coast live oak	5,5,4	No	3	Moderate	Multiple attachments arise from base; cut stem growing through fence; rounded crown; vigorous.
51	Blue atlas cedar	25,15,15,12,12,6	Yes	4	High	In unmaintained lawn; multiple narrow attachments at 1'; large spreading crown; vigorous.
52	Monterey pine	39	Yes	2	Low	In unmaintained lawn; 1-sided and leans to S.; history of limb removal; vigorous.
53	Monterey pine	50	Yes	2	Low	In unmaintained lawn w/ mechanically damaged surface roots; large limb removals S.E.; branch dieback E; side; vigorous.
54	Blue atlas cedar	25,12,5	Yes	4	High	In unmaintained lawn; basal limb removals S.E.; multiple narrow attachments at 5'; vigorous crown.
55	London plane	13	Yes	2	Low	In unmaintained lawn; codominant stems at 7'; abandoned pollard w/ attachments at 8' + overextended branches; slight lean E.
56	London plane	9	No	2	Low	In unmaintained lawn; multiple attachments/abandoned pollard at 8'; slight lean E.
57	London plane	10	Yes	2	Low	In unmaintained lawn; multiple attachments/abandoned pollard at 7'; overextended branches.
58	London plane	11	Yes	1	Low	In unmaintained lawn; strong lean N.E.; 5' trunk wound S.W; w/ decay; vigorous w/ suckers at base.
59	London plane	9	No	2	Low	In unmaintained lawn; leans N.E ; multiple attachments at 8'; abandoned pollard above.
60	London plane	11	Yes	2	Low	In unmaintained lawn; suckers at base; correcting lean N.E.; abandoned pollard at 9'.
61	London plane	9	No	2	Low	In unmaintained lawn; correcting lean N.E.; multiple attachments at 8' w/ abandoned pollard above.
62	London plane	10	Yes	2	Low	In unmaintained lawn; 4' from hydrant; history of limb removal; abandoned pollard at 9'.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
63	London plane	15	Yes	2	Low	In unmaintained lawn; codominant stems at 6'; history of limb removal; abandoned pollard at 8,9'; vigorous.
64	London plane	8	No	2	Low	In unmaintained lawn; correcting lean N.E.; codominant stems at 6'; abandoned pollard above.
65	London plane	9	No	2	Low	In unmaintained lawn; abandoned pollard at 7'.
66	London plane	11	Yes	2	Low	In unmaintained lawn planter narrowing to 6'; history of limb removal; abandoned pollard at 8'.
67	London plane	10	Yes	2	Low	In unmaintained lawn end planter; codominant stems at 7'; abandoned pollard at 8'.
68	Lemon-scented gum	37	Yes	3	Low	In corner planting bed; base pillows over curb; multiple narrow attachments at 2'; large vigorous crown.
69	Blue atlas cedar	17,17,13,1 2,7	Yes	4	High	In corner planting bed; surface roots; vase form; vigorous.
70	Blue atlas cedar	28	Yes	3	Moderate	Multiple attachments 2' w/ multiple narrow attachments at 4'; fused lower stems; rounded crown; crowded by #71.
71	Blue atlas cedar	19,14,8,6	Yes	3	Moderate	Codominant stems at 1.5'; multiple attachments above; crowded; both vigorous.
72	Coast live oak	12,10,9	Yes	3	Moderate	2' from fence; codominant stems at 3' w/ seam; vase form; crowded.
73	Coast live oak	21,13	Yes	4	High	Codominant stems at 3' w/ seam; large vase form.
74	Coast live oak	13,4	Yes	3	Moderate	At top of slope; exposed surface roots; codominant stems at 4'; stems lean on fence; very crowded.
75	Coast live oak	8,2	Yes	2	Low	At top of slope; sparse; very crowded.
76	Coast live oak	7	Yes	2	Low	At top of slope; leans on fence; very crowded by shrubs.
77	Coast live oak	5	No	2	Low	At top of slope; leans S.; high crown; crowded by shrubs.
78	Coast live oak	6	Yes	2	Low	At top of slope; leans S.; branches growing into fence; high crown; crowded.
79	Victorian box	5,3	No	2	Low	On slope; branch dieback; crowded; yellowing foliage.
80	Victorian box	4,2,2	No	2	Low	On slope; multiple attachments arise from base; yellowing foliage; crowded.
81	Coast live oak	7	Yes	2	Low	On slope; leans N.E.; very crowded.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
82	Victorian box	6,3,3,3,3,3	No	2	Low	On slope; multiple attachments arise from base; very crowded; yellowing foliage.
83	Coast live oak	7,6,6,4,4,4,4	Yes	2	Low	Tagged on branch; On slope; multiple attachments arise from base; crowded.
84	Victorian box	5,3,3,3,3,2,2,2	No	2	Low	On slope at fence; multiple attachments at 1'; branch dieback; yellowing foliage.
85	Coast live oak	13,4	Yes	2	Low	On slope at fence; codominant stems at 1'; vase form; crowded.
86	Coast live oak	8,6,4	Yes	3	Moderate	At fence; multiple attachments arise from base; raised crown; branching thru fence; crowded by shrubs; vigorous.
87	Coast live oak	6	Yes	2	Low	Leans N.; engulfed in shrubs.
88	Coast live oak	7,5,5,3,3,3,3,3	Yes	2	Low	Leans S.; fused stems and base growing through fence; engulfed in shrubs.
89	Plum	6,6	No	2	Low	Codominant stems at 3.5'; crowded by shrubs.
90	Blue atlas cedar	26	Yes	3	Moderate	On slope; asphalt at base; slightly thin crown.
91	Myoporum	7,6	No	2	Low	Leans N.; codominant stems at 1'; sparse.
92	Myoporum	6,4,3	No	2	Low	Leans E.; multiple attachments arise from base; failing stem; engulfed in shrubs.
93	Myoporum	5,4,4,3,3	No	2	Low	Leans N.E.; multiple attachments at base; crowded by shrubs.
94	Myoporum	5,4,4,3,3,3	No	2	Low	Leans N.E.; multiple attachments arise from base; engulfed in ivy; crowded.
95	Monterey pine	17	Yes	2	Low	Codominant stems at 3' w/ 2' included bark; high crown; crowded by shrubs; engulfed in ivy; vigorous.
96	Monterey pine	13	Yes	2	Low	Engulfed in ivy; slight lean S.; high crown; vigorous; crowded.
97	Myoporum	7	-	0	-	Leans S.; engulfed in shrubs; dead.
98	Monterey pine	13	Yes	2	Low	Engulfed in ivy; sinuous trunk; high crown; crowded.
99	Monterey pine	4,3	No	2	Low	Codominant stems at base; stems fused for 4'; engulfed in shrubs; young tree.
100	Monterey pine	8	Yes	4	Moderate	Engulfed in ivy; crowded by shrubs; vigorous; good young tree.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
101	Myoporum	6,2	No	1	Low	Engulfed in ivy; very high sparse crown.
102	Myoporum	10,7,5,5,4	Yes	1	Low	On slope; multiple attachments w/ decay at base; very sparse.
103	Myoporum	7,7,6,4,4,4,4	No	1	Low	On slope; multiple attachments arise from base; very sparse.
104	Myoporum	7,3,2	No	1	Low	On slope; multiple attachments arise from base; leans N.E.; all but dead.
105	Myoporum	6,2,2	No	1	Low	On slope; multiple attachments arise from base; failing stems; very sparse.
106	Myoporum	7,6,5,1	No	1	Low	On slope; engulfed in ivy; multiple attachments arise from base; 2 fused stems; high sparse crown.
107	Myoporum	9,6,6,4	No	1	Low	On slope; multiple attachments arise from base; group of decayed stems; high sparse crown.
108	Myoporum	6,5,5,4,3,3,2	No	1	Low	On slope; multiple attachments arise from base; engulfed in shrubs and ivy; high sparse crown.
109	Myoporum	6,3	No	1	Low	On slope; trunk failed to E.; sparse.
110	Myoporum	6,5,5,4	No	1	Low	On slope; multiple attachments arise from base; leans S.; crowded.
111	Myoporum	7,7	No	1	Low	On slope; codominant stems at base w/ extensive basal decay; sparse.
112	Myoporum	6,6,4,4,3,3,3,3	No	1	Low	On slope; multiple attachments arise from base; decayed stems; branch dieback; sparse.
113	Monterey pine	6	Yes	3	Low	On slope; base at #114; vigorous young tree.
114	Myoporum	7	No	1	Low	On slope; base at #113; ivy on trunk; high crown.
115	Monterey pine	10	Yes	3	Low	On slope; good form and structure; in shrubs; vigorous.
116	Myoporum	6,5,5,3,3	No	1	Low	On slope; multiple attachments arise from base; sparse.
117	Myoporum	7,7,6	No	1	Low	On slope; multiple attachments arise from base; leans N.; in shrubs; high sparse crown.
118	Myoporum	6,6,3,3,2,2	No	1	Low	On slope; multiple attachments arise from base; leans N.; engulfed in shrubs; high sparse crown.
119	Coast live oak	5	No	4	High	At fence; codominant stems at 6'; vigorous; good young tree.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
120	Coast live oak	5	No	3	Moderate	At fence; starting to embed in chain link; codominant stems at 6.5'; vigorous; suppressed by #131.
121	Coast live oak	30	Yes	2	Low	At fence; N; base in asphalt; S; base embedding in fence; large vase form; branch dieback; sparse crown.
