APPENDIX 2-J: POLICY CONSISTENCY ANALYSIS

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The California High-Speed Rail Authority (Authority) is a state agency and therefore is not required to comply with local land use and zoning regulations; however, it has endeavored to design and build the San Francisco to San Jose Project Section as compatibly as possible with land use and zoning regulations. The Council on Environmental Quality (CEQ) and Federal Railroad Administration (FRA) regulations require the discussion of any inconsistency or conflict of a proposed action with regional or local plans and laws. Where inconsistencies or conflicts exist, CEQ and FRA require a description of the extent of reconciliation and the reason for proceeding if full reconciliation is not feasible (40 Code of Federal Regulations § 1506.2(d) and 64 *Federal Register* 28545, 14(n)(15)). California Environmental Quality Act (CEQA) Guidelines also require that an environmental impact report (EIR) discuss the inconsistencies between the proposed project and applicable general plans, specific plans, and regional plans (CEQA Guidelines § 15125(d)).

Although the *San Francisco to San Jose Project Section Environmental Impact Report/Environmental Impact Statement (EIS)* describes the project's inconsistency with local plans to provide a context for the project, inconsistency with such plans is not considered an environmental impact.

This appendix provides the following for each resource with identified policy inconsistencies:

- A statement for each policy that the project is inconsistent with, and an explanation of any inconsistencies.
- A discussion of reconciliation approaches the Authority has committed to take to reconcile any inconsistency. These consist of impact avoidance and minimization features (described in Volume 2, Appendix 2-E, Project Impact Avoidance and Minimization Features) and mitigation measures, and activities described in Appendix 2-D, Applicable Design Standards.
- The rationale for moving the project forward if it remains inconsistent with the policy despite these approaches.

Transportation

Table 1 Policy Inconsistency, Reconciliation, and Rationale for Transportation

Policy	Description of Inconsistency	Reconciliation	Rationale
San Francisco General Plan, Transportation Element (2010)			
▪ Policy 1.3: Give priority to public transit and other alternatives to the private automobile as the means of meeting San Francisco's transportation needs, particularly those of commuters.	The project would cause five intersections under San Francisco's jurisdiction to operate at worse than LOS D. San Francisco does not have an LOS standard for its intersections; however, added intersection delay may increase delay for transit vehicles, which would violate San Francisco's Transit First policy.	While the project includes features to implement transit priority mitigations, mitigation is not available to address intersection delay for transit at all intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS for transit at some locations, the Authority is mandated to build and operate the HSR project. The project would result in an increased use of overall transit in San Francisco, resulting in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.
▪ Objective 20: Give first priority to improving transit service throughout the city, providing a convenient and efficient system as a preferable alternative to automobile use.	The project would cause five intersections under San Francisco's jurisdiction to operate at worse than LOS D. San Francisco does not have an LOS standard for its intersections; however, added intersection delay may increase delay for transit vehicles, which would violate San Francisco's Transit First policy.	While the project includes features to implement transit priority mitigations, mitigation is not available to address intersection delay for transit at all intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS for transit at some locations, the Authority is mandated to build and operate the HSR project. The project would result in an increased use of overall transit in San Francisco, resulting in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.
▪ Objective 21: Develop transit as the primary mode of travel to and from downtown and all major activity centers within the region.	The project would cause five intersections under San Francisco's jurisdiction to operate at worse than LOS D. San Francisco does not have an LOS standard for its intersections; however, added intersection delay may increase delay for transit vehicles, which would violate San Francisco's Transit First policy.	While the project includes features to implement transit priority mitigations, mitigation is not available to address intersection delay for transit at all intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS for transit at some locations, the Authority is mandated to build and operate the HSR project. The project would result in an increased use of overall transit in San Francisco, resulting in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Brisbane General Plan (2020)			
▪ Policy C.2: The level of service objective for principal and minor arterial streets within the City is LOS "D."	LOS D or better is not achieved at all facilities studied in the City's jurisdiction requiring LOS D resulting in an inconsistency with the City's LOS policy.	While the project includes features to implement LOS mitigations, they are not available for all affected intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. While the project would have some localized traffic impacts, it would result in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.
South San Francisco General Plan (2014)			
Policy 4.2-G-15: Strive to maintain LOS D or better on arterial and collector streets, at all intersections, and on principal arterials in the CMP during peak hours.	LOS D or better is not achieved at all facilities studied in the City's jurisdiction resulting in an inconsistency with the City's LOS policy.	While the project includes features to implement LOS mitigations, they are not available for all affected intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. While the project would have some localized traffic impacts, it would result in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.
City of San Mateo General Plan, Circulation Element (2015)			
Policy C 2.1: Acceptable Levels of Service. Maintain a Level of Service no worse than mid LOS D, average delay of 45.0 seconds, as the acceptable Level of Service for all intersections within the City.	LOS D or better is not achieved at all facilities studied in the City's jurisdiction resulting in an inconsistency with the City's LOS policy.	While the project includes features to implement LOS mitigations, they are not available for all affected intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. While the project would have some localized traffic impacts, it would result in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.

Policy	Description of Inconsistency	Reconciliation	Rationale
Policy C 3.6: Below Grade Rail Line. Depress the rail line through the downtown with street crossings remaining at grade as Caltrain service is increased and high speed rail through the corridor is implemented. Depressing the rail line in downtown should include examination of a tunnel alternative and potential use of air rights.	The HSR project would be at grade through downtown San Mateo, resulting in an inconsistency with the City's policy that calls for the rail line to be depressed below street level.	While the project includes features to implement LOS mitigations and other effects caused by an at-grade alignment, the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. State legislation approved in 2013, after the Downtown Area Plan was adopted in 2009, led to the at-grade "blended" system in the San Francisco to San Jose Project Section, where HSR and Caltrain share tracks.
Redwood City General Plan (2010)			
Program BE-55: Level of Service Policy Evaluation. [. . .] Maintaining LOS D or better for motor vehicles in all areas of the city, except the Downtown area as defined by the Downtown Precise Plan. In Downtown, no minimum vehicular LOS standard will be maintained but vehicular LOS will be calculated and alternate LOS standards for other travel modes will be established.	LOS D or better is not achieved at certain facilities studied in the City's jurisdiction outside of the Downtown Precise Plan area, resulting in an inconsistency with the City's LOS policy.	While the project includes features to implement LOS mitigations, they are not available for all affected intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. While the project would have some localized traffic impacts, it would result in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.
Menlo Park General Plan (2016)			
Policy CIRC-3.4: Level of Service. Strive to maintain level of service (LOS) D at all City-controlled signalized intersections during peak hours, except at the intersection of Ravenswood Avenue and Middlefield Road and at intersections along Willow Road from Middlefield Road to US 101. The City shall work with Caltrans to ensure that average stopped delay on local approaches to State-controlled signalized intersections does not exceed LOS E.	LOS D or better is not achieved at all facilities studied in the City's jurisdiction requiring LOS D resulting in an inconsistency with the City's LOS policy.	While the project includes features to implement LOS mitigations, they are not available for all affected intersections and the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. While the project would have some localized traffic impacts, it would result in an overall reduction in VMT. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize LOS degradation.

Policy	Description of Inconsistency	Reconciliation	Rationale
Santa Clara County General Plan (1994)			
Policy C-TR 12: It is the goal of this plan to achieve a LOS no lower than D at peak travel periods on city streets, county roads, expressways and state highways. However, in certain instances, a lower level of service may be acceptable when LOS D cannot practically be achieved.	The project would cause some intersections under County jurisdiction to operate at worse than LOS of D or better, resulting in an inconsistency with the County's LOS policy.	While the project includes features to implement LOS mitigations, the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize LOS degradation.
City of San Jose General Plan (2018)			
Policy TR-5.3: The minimum overall roadway performance during peak travel periods should be level of service "D" except for designated areas.	The project would cause some intersections under City jurisdiction to operate at worse than the target LOS of D or better, resulting in an inconsistency with the City's LOS policy.	While the project includes features to implement LOS mitigations, the project will remain inconsistent. Not reconciled.	While the project would degrade intersection LOS at some locations, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize LOS degradation.

