

ADDENDUM

TO

MITIGATED NEGATIVE DECLARATION

State Clearing House No. 2022120217

Project Title

City of San Bruno 2023-2031 Housing Element Update

Lead Agency and Address

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

Contact Person and Phone Number

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Project Location

The proposed project would occur entirely within the City of San Bruno, which is located in northern San Mateo County. The city limits encompass a 5.49 square-mile area that stretches 3.5 miles from the relatively flat eastern areas along Highway 101 to the hilly western neighborhoods located on the eastern facing slope of the Coast Ranges.

Project Sponsor's Name & Address

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

Description of Project

The project proposes to update the Housing Element of the San Bruno General Plan 2025 in accordance with California Government Code Section 65583. The proposed 2023-2031 Housing Element will replace the existing 2015-2023 Housing Element and serve as the City of San Bruno's guiding policy document for meeting the City's future housing needs at all economic levels. As a policy document, the Housing Element does not result in direct physical changes to the environment but would indirectly lead to physical environmental changes by enabling the development of additional housing units within the City's jurisdiction.

As required by Government Code Section 65583(a)(3), the Housing Element Update involves the preparation of an inventory of land suitable and available for residential development, including vacant sites and sites with a realistic and demonstrated potential for redevelopment during the

planning period (2023-2031) to meet the City’s housing need at the designated income levels. In accordance with the sites inventory requirements under California Government Code sections 65583(c), the project will also include a program that identifies actions that the City is undertaking or intends to undertake to implement the policies and achieve the goals and objectives of the 2023-2031 Housing Element through the administration of land use and development controls (including General Plan Amendments and rezoning).

Background

This document is an Addendum to the Initial Study/Mitigated Negative Declaration (IS/MND) prepared for the City of San Bruno’s 2023-2031 Housing Element Update of the General Plan (6th Cycle), which was adopted by the City of San Bruno on January 24, 2023 (the “original Project”) per City Council Resolution No. 2023-08 (State Clearinghouse No. 2022120217). The IS/MND document, inclusive of exhibits, is hereby incorporated by reference.

The IS/MND for the original Project studied the potential environmental effects on aesthetics, agriculture and forest resources, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, recreation, public services, transportation, tribal cultural resources, utilities and service systems, wildfire, and mandatory findings of significance. The IS/MND found that the original Project would have no impact or less than significant impacts to aesthetics, agriculture and forest resources, energy, geology and soils, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire; and less than significant impacts with certain mitigations as to air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, noise, transportation, and tribal cultural resources.

Since the adoption of the IS/MND, the City has made multiple rounds of revisions to the original Project, in order to address the comments provided by the State Department of Housing and Community Development (HCD). This addendum to the adopted IS/MND analyzes the potential environmental impact ramifications of the changes or additions made to the adopted 2023-2031 Housing Element (the “Amendments”), which will be considered by the City Council.

For analysis purposes, this Addendum recognizes the previously certified IS/MND as the baseline by which the current project is compared, as that certified IS/MND provides the policies, programs, potential development sites, and mitigation measures that comprise the original approval. The following analysis demonstrates that these changes to San Bruno’s 2023-2031 Housing Element will not create or exacerbate environmental impacts as identified in the certified IS/MND.

Statutory Requirements

Section 15164 of the California Environmental Quality Act (CEQA) Guidelines allows for a lead agency to prepare an addendum to an adopted negative declaration or environmental impact report (EIR) if only minor technical changes or additions are necessary or if none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred. Pursuant to CEQA Section 15162, no subsequent negative declaration shall be prepared for the project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project that will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a

substantial increase in the severity of previously identified significant effects;

(2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or,

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

This Addendum evaluates the Amendments and demonstrates that these revisions consist of the addition of information and minor technical changes, and therefore, do not meet any of the requirements set forth in Section 15162. This Addendum will be considered by the decision-making body in conjunction with consideration of the Amendments to the adopted 2023-2031 Housing Element.