122	Cork oak	17	Yes	3	Moderate	In raised planter; multiple attachments at 3'; slight correcting lean S.
123	Cork oak	12,10	Yes	3	Moderate	Codominant stems at 2.5'; raised crown.
124	Cork oak	11	Yes	3	Moderate	In raised planter; multiple attachments at 5'; sinuous trunk; crowded by acacia sapling.
125	Blackwood acacia	6,4,4,4,3	No	3	Low	In raised planter; multiple attachments arise from base; large shrub form.
126	Blackwood acacia	7,6,6,6,6	No	3	Low	In raised planter; multiple attachments arise from base; shrub form; vigorous; crowded.
127	Blackwood acacia	8,6,5	No	3	Low	In raised planter; multiple attachments arise from base; vigorous; crowded.
128	Blackwood acacia	7	No	3	Low	In raised planter; shrub form; crowded; vigorous.
129	Blue atlas cedar	14	Yes	4	High	In raised planter; multiple attachments at 4'; vase form.
130	Cork oak	14	Yes	3	Moderate	In raised planter; multiple attachments at 4'; raised crown; vase form; slightly sparse.
131	Cork oak	9,8,6,6	Yes	2	Low	In raised planter; multiple attachments at 1'; vase form; very sparse.
132	Cork oak	16,8,7	Yes	2	Low	In raised planter; multiple attachments at 2.5'; very sparse.
133	Cork oak	11,8,7	Yes	3	Moderate	Codominant stems at 1'; raised crown; slightly sparse.
134	Glossy privet	13	Yes	2	Low	In raised planter; codominant stems at 5'; history of limb failure; correcting lean S.W.; crowded.
135	Glossy privet	8,6,3	No	2	Low	In raised planter; multiple attachments at 3'; suppressed.
136	Glossy privet	8	No	2	Low	In raised planter; multiple attachments at 5'; crowded.
137	Glossy privet	10	Yes	2	Low	In raised planter; codominant stems at 4'; trunk decayed; raised crown; crowded.
138	Glossy privet	6,6	No	2	Low	In raised planter; codominant stems at 3.5'; history of limb removal; vase form; crowded.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
139	Glossy privet	8	No	2	Low	In raised planter; multiple attachments at 4.5'; crowded; sparse.
140	Glossy privet	8	No	1	Low	In raised planter; codominant stems at 4'; history of limb removal w/ decay; sparse; basal cavity.
141	Glossy privet	9	No	2	Low	In raised planter; codominant stems at 4' w/ removed stem; crowded; sparse.
142	Glossy privet	7	No	2	Low	In raised planter; codominant stems at 5'; raised crown; sparse.
143	Glossy privet	9	No	2	Low	In raised planter; multiple attachments at 5' w/ decay; history of limb removal; sparse.
144	Glossy privet	7	No	2	Low	In raised planter; multiple attachments at 4.5'; history of limb removal; sparse; crowded.
145	Glossy privet	7	No	2	Low	In raised planter; multiple attachments at 5'; history of limb removal; 1-sided to N.E.
146	Glossy privet	8	No	2	Low	In raised planter; multiple attachments at 5' w/ decay; crowded.
147	Glossy privet	12	Yes	2	Low	In raised planter; multiple attachments at 5.5'; raised crown; branch dieback; crowded.
148	Glossy privet	7	No	1	Low	In raised planter; codominant stems at 4'; history of limb removal; branch dieback; very crowded.
149	Glossy privet	9	No	2	Low	In raised planter; multiple narrow attachments at 4'; raised crown; crowded.
150	Glossy privet	16	Yes	2	Low	In raised planter; multiple attachments at 4.5'; raised crown; stem decay; crowded.
151	Bronze loquat	11	Yes	4	High	No tag; Multiple attachments 5'; raised crown; vigorous.
152	Cajeput paperbark tree	18	Yes	3	Moderate	Multiple attachments at 6.5'; raised crown; 1-sided to N.E.; crowded.
153	Cajeput paperbark tree	17	Yes	3	Moderate	Codominant stems at 6' w/ seam and narrow attachment; high raised crown; crowded.
154	Cajeput paperbark tree	16	Yes	2	Low	Leans S.; 8" removed stem N.; very crowded.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
155	Cajeput paperbark tree	20	Yes	3	Moderate	Codominant stems at 2', fused to 10'; leans S.W.; high raised crown; crowded.
156	Bronze loquat	9	-	0	-	In raised 4x4' planter; dead.
157	Bronze loquat	11	Yes	3	Moderate	Codominant stems at 6'; 1-sided to S.; raised crown; some trunk decay S; side.
158	Blackwood acacia	8	No	3	Low	Good form and structure w/ central leader; vigorous; crowded.
159	Olive	5,3	No	3	Low	Codominant stems at 4'; very crowded.
160	Chinese elm	3	No	3	Moderate	Tagged on cross brace; leans N.E.; good young tree.
161	Monterey pine	39	Yes	2	Low	Multiple attachments at 7'; history of limb removal; overextended branches; some branch dieback.
162	Victorian box	5,3,3,2,1,1	No	2	Low	On slope; multiple attachments at 2'; shrub form; branch dieback; crowded.
163	Victorian box	5,5,4,3,2,2	No	2	Low	On slope; multiple attachments at 2'; shrub form; branch dieback; crowded.
164	Coast live oak	4	No	3	Moderate	On slope at fence; codominant stems arise from base; vase form; vigorous.
165	Victorian box	6,6,3,3,2	No	2	Low	On slope; multiple attachments at 2'; shrub form; branch dieback; crowded.
166	Coast live oak	6,6,5	Yes	2	Low	On slope; multiple attachments arise from base; leans W.; crowded.
167	Victorian box	5,5,3,2,2	No	2	Low	On slope; multiple attachments at 2'; shrub form; branch dieback; crowded.
168	Victorian box	6,3,3,3,2,2,1	No	2	Low	On slope w/ history of limb removal at base; branch dieback; crowded.
169	Victorian box	6,3,3,3	No	2	Low	On slope; multiple attachments at 2'; shrub form; branch dieback; crowded; leans E.
170	Victorian box	6,5,4,2,2,2	No	2	Low	On slope; multiple attachments at 1'; raised crown; leans E.; crowded.
171	Coast live oak	5	No	2	Low	Tagged on fence; At fence on slope; high sparse crown; very crowded.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
172	Coast live oak	8	Yes	2	Low	Tagged on fence; Codominant stems at 6'; 1-sided to W.; sparse; very crowded.
173	Toyon	10	Yes	1	Low	Tagged on fence; On slope; codominant stems at 4'; branch dieback; very crowded.
174	Coast live oak	10,5,4	Yes	4	High	On slope; good form and structure; vigorous; crowded.
175	Coast live oak	9,5,3	Yes	3	Moderate	Multiple attachments arise from base; codominant stems at 7.5'; slight lean W.; crowded.
176	London plane	16	Yes	4	High	Multiple attachments at 12'; otherwise good form and structure; large vigorous crown.
177	London plane	16	Yes	3	Moderate	High vase crown; crowded.
178	London plane	13	Yes	3	Moderate	Codominant stems at 9'; slightly crowded.
179	London plane	18	Yes	4	High	Codominant stems at 7'; large vase crown.
180	Coast live oak	26	Yes	3	Moderate	Tag on fence; on slope; multiple branch attachments at 3'; narrow attachments at 4'; slightly sparse E.; crowded; Overhang from site fence: ~15'.
181	Coast live oak	8	Yes	2	Low	On slope; codominant stems at 4.5'; narrow form; sparse; crowded; Overhang from site fence: ~2'.
182	Coast live oak	10	Yes	2	Low	On slope; codominant stems at 3' w/ seam; 1-sided to S.W.; sparse; Overhang from site fence: ~15'.
183	Coast live oak	6,5,4,3,1	Yes	2	Low	3' from utility pole; multiple attachments arise at base; crowded; slightly sparse.
184	Coast live oak	6,3	Yes	1	Low	Tag on fence; on slope; codominant stems at 3'; leans W.; sparse; Overhang from site fence: ~3'.
185	Coast live oak	12,8	Yes	1	Low	Tag on fence; on slope; leans S.W.; codominant stems at 4.5' w/ seam; crowded and suppressed; Overhang from site fence: ~12'.
186	Blue atlas cedar	25,16	Yes	3	Moderate	Tag on fence; on slope; codominant stems at 3.5' w/ smaller fused stems; large vase form; Overhang from site fence: ~4'.
187	Coast live oak	10,10,8,8,8,5,3	Yes	4	High	Multiple attachments arise from base; vase form; full vigorous crown.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
188	Coast live oak	7	Yes	3	Moderate	Tag on fence; sinuous trunk; leans S; w/ branches on fence; vigorous; Overhang from site fence: ~3'.
189	Coast live oak	6,6,5	Yes	3	Moderate	At fence; multiple attachments at 1'; leans S.; vigorous.
190	Monterey pine	38	Yes	2	Low	Tag on fence; engulfed in ivy; history of limb removal; high crown; Overhang from site fence: ~18'.