Sources: City of Brisbane 2020a; City and County of San Francisco 2010; City of San Mateo 2015a; City of South San Francisco 2014; City of Redwood City 2010; City of Menlo Park 2016; County of Santa Clara 1994; City of San Jose 2018
Authority = California High-Speed Rail Authority
HSR = high-speed rail
LOS = level of service
VMT = vehicle miles traveled

Air Quality and Greenhouse Gases

Table 2 Policy Inconsistency, Reconciliation, and Rationale for Air Quality

Policy	Description of Inconsistency	Reconciliation	Rationale
Plan Bay Area 2040 (2017)			
Target #3: Reduce adverse health impacts associated with air quality, road safety, and physical inactivity by 10 percent.	During construction, the project would result in temporary emissions of criteria pollutants that could increase temporary health risks in the vicinity of existing communities.	AQ-IAMF#1: Fugitive Dust Emissions, and AQ-IAMF#2: Selection of Coatings, would minimize emissions of fugitive dust and off-gassing emissions of VOCs from paints and other coatings. AQ-IAMF#3: Renewable Diesel, through AQ-IAMF#5: Reduce Criteria Exhaust Emissions from On-Road Construction Equipment, would reduce and minimize impacts by requiring the use of renewable diesel and the cleanest reasonably available equipment and control measures to limit criteria pollutant emissions from construction equipment and vehicles. Despite these on-site controls, both project alternatives would contribute temporarily to existing violations of the PM_{10} CAAQS and new violations of the $PM_{2.5}$ NAAQS, which have been established to protect public health. Therefore, the project would remain inconsistent.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The Authority has incorporated IAMFs into the project to minimize impacts on air quality and public health.

Source: ABAG and MTC 2017
Authority = California High-Speed Rail Authority
CAAQS = California ambient air quality standards
HSR = high-speed rail
IAMF = impact avoidance and minimization feature
PM_{10} = particulate matter smaller than or equal to 10 microns in diameter
VOC = volatile organic compound

Noise and Vibration

Table 3 Policy Inconsistency, Reconciliation, and Rationale for Noise and Vibration

Policy	Description of Inconsistency	Reconciliation	Rationale
San Francisco General Plan, Environmental Protection Element (2004)			
Policy 11.1: Discourage new uses in areas in which the noise level exceeds the noise compatibility guidelines for that use. *[Refer to the land use compatibility chart for community noise.]*	Project operation would result in noise environments that exceed 70 L_{dn} which *Requires noise insulation analysis and design* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3). At Institutional and commercial land uses (FRA Category 3), project operation would result in noise environments that exceed 75 L_{dn}/CNEL which *Requires noise insulation analysis and design*.	The project would incorporate NV-MM#3: Implement Proposed California High-Speed Rail Project Noise Mitigation Guidelines, to minimize operations noise impacts, and it would consider the following: construct noise barriers, support City implementation of quiet zones where cities decide to implement them, install sound insulation, or acquire easements on properties severely affected by noise. These determinations would be based on criteria in the Authority's Noise and Vibration Mitigation Guidelines (Volume 2, Appendix 3.4-B, Noise and Vibration Mitigation Guidelines). These measures will reduce or compensate for severe noise impacts from operations. NV-MM#4: Support Potential Implementation of Quiet Zones by Local Jurisdictions, requires HSR vehicles to meet federal regulations for noise (40 C.F.R. § 201.12) at the time of procurement. NV-MM#5: Vehicle Noise Specification, requires the contractor to document how they minimized or eliminated rail gaps related to special trackwork, which can be a major source of noise during operations. NV-MM#6: Special Trackwork at Crossovers, Turnouts, and Insulated Joints, requires final design noise measures. These mitigation measures would all be effective at reducing the number of severe noise impacts in the RSA; however, they would not mitigate all noise impacts.	Although mitigation measures would be able to reduce project noise levels, they would not reduce all levels to the standards for residential, commercial, and institutional land uses due to the limitations in noise barrier cost effectiveness, implementation (HSR cannot implement quiet zones; only local jurisdictions can), and funding (in regards to grade separations).

Policy	Description of Inconsistency	Reconciliation	Rationale
San Francisco Police Code			
SEC. 2908. Construction Work at Night. It shall be unlawful for any person, between the hours of 8:00 p.m. and 7:00 a.m. to erect, construct, demolish, excavate for, alter or repair any building or structure if the noise level created thereby is in excess of the ambient noise level by 5 dBA at the nearest property plane [. . .]	Project construction would include nighttime and weekend construction that, at times, would exceed a 5 dBA increase.	The project would incorporate NV-IAMF#1: Noise and Vibration, to minimize noise impacts by requiring compliance with FRA guidelines for minimizing construction noise and vibration impacts when work is conducted within 1,000 feet of sensitive receptors. The Authority would implement NV-MM#1: Construction Noise Mitigation Measures, which would require the contractor to prepare a noise-monitoring program and noise control plan prior to construction to comply with the FRA construction noise limits wherever feasible. The monitoring program would describe the actions the contractor would use to reduce noise, such as installing temporary noise barriers, avoiding nighttime construction near residential areas, and using low-noise emission equipment.	Construction would occur in a constrained operating rail corridor. Trackwork and some roadway work would be done at night to avoid disruption to Caltrain commuter rail operations and roadway operations. Even with the project features and mitigation measures, there would be locations where it is not technically feasible to meet the established noise limits and permitted construction hours.
San Mateo County Zoning Regulations			
The San Mateo County zoning regulations permit construction weekdays from 7:00 a.m. to 6:00 p.m.; Saturdays from 9:00 a.m. to 5:00 p.m.; prohibited on Sundays and holidays.	Project construction would occur at nighttime and on weekends outside the hours established in the zoning regulations.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
City of Brisbane Code of Ordinances			
8.28.060. Construction Activities. Construction shall be allowed between the hours of 7:00 a.m. and 7:00 p.m. on weekdays and 9:00 a.m. to 7:00 p.m. on weekends and holidays. No individual piece of equipment shall produce a noise level exceeding 83 dBA at a distance of 25 feet from the source, and the noise level outside the property plane of the project shall not exceed 86 dBA.	Project construction would occur at nighttime and on weekends outside the hours established in the code of ordinances.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.

Policy	Description of Inconsistency	Reconciliation	Rationale
Daly City 2030 General Plan (2013)			
Policy NE-3: Maintain a CNEL level of not more than 70 dBA L_{eq} in residential areas.	Project operation would result in noise environments that exceed 70 L_{dn}/CNEL which is *Normally Unacceptable* for residential land use (FRA Category 2) or 75 L_{dn}/CNEL which is *Clearly Unacceptable* for residential land use (FRA Category 2).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Policy NE-4: Maintain a noise level not in excess of 75 dBA CNEL in open space, parks, and tot lots, including outdoor activity areas such as outdoor entertainment or green space of multi-family projects.	Project operation would result in noise environments that exceed 75 L_{dn}/CNEL which is *Clearly Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Policy NE-5: Maintain the City's current standard of 75 dBA CNEL for office, commercial and professional areas.	Project operation would result in noise environments that exceed 75 L_{dn}/CNEL which is *Normally Unacceptable* at institutional and commercial land use (FRA Category 3).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Daly City Code of Ordinances			
9.22.030. Between the hours of 10 p.m. and 6 a.m. of the following day, no person shall cause, create or permit any noise, music, sound or other disturbance upon his property which may be heard by, or which noise disturbs or harasses, any other person beyond the confines of the property, quarters or apartment from which the noise, music, sound or disturbance emanates.	Project construction would occur at nighttime and on weekends outside the hours established in the code of ordinances.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.