Project Description

The State of California requires every jurisdiction to include a Housing Element in its General Plan. The Housing Element must contain an analysis of the housing needs of all economic segments of the community, including persons with special needs, as well as goals, policies, programs and objectives to address those needs. It is a guide for providing housing opportunities and services for all household types and income groups in the City. State law requires that the City update its Housing Element every eight years, with this update to cover the 2023-2031 planning period, also known as the 6th Cycle of Housing Elements.

As required by State law, the Housing Element includes a Housing Plan, which establishes goals, policies, programs and quantified objectives for addressing the City's housing needs during the 8-year Housing Element planning period. The Housing Plan is based upon the City's analysis of a variety of issues that affect current and future residents of San Bruno and contains policies and programs to address and guide the future development of housing in the City.

San Bruno adopted its 2023-2031 Housing Element update on January 24, 2023 and certified the IS/MND for the original Project in advance of the adoption. In an effort to make the adopted

document easier to navigate, the format of the adopted version of the Housing Element for which the IS/MND was certified was substantially revised after HCD provided review comments in March 2023. However, the essential content of the document did not change. All of the appendices were removed from the document and the document was divided into two parts. The first part of the document contains the following three chapters:

- Chapter 1 presents an executive summary of the Housing Element
- Chapter 2 provides an introduction and lays out the organization of the document
- Chapter 3 provides the City's Housing Plan

The Technical Background Report comprises the second part of the Housing Element which includes the following background data and analysis:

- Chapter 1 introduces the data sources and changes to state law
- Chapter 2 includes analysis of the City's demographic characteristics and housing needs
- Chapter 3 includes analysis of potential constraints to meeting the City's housing needs
- Chapter 4 includes an evaluation of the City's RHNA strategy
- Chapter 5 provides an evaluation of fair housing needs in the city
- Chapter 6 describes the public participation process for the Housing Element update
- Chapter 7 provides a review of the City's accomplishments during the previous planning period and the effectiveness of current policies and programs in meeting housing needs

Amendments to the Housing Element

Although the document looks very different the content is very similar to the adopted Housing Element. The majority of amendments made to the adopted 2023-2031 Housing Element since it was adopted on January 24, 2023 consist of amending the policies and programs in the Housing Plan by providing a greater level of detail regarding the policy commitments, adding more information about actions the City will take in relation to such policies and programs, and adding more specific timelines for when the City shall implement and accomplish certain actions in the policies and programs. In addition, the Housing Plan was revised with more robust analysis and policies/programs related to the Affirmatively Furthering Fair Housing (AFFH) discussion. The sites inventory was revised to provide more analysis substantiating why each site is likely to redevelop at the specified densities. These changes are discussed in greater detail in the analysis below.

- Added "Accommodating Fifth Cycle Shortfall" section describing how city met rezoning obligations.
- Programs were added which commit the City to Accessory Dwelling Unit (ADU) affordability monitoring and additional strategies and incentives for promoting their creation.
- Timing for implementation was added to ADU programs.
- Programs were added to comply with state law regarding emergency shelters, supportive housing, SRO housing, and employee housing.
- Land Use and Zoning regulation discussion was revised.
- The Planning Review Process and Permitting Times sections were revised.

- More detail was provided about the Architectural Review process for housing with a program added to streamline the process by a specific date.
- State Density Bonus Law program was revised and now includes a commitment and timeline for revising the base density study requirement.
- A program to shorten permit plan review turnaround times was added.
- Specific timing for implementation was added to the program committing to create a development fee calculator on the city's website.
- Strategy defined and timeline added for implementation of the program to create an affirmative marketing strategy.
- Implementation of the program to bring forth a ballot measure amending Ord. 1284 was pushed back to November 2028.
- Specific timing was added to the program to conduct a fee nexus study.
- Programs to increase housing for special needs and larger households, revise the affordable housing ordinance, and expedite review of affordable housing project were added back.
- Details were added to define how the El Camino Real corridor would be rezoned in the event that Ord. 1284 is amended.
- Incentives and timelines were added to the ADU program.
- A program was added to increase the allowable number of ADUs/JADUs beyond State law on eligible R-1 and R-2 parcels.
- A program was added to assist ADU owners in finding tenants, including marketing available ADUs beyond City limits through regional/County organizations.
- A program was added to establish ADU amnesty program and legalize at least 50 ADUs over the planning period.
- A program was added to participate in the countywide ADU Resource Center to help facilitate ADU production.
- Additional information was added regarding the City's current ADU permitting trends, and a cross reference regarding a commitment to further encourage ADU construction through regulatory incentives.
- A program was added to develop additional incentives for construction ADUs if overall production falls below projections.
- A program was added to implement ministerial review and by-right requirements for all multi-family housing sites on the sites inventory that achieve the unit count listed in the Housing Element.
- More details were added about approved housing projects in the city to justify density assumptions for future housing projects, including projects that requested a density bonus.
- Added a program which commits the city to adding 500 more units to the Sites Inventory by December 2026.
- A program was added to educate faith-based organizations on opportunities to develop