191	Coast live oak	7,6	Yes	2	Low	Tag on branch; on slope; codominant stems at 3'; branches through fence; Overhang from site fence: ~7'.
192	Monterey pine	5	No	3	Low	Tag on fence; growing against fence; vigorous young tree; Overhang from site fence: ~2'.
193	Monterey pine	39	Yes	2	Low	Tag on fence; on slope; history of limb removal; stub cuts; poor form and structure; Overhang from site fence: ~21'.
194	Monterey pine	13	Yes	1	Low	Tag on fence; leans N.E.; topped; history of limb removal w/ stub cuts; Overhang from site fence: ~1'.
195	Monterey pine	38	Yes	2	Low	Tag on fence; on slope; history of limb removal w/ stub cuts; Overhang from site fence: ~16'.
196	Monterey pine	25	Yes	2	Low	Tag on fence; multiple attachments at 20'; poor form and structure; history of limb removal w/ stub cuts; Overhang from site fence: ~15'.
197	Monterey pine	24	Yes	1	Low	Tag on fence; leans S.W.; poor form and structure; egregious stub cuts; Overhang from site fence: ~15'.
198	Monterey pine	18	Yes	1	Low	Tag on fence; correcting lean N.E.; overly raised crown; overextended branches over site; Overhang from site fence: ~17'.
199	Monterey pine	32	Yes	2	Low	Tag on fence; very sinuous trunk; poor form and structure; vigorous; Overhang from site fence: ~17'.
200	Monterey pine	29	Yes	1	Low	Tag on fence; on slope; history of limb removal; overextended branching over site; extremely sparse; Overhang from site fence: ~18'.
201	Monterey pine	45	Yes	3	Low	Tag on fence; On slope; history of limb removal w/ stub cuts S; side; vigorous; Overhang from site fence: ~15'.
202	Monterey pine	55	Yes	2	Low	Tag on fence; multiple attachments at 4'; upright form; very sparse; Overhang from site fence: ~17'.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
203	Coast live oak	6,4,4	Yes	2	Low	Tag on stem; growing through fence; leans S.; vigorous.
204	Monterey pine	32	Yes	2	Low	Tag on fence; leans S.E.; multiple attachments at 15'; poor form and structure; Overhang from site fence: ~16'.
205	Monterey pine	27	Yes	2	Low	Tag on fence; overly raised crown; multiple attachments at 35'; sparse; Overhang from site fence: ~5'.
206	Coast live oak	7	Yes	3	Moderate	Tag on fence; sinuous trunk; vigorous; Overhang from site fence: ~1'.
207	Monterey pine	16	Yes	1	Low	Tag on fence; on slope; leans E.; overextended branches; Overhang from site fence: ~9'.
208	Monterey pine	38,12	Yes	2	Low	Tag on fence; on slope; failed downhill tree leaning against; codominant stems at 6.5'; some stub cuts; vigorous; Overhang from site fence: ~12'.
209	Monterey pine	42	Yes	2	Low	Tag on fence; multiple attachments at 6'; history of limb failure; corrected lean S.E; Overhang from site fence: ~12'.
210	Coast live oak	6,4,4,3	Yes	3	Low	Tag on fence; multiple attachments at base; growing through fence; Overhang from site fence: ~4'.
211	Monterey pine	30	Yes	2	Low	No tag; history of limb removal; leans N.E.; vigorous; Overhang from site fence: ~9'.
212	Monterey pine	32	Yes	2	Low	No tag; history of limb removal; raised crown; overextended branches; Overhang from site fence: ~20'.
213	Monterey pine	38	Yes	1	Low	Tag on fence; leans S.E.; all but dead; Overhang from site fence: ~15'.
214	Monterey pine	22	Yes	2	Low	Tag on fence; multiple attachments at ~35'; sinuous stems; correcting lean N.
215	Monterey pine	24	Yes	3	Low	No tag; upright form; good form and structure; slightly thin.
216	Monterey pine	26	-	0	-	Tag on fence; overextended branches; dead.
217	Monterey pine	26	-	0	-	Tag on fence; overextended branches; dead.
218	Monterey pine	28	Yes	2	Low	Tag on fence; overextended branches; sparse; pine bark beetle damage.
219	Monterey pine	22	Yes	2	Low	Tag on fence; low live crown ratio; very high sparse crown.
220	Coast live oak	5	No	2	Low	Tagged on branch; engulfed in poison oak; leans S.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
221	Manna gum	38	Yes	2	Low	Tag on fence; leans S.E.; multiple attachments at ~40'; Overhang from site fence: ~35'.
222	Coast live oak	16	Yes	3	Moderate	Tag on fence; multiple attachments at 6'; slightly sparse; suppressed; Overhang from site fence: ~20'.
223	Coast live oak	10,7,4	Yes	2	Low	No tag; multiple attachments at 2'; very suppressed.
224	Manna gum	19,8	Yes	3	Low	Tag on fence; codominant stems arise from base w/ narrow attachment; crowded; Overhang from site fence: ~15'.
225	Coast live oak	5,3,3,2,2	No	2	Low	Tag on fence; on slope; multiple branch attachments at 3'; narrow attachments at 4'; slightly sparse E.; crowded; Overhang from site fence: ~15'.
226	Coast live oak	6,4	Yes	2	Low	At fence; codominant stems arise from base; vase form; leans E.; crowded.
227	Coast live oak	8	Yes	2	Low	At fence; multiple attachments at 3.5'; leans E.; crowded.
228	Monterey pine	32	Yes	2	Low	Tag on fence; engulfed in poison oak; overextended branches; Overhang from site fence: ~15'.
229	Manna gum	5,5	No	1	Low	On fence line; codominant stems at 1'; growing through fence; very sparse; suppressed.
230	Monterey pine	23	Yes	1	Low	Tag on fence; codominant stems w/ narrow attachment at 4.5'; very high crown; Overhang from site fence: ~12'.
231	Manna gum	6	No	3	Low	On fence line; at fence; good form and structure; young tree.
232	Monterey pine	30	Yes	2	Low	Tag on fence; codominant stems at ~30'; overextended branches; crowded; Overhang from site fence: ~18'.
233	White poplar	7	No	2	Low	Tag on fence; very narrow high crown; multiple narrow attachments at ~35'; crowded.
234	White poplar	6,4	No	3	Low	Codominant stems w/ narrow attachment at 2.5'; high narrow crown.
235	White poplar	7	No	2	Low	Tag on fence; engulfed in poison oak; high narrow crown; Overhang from site fence: ~3.
236	Monterey pine	25	Yes	2	Low	Tag on fence; leans S.E; against fence; engulfed in ivy and poison oak; overextended branches.
237	White poplar	10	-	0	-	Tag on fence; engulfed in ivy and poison oak; dead.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
238	Monterey pine	37	Yes	2	Low	Tag on fence; crown weighted S.E.; engulfed in ivy; Overhang from site fence: ~25'.
239	White poplar	15,5,3,2,2	Yes	3	Low	At fence; multiple attachments arise from base; tall narrow form.
240	Monterey pine	17	Yes	3	Low	Tag on fence; not accessible; Pyramidal form; good central leader; vigorous.
241	White poplar	6,2,2,2,2,1,1,1	No	2	Low	Growing though fence; multiple narrow attachments at 2'; narrow upright form.
242	Coast live oak	30,14	Yes	4	High	Multiple attachments at 3 and 4'; very wide spreading crown w/ branching to ground S; side; vigorous specimen tree.
243	Coast live oak	14,12	Yes	3	Moderate	Suppressed by pine; Overhang from site fence: ~12'.
244	Monterey pine	20	Yes	3	Low	Tag on branch; narrow codominant stem union at 5'; Overhang from site fence: ~5'.
245	Coast live oak	12,5	Yes	2	Low	Codominant stems at 1'; very suppressed and 1-sided to S.
246	Coast live oak	19	Yes	4	High	At fence; multiple attachments at 4'; wide vigorous crown.
247	Coast live oak	7,5	Yes	2	Low	Tag on fence; codominant stems at 3' w/ removed stem; very suppressed by #246.
248	Monterey pine	6	Yes	3	Low	Off-site. Tag on fence; at fence; codominant stems at 3'; vigorous young tree.
249	Lawson false cypress	22,16,10	Yes	3	Moderate	Multiple attachments at 3'; typical spreading crown; sparse w/ branch dieback E; side.
250	Coast live oak	6	Yes	4	High	Off-site. Codominant stems at 5' w/ 6" seam; oval crown; good young tree.
251	Lawson false cypress	18,13,12,12	Yes	4	High	Codominant stems at 3'; typical form and structure; more vigorous.
252	Coast live oak	7	Yes	2	Low	Off-site. At fence; leans W.; crowded by shrubs.
253	Coast live oak	23	Yes	3	Moderate	Tag on fence; wide slightly sparse crown.
254	Coast live oak	7	Yes	2	Low	At fence; growing through fence; 1-sided to W.; vigorous.
255	Coast live oak	11	Yes	3	Moderate	Off-site. At fence; multiple attachments at 6'; slight lean W.; vigorous.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
256	Coast live oak	13	Yes	3	Moderate	Off-site. At fence; growing through fence; wide rounded vigorous crown.