Policy	Description of Inconsistency	Reconciliation	Rationale
South San Francisco General Plan (1999)			
Policy 9-G-2: Continue efforts to incorporate noise considerations into land use planning decisions and guide the location and design of transportation facilities to minimize the effects of noise on adjacent land uses. *[Refer to Table 9.2-1, Land Use Criteria for Noise-Impacted Areas.]*	Project operation would result in noise environments that exceed 70 L_{dn}/CNEL for which *Development should not be undertaken* for residential land use. At industrial land use, project operation would result in noise environments that exceed 75 L_{dn}/CNEL for which *Development requires noise insulation analysis and design*.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
South San Francisco Municipal Code			
8.32.050 Special provisions. [. . .] Construction, alteration, repair or landscape maintenance activities which are authorized by a valid city permit shall be allowed on weekdays between the hours of 8 a.m. and 8 p.m., on Saturdays between the hours of 9 a.m. and 8 p.m., and on Sundays and holidays between the hours of 10 a.m. and 6 p.m., if they meet at least one of the following noise limitations: (1) No individual piece of equipment shall produce a noise level exceeding 90 dB at a distance of 25 feet. [. . .]; (2) The noise level at any point outside of the property plane of the project shall not exceed 90 dB.	Project construction would occur at nighttime and on weekends outside the hours established in the municipal code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.

Policy	Description of Inconsistency	Reconciliation	Rationale
San Bruno General Plan (2009)			
Policy HS-33: Prevent the placement of new noise sensitive uses unless adequate mitigation is provided. Establish insulation requirements as mitigation measures for all development, per the standards in Table 7-1.	Project operation would result in noise environments that exceed 70 CNEL which is *Incompatible* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3). At commercial land use/FRA Category 3, project operation would result in noise environments that exceed 70-80 CNEL which is *Conditionally Compatible*.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
San Bruno Municipal Code			
6.16.070 Construction of buildings and projects. No person shall, within any residential zone, or within a radius of 500 feet there from, operate equipment [. . .] between the hours of 7 a.m. and 10 p.m., a noise level of 85 dB as measured at 100 feet, or exceed between the hours of 10 p.m. and 7 a.m. a noise level of 60 dB as measured at 100 feet [. . .].	Project construction would occur at nighttime and on weekends outside the hours established in the municipal code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
City of Millbrae General Plan (1998)			
Policy NS2.1: Land Use Compatibility Standards. New development must meet acceptable exterior noise level standards. The "normally acceptable" noise standards for new land uses are established in the Noise and Land Use Compatibility Guidelines [. . .] If the noise source is a railroad, then the outdoor noise exposure criterion should be 70 Ldn for future development, recognizing that train noise is characterized by relatively few loud events.	Project operation would result in noise environments that exceed 70 L_{dn}/CNEL which is *Conditionally Compatible* residential land use (FRA Category 2) or *Not Compatible* for schools and churches, etc. (FRA Category 3). Where the project would exceed 75 L_{dn}/CNEL it would also be *Not Compatible* at residential land use (FRA Category 3).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
Burlingame Downtown Specific Plan (2018)			
Section 7.2.4: California High Speed Rail. [. . .] Given that the [HSR] alignment is proposed to pass through Burlingame and its downtown, there is concern over the potential for the rail line to create a physical barrier through the city if it involves bridging, elevated tracks, or the use of retaining walls. Like other peninsula cities, Burlingame has indicated a preference for having the rail line in an underground tunnel rather than at surface or above grade. Having the line underground would be more compatible with the continued economic vitality and quality of life of Burlingame and its downtown. It would also be more compatible with the preservation of valuable historic resources such as the eucalyptus grove and the Burlingame Avenue and Broadway train stations. If all rail lines are accommodated underground along the length of the peninsula alignment, it will enable dozens of surface crossings to be relieved of train conflicts, thereby easing access at many scales and reducing congestion throughout the peninsula. [. . .]	The HSR project would be at grade through Burlingame, resulting in an inconsistency with the City's policy that calls for the rail line to be depressed below street level.	The project would incorporate mitigation measures to minimize operational noise impacts, and would consider the following: construct noise barriers, support City implementation of quiet zones where cities decide to implement them, install sound insulation, or acquire easements on properties severely affected by noise. However, the project would remain inconsistent with this policy. Not reconciled.	The Authority is mandated to build and operate the HSR project. State legislation approved in 2013, after the Burlingame Downtown Specific Plan was adopted in 2010, led to the at-grade "blended" system in the San Francisco to San Jose Project Section, where HSR and Caltrain share tracks.
City of San Mateo General Plan, Noise Element (2010)			
Policy N 2.2: Minimize Noise Impact. Protect all "noise-sensitive" land uses listed in Tables N-1 and N-2 from adverse impacts caused by the noise generated on-site by new developments. Incorporate necessary mitigation measures into development design to minimize noise impacts. Prohibit long-term exposure increases of 3 dB (Ldn) or greater at the common property line, or new uses which generate noise levels of 60	Project operation would result in noise environments that exceed 70 L_{dn} which is *Normally Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3). At institutional and commercial land use (FRA Category 3), project operation would result in	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
dB (Ldn) or greater at the property line, excluding existing ambient noise levels.	noise environments that exceed 75 L_{dn} which is *Clearly Unacceptable*.		
Policy N 2.5: Railroad Noise. Promote the installation of noise barriers along the railroad corridor where "noise-sensitive" land uses are adversely impacted by unacceptable noise levels (60 dB or greater). Promote adequate noise mitigation to be incorporated into any rail service expansion or track realignment. Study the need of depressing the rail line to eliminate at-grade crossings or other mitigation measures to decrease noise levels prior to substantial expansion of the rail service.	The HSR project would be at grade through San Mateo, resulting in a partial inconsistency with the City's policy that calls for the rail line to be depressed below street level.	The project would incorporate mitigation measures to minimize operational noise impacts, and would consider the following: construct noise barriers, support City implementation of quiet zones where cities decide to implement them, install sound insulation, or acquire easements on properties severely affected by noise. However, the project would remain inconsistent with this policy. Not reconciled.	The Authority is mandated to build and operate the HSR project. State legislation approved in 2013, after the General Plan was adopted in 2010, led to the at-grade "blended" system in the San Francisco to San Jose Project Section, where HSR and Caltrain share tracks.
City of San Mateo Municipal Code			
7.30.060 Special Provisions. Construction shall be allowed on weekdays between the hours of 7 a.m. and 7 p.m., on Saturdays between the hours of 8 a.m. and 5 p.m., and on Sundays and holidays between the hours of 12 and 4 p.m., if they meet at least one of the following noise limitations: (1) No individual piece of equipment shall produce a noise level exceeding 90 dB at a distance of 25 feet. (2) The noise level at any point outside of the property plane of the project shall not exceed 90 dB.	Project construction would occur at nighttime and on weekends outside the hours established in the municipal code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
Belmont 2035 General Plan (2017)			
Policy 7.1-3: Require noise-reducing mitigation to meet allowable outdoor and indoor noise exposure standards in Table 7-2. Noise mitigation measures that may be approved to achieve these noise level targets include but are not limited to the following: construct façades with substantial weight and insulation; use sound-rated	Project operation would result in noise environments that exceed 70 L_{dn} which is *Normally Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3). At institutional and commercial land use (FRA Category 3), project operation would result in	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
windows for primary sleeping and activity areas; use sound-rated doors for all exterior entries at primary sleeping and activity areas; use minimum setbacks and exterior barriers; Use acoustic baffling of vents for chimneys, attic and gable ends; and install a mechanical ventilation system that provides fresh air under closed window conditions. *[Refer to Table 7-2, Transportation (Non-Aircraft Noise Sources), which establishes acceptable limits of noise for sensitive land uses for both exterior and interior environments from transportation sources.]*	noise environments that exceed 75 L_{dn} which is *Normally Unacceptable*.		
Belmont Noise Ordinance			
15-102 Noise Limitations. Construction activities are subject to the following regulations: All construction and related activities, which require a city permit, including the use of powered equipment in connection with such activities, shall be allowed only during the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday, and 10:00 a.m. to 5:00 p.m. Saturdays.	Project construction would occur at nighttime and on weekends outside the hours established in the municipal code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
San Carlos 2030 General Plan (2009)			
Policy NOI-1.3: Limit noise impacts on noise-sensitive uses to noise level standards as indicated in Table 9-1.	Project operation would result in noise environments that exceed 70 L_{dn} which is *Conditionally Acceptable* for all noise-sensitive land use or 75 L_{dn} which is *Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of San Carlos Noise Ordinance			
9.30.070 Exempt activities. Construction activities; such activities, however, shall be limited to the hours of eight a.m. to six p.m. Monday through Friday, and nine a.m. to five p.m. on Saturdays and Sundays. No construction noise-related activities on holidays.	Project construction would occur at nighttime and on weekends outside the hours established in the noise ordinance.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
Redwood City General Plan (2010)			
Goal PS-14.1: Minimize the impacts of transportation-related noise. *[Refer to Figure PS-10, Redwood City Noise Guidelines for Land Use Planning for noise guidelines.]*	Project operation would result in noise environments that exceed 70 CNEL which is *Normally Acceptable* for residential land use (FRA Category 2) and *Clearly Unacceptable* at schools (FRA Category 3) or 75 CNEL which is *Clearly Unacceptable* for residential land use (FRA Category 2). At institutional and commercial land use (FRA Category 3), project operation would result in noise environments that exceed 75 CNEL which is *Normally Unacceptable*.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Redwood City Noise Ordinance			
Sec. 24.32. - TIME LIMITATIONS. [. . .] it shall be unlawful for any person to engage in construction activities, including demolition, alteration, repair or remodeling of or to existing structures and the construction of new structures on property in a residential district or within 500 feet of a residential district in the City, between the hours of 8:00 p.m. and 7:00 a.m. the following day, Monday through Friday of any week or at any time on Saturdays, Sundays or holidays if the noise level	Project construction would occur at nighttime and on weekends outside the hours established in the noise ordinance.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.