affordable housing through SB 4 and/or AB 1851.

- A program was added to revise zoning requirements regarding group homes for consistency with state law.
- A program was added to amend the zoning code to revise bicycle parking and vehicle loading requirements.
- A program was added to revise the floor area ratio limits for smaller lot and revise minimum setback and stepback requirements.
- A program was added to waive the pre-application fees for housing projects on the Sites Inventory that meet the projected density.
- A program was added to establish faster permit plan review turnaround times for multi-family residential projects that provide 20% or more lower-income units.
- A program was added to amend the ground floor commercial requirements in the CBD to provide more flexibility, and revise requirements for bicycle parking and off-street vehicle loading.
- A program was added to advertise BMR units as they become available, utilizing the same strategies outlined in the Affirmative Marketing Plan.
- A program was added to provide Spanish translation and/or interpretation for published materials and community meetings related to Housing Element and AFFH activities that involve fair housing, affirmative marketing, additional housing options, or are geographically targeting low resource areas.
- The program for the rezoning of housing element sites was revised to include an anticipated timeline for the Tanforan development project.

The policies and programs have been revised based on the comments provided by HCD, which are intended to help address potential constraints to and further incentivize the development of housing in the City. As detailed above, the changes mostly consist of adding further background information and context, and new action items and timeframes for such actions to be completed. The programs to allow additional ADUs and add 500 more units to the sites inventory could induce more housing development but ADUs are reviewed ministerially and exempt from CEQA review, and the precise location of the 500 units has not been identified, so it is unknown at this time whether any of the sites would require rezoning, making it difficult to accurately analyze the potential impact of the program. Because the specifics of the ballot measure programs has not been defined, additional environmental review will be performed once the specific policies have been developed. None of the other minor changes to programs or addition of programs that alter City processes will result in the modification of development patterns or change the pattern of land uses established in the General Plan Land Use Element. Therefore, the changes to the Housing Plan will not result in changes to the significance findings in all of the environmental issue areas studied in the IS/MND.

Revisions to the Affirmatively Furthering Fair Housing (AFFH) Discussion and Assessment of Fair Housing

The AFFH discussion section of the Housing Element is a new requirement for this cycle of the Housing Element Update, per Assembly Bill (AB) 686. This bill requires that jurisdictions take meaningful steps to overcome patterns of segregation by completing a fair housing analysis of their community and administering their programs and activities related to housing and community

development in a way that affirmatively furthers fair housing. Changes to the AFFH chapter of the Housing Element include the following:

- An analysis of the wellbeing of residents based on the environment was added to the AFFH analysis.
- An analysis of Special Flood Hazard Areas was added to the AFFH analysis with an accompanying map.
- An analysis of Fire Hazard Severity Zones was added to the AFFH analysis with an accompanying map.
- An identification of disadvantaged communities was added to the AFFH analysis with an accompanying map.
- Additional analysis was added to the AFFH analysis to address displacement risks and programs were added to adopt ordinances that establish local tenant protection, just cause eviction, tenant relocation assistance, and tenant anti-harassment protections.

Since this discussion only intends to provide greater background information and context, none of these changes will result in the modification of development patterns or change the pattern of land uses. Therefore, the changes to the AFFH will not result in changes to the significance findings in all the environmental issue areas studied in the IS/MND.