257	Coast live oak	11	Yes	3	Moderate	Off-site. At fence; codominant stems at 4'; vigorous crown.
258	Lawson false cypress	23	Yes	2	Low	Off-site. Correcting lean S.; codominant stems at 6'; history of limb removal; extensive branch dieback.
259	Coast live oak	7,2	Yes	2	Low	Off-site. On fence line; growing through fence; 1-sided to W.; slightly sparse.
260	Coast live oak	11,7	Yes	2	Low	Off-site. Tagged on branch; at fence; leans S.; codominant stems at 4'; very crowded.
261	Coast live oak	11,7	Yes	2	Low	Off-site. Tagged on branch; at fence; leans S.; codominant stems at 4'; very crowded.
262	Coast live oak	13	Yes	3	Moderate	Off-site. At fence; leans W.; multiple attachments at 8'.
263	Coast live oak	15	Yes	2	Low	Off-site. At fence; leans W.; multiple attachments at 8'.
264	Coast live oak	15	Yes	2	Low	Off-site. At fence; tagged on branch; multiple attachments at 9'; sparse; crowded.
265	Coast live oak	15,12	Yes	3	Moderate	Off-site. At fence; tagged on fence; codominant stems at 3'; narrow; crowded.
266	Coast live oak	11,6,3	Yes	2	Low	Off-site. At fence; tagged on fence; multiple attachments at 3'; branch dieback; crowded and suppressed.
267	Coast live oak	8	Yes	2	Low	Off-site. At fence; slight lean S.; narrow; crowded.
268	Coast live oak	11	Yes	2	Low	Off-site. At fence; high narrow crown; sparse; crowded.
269	Coast live oak	12	Yes	2	Low	Off-site. At fence; 1-sided to W.; sparse.
270	Coast live oak	9	Yes	2	Low	Off-site. At fence; codominant stems at 5'; very crowded.
271	Coast live oak	12,9	Yes	2	Low	Off-site. At fence; codominant stems at 3'; sparse; very crowded.
272	Coast live oak	7	Yes	2	Low	Off-site. At fence; codominant stems at 5.5'; narrow; sparse.
273	Coast live oak	13	Yes	2	Low	Off-site. At fence; growing through fence at base; codominant stems at 4.5'; large stem removal E; side.
274	Coast live oak	8,6,6,5	Yes	2	Low	Off-site. At fence; multiple attachments at base; leans W.; crowded.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
275	Coast live oak	9,9,4	Yes	3	Moderate	Off-site. At fence; branches through fence; vigorous.
276	Coast live oak	9,7,5	Yes	2	Low	Off-site. At fence; branches through fence; vigorous.
277	Coast live oak	5,4	No	2	Low	Tagged on fence; at fence; branches through fence; vigorous.
278	Coast live oak	4,3,3	No	2	Low	Tagged on branch; multiple attachments at base; low shrubby form.
279	Monterey pine	6	Yes	3	Low	At fence; young vigorous tree.
280	Coast live oak	5,2,2	No	2	Low	Tagged on fence; multiple attachments at base; sparse.
281	Blue gum	26	Yes	2	Low	Tagged on fence; topped; at fence; slightly sparse.
282	Coast live oak	16,13,5,4	Yes	2	Low	Multiple attachments at base; growing through fence; wide crown; crowded by #283.
283	Coast live oak	15	Yes	3	Moderate	At fence; multiple attachments at 6'; crowded.
284	Coast live oak	10	Yes	3	Moderate	Tagged on fence; codominant stems at 4'; crowded; sparse.
285	Blue atlas cedar	19,13,7,7,4	Yes	3	Moderate	Tagged on fence; multiple attachments at 3'; vase form; crowded.
286	Blue atlas cedar	13,5,4	Yes	3	Moderate	Tagged on fence; on slope, multiple attachments at 3'; narrow upright crown; crowded.
287	Monterey pine	26,22	Yes	2	Low	Tagged on fence; on slope, multiple attachments at 4'; overextended branches; large vase form; sparse; crowded.
288	Monterey pine	30	Yes	2	Low	Tagged on fence; codominant stems at 10'; upright form.
289	Coast live oak	7	Yes	4	High	Tagged on fence; on slope; codominant stems at 3'; vigorous.
290	Coast live oak	12	Yes	4	High	Tagged on fence; on slope; multiple attachments at 12'; vigorous upper crown.
291	Monterey pine	30	Yes	2	Low	Tagged on fence; engulfed in poison oak; high crown.
292	Coast live oak	6	Yes	4	High	Tagged on fence; on slope; 3' from #291; central leader bows S.; vigorous.
293	Coast live oak	5,5	No	3	Moderate	Tagged on fence; on slope; codominant stems at 3'; crowded.
294	Monterey pine	22	Yes	1	Low	Tagged on fence; on slope; overextended branches; all but dead.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
295	Coast live oak	7,6	Yes	3	Moderate	Tagged on fence; on slope; 2 stems arise from base; sparse.
296	Coast live oak	7	Yes	2	Low	Tagged on fence; on slope; leans N.; sparse; crowded.
297	Monterey pine	24	Yes	2	Low	Tagged on fence; on slope; very high crown; engulfed in poison oak.
298	Coast live oak	6	Yes	3	Moderate	Tagged on fence; on slope; codominant stems at 8'; crowded; surrounded by dead brush.
299	Coast live oak	12	Yes	3	Moderate	Tagged on fence; on slope; codominant stems at 9'; crown weighted S.; crowded.
300	Coast live oak	10	Yes	4	High	Tagged on fence; on slope; codominant stems at 12'; vigorous oval crown.
301	Coast live oak	18,14	Yes	4	High	On slope; codominant stems at 3' w/ seam; vigorous.
302	Coast live oak	17,12,10,8,8,8	Yes	3	Moderate	Tagged on fence; multiple attachments arise from base; wide vase form.
303	Monterey pine	10	Yes	4	Low	Off-site. Strong central leader; vigorous young tree.
304	Coast live oak	6	Yes	2	Low	Off-site. Tagged on branch; growing through fence; crowded by pine.
305	Coast live oak	7,6	Yes	3	Moderate	Off-site. Tagged on branch; at fence; branches through fence; codominant stems at 4'; vigorous.
306	Monterey pine	27	Yes	3	Moderate	Possibly offsite; Tagged on fence; on slope; correcting lean N.; codominant stems at ~30' w/narrow attachment; vigorous.
307	Coast live oak	20, 14, 13,8,8,5	Yes	4	High	Possibly offsite; Tagged on branch; on slope; multiple attachments arise from 1'; very wide spreading crown.
308	Monterey pine	30	Yes	3	Low	Possibly offsite; Tagged on fence; on slope; topped in past at ~40'; slight lean N.
309	Coast live oak	6,5,4	Yes	3	Moderate	Possibly offsite; On slope; multiple attachments at 3'; crowded.
310	Blue atlas cedar	8,7	Yes	2	Low	Possibly offsite; Tagged on branch; on slope; 1-sided to N.; suppressed by #311.
311	Monterey pine	40	Yes	-	-	Possibly offsite; On slope; dead.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
312	Blue atlas cedar	10	Yes	2	Low	Off-site. On slope; 1-sided to N.; extremely suppressed by dead pines.
313	Monterey pine	40	Yes	-	-	Possibly offsite; Tagged on shrub at fence; upright vase form.
314	Blue atlas cedar	5,4,3	Yes	1	Low	Possibly offsite; Tagged on fence; on slope; suppressed; very sparse.
315	Coast live oak	8,7	Yes	3	Moderate	Possibly offsite; Tagged on fence; on slope; codominant stems at 4'; high crown.
316	Blue atlas cedar	14	Yes	4	High	Off-site. Tagged on fence; on slope; strong central leader; pyramidal form; crowded.
317	Monterey pine	12	Yes	4	Moderate	Possibly offsite; Tagged on fence; on slope; strong central leader; vigorous.
318	Coast live oak	6,3	Yes	3	Moderate	Possibly offsite; Tagged on fence; on slope; sinuous trunk; codominant stems at 2'; crowded.
319	Monterey pine	16	Yes	3	Moderate	Possibly offsite; Tagged on fence; on slope; strong central leader; slightly sparse.
320	Coast live oak	11	Yes	3	Moderate	Possibly offsite; Tagged on branch; at fence; correcting lean N.E.; codominant stems at 6.5'; slightly sparse.
321	Blue atlas cedar	13,8,6,6	Yes	2	Low	Possibly offsite; Tagged on fence; on slope; multiple attachments at 2'; thin crown; crowded.
322	Coast live oak	12	Yes	3	Moderate	Possibly offsite; At fence; sinuous trunk; slightly sparse.
323	Coast live oak	13	Yes	3	Moderate	Possibly offsite; At fence; multiple attachments at 4.5'; sparse ; crowded.
324	Coast live oak	11,10	Yes	3	Moderate	Possibly offsite; On slope; codominant stems arise from base; wide crown; slightly sparse.
325	Coast live oak	8	Yes	2	Low	Offsite. At fence; leans N.; history of limb removal; sinuous trunk; poor form and structure.
326	Monterey pine	17,15	Yes	2	Low	Possibly offsite; Tag on fence; on slope; multiple branch attachments at 3'; narrow attachments at 4'; slightly sparse E.; crowded; Overhang from site fence: ~15'.
327	Monterey pine	32	Yes	2	Low	No tag; engulfed in poison oak; lost top; overextended branches.