Policy	Description of Inconsistency	Reconciliation	Rationale
generated by any such activity exceeds the local ambient measured at any point within the residential district and outside of the plane of said property.			
Atherton General Plan (2002)			
Noise Element Policy 5.720: Information contained in the survey of noise contours shall be used as a tool for land use decision making. *[Refer to Table N-2, Land Use Compatibility for Community Environments.]*	Project operation would result in noise environments that exceed 70 L_{dn} which is *Normally Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3), or 75 L_{dn} which is *Unacceptable* for residential land use (FRA Category 2).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Atherton Municipal Code			
15.40.120 Time Limits. Establishes time period during which construction, pickup and delivery are permitted between 8:00 a.m. and 5:00 p.m. on weekdays, and prohibits construction outside of this time period, on weekends, and holidays.	Project construction would occur at nighttime and on weekends outside the hours established in the noise ordinance.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
City of Menlo Park General Plan, Open Space/Conservation, Noise and Safety Elements (2013)			
N1.2: Land Use Compatibility Noise Standards. Protect people in new development from excessive noise by applying the City's Land Use Compatibility Noise Standards for New Development (see chart on the next page) to the siting and required mitigation for new uses in existing noise environments.	Project operation would result in noise environments that exceed 70 L_{dn} which is *Normally Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3), or 75 L_{dn} which is *Clearly Unacceptable* for residential land use (FRA Category 2).	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Menlo Park Municipal Code			
8.06.040 Exceptions. Construction activities are permitted between the hours of 8 a.m. and 6 p.m. Monday through Friday.	Project construction would occur at nighttime and on weekends outside the hours established in the noise ordinance.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
Santa Clara County General Plan (1994)			
Policy C-HS 24: Environments for all residents of Santa Clara County free from noises that jeopardize their health and well-being should be provided through measures which promote noise and land use compatibility. *[Refer to Noise Compatibility Standards for Land Use in Santa Clara County, page I-20.]*	Project operation would result in noise environments that exceed 70 L_{dn} which is *Critical* for all noise-sensitive land uses.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Santa Clara County Ordinance Code			
Section B11-154. Prohibited acts. Operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekdays and Saturday hours of 7 p.m. and 7 a.m., or at any time on Sundays or holidays, that the sound therefrom creates a noise disturbance across a residential or commercial real property line, except for emergency work of public service utilities or by variance.	Project construction will occur at night and on weekends outside the hours in the code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
Palo Alto Comprehensive Plan (2017)			
Policy N-6.1: Encourage the location of land uses in areas with compatible noise environments. Use the guidelines in Table N-1 to evaluate the compatibility of proposed land uses within existing noise environments when preparing, revising, or reviewing	Project operation would result in noise environments that exceed 70 L_{dn}/CNEL which is *Conditionally Acceptable* for residential land use (FRA Category 2) and schools and churches, and offices and commercial	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
development proposals. Acceptable exterior, interior and ways to discern noise exposure include: ▪ The guideline for maximum outdoor noise levels in residential areas is an Ldn of 60 dB. [. . .] ▪ Interior noise, per the requirements of the State of California Building Standards Code (Title 24) and Noise Insulation Standards (Title 25), must not exceed an Ldn of 45 dB in all habitable rooms of all new dwelling units.	buildings, etc. (FRA Category 3) or 75 L_{dn} which is *Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3).		
City of Palo Alto Municipal Code			
9.10.060 Special provisions. **(b)** Construction, alteration and repair activities shall be prohibited on Sundays and holidays and shall be prohibited except between the hours of 8 a.m. and 6 p.m. Monday through Friday, 9 a.m. and 6 p.m. on Saturday [. . .]	Project construction will occur at night and on weekends outside the hours in the code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.
Mountain View 2030 General Plan (2012)			
Policy NOI 1.1: Land use compatibility. Use the Outdoor Noise Environment Guidelines as a guide for planning and development decisions (Table 7.1).	Project operation would result in noise environments that exceed 70 L_{dn}/CNEL which is *Normally Unacceptable* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3) and *Conditionally Acceptable* for offices and commercial buildings, or 75 L_{dn}/CNEL which is *Clearly Unacceptable* for residential land use (FRA Category 2) and *Normally Unacceptable* for offices and commercial buildings.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.

Policy	Description of Inconsistency	Reconciliation	Rationale
Sunnyvale General Plan (2011)			
Policy SN-8.5: Comply with "State of California Noise Guidelines for Land Use Planning" (Figure 6-5) for the compatibility of land uses with their noise environments, except where the city determines that there are prevailing circumstances of a unique or special nature.	Project operation would result in noise environments that exceed 70 L_{dn} which is *Conditionally Acceptable* for residential land use (FRA Category 2) and schools and churches, offices and commercial land use, etc. (FRA Category 3). At residential land use (FRA Category 2) and schools and churches (FRA Category 3), project operation would result in noise environments that exceed 75 L_{dn} which would be *Unacceptable*.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
City of Sunnyvale Municipal Code			
16.08.030. Hours of construction—Time and noise limitations. Construction activity shall be permitted between the hours of seven a.m. and six p.m. daily Monday through Friday. Saturday hours of operation shall be between eight a.m. and five p.m. There shall be no construction activity on Sunday or federal holidays when city offices are closed.	Project construction would occur at night and on weekends outside the hours in the code.	This reconciliation is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.	This rationale is the same as described for consistency with Sec. 2908 of the San Francisco Police Code with regard to permitted construction hours.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Santa Clara 2010–2035 General Plan (2010)			
Policy 5.10.6-P2: Incorporate noise attenuation measures for all projects that have noise exposure levels greater than General Plan "normally acceptable" levels. *[Refer to Table 8.14-1, General Plan Noise Standards.]*	Project operation would result in noise environments that exceed 70 L_{dn} which *Requires Design and insulation* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3) or 73 L_{dn} which is *Incompatible* for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3). At institutional and commercial land use (FRA Category 3), project operation would result in noise environments that exceed 75 L_{dn}/CNEL which *Requires Design and insulation*.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.
Envision San José 2040 General Plan (2018)			
Land Use Compatibility Guidelines for Community Noise in San Jose, Table 4	Project implementation would result in noise environments that would exceed 70 L_{dn} which requires acoustical analysis for residential land use (FRA Category 2) and schools and churches, etc. (FRA Category 3). At institutional and commercial land use (FRA Category 3), project implementation would result in noise environments that exceed 77 $L_{dn,}$ which requires acoustical analysis.	This reconciliation is the same as described for consistency with Policy 11.1 of the San Francisco General Plan with regard to noise compatibility with land uses.	This rationale is the same as described for consistency with Policy 11.1 o the San Francisco General Plan with regard to noise compatibility with land uses.