Revisions to the Discussion of Potential Constraints on Housing Production and Conservation

Chapter 3 of the technical background report to the Housing Element discusses all of the potential constraints that may affect the production and conservation of housing in the City. In response to HCD's comments, this discussion has been revised to include more information and explanation about current development trends, and cross references to information included elsewhere in the Housing Element. These revisions have been made to include the following information:

- A discussion and program was added to further streamline the planning process.
- More detail was added about the City's Reasonable Accommodations process and a program was added to revise the process for compliance with state law, including removing/modifying subjective findings.
- Constraints section describes definition of "family" and impacts affecting persons with disabilities.
- Additional information was added regarding the City's inclusionary housing requirement, and how this interacts with the implementation of existing state law requirements and with current development trends.
- Additional information was added regarding recent state laws affecting parking requirements for projects.
- Revisions to development trend information, such as the addition of data for newer multi-family residential development projects was added.
- Further information and analysis was added related to longer-term development trends in the City and whether existing regulations act as constraints to development/redevelopment.

- Additional information was added related to the Mixed-Use zoning regulations.
- Additional information was added about how housing projects are currently being processed by the City.
- Cross references to changes in the Housing Plan that relate to topics in this, such as ADU incentives and changes to remove regulations that may act as barriers for persons with disabilities.
- Additional development constraints were added to the constraints section and analyzed.
- Place-based and anti-displacement strategies now included in AFFH matrix to mitigate disproportionately affected communities.

Revisions to the Sites Inventory of the Housing Element

State Housing Element law requires each city and county to identify and analyze existing and projected housing needs in its jurisdiction and prepare goals, policies, and programs to encourage the development, improvement and preservation of housing (Government Code 65580-65589). The programs developed are meant to help the city meet its “fair share” of housing needs, as determined by the State and allocated by the Association of Bay Area Governments (ABAG) through the Regional Housing Needs Assessment (RHNA) Allocation. The City’s RHNA for the 2023-2031 planning period is a total of 3,165 units.

The sites inventory is a list of parcels that the City has identified as land that is suitable and available for residential development. The sites inventory must include enough parcels that can accommodate the City’s RHNA allocation of a total 3,165 units, which is further divided into unit allocations at different levels of affordability, including units that are affordable to very low, low, moderate, and above moderate rate households. State law pertaining to Housing Elements has added more requirements for the sites inventory for the 6th Cycle than in previous housing element cycles, including a requirement to provide substantial evidence that the level of housing development anticipated by the sites inventory will reasonably occur during the planning period (2023 to 2031) and that the calculation of the residential unit capacity on each site is realistic, based on market conditions and similar types of developments that have been completed. The sites inventory in the city’s adopted Housing Element (the original Project) is one consolidated table. To demonstrate compliance with Housing Element Law, the sites in the inventory have been separated into different categories. These different categories include: Sites with pending projects; Sites that were also in the 5th cycle sites inventory; New sites; and new sites that require rezoning to meet a housing shortfall.

In addition to changing how the sites inventory was arranged, several other changes were made to the Sites Inventory section as identified below:

- The Melody Toyota Lot and Melody Toyota Showroom (formerly sites 11 and 12) were removed from the sites inventory because the sites are being developed with other uses. This reduced the sites inventory by 41 units.
- The AT&T Building (formerly site 1) was transferred from the sites inventory to the approved projects category to reflect a recent entitlement, and the unit count was increased from 320 to 341 to reflect the developer’s proposal. This reduced the sites inventory by 320 units and increased the approved project category by 341 units.
- The Large Site With One House (R-2) (also known as 116 San Marco) (formerly site 10) was transferred from the sites inventory to the approved projects category to reflect a

recent entitlement approval. This reduced the sites inventory by 2 units and increased the approved project category by 2 units.