Tree Assessment

300 Piedmont Avenue
 San Bruno, CA
 May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
328	Monterey pine	26	Yes	2	Low	No tag; engulfed in poison oak; high crown.
329	Coast live oak	12	Yes	3	Moderate	On slope; codominant stems; at 7'; 1-sided to N.; crowded; a little sparse.
330	Monterey pine	16	Yes	2	Low	On slope; leans S.E.; high raised crown; crowded.
331	Blue atlas cedar	9,8,7,3	Yes	3	Moderate	On slope; multiple attachments at 3'; thin crown; crowded.
332	Monterey pine	14	Yes	2	Low	On slope; extremely high crown; low live crown ratio; 1-sided to N.
333	Blue atlas cedar	6	No	2	Low	On slope; stem failure W; side; history of limb removal; leans N.; crowded.
334	Coast live oak	11	Yes	2	Low	On slope; leans N.E.; codominant stems at 6'; crowded.
335	Blue atlas cedar	7	No	2	Low	On slope; raised crown; leans away from oak.
336	Coast live oak	4,3,3,3,3,3	No	3	Low	On slope; 2' from curb; multiple attachments arise from base; vigorous shrub form.
337	Blue atlas cedar	23,16,7,7,6,6,5	Yes	2	Low	On slope; engulfed in poison oak; multiple attachments at 1'; history of limb removal w/ stub cuts E; side; sparse.
338	Coast live oak	24,22,12	Yes	2	Low	At fence; growing through it; multiple attachments at 2'; leans E.; vigorous.
339	Monterey pine	26	Yes	2	Low	Tagged on fence; leans E.; engulfed in ivy and poison oak; high crown; overhang from site fence: ~4'.
340	Toyon	10,6	Yes	3	Moderate	Tagged on fence; multiple attachments arise from base; vigorous; crowded.
341	Monterey pine	30	Yes	2	Low	Tagged on fence; on slope; engulfed in ivy and poison oak; slight lean N.; high crown.
342	Coast live oak	6	Yes	3	Moderate	Tagged on fence; on slope; codominant stems at 6'; leans E.; crowded.
343	Monterey pine	32	Yes	2	Low	Tagged on fence; on slope; engulfed in ivy and poison oak; high vase crown; overhang from site fence: ~6-8'.
344	Monterey pine	28	Yes	2	Low	Tagged on fence; on slope; very high crown; crowded; overhang from site fence: ~6-8'.
345	Monterey pine	28	Yes	3	Low	Tagged on fence; on slope; some stub cuts; more vigorous.

Tree Assessment

300 Piedmont Avenue
San Bruno, CA
May 2022 (Comments updated Sept. 2023)



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Suitability for Preservation	Comments
346	Monterey pine	30	Yes	3	Low	Tagged on fence; on slope; multiple attachments at 10'; vigorous; crowded; 1 lateral overhang from site fence: ~5.
347	Blackwood acacia	6	No	3	Low	Tagged on fence; on slope; strong central leader; high crown; crowded.
348	Monterey pine	23	Yes	2	Low	Tagged on fence; on slope; leans N.E.; high crown; crowded; 1 lateral overhang from site fence: ~10.
349	Coast live oak	12	Yes	3	Moderate	Tagged on fence; on slope; codominant stems at 15'; vigorous upper crown; crowded.
350	Monterey pine	15	Yes	2	Low	Tagged on fence; at top of slope; leans E.; ivy mid trunk; high crown; overhang from site fence: ~12-15'.
351	Monterey pine	11	Yes	2	Low	Tagged on fence; on slope; high crown; overhang from site fence: ~4'.
352	Monterey pine	24	Yes	2	Low	Tagged on fence; on slope; engulfed in poison oak; slight lean N.E.; sparse; overhang from site fence: ~4'.
353	Monterey pine	14	Yes	2	Low	Tagged on fence; on slope; strong central leader; vigorous; overhang from site fence: ~6-8'.
354	Toyon	12,12,8,6	Yes	2	Low	Tagged on fence; on slope; multiple attachments arise from base; decayed stems; sparse.
355	Monterey pine	15	Yes	4	Low	Tagged on fence; on slope; strong central leader; vigorous; overhang from site fence: ~5'.
356	Monterey pine	20	Yes	2	Low	Tagged on fence; at fence and curb; pine pitch canker; 1-sided to W.; history of limb removal; 1 stem dead.
357	Monterey pine	18	Yes	4	Low	Tagged on fence; at fence; strong central leader; vigorous.
358	Coast live oak	8	Yes	3	Moderate	No tag, not accessible; On slope; slight lean S.E.; very crowded.
359	White poplar	7	No	2	Low	No tag, not accessible; At fence; high narrow crown; overhang from site fence: ~3'.
360	Coast live oak	16	Yes	3	Moderate	No tag, not accessible; Multiple attachments; vigorous; overhang from site fence: ~11'.
361	Coast live oak	12	Yes	3	Moderate	No tag, not accessible; Multiple attachments at 6'; overhang from site fence: ~5'.

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
1	Monterey pine	30	-	0	Remove	Dead. Within grading limits
2	Monterey pine	27	-	0	Remove	Dead. Within grading limits
3	Monterey pine	39	Yes	2	Remove	Within grading limits
4	Monterey pine	32	Yes	2	Remove	Within grading limits
5	Monterey pine	59	Yes	2	Remove	Within grading limits
6	Monterey pine	40	Yes	2	Remove	Within grading limits
7	Monterey pine	27	Yes	2	Remove	Within grading limits
8	Monterey pine	27	Yes	2	Remove	Within grading limits
9	Monterey pine	31	Yes	2	Remove	Within grading limits
10	Monterey pine	41	Yes	2	Remove	Within grading limits
11	Monterey pine	29	Yes	2	Remove	Within grading limits
12	Monterey pine	42	Yes	2	Remove	Within grading limits
13	London plane	14	Yes	2	Remove	Within grading limits
14	London plane	11	Yes	2	Remove	Within grading limits
15	London plane	10	Yes	2	Remove	Within grading limits
16	London plane	8	No	2	Remove	Within grading limits
17	London plane	17	Yes	2	Remove	Within grading limits
18	London plane	16	Yes	2	Remove	Within grading limits
19	London plane	17	Yes	2	Remove	Within grading limits
20	Blackwood acacia	6,6,5	No	2	Remove	Within grading limits
21	Monterey pine	34	Yes	2	Remove	Within grading limits
22	Monterey pine	30	Yes	1	Remove	Within grading limits
23	Monterey pine	35	Yes	2	Remove	Within grading limits
24	Monterey pine	24	Yes	2	Remove	Within grading limits
25	Monterey pine	33	-	0	Remove	Dead. Within grading limits
26	Monterey pine	35	Yes	2	Remove	Within grading limits
27	Monterey pine	26	Yes	2	Remove	Within grading limits
28	Monterey pine	28	Yes	1	Remove	Within grading limits
29	Monterey pine	33	Yes	2	Remove	Within grading limits
30	Monterey pine	38,36	Yes	2	Remove	Within grading limits
31	Blue atlas cedar	28,9	Yes	3	Remove	Within grading limits
32	Blue atlas cedar	19,14,10	Yes	3	Remove	Within grading limits
33	Blue atlas cedar	19,9,8,5,5	Yes	3	Remove	Within grading limits
34	Blue atlas cedar	19,19,17,16, 11,11,11	Yes	4	Remove	Within grading limits
35	Blue atlas cedar	18,16,16,16, 15,15,14,13, 13	Yes	4	Remove	Within grading limits
36	Blue atlas cedar	24,22,19,15, 13,12,10,10, 5,5	Yes	3	Remove	Within grading limits