Sources: City of Belmont 2017a; City of Burlingame 2018; City of Daly City 2013; City of Menlo Park 2013; City of Millbrae 1998; City of Mountain View 2012; City of Palo Alto 2017; City of Redwood City 2010; City of San Bruno 2009; City of San Carlos 2009; City and County of San Francisco 2004; City of San Jose 2018; City of San Mateo 2010; City of Santa Clara 2010; City of South San Francisco 1999; City of Sunnyvale 2011; County of Santa Clara 1994; Town of Atherton 2002

Authority = California High-Speed Rail Authority
C.F.R. = Code of Federal Regulations
CNEL = Community Noise Equivalent Level
dBA = A-weighted decibel
FRA = Federal Railroad Administration
HSR = high-speed rail
L_{dn} = day-night sound level
L_{eq} = equivalent sound level
RSA = resource study area

Hydrology and Water Resources

Table 4 Policy Inconsistency, Reconciliation, and Rationale for Hydrology and Water Resources

Policy	Description of Inconsistency	Reconciliation	Rationale
South Westside Groundwater Management Plan (2012)			
Policy J1: Preserve and protect, to the extent possible, aquifer recharge areas.	Proposed radio communication towers along San Antonio Avenue in San Bruno are located in a vegetated strip on the west side of the existing Caltrain corridor that facilitates groundwater recharge in the South Westside groundwater basin. The project cannot be relocated to avoid development in this area, because the project follows the existing Caltrain corridor.	Although the project requires building impervious surfaces in open/vacant areas that provide groundwater recharge in the existing condition, the increase in imperviousness would have minimal impacts on groundwater recharge. However, as a condition of the Phase II MS4 permit, the project would seek to maximize pervious surfaces and minimize impervious surfaces to reduce impacts on hydrology and water resources.	The Authority is mandated to build and operate the project along the existing Caltrain corridor, so the project cannot be relocated to avoid all open/vacant lands that allow rainfall to recharge groundwater aquifers. However, the project would maximize pervious surfaces and minimize impervious surfaces to reduce impacts on hydrology and water resources.
Belmont General Plan (2017)			
Policy 6.2-3: Require all proposed drainage facilities to comply with the city's storm drainage facility requirements to ensure they are properly sized to handle 100-year flood conditions.	The Authority would design proposed drainage systems according to design criteria promulgated by the Authority and primarily based on Caltrans' *Highway Design Manual*, which does not require designing systems to convey the 100-year flow.	The Authority's standards for hydrological analysis and hydraulic design are primarily based on the Caltrans *Highway Design Manual*. However, if any of the project's proposed drainage facilities require a connection to Belmont's drainage facilities, the Authority would coordinate with Belmont to determine if an upgrade to the existing facility is required.	The Authority is using Caltrans' *Highway Design Manual* for hydrological analysis and hydraulic design because it has a demonstrated record of safely removing accumulated rainfall from the state's highway system.

Sources: City of San Bruno et al. 2012; City of Belmont 2017a
ATC = automatic train control
Authority = California High-Speed Rail Authority
Caltrans = California Department of Transportation
HSR = high-speed rail
MS4 = municipal separate storm sewer system

Safety and Security

Table 5 Policy Inconsistency, Reconciliation, and Rationale for Safety and Security

Policy	Description of Inconsistency	Reconciliation	Rationale
City of San Mateo General Plan, Circulation Element (2015)			
C 3.5: Promote the elimination of existing at grade crossing to improve local circulation and safety.	The project does not include any changes to the existing grade levels of road-rail crossings.	Although the project does not include changes to existing grade levels of road-rail crossings, neither does it create any new at-grade crossings. Pedestrian and vehicle safety would be improved at existing at-grade crossings in the Project Section through the project's installation of four-quadrant gates and/or channelization at all at-grade crossings.	The project would improve the safety of existing at-grade crossings. Additionally, the proposed design would not preclude future grade separation of existing at-grade crossings.
C 3.6: Depress the rail line through the downtown with street crossings remaining at grade as Caltrain service is increased and high speed rail through the corridor is implemented. Depressing the rail line in downtown should include examination of a tunnel alternative and potential use of air rights.	The project does not include any changes to the existing grade levels of road-rail crossings.	Although the project does not include changes to existing grade levels of road-rail crossings, neither does it create any new at-grade crossings. Pedestrian and vehicle safety would be improved at existing at-grade crossings in the Project Section through the project's installation of four-quadrant gates and/or channelization at all at-grade crossings	The project would improve the safety of existing at-grade crossings. Additionally, the proposed design would not preclude future grade separation of existing at-grade crossings.
San Mateo Downtown Area Plan (2009)			
Policy VI.3: Railway Improvements. Depress the rail line through the downtown street crossings remaining at grade as Caltrain service is increased and high- speed rail through the corridor is implemented. Depressing the rail line should include examination of a tunnel alternative and potential use of air rights to fulfill Downtown Plan goals and policies.	The project does not include any changes to the existing grade levels of road-rail crossings.	Although the project does not include changes to existing grade levels of road-rail crossings, neither does it create any new at-grade crossings. Pedestrian and vehicle safety would be improved at existing at-grade crossings in the Project Section through the project's installation of four-quadrant gates and/or channelization at all at-grade crossings	The project would improve the safety of existing at-grade crossings. Additionally, the proposed design would not preclude future grade separation of existing at-grade crossings.

Policy	Description of Inconsistency	Reconciliation	Rationale
San Mateo Rail Corridor Transit-Oriented Development Plan (2005)			
Policy 4.4: Improve East-West access via new grade separated rail crossings.	The project does not include any changes to the existing grade levels of road-rail crossings.	Although the project does not include changes to existing grade levels of road-rail crossings, neither does it create any new at-grade crossings. Pedestrian and vehicle safety would be improved at existing at-grade crossings in the Project Section through the project's installation of four-quadrant gates and/or channelization at all at-grade crossings	The project would improve the safety of existing at-grade crossings. Additionally, the proposed design would not preclude future grade separation of existing at-grade crossings.
City of Belmont Municipal Code			
15.5 Speed of Trains - It shall be unlawful for any engineer, fireman, brakeman, conductor or other person having any train or railroad cars or any part or section of any such train or any railroad locomotive or any engine under his charge, control or direction, in whole or in part, to run such train, section of train, locomotive or engine, or cause the same to be run on any railroads within the city at a speed exceeding thirty-five (35) miles per hour, between a point one hundred (100) yards north of the center of Ralston Avenue at its intersection with the railroad tracks and a point one hundred (100) yards south of the center of Harbor Boulevard at its intersection with the railroad tracks.	Operation of HSR trains on the segment of track between Ralston Avenue and Harbor Boulevard would exceed the 35-mile-per-hour speed limit in the Belmont Municipal Code.	This code section was put in place in 1961 prior to grade separation of Ralston Avenue and Harbor Boulevard, likely due to safety concerns for at-grade crossings. Because these crossings are now grade separated in Belmont, this policy is outdated; reconciliation of this inconsistency would not occur.	HSR trains would be controlled by safety systems (e.g., ATC systems) that would allow for safe operations. As there are no longer at-grade crossings in Belmont, train speeds would not affect safety of pedestrian and vehicle crossings within the city.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Palo Alto Comprehensive Plan (2017)			
Policy T-3.13: Pursue grade separation of rail crossings along the rail corridor as a City priority.	The project does not include any changes to the existing grade levels of road-rail crossings.	Although the project does not include changes to existing grade levels of road-rail crossings, neither does it create any new at-grade crossings. Pedestrian and vehicle safety would be improved at existing at-grade crossings in the Project Section through the project's installation of four-quadrant gates and/or channelization at all at-grade crossings	The project would improve the safety of existing at-grade crossings. Additionally, the proposed design would not preclude future grade separation of existing at-grade crossings.