- Vacant site (also known as San Marco Ave, adjacent to 116 San Marco) (formerly site 16) was transferred from the sites inventory to the approved projects category to reflect recent entitlement approvals. This reduced the sites inventory by 2 units and increased the approved project category by 2 units.
- 271 El Camino Real (presently Site 6) was transferred from the approved projects category to a pending project on the sites inventory to reflect a new entitlement submittal and the site's housing unit yield was increased from 23 units to 35 units to reflect the new development plan. This reduced the approved project category by 23 units and increased the sites inventory by 35 units.
- The 850 Glenview project (presently Site 4) was transferred from the approved projects category to a pending project on the sites inventory to reflect a new development proposal. This reduced the approved project category by 29 units and increased the sites inventory by 58 units.
- The number of housing units projected for 732-740 El Camino Real was reduced from 136 units to 134 units to reflect revisions to the project, which is under construction, resulting in a 2 unit reduction in the approved projects category.
- A table was added for projects that have requested a density bonus.
- More data and analysis were added about built projects in San Bruno to justify density projections.
- A narrative about trends in office vacancy was added.
- A sites inventory selection criteria table was added with data to explain how the sites in the inventory were chosen.
- A sites inventory summary table was added.
- Tables were added to the sites inventory to distinguish between sites that were also used in the 5th planning cycle, sites with pending projects, sites that are new with appropriate zoning, and new sites (shortfall) that require rezoning.
- Affordability assumptions, capacity calculations, and site characteristics (parcel #, size, zoning, GP, uses) for each site and proposed general plan and zoning designations for sites planned for rezone have been added per site type (Tables 4-15 through 4-18) Policy H 1.5 has been revised to add that the City shall monitor the potential loss of existing residential units due to redevelopment, which is in line with the City's goal to preserve existing housing stock and enact renters' protections.
- Added narrative of development trends and achieved capacities in different zones. Staff also included realistic capacity analysis added for sites below a half-acre and a half acre to 10 acres in size. The analysis includes projects in San Bruno and adjacent cities. Analysis includes adjustments due to possible constraints. Analysis includes that there has only been one 100% commercial project in TCP since its inception in 2013.
- Analysis of affordability assumptions for each site has been added, creating four different affordability categories. (see pg.TBR-13). The affordability assumptions for each site are listed in tables 4-15 through 4-18.

- Affordability assumptions only allocate lower income units to sites where allowed density is at least 30 du/ac and sites are between 0.5 and 10 acres. (pg. 13).
- A development trends analysis and factors for selection of non-vacant sites was added to the sites inventory analysis. The analysis now includes detailed description of recently built, approved, and in review projects in San Bruno and the site characteristics for these projects. Analysis also includes site characteristics of recent projects in San Francisco Peninsula and site characteristics used to develop selection criteria for sites.
- Construction dates and number of stories was added to the site inventory trends data to provide more rationale about why certain properties were chosen for redevelopment.
- Added data showing a trend of lot consolidation for properties under different ownership.
- A more robust narrative of site characteristics and feasibility for each site in inventory was provided.
- Clarification was provided indicating which sites were reused in past planning periods.
- A line item for RHNA shortfall was added to the RHNA strategy table.
- More specific timing for coordination with developers and completion of major project milestones during the planning period, with annual updates, was provided for the Tanforan site. A commitment was added to find an alternative by 2028 if Tanforan milestones are not met.
- Clarification was provided indicating which sites were reused in past planning periods.
- Reduction in the projected new ADUs for the cycle based on updated data, from 240 to 224.
- Additional justification provided for ADU affordability assumptions.
- Affordability assumptions, capacity calculations, and site characteristics (parcel #, size, zoning, GP, uses) for each site and proposed general plan and zoning designations for sites planned for rezone have been added per site type (Tables 4-15 through 4-18) Policy H 1.5 has been revised to add that the City shall monitor the potential loss of existing residential units due to redevelopment, which is in line with the City's goal to preserve existing housing stock and enact renters' protections.
- Added narrative of development trends and achieved capacities in different zones (starting pg.10). Staff also included realistic capacity analysis added for sites below a half acre and a half acre to 10 acres in size (see tables 4-7 and 4-8). The analysis includes projects in San Bruno and adjacent cities. Analysis includes adjustments due to possible constraints. Analysis includes there has only been one 100% commercial project in TCP since 2013 (pg. 10)
- Analysis of affordability assumptions for each site has been added, creating four different affordability categories. (see pg.TBR-13). The affordability assumptions for each site are listed in tables 4-15 through 4-18.
- Affordability assumptions only allocate lower income units to sites where allowed density is at least 30 du/ac and sites are between 0.5 and 10 acres. (pg. 13).
- City assumed lot consolidation of smaller parcels into "Sites" based on common ownership or if adjacent parcels have limited access. See site by site description and tables with parcel