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
37	Blue atlas cedar	38,12,10,10, 10,10,10	Yes	3	Remove	Within grading limits
38	Blue atlas cedar	36,25,12,6,6	Yes	3	Remove	Within grading limits
39	Japanese cedar	16,13	Yes	3	Remove	Within grading limits
40	Monterey pine	42	Yes	2	Remove	Within grading limits
41	Monterey pine	33	Yes	2	Remove	Within grading limits
42	Monterey pine	42	Yes	2	Remove	Within grading limits
43	Monterey pine	28	Yes	2	Remove	Within grading limits
44	Monterey pine	39	Yes	2	Remove	Within grading limits
45	Monterey pine	46	Yes	2	Remove	Within grading limits
46	Monterey pine	41	Yes	2	Remove	Within grading limits
47	Monterey pine	41	Yes	2	Remove	Within grading limits
48	Monterey pine	37	Yes	1	Remove	Within grading limits
49	Monterey pine	48	Yes	2	Remove	Within grading limits
50	Coast live oak	5,5,4	No	3	Remove	Within grading limits
51	Blue atlas cedar	25,15,15,12, 12,12,6	Yes	4	Remove	Within grading limits
52	Monterey pine	39	Yes	2	Remove	Within grading limits
53	Monterey pine	50	Yes	2	Remove	Within grading limits
54	Blue atlas cedar	25,12,5	Yes	4	Remove	Within grading limits
55	London plane	13	Yes	2	Remove	Within grading limits
56	London plane	9	No	2	Remove	Within grading limits
57	London plane	10	Yes	2	Remove	Within grading limits
58	London plane	11	Yes	1	Remove	Within grading limits
59	London plane	9	No	2	Remove	Within grading limits
60	London plane	11	Yes	2	Remove	Within grading limits
61	London plane	9	No	2	Remove	Within grading limits
62	London plane	10	Yes	2	Remove	Within grading limits
63	London plane	15	Yes	2	Remove	Within grading limits
64	London plane	8	No	2	Remove	Within grading limits
65	London plane	9	No	2	Remove	Within grading limits
66	London plane	11	Yes	2	Remove	Within grading limits
67	London plane	10	Yes	2	Remove	Within grading limits
68	Lemon-scented gum	37	Yes	3	Remove	Within grading limits
69	Blue atlas cedar	17,17,13,12, 7	Yes	4	Remove	Within grading limits
70	Blue atlas cedar	28	Yes	3	Remove	Within grading limits
71	Blue atlas cedar	19,14,8,6	Yes	3	Remove	Within grading limits
72	Coast live oak	12,10,9	Yes	3	Remove	Within grading limits

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
73	Coast live oak	21,13	Yes	4	Remove	Within grading limits
74	Coast live oak	13,4	Yes	3	Remove	Within grading limits
75	Coast live oak	8,2	Yes	2	Remove	Within grading limits
76	Coast live oak	7	Yes	2	Remove	Within grading limits
77	Coast live oak	5	No	2	Remove	Within grading limits
78	Coast live oak	6	Yes	2	Remove	Within grading limits
79	Victorian box	5,3	No	2	Remove	Within grading limits
80	Victorian box	4,2,2	No	2	Remove	Within grading limits
81	Coast live oak	7	Yes	2	Remove	Within grading limits
82	Victorian box	6,3,3,3,3,3	No	2	Remove	Within grading limits
83	Coast live oak	7,6,6,4,4,4,4	Yes	2	Remove	Within grading limits
84	Victorian box	5,3,3,3,3,2,2,2	No	2	Remove	Within grading limits
85	Coast live oak	13,4	Yes	2	Remove	Within grading limits
86	Coast live oak	8,6,4	Yes	3	Remove	Within grading limits
87	Coast live oak	6	Yes	2	Remove	Within grading limits
88	Coast live oak	7,5,5,3,3,3,3	Yes	2	Remove	Within grading limits
89	Plum	6,6	No	2	Remove	Within grading limits
90	Blue atlas cedar	26	Yes	3	Remove	Within grading limits
91	Myoporum	7,6	No	2	Remove	Within grading limits
92	Myoporum	6,4,3	No	2	Remove	Within grading limits
93	Myoporum	5,4,4,3,3	No	2	Remove	Within grading limits
94	Myoporum	5,4,4,3,3,3	No	2	Remove	Within grading limits
95	Monterey pine	17	Yes	2	Remove	Within grading limits
96	Monterey pine	13	Yes	2	Remove	Within grading limits
97	Myoporum	7	-	0	Remove	Dead. Within grading limits
98	Monterey pine	13	Yes	2	Remove	Within grading limits
99	Monterey pine	4,3	No	2	Remove	Within grading limits
100	Monterey pine	8	Yes	4	Remove	Within grading limits
101	Myoporum	6,2	No	1	Remove	Within grading limits
102	Myoporum	10,7,5,5,4	Yes	1	Remove	Within grading limits
103	Myoporum	7,7,6,4,4,4,4	No	1	Remove	Within grading limits
104	Myoporum	7,3,2	No	1	Remove	Within grading limits
105	Myoporum	6,2,2	No	1	Remove	Within grading limits
106	Myoporum	7,6,5,1	No	1	Remove	Within grading limits
107	Myoporum	9,6,6,4	No	1	Remove	Within grading limits
108	Myoporum	6,5,5,4,3,3,2	No	1	Remove	Within grading limits
109	Myoporum	6,3	No	1	Remove	Within grading limits
110	Myoporum	6,5,5,4	No	1	Remove	Within grading limits
111	Myoporum	7,7	No	1	Remove	Within grading limits

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
112	Myoporum	6,6,4,4,3,3,3,3	No	1	Remove	Within grading limits
113	Monterey pine	6	Yes	3	Remove	Within grading limits
114	Myoporum	7	No	1	Remove	Within grading limits
115	Monterey pine	10	Yes	3	Remove	Within grading limits
116	Myoporum	6,5,5,3,3	No	1	Remove	Within grading limits
117	Myoporum	7,7,6	No	1	Remove	Within grading limits
118	Myoporum	6,6,3,3,2,2	No	1	Remove	Within grading limits
119	Coast live oak	5	No	4	Remove	Within grading limits
120	Coast live oak	5	No	3	Remove	Within grading limits
121	Coast live oak	30	Yes	2	Remove	Within grading limits
122	Cork oak	17	Yes	3	Remove	Within grading limits
123	Cork oak	12,10	Yes	3	Remove	Within grading limits
124	Cork oak	11	Yes	3	Remove	Within grading limits
125	Blackwood acacia	6,4,4,4,3	No	3	Remove	Within grading limits
126	Blackwood acacia	7,6,6,6,6	No	3	Remove	Within grading limits
127	Blackwood acacia	8,6,5	No	3	Remove	Within grading limits
128	Blackwood acacia	7	No	3	Remove	Within grading limits
129	Blue atlas cedar	14	Yes	4	Remove	Within grading limits
130	Cork oak	14	Yes	3	Remove	Within grading limits
131	Cork oak	9,8,6,6	Yes	2	Remove	Within grading limits
132	Cork oak	16,8,7	Yes	2	Remove	Within grading limits
133	Cork oak	11,8,7	Yes	3	Remove	Within grading limits
134	Glossy privet	13	Yes	2	Remove	Within grading limits
135	Glossy privet	8,6,3	No	2	Remove	Within grading limits
136	Glossy privet	8	No	2	Remove	Within grading limits
137	Glossy privet	10	Yes	2	Remove	Within grading limits
138	Glossy privet	6,6	No	2	Remove	Within grading limits
139	Glossy privet	8	No	2	Remove	Within grading limits
140	Glossy privet	8	No	1	Remove	Within grading limits
141	Glossy privet	9	No	2	Remove	Within grading limits
142	Glossy privet	7	No	2	Remove	Within grading limits
143	Glossy privet	9	No	2	Remove	Within grading limits
144	Glossy privet	7	No	2	Remove	Within grading limits
145	Glossy privet	7	No	2	Remove	Within grading limits
146	Glossy privet	8	No	2	Remove	Within grading limits
147	Glossy privet	12	Yes	2	Remove	Within grading limits
148	Glossy privet	7	No	1	Remove	Within grading limits
149	Glossy privet	9	No	2	Remove	Within grading limits
150	Glossy privet	16	Yes	2	Remove	Within grading limits