Sources: City of San Mateo 2005, 2009, 2015a; City of Palo Alto 2017
ATC = automatic train control
HSR = high-speed rail

Socioeconomics and Communities

Table 6 Policy Inconsistency, Reconciliation, and Rationale for Socioeconomics and Communities

Policy	Description of Inconsistency	Reconciliation	Rationale
Plan Bay Area 2040 (2017)			
Plan Bay Area 2040 identifies as a priority development area, the industrial and vacant lands in Brisbane between Bayshore Boulevard on the west and US 101 on the east, due to its potential for transit-oriented compact development.	The East or West Brisbane LMF under both project alternatives would reduce the amount of land available for TOD in the Brisbane priority development area. As the greatest potential for TOD is in the northwest portion of the priority development area, the West Brisbane LMF under Alternative B would have a greater inconsistency with the plan.	The Authority would work with the City of Brisbane and developer of the Brisbane Baylands site to enhance the public benefits of HSR development to help meet the needs of the local communities, including housing and job opportunities (LU-IAMF#1: HSR Station Area Development—General Principles and Guidelines, and LU-IAMF#2: Station Area Planning and Local Agency Coordination). While the project includes features to implement urban design guidelines to maximize compatible design, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize conflicts with existing land uses and land use plans.
City of Brisbane General Plan (1994, 2020)			
Policy 8: Maintain and diversify the City's tax base, consistent with community character, in order to generate adequate revenues for City Government and sustain a healthy local economy.	Alternatives A and B would both displace two industrial businesses and one commercial business in Brisbane. This would result in a reduction in the City's tax base under both project alternatives, which would reduce the City's property tax revenues. Project features and compliance with the Uniform Act would minimize the impacts on commercial and industrial properties by offering relocation assistance. Project features would partially reconcile these impacts; however, some existing commercial and industrial properties would be permanently removed.	The Authority would work with the City of Brisbane and developer of the Brisbane Baylands site to enhance the public benefits of HSR development to help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for businesses. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert commercial facilities to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.

Policy	Description of Inconsistency	Reconciliation	Rationale
Policy LU.5: Establish a mix of uses with a diversified economic base to maintain and increase tax revenues and contribute to the City's ability to provide services.	The East or West Brisbane LMF options would be inconsistent with General Plan designations for residential and commercial development in the Brisbane Baylands thus reducing potential tax revenues to the City.	The Authority would work with the City of Brisbane to enhance the public benefits of HSR development to help meet the needs of the local communities, including housing and job opportunities (LU-IAMF#1, LU-IAMF#2). While the project includes features to implement urban design guidelines to maximize compatible design, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize conflicts with existing land uses and land use plans.
San Bruno General Plan, Housing Element (2015)			
Housing Element Goal 1: Protect the quality and stability of existing neighborhoods through the conservation, rehabilitation, and improvement of the existing housing supply.	Residential displacements of 7 units in the city of San Bruno would occur under both Alternative A and Alternative B. The project would displace three duplexes and one single-family home east of the alignment and just south of I-380 near the intersection of Walnut Street and Montgomery Avenue. Project features and compliance with the Uniform Act would minimize the impacts on residential properties by offering relocation assistance. Project features would partially reconcile these impacts; however, some existing residential units would be permanently removed.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for residences. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert residential units to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Millbrae General Plan, Housing Element (2015)			
Goal H2: Protect and Enhance Existing Housing, Community Character and Resources.	Within the city of Millbrae, the project would displace one single-family home under Alternatives A and B. This residence is west of the Millbrae Station on Serra Avenue. Project features and compliance with the Uniform Act would minimize the impacts on residential properties by offering relocation assistance. Project features would partially reconcile these impacts; however, some existing residential units would be permanently removed.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for residences. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert residential units to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.
City of San Mateo General Plan, Housing Element (2015)			
Housing Element Goal 1: Maintain the character and physical quality of residential neighborhoods.	In the city of San Mateo, Alternative B would displace two single-family residences. However, the construction activities associated with the project would not affect the character of the City of San Mateo's residential neighborhoods to the extent that the sense of community character would be reduced. Compliance with the Uniform Act would minimize the impacts on residential properties by offering relocation assistance. Project features would partially reconcile these impacts; however, some existing residential units would be permanently removed under Alternative B.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for residences. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert residential units to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Belmont 2035 General Plan (2017)			
Land Use Goal 2.5: Enhance the Belmont Village PDA and develop a distinct identity for the area as Belmont's vibrant town center for residents and visitors with commercial, residential, dining, civic, cultural, and entertainment activities.	In the city of Belmont, Alternative A would displace 10 businesses, most of them auto-related businesses along Old County Road. Alternative B would displace 65 businesses due to the passing tracks through Belmont. These include the same auto-related businesses displaced by Alternative A, along with others such as warehouses, outbuildings, home renovation stores, print shops, offices, food and drink, and a dance studio. Compliance with the Uniform Act would minimize the impacts on businesses by offering relocation assistance. Project features would partially reconcile these impacts; however, some existing residential units would be permanently removed.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for business owners. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert businesses to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.
Belmont Village Specific Plan (2017)			
Policy 2.1-7 Neighborhood Services: Ensure that the mix of commercial uses provides adequate neighborhood and community services for residential development in the Village to reduce the need for driving for everyday needs. In particular, encourage the provision of neighborhood and community services in the Station Core district.	The project would displace 10 commercial and industrial businesses under Alternative A, and 65 commercial and industrial businesses displaced under Alternative B, which could decrease the level of community services offered to residential development. Compliance with the Uniform Act would minimize the impacts on businesses by offering relocation assistance. Project features would partially reconcile these impacts; however, some existing residential units would be permanently removed.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for business owners. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert businesses to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.

Policy	Description of Inconsistency	Reconciliation	Rationale
Santa Clara County General Plan, Housing Element (2014)			
Policy HG 21: The conservation and rehabilitation of the existing housing supply shall be encouraged and facilitated.	The project would result in the displacement of one single-family residence under both Alternative A and B within the city of Palo Alto. However, aside from the one home that would be displaced, the project would otherwise maintain the existing housing supply within Santa Clara County. Compliance with the Uniform Act would minimize the impacts on residential properties by offering relocation assistance. Project features would partially reconcile these impacts; however, one existing residential unit would be permanently removed.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for residences. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert residential units to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize impacts from displacements and relocations.
City of San Jose Housing Element (2015)			
Policy H-2.3. Conserve viable housing stock through a balanced combination of housing code enforcement and complementary programs such as rehabilitation loans and grants to help maintain the supply of low-priced housing. Policy H-3.4. Promote the conservation and rehabilitation of existing viable housing stock.	The project would require the acquisition of land within the project footprint, result in the demolition of some existing residences that could widen existing community divisions, affect social relationships, and alter the existing character and integrity of the communities through which it passes. Project features would minimize the impacts on existing housing stock by providing replacement housing. Mitigation measures would partially reduce these impacts; however, some existing housing and businesses would be permanently removed.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities, including housing. The Authority must comply with the Uniform Act, as amended, as identified in SOCIO-IAMF#2: Compliance with Uniform Relocation Assistance and Real Property Acquisition Policies Act. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert residential land uses to transportation and industrial uses, the Authority is mandated to build and operate the HSR project. This a state-level project that would have benefits across multiple resource areas. The project design includes features to minimize division of communities and reduction of housing stock.