by parcel characteristics

- Added data showing a trend of lot consolidation for properties under different ownership.
- A development trends analysis and factors for selection of non-vacant sites was added to the sites inventory analysis. The analysis now includes detailed description of recently built, approved, and in review projects in San Bruno and the site characteristics for these projects. Analysis also includes site characteristics of recent projects in San Francisco Peninsula and site characteristics used to develop selection criteria for sites.
- Added more narrative regarding site characteristics and feasibility for each site in inventory starting.
- The Sites Inventory has been revised to reflect changes to the housing unit calculations.
- Language regarding school sites in the sites inventory was revised to incorporate compliance with the Surplus Lands Act.
- Added Status and anticipated completion dates for approved projects.
- Barriers to redevelopment of each site and other relevant factors is discussed in the description of each site in sites inventory.

As a result of these revisions, total units accommodated by the Housing Element modestly rises from 3,662 to 3,682 units (20 unit increase throughout the entire City), primarily due to approved (entitled) projects being reapplied for with greater unit counts.

But the RHNA Remaining Need (which reflects the City's RHNA less credits of approved projects and potential ADUs) was reduced from 2,495 units to 2,158 units and the Sites Inventory changed from 2,709 units to 2,552 units, primarily because the 341 units for the AT&T Building shifted from being listed on the Sites Inventory as a pending project to Approved Projects (Credits) in the RHNA Strategy.

Since (1) the AT&T Building project had a separate environmental review process that analyzed its potential impacts, and found no significant impacts, (2) the fact that the Housing Element now projects fewer new units being constructed in order to fulfill the City's RHNA, and (3) the remaining Sites Inventory locations were analyzed in the certified Mitigated Negative Declaration, the combined total of all changes to the RHNA Strategy and Sites Inventory has no potential to introduce or increase any potential significant environmental impacts or result in changes to the IS/MND significance findings because:

Other Revisions and Addition of Information

- Most of the appendices were removed from the document to make it easier to navigate and easier to understand.
- Quantified objectives for housing rehabilitation and conservation were added.

Review of Environmental Impacts and Determination

An analysis of the Amendments, changes in circumstances, and any new information since the certification of the previous IS/MND has been completed to determine if any new environmental impacts could occur. The environmental analysis and conclusions provided in the IS/MND remain

current and applicable to the Amendments. All potential impacts in the CEQA Environmental Checklist were considered during the preparation of this Addendum, and it has been determined that no new or substantial increase in impacts would result from the revisions made to San Bruno's 2023-2031 Housing Element. Nothing Since the Amendments result in a reduction in the number of units expected to be developed citywide and on the Site Inventory locations, and that all Site Inventory locations were identified in the prior version of the Housing Element, the level of development, construction activity, ground disturbance, service, recreation, transportation and utility impacts would be less than those contemplated by the certified Mitigated Negative Declaration, and that operational impacts if/when the sites are developed would be equivalent to, or less than, the impacts contemplated by the certified Mitigated Negative Declaration with the implementation of the required mitigation measures.

Further, the modifications proposed for the Housing Element are minor and none of the conditions outlined in CEQA Section 15162 have occurred as explained below, specifically:

(1) No substantial changes are proposed in the project that will require major revisions of the previous negative declaration due to the involvement of new, significant environmental effects or a substantial increase in the severity of previously identified significant effects.