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
151	Bronze loquat	11	Yes	4	Remove	Within grading limits
152	Cajeput paperbark tree	18	Yes	3	Remove	Within grading limits
153	Cajeput paperbark tree	17	Yes	3	Remove	Within grading limits
154	Cajeput paperbark tree	16	Yes	2	Remove	Within grading limits
155	Cajeput paperbark tree	20	Yes	3	Remove	Within grading limits
156	Bronze loquat	9	-	0	Remove	Dead. Within grading limits
157	Bronze loquat	11	Yes	3	Remove	Within grading limits
158	Blackwood acacia	8	No	3	Remove	Within grading limits
159	Olive	5,3	No	3	Remove	Within grading limits
160	Chinese elm	3	No	3	Remove	Within grading limits
161	Monterey pine	39	Yes	2	Remove	Within grading limits
162	Victorian box	5,3,3,2,1,1	No	2	Remove	Within grading limits
163	Victorian box	5,5,4,3,2,2	No	2	Remove	Within grading limits
164	Coast live oak	4	No	3	Remove	Within grading limits
165	Victorian box	6,6,3,3,2	No	2	Remove	Within grading limits
166	Coast live oak	6,6,5	Yes	2	Remove	Within grading limits
167	Victorian box	5,5,3,2,2	No	2	Remove	Within grading limits
168	Victorian box	6,3,3,3,2,2,1	No	2	Remove	Within grading limits
169	Victorian box	6,3,3,3	No	2	Remove	Within grading limits
170	Victorian box	6,5,4,2,2,2	No	2	Remove	Within grading limits
171	Coast live oak	5	No	2	Remove	Within grading limits
172	Coast live oak	8	Yes	2	Remove	Within grading limits
173	Toyon	10	Yes	1	Remove	Within grading limits
174	Coast live oak	10,5,4	Yes	4	Remove	Within grading limits
175	Coast live oak	9,5,3	Yes	3	Remove	Within grading limits
176	London plane	16	Yes	4	Remove	Within grading limits
177	London plane	16	Yes	3	Remove	Within grading limits
178	London plane	13	Yes	3	Remove	Within grading limits
179	London plane	18	Yes	4	Remove	Within grading limits
180	Coast live oak	26	Yes	3	Remove	Within grading limits
181	Coast live oak	8	Yes	2	Remove	Within grading limits
182	Coast live oak	10	Yes	2	Remove	Within grading limits
183	Coast live oak	6,5,4,3,1	Yes	2	Remove	Within grading limits
184	Coast live oak	6,3	Yes	1	Remove	Within grading limits
185	Coast live oak	12,8	Yes	1	Remove	Within grading limits
186	Blue atlas cedar	25,16	Yes	3	Remove	Within grading limits

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
187	Coast live oak	10,10,8, 8,8,5,3	Yes	4	Remove	Within grading limits
188	Coast live oak	7	Yes	3	Preserve	At edge of grading
189	Coast live oak	6,6,5	Yes	3	Remove	Within grading limits
190	Monterey pine	38	Yes	2	Preserve	At edge of grading
191	Coast live oak	7,6	Yes	2	Remove	At edge of grading
192	Monterey pine	5	No	3	Remove	Within grading limits
193	Monterey pine	39	Yes	2	Preserve	At edge of grading
194	Monterey pine	13	Yes	1	Remove	Within grading limits
195	Monterey pine	38	Yes	2	Remove	Within grading limits
196	Monterey pine	25	Yes	2	Preserve	At edge of grading
197	Monterey pine	24	Yes	1	Preserve	At edge of grading
198	Monterey pine	18	Yes	1	Remove	Within grading limits
199	Monterey pine	32	Yes	2	Preserve	At edge of grading
200	Monterey pine	29	Yes	1	Remove	Within grading limits
201	Monterey pine	45	Yes	3	Remove	Within grading limits
202	Monterey pine	55	Yes	2	Remove	Within grading limits
203	Coast live oak	6,4,4	Yes	2	Preserve	At edge of grading
204	Monterey pine	32	Yes	2	Preserve	At edge of grading
205	Monterey pine	27	Yes	2	Preserve	At edge of grading
206	Coast live oak	7	Yes	3	Remove	At edge of grading
207	Monterey pine	16	Yes	1	Remove	Within grading limits
208	Monterey pine	38,12	Yes	2	Remove	At edge of grading
209	Monterey pine	42	Yes	2	Remove	At edge of grading
210	Coast live oak	6,4,4,3	Yes	3	Remove	At edge of grading
211	Monterey pine	30	Yes	2	Preserve	At edge of grading
212	Monterey pine	32	Yes	2	Preserve	At edge of grading
213	Monterey pine	38	Yes	1	Remove	At edge of grading
214	Monterey pine	22	Yes	2	Remove	At edge of grading
215	Monterey pine	24	Yes	3	Remove	At edge of grading
216	Monterey pine	26	-	0	Remove	Dead.
217	Monterey pine	26	-	0	Remove	Dead.
218	Monterey pine	28	Yes	2	Remove	At edge of grading
219	Monterey pine	22	Yes	2	Remove	At edge of grading
220	Coast live oak	5	No	2	Remove	Within grading limits
221	Manna gum	38	Yes	2	Remove	At edge of grading
222	Coast live oak	16	Yes	3	Remove	At edge of grading
223	Coast live oak	10,7,4	Yes	2	Remove	At edge of grading
224	Manna gum	19,8	Yes	3	Preserve	At edge of grading
225	Coast live oak	5,3,3,2,2	No	2	Preserve	At edge of grading

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
226	Coast live oak	6,4	Yes	2	Preserve	At edge of grading
227	Coast live oak	8	Yes	2	Preserve	At edge of grading
228	Monterey pine	32	Yes	2	Preserve	At edge of grading
229	Manna gum	5,5	No	1	Remove	Within grading limits
230	Monterey pine	23	Yes	1	Preserve	At edge of grading
231	Manna gum	6	No	3	Remove	Within grading limits
232	Monterey pine	30	Yes	2	Remove	Within grading limits
233	White poplar	7	No	2	Remove	Within grading limits
234	White poplar	6,4	No	3	Remove	Within grading limits
235	White poplar	7	No	2	Remove	Within grading limits
236	Monterey pine	25	Yes	2	Remove	Within grading limits
237	White poplar	10	-	0	Remove	Dead. Within grading limits
238	Monterey pine	37	Yes	2	Remove	Within grading limits
239	White poplar	15,5,3,2,2	Yes	3	Remove	Within grading limits
240	Monterey pine	17	Yes	3	Remove	Within grading limits
241	White poplar	6,2,2,2,2,1,1,1	No	2	Remove	Within grading limits
242	Coast live oak	30,14	Yes	4	Preserve	Outside project area
243	Coast live oak	14,12	Yes	3	Preserve	Edge of project area
244	Monterey pine	20	Yes	3	Preserve	Edge of project area
245	Coast live oak	12,5	Yes	2	Preserve	Edge of project area
246	Coast live oak	19	Yes	4	Preserve	Edge of project area
247	Coast live oak	7,5	Yes	2	Preserve	Edge of project area
248	Monterey pine	6	Yes	3	Preserve	Off-site. Edge of project area
249	Lawson false cypress	22,16,10	Yes	3	Remove	Within grading limits
250	Coast live oak	6	Yes	4	Preserve	Off-site. Edge of project area
251	Lawson false cypress	18,13,12,12	Yes	4	Remove	Within grading limits
252	Coast live oak	7	Yes	2	Preserve	Off-site. Edge of project area
253	Coast live oak	23	Yes	3	Remove	Within grading limits
254	Coast live oak	7	Yes	2	Preserve	Edge of project area
255	Coast live oak	11	Yes	3	Preserve	Off-site. Edge of project area
256	Coast live oak	13	Yes	3	Preserve	Off-site. Edge of project area
257	Coast live oak	11	Yes	3	Preserve	Off-site. Edge of project area
258	Lawson false cypress	23	Yes	2	Remove	Within grading limits
259	Coast live oak	7,2	Yes	2	Preserve	Off-site. Edge of project area
260	Coast live oak	11,7	Yes	2	Preserve	Off-site. Edge of project area
261	Coast live oak	11,7	Yes	2	Preserve	Off-site. Edge of project area
262	Coast live oak	13	Yes	3	Preserve	Off-site. Edge of project area