Sources: ABAG and MTC 2017; City of Belmont 2017a, 2017b; City of Brisbane 1994, 2020b; City of Millbrae 2015; City of San Bruno 2015; City of San Jose 2015; City of San Mateo 2015b; County of Santa Clara 2014
The Project Section's consistency with regional and local plans and policies is assessed for adopted plans only.
Authority = California High-Speed Rail Authority
FRA = Federal Railroad Administration
FTA = Federal Transit Administration
HSR = high-speed rail
LMF = light maintenance facility
TOD = transit-oriented development
US = U.S. Highway

Station Planning, Land Use, and Development

Table 7 Policy Inconsistency, Reconciliation, and Rationale for Station Planning, Land Use, and Development

Policy	Description of Inconsistency	Reconciliation	Rationale
Plan Bay Area 2040 (2017)			
Plan Bay Area 2040 identifies as a priority development area, the industrial and vacant lands in Brisbane between Bayshore Boulevard on the west and US 101 on the east, due to its potential for transit-oriented compact development.	The East or West Brisbane LMF under both project alternatives would reduce the amount of land available for TOD in the Brisbane priority development area. As the greatest potential for TOD is in the northwest portion of the priority development area, the West Brisbane LMF under Alternative B would have a greater inconsistency with the plan.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities, including housing and job opportunities (LU-IAMF#1: HSR Station Area Development: General Principles and Guidelines, and LU-IAMF#2: Station Area Planning and Local Agency Coordination). While the project includes features to implement urban design guidelines to maximize compatible design, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize conflicts with existing land uses and land use plans.
City of Brisbane General Plan (2018, 2020)			
Policy LU.3: Establish a mix of land uses that best serves the needs of the community. Program LU3.a: When evaluating land uses, consider whether a use would result in adverse impacts on existing and proposed land uses nearby, and whether those impacts can be mitigated.	The East or West Brisbane LMF options would be inconsistent with General Plan designations for residential and commercial development in the Brisbane Baylands.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities, including housing and job opportunities (LU-IAMF#1, LU-IAMF#2). While the project includes features to implement urban design guidelines to maximize compatible design, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize conflicts with existing land uses and land use plans.

Policy	Description of Inconsistency	Reconciliation	Rationale
Policy LU.5: Establish a mix of uses with a diversified economic base to maintain and increase tax revenues and contribute to the City's ability to provide services.	The East or West Brisbane LMF options would be inconsistent with General Plan designations for residential and commercial development in the Brisbane Baylands, thus reducing tax revenues to the City.	The Authority would work with local governments to enhance the public benefits of HSR development so that they help meet the needs of the local communities, including housing and job opportunities (LU-IAMF#1, LU-IAMF#2). While the project includes features to implement urban design guidelines to maximize compatible design, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize conflicts with existing land uses and land use plans.
San Mateo Downtown Area Plan (2009)			
Policy VI.3, Railway Improvements: Depress the rail line through the downtown with street crossings remaining at grade as Caltrain service is increased and high speed rail through the corridor is implemented. Depressing the rail line should include examination of a tunnel alternative and potential use of air rights to fulfill Downtown Plan goals and policies.	Inconsistent under both project alternatives. Both project alternatives would be inconsistent with this policy. However, both project alternatives would be compatible with the railway improvements being undertaken by Caltrain and the City of San Mateo associated with the proposed 25th Avenue Grade Separation Project, which will elevate the existing at-grade Caltrain track between SR 92 and Hillsdale Boulevard to provide a grade-separated undercrossing of 25th Avenue, construct new east-west crossings under the track corridor at 28th and 31st Avenues, and relocate Hillsdale Station.	Not reconciled.	Although the project alternatives are inconsistent with this policy as written, they are compatible with the 25th Avenue Grade Separation Project and with the broader intent of grade separation through downtown San Mateo.

Sources: ABAG and MTC 2017; City of Brisbane 2018, 2020b; City of San Mateo 2009
The Project Section's consistency with regional and local plans and policies is assessed for adopted plans only.
Authority = California High-Speed Rail Authority
HSR = high-speed rail
LMF = light maintenance facility
SR = State Route
TOD = transit-oriented development
US = U.S. Highway

Aesthetics and Visual Quality

Table 8 Policy Inconsistency, Reconciliation, and Rationale for Aesthetics and Visual Quality

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Brisbane General Plan (2020)			
Policy LU 21: Preserve open areas with biological value and/or significant topographic characteristics at the perimeter of the City to maintain Brisbane as separate and distinct from nearby communities.	Both project alternatives would build a 100- to 110-acre LMF on land that is currently undeveloped, eliminating views of open space that provide an image of Brisbane as separate and distinct from nearby communities, creating a view of continuous development from central Brisbane to San Francisco.	Prior to construction the contractor would document, through issue of a technical memorandum, how the Authority's aesthetic guidelines have been employed to minimize visual impacts. The Authority seeks to balance providing a consistent, project-wide aesthetic with the local context for the numerous HSR non-station structures across the state. Examples of aesthetic options that can be applied to non-standard structures in the HSR system would be provided to local jurisdictions (AVQ-IAMF#1: Aesthetic Options). The Authority would also require its contractors to document that the Authority's *Aesthetic Design Review Process* has been followed (AVQ-IAMF#2: Aesthetic Review Process). While the project includes these features to minimize visual impacts, they cannot keep the open space intact and the project would remain inconsistent. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize visual impacts on sensitive viewers.
City of Millbrae General Plan (1998)			
Policy LUIP-10: Railroad Station House. Consider and support appropriate community or economic uses of the Station House and continue to support its historic importance in its existing location.	Both project alternatives would require relocation of the historic Millbrae Station House; however, the proposed relocation moves the building only about 50 feet from its existing location. It has been moved once before, in 1980, when it was moved 200 feet south from its original site.	Prior to construction the contractor would document, through issue of a technical memorandum, how the Authority's aesthetic guidelines have been employed to minimize visual impacts. The Authority seeks to balance providing a consistent, project-wide aesthetic with the local context for the numerous HSR non-station structures across the state. Examples of aesthetic options that can be applied to non-standard structures in the HSR system would be provided to local jurisdictions (AVQ-IAMF#1). The Authority would also require its contractors to document that the Authority's *Aesthetic Design Review Process* has been followed (AVQ-IAMF#2). While the project includes these features to minimize visual impacts, historic Millbrae Station House would be moved from its existing location and the project would remain inconsistent. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize visual impacts on sensitive viewers.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of San Mateo General Plan, Conservation, Open Space, Parks and Recreation Element (2011)			
Policy C/OS 6.4: Tree and Stand Retention. Retain the maximum feasible number of trees and preserve the character of stands or groves of trees in the design of new or modified projects.	Inconsistent under Alternative B. Alternative B would degrade the visual environment along El Camino Real in San Mateo by removing mature trees that obscure the railway from viewers, eliminating the character of the stand; however, project design includes measures to soften the appearance of infrastructure, including planting replacement trees.	Prior to construction the contractor would document, through issue of a technical memorandum, how the Authority's aesthetic guidelines have been employed to minimize visual impacts. The Authority seeks to balance providing a consistent, project-wide aesthetic with the local context for the numerous HSR non-station structures across the state. Examples of aesthetic options that can be applied to non-standard structures in the HSR system would be provided to local jurisdictions (AVQ-IAMF#1). The Authority would also require its contractors to document that the Authority's *Aesthetic Design Review Process* has been followed (AVQ-IAMF#2). While the project includes these features to minimize visual impacts, including the planting of replacement trees, the mature trees would be removed and the project would remain inconsistent. Not reconciled.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. The project design includes measures to minimize visual impacts on sensitive viewers.

Sources: City of Brisbane 2020b; City of Millbrae 1998; City of San Mateo 2011
Authority = California High-Speed Rail Authority
HSR = high-speed rail
LMF = light maintenance facility

Cultural Resources

Table 9 Policy Inconsistency, Reconciliation, and Rationale for Cultural Resources

Policy	Description of Inconsistency	Reconciliation	Rationale
San Mateo County General Plan (2013)			
Goal/Objective 5.3: Protection of Archaeological/Paleontological Sites: Protect archaeological/paleontological sites from destruction in order to preserve and interpret them for future scientific research, and public educational programs.	There is a potential for construction activities for either project alternative to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1: Mitigate Adverse Effects on Archaeological and Built Resources Identified during Phased Identification and Comply with the Stipulations Regarding the Treatment of Archaeological and Historic Built Resources in the PA and MOA, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2: Halt Work in the Event of an Archaeological Discovery, and Comply with the PA, MOA, ATP, and all State and Federal Laws, as Applicable, would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3: Other Mitigation for Effects on NRHP-Eligible Pre-Contact Archaeological Resources, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.

Policy	Description of Inconsistency	Reconciliation	Rationale
City of Brisbane General Plan (1994)			
Policy 137: Conserve pre-historic resources in accordance with State and Federal requirements.	There is a potential for construction activities for either project alternative to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.

Policy	Description of Inconsistency	Reconciliation	Rationale
South San Francisco General Plan (2014)			
Guiding Policies: Historic and Cultural Resources: 7.5-G-1: Conserve historic cultural, and archaeological resources for the aesthetic, educational economic, and scientific contribution they make to South San Francisco's identity and quality of life.	There is a potential for construction activities for either project alternative to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	The Authority is mandated to construct and operate the HSR project. This is a state-level project that would have benefits across multiple resources areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.
San Bruno General Plan (2009)			
T-82: Prohibit the encroachment of transportation facilities on irreplaceable resources, such as important open spaces, recreational areas, and historic sites. ERC-39: Continue to protect archaeological sites and resources from damage. Require that areas found to contain significant indigenous artifacts be examined by a qualified	While significant adverse impacts on any known historical resources, including human remains, would be avoided, minimized or mitigated for all project alternatives, project construction activities have the potential to encroach on historic sites that include archaeological artifacts and/or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid,

Policy	Description of Inconsistency	Reconciliation	Rationale
archaeologist for recommendations concerning protection and preservation.		CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	minimize, or mitigate impacts on cultural resources.
City of Millbrae General Plan (1998)			
LU2.5: Identify and protect sites and structures of architectural, historical, archaeological, and cultural significance, including significant trees and other plant materials. Require new development in historic areas to complement the character of nearby historic. LUIP-10: Railroad Station House. Consider and support appropriate community or economic uses of the Station House and continue to support its historic importance in its existing location.	While significant adverse impacts on any known historical resources would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains. Both project alternatives would require relocation of the historic Millbrae Station House; however, the proposed relocation moves the building only about 50 feet from its existing location. It has been moved once before, in 1980, when it was moved 200 feet south from its original site.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.

Policy	Description of Inconsistency	Reconciliation	Rationale
		reconciled and the project would be consistent with LU2.5. The proposed project includes the CUL-IAMF#6 project feature, where the contractor would prepare a pre-construction conditions assessment of the SPRR Depot/Millbrae Station and develop a plan for its protection. Given the station's relocation is included as a proposed project activity, a relocation plan would also be prepared. Protection measures would be in place prior to any construction activities, construction staff would be alerted of the need to avoid affecting this built resource in the reports completed for CUL-IAMF#6: Pre-Construction Conditions Assessment, Plan for Protection of Historic Built Resources, and Repair of Inadvertent Damage. An architectural historian would monitor the efficacy of the protective measures, as defined in the protection plan and the relocation plan. Should any inadvertent damage occur during construction or relocation, the architectural historian, and if needed a structural engineer, would assess the damage and determine the best approach to repair the depot, following the SOI's Standards for the Treatment of Historic Properties and in consultation with the Authority and the SHPO. Under CUL-IAMF#7: Built Environment Monitoring Plan, the contractor would prepare a built environment monitoring plan prior to construction to detail the monitoring methods and process required for ground-disturbing activities within 1,000 feet of the property. Under CUL-IAMF#8: Implement Protection and/or Stabilization Measures, the contractor would implement these planning documents to put protective measures in place prior to construction. Under CUL-IAMF#6, CUL-IAMF#7, and CUL-IAMF#8, the property would still be relocated but the protective measures would support appropriate community or economic uses of the Station House and continue to	

Policy	Description of Inconsistency	Reconciliation	Rationale
		support its historic importance on its current site, consistent with Policy LUIP-10.	
Belmont 2035 General Plan (2017)			
Goal 5.12: Preserve and protect areas and sites of prehistoric, cultural, and archaeological significance. Policy 5.12-1: Ensure that development avoids potential impacts to sites suspected of being archeologically, paleontologically, or culturally significant, tribal or otherwise, or of concern by requiring appropriate and feasible mitigation.	While significant adverse impacts on any known historical resources would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.
San Carlos 2030 General Plan (2009)			
Goal LU-2: Protect San Carlos' historic and cultural resources to maintain and enhance a unique sense of place.	While significant adverse impacts on any known historical resources would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation

Policy	Description of Inconsistency	Reconciliation	Rationale
		qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.
Redwood City General Plan (2010)			
Goal BE-37: Protect, preserve, restore rehabilitate, and /or enhance historic resources. Policy BE-37.1: Enhance, restore, preserve, and protect, as appropriate, historic resources throughout the city.	While significant adverse impacts on any known historical resources would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.

Policy	Description of Inconsistency	Reconciliation	Rationale
		With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	
Santa Clara County General Plan (1994)			
Goal 5.1: Heritage Resource Protection. Protection and preservation of heritage resources both natural (e.g., heritage trees and paleontological resources) and cultural (e.g., historic sites and structures, and archeological sites). Cultural heritage resources reflecting the contributions to society of all cultures acknowledged, preserved and commemorated. Policy C-RC-52: Heritage Resources Preservation. Prevention of unnecessary losses to heritage resources should be ensured as much as possible through adequate ordinances, regulations, and standard review procedures. Mitigation efforts, such as relocation of the resource, should be employed where feasible when projects will have significant adverse impact upon heritage resources.	While significant adverse impacts on any known historical resources, including human remains, would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.

Policy	Description of Inconsistency	Reconciliation	Rationale
Palo Alto Comprehensive Plan (2017)			
Policy L-7.15: Protect Palo Alto's archaeological resources, including natural land formations, sacred sites, the historical landscape, historic habitats and remains of settlements here before the founding of Palo Alto in the 19th century.	While significant adverse impacts on any known historical resources would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains.	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, the inconsistency would be reconciled and the project would be consistent with these goals and policies.	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid, minimize, or mitigate impacts on cultural resources.
City of Santa Clara General Plan (2010)			
Policy 5.6.2-P1: Areas of Historic Sensitivity. Evaluate any proposed changes to properties within 100 feet of historic resources on the City's list of Architecturally or Historically Significant Properties for potential negative effects on the historic integrity of the resource or its historic context.	While significant adverse impacts on any known historical resources located within the area of potential effect would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to affect the 100-foot setting of unknown resources outside the area of potential effect. Additionally, while significant adverse impacts on any known historical	Through implementation of CUL-MM#1, the Authority would complete Phased Identification inventory for archaeological resources and utilize or further develop treatment plans for any identified resources that would be impaired by the project. Implementation of CUL-MM#2 would train construction crews to identify archaeological resources during construction activities, provide for construction monitoring by qualified professionals in areas of archaeological sensitivity, and establish procedures to stop work in the event of a discovery. Also in accordance with	The Authority is mandated to build and operate the HSR project. This is a state-level project that would have benefits across multiple resource areas. Through project features and implementation of mitigation measures, the Authority would reconcile potential inconsistencies and avoid,

Policy	Description of Inconsistency	Reconciliation	Rationale
Goal 5.6.3-G1: Archaeological and Cultural Resources. Protection and preservation of cultural resources, as well as archaeological and paleontological sites.	resources would be avoided, minimized or mitigated for all project alternatives, there is a potential for construction activities to encounter unknown archaeological resources or human remains.	CUL-MM#2, if human remains are encountered, the appropriate state and federal laws would be followed to determine whether the remains are affiliated with a Native American tribe; if so, such remains would be treated appropriately. In accordance with CUL-MM#3, in the event that an unknown archaeological resource is encountered and cannot be avoided, mitigation measures would be applied as stipulated by the MOA and ATP. With the implementation of CUL-MM#1, CUL-MM#2, and CUL-MM#3, one inconsistency would be reconciled and the project would be consistent with Goal 5.6.3-G1. The project would remain inconsistent with Policy 5.6.2-P1.	minimize, or mitigate impacts on cultural resources.

Sources: City of Belmont 2017a; City of Brisbane 1994; City of Millbrae 1998; City of Palo Alto 2017; City of Redwood City 2010; City of Santa Clara 2010; City of San Bruno 2009; City of San Carlos 2009; County of San Mateo 2013; County of Santa Clara 1994; City of South San Francisco 2014
ATP = archaeological treatment program
Authority = California High-Speed Rail Authority
HSR = high-speed rail
MOA = Memorandum of Agreement
NRHP = National Register of Historic Places
PA = Programmatic Agreement
SHPO = State Historic Preservation Officer
SOI = Secretary of the Interior