The Amendments include technical changes, the addition of further information to the adopted Housing Element, and changes to programs. The vast majority of these changes reflect revisions to the policies and programs in the Housing Plan and the recategorizing of parcels on the sites inventory. The Amendments do not include modifications to development patterns or changes in the pattern of land uses established in the General Plan, and do not include changes that affect where housing is allowed to be constructed in the City. The adopted version of the sites inventory consists of fewer sites that what was identified and analyzed with as part of the certified Mitigated Negative Declaration. The current version of the sites inventory has been updated to recategorize sites based on their current entitlement status and current projected or approved number of units. The Amendments do not propose or contemplate specific development projects and will not result in direct or indirect housing development. Therefore, the programs would not result in physical environmental impacts or change the conclusions of the IS/MND. Although goals and policies in the plan may result in future actions that could have environmental effects, there is not any information available to allow for meaningful environmental analysis at this time. Environmental review of any implementing actions would occur at that time when project details are known. The adoption of the Amendments to the adopted Housing Element will not result in any direct changes to the physical environment.

(2) No substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

It has been determined that no substantial changes have occurred with respect to the circumstances under which the project is undertaken, and thus no major revisions of the previous negative declaration are necessary. The Amendments include only minor technical changes and the addition of information to the adopted Housing Element and will not cause any significant effects to the environment. Since both the adopted Housing Element and the Amendments result in a sites inventory that includes a surplus of housing units to accommodate the City's RHNA allocation, and do not require any new changes in land use designations or zoning that were not already analyzed,

they are therefore within the scope of the certified MND. Thus, no significant changes have occurred since adoption of the IS/MND for the adopted 2023-2031 Housing Element.

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the negative declaration was adopted, shows any of the following:

- a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

Analysis of the revisions indicates that there is no new information of substantial importance, which was not known at the time the IS/MND was adopted in January 2023 that shows the project will have significant effects on the environment, or effects that will be substantially more severe than shown in the IS/MND.

- b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;

No significant effects were previously identified and no EIR was previously prepared. And the revised Housing Element will not result in effects that are substantially more severe than shown in the previous MND because the total units accommodated by the revised Housing Element is 3,682 units where the previous MND contemplated 3,662 units, and the Sites Inventory where new development would occur consist of those analyzed in the previous MND, but with the entitlement of the AT&T Building site resulting in units shifting from the Sites Inventory to the Credits category, the total number of units in the Sites Inventory is reduced from 2,709 to 2,552 units compared to what the previous MND contemplated.

- c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

The revisions to the adopted Housing Element do not include changes to the development potential, but rather consist of increased housing capacity as reflected in projects that have been entitled for sites included in the inventory. The development potential analyzed in the adopted IS/MND was for the maximum potential development of all of the sites included in the sites inventory and is not intended to limit the development potential of the sites to what is specified in the adopted Housing Element. Because no new sites were added to the sites inventory, no additional mitigation measures or alternatives were necessary.

- d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

No significant effects were identified for the adopted IS/MND, however, the IS/MND concluded that less than significant impacts, with certain mitigations, would result for aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, transportation, public services, recreation, tribal cultural resources, utilities and service systems, and wildfire. The Amendments include modest increases in development potential for a small number of sites that were already included in the inventory. The development potential analyzed in the adopted IS/MND was for the maximum potential development of all of the

sites included in the sites inventory, which has not changed as a result of removing parcels from the sites inventory. As a result, no additional mitigation measures or alternatives were necessary.

Conclusion

Given the analysis presented in this Addendum, it is therefore found that the revisions to the adopted 2023-2031 Housing Element would not result in a measurable increase in environmental impacts over what was previously analyzed in the adopted IS/MND for San Bruno's adopted 2023-2031 Housing Element. There are no changes with respect to the circumstances under which the project is undertaken that will require revisions to the previous IS/MND. Therefore, pursuant to CEQA Guidelines Section 15164, an Addendum to the IS/MND is appropriate and has been prepared to document the technical changes and addition of information that have been included in the revisions to San Bruno's adopted 2023-2031 Housing Element.

As provided in Section 15164 of the CEQA Guidelines, this Addendum need not be circulated for public review, but shall be considered with the prior environmental documents before making a decision on the current project.

For any action or approval to be taken by the City on the proposed project, this Addendum shall be considered together with the previously certified Mitigated Negative Declaration (Attachment B). All documents are available from the City of San Bruno Community Development Department.

MICHAEL SMITH, SENIOR PLANNER

July 2024