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
263	Coast live oak	15	Yes	2	Preserve	Off-site. Edge of project area
264	Coast live oak	15	Yes	2	Preserve	Off-site. Edge of project area
265	Coast live oak	15,12	Yes	3	Preserve	Off-site. Edge of project area
266	Coast live oak	11,6,3	Yes	2	Preserve	Off-site. Edge of project area
267	Coast live oak	8	Yes	2	Preserve	Off-site. Edge of project area
268	Coast live oak	11	Yes	2	Preserve	Off-site. Edge of project area
269	Coast live oak	12	Yes	2	Preserve	Off-site. Edge of project area
270	Coast live oak	9	Yes	2	Preserve	Off-site. Edge of project area
271	Coast live oak	12,9	Yes	2	Preserve	Off-site. Edge of project area
272	Coast live oak	7	Yes	2	Preserve	Off-site. Edge of project area
273	Coast live oak	13	Yes	2	Preserve	Off-site. Edge of project area
274	Coast live oak	8,6,6,5	Yes	2	Preserve	Off-site. Edge of project area
275	Coast live oak	9,9,4	Yes	3	Preserve	Off-site. Edge of project area
276	Coast live oak	9,7,5	Yes	2	Preserve	Off-site. Edge of project area
277	Coast live oak	5,4	No	2	Remove	Within grading limits
278	Coast live oak	4,3,3	No	2	Remove	Within grading limits
279	Monterey pine	6	Yes	3	Remove	Within grading limits
280	Coast live oak	5,2,2	No	2	Remove	Within grading limits
281	Blue gum	26	Yes	2	Remove	Within grading limits
282	Coast live oak	16,13,5,4	Yes	2	Remove	Within grading limits
283	Coast live oak	15	Yes	3	Remove	Within grading limits
284	Coast live oak	10	Yes	3	Remove	Within grading limits
285	Blue atlas cedar	19,13,7,7,4	Yes	3	Remove	Within grading limits
286	Blue atlas cedar	13,5,4	Yes	3	Remove	Within grading limits
287	Monterey pine	26,22	Yes	2	Preserve	Edge of project area
288	Monterey pine	30	Yes	2	Preserve	Edge of project area
289	Coast live oak	7	Yes	4	Preserve	Edge of project area
290	Coast live oak	12	Yes	4	Preserve	Edge of project area
291	Monterey pine	30	Yes	2	Preserve	Edge of project area
292	Coast live oak	6	Yes	4	Preserve	Edge of project area
293	Coast live oak	5,5	No	3	Preserve	Edge of project area
294	Monterey pine	22	Yes	1	Preserve	Edge of project area
295	Coast live oak	7,6	Yes	3	Preserve	Edge of project area
296	Coast live oak	7	Yes	2	Preserve	Edge of project area
297	Monterey pine	24	Yes	2	Preserve	Edge of project area
298	Coast live oak	6	Yes	3	Preserve	Edge of project area
299	Coast live oak	12	Yes	3	Preserve	Edge of project area
300	Coast live oak	10	Yes	4	Preserve	Edge of project area
301	Coast live oak	18,14	Yes	4	Preserve	Edge of project area

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
302	Coast live oak	17,12,10,8,8,8	Yes	3	Preserve	Edge of project area
303	Monterey pine	10	Yes	4	Preserve	Off-site. Edge of project area
304	Coast live oak	6	Yes	2	Preserve	Off-site. Edge of project area
305	Coast live oak	7,6	Yes	3	Preserve	Off-site. Edge of project area
306	Monterey pine	27	Yes	3	Preserve	Edge of project area
307	Coast live oak	20, 14, 13,8,8,5	Yes	4	Preserve	Edge of project area
308	Monterey pine	30	Yes	3	Preserve	Edge of project area
309	Coast live oak	6,5,4	Yes	3	Preserve	Edge of project area
310	Blue atlas cedar	8,7	Yes	2	Preserve	Edge of project area
311	Monterey pine	40	-	0	Remove	Dead. Possibly off-site. Edge of project area.
312	Blue atlas cedar	10	Yes	2	Preserve	Off-site. Edge of project area
313	Monterey pine	40	-	0	Remove	Dead. Possibly off-site. Edge of project area.
314	Blue atlas cedar	5,4,3	Yes	1	Preserve	Possibly off-site. Edge of project area.
315	Coast live oak	8,7	Yes	3	Preserve	Possibly off-site. Edge of project area.
316	Blue atlas cedar	14	Yes	4	Preserve	Off-site. Edge of project area
317	Monterey pine	12	Yes	4	Preserve	Possibly off-site. Edge of project area.
318	Coast live oak	6,3	Yes	3	Preserve	Possibly off-site. Edge of project area.
319	Monterey pine	16	Yes	3	Preserve	Possibly off-site. Edge of project area.
320	Coast live oak	11	Yes	3	Preserve	Possibly off-site. Edge of project area.
321	Blue atlas cedar	13,8,6,6	Yes	2	Preserve	Possibly off-site. Edge of project area.
322	Coast live oak	12	Yes	3	Preserve	Possibly off-site. Edge of project area.
323	Coast live oak	13	Yes	3	Preserve	Possibly off-site. Edge of project area.
324	Coast live oak	11,10	Yes	3	Preserve	Possibly off-site. Edge of project area.
325	Coast live oak	8	Yes	2	Preserve	Off-site. Edge of project area
326	Monterey pine	17,15	Yes	2	Preserve	Possibly off-site. Edge of project area.
327	Monterey pine	32	Yes	2	Remove	Within grading limits
328	Monterey pine	26	Yes	2	Preserve	Edge of project area
329	Coast live oak	12	Yes	3	Remove	Within grading limits
330	Monterey pine	16	Yes	2	Remove	Within grading limits

Tree Disposition

300 Piedmont Avenue
San Bruno, CA
January 2024



Tree No.	Species	Trunk Diameter (in.)	Heritage Tree?	Condition 0=dead 5=excellent	Disposition	Notes
331	Blue atlas cedar	9,8,7,3	Yes	3	Remove	Within grading limits
332	Monterey pine	14	Yes	2	Remove	Within grading limits
333	Blue atlas cedar	6	No	2	Remove	Within grading limits
334	Coast live oak	11	Yes	2	Remove	Within grading limits
335	Blue atlas cedar	7	No	2	Remove	Within grading limits
336	Coast live oak	4,3,3,3,3,3,3	No	3	Remove	Within grading limits
337	Blue atlas cedar	23,16,7,7,6,6,5	Yes	2	Remove	Within grading limits
338	Coast live oak	24,22,12	Yes	2	Remove	Within grading limits
339	Monterey pine	26	Yes	2	Remove	Within grading limits
340	Toyon	10,6	Yes	3	Remove	Within grading limits
341	Monterey pine	30	Yes	2	Remove	Within grading limits
342	Coast live oak	6	Yes	3	Remove	Within grading limits
343	Monterey pine	32	Yes	2	Remove	Within grading limits
344	Monterey pine	28	Yes	2	Remove	Within grading limits
345	Monterey pine	28	Yes	3	Remove	Within grading limits
346	Monterey pine	30	Yes	3	Preserve	Edge of project area
347	Blackwood acacia	6	No	3	Remove	Edge of project area
348	Monterey pine	23	Yes	2	Preserve	Edge of project area
349	Coast live oak	12	Yes	3	Remove	Edge of project area
350	Monterey pine	15	Yes	2	Remove	Edge of project area
351	Monterey pine	11	Yes	2	Remove	Edge of project area
352	Monterey pine	24	Yes	2	Preserve	Edge of project area
353	Monterey pine	14	Yes	2	Remove	Edge of project area
354	Toyon	12,12,8,6	Yes	2	Remove	Within grading limits
355	Monterey pine	15	Yes	4	Remove	Edge of project area
356	Monterey pine	20	Yes	2	Remove	Edge of project area
357	Monterey pine	18	Yes	4	Remove	Edge of project area
358	Coast live oak	8	Yes	3	Remove	Within grading limits
359	White poplar	7	No	2	Remove	Within grading limits
360	Coast live oak	16	Yes	3	Remove	Within grading limits
361	Coast live oak	12	Yes	3	Remove	Within grading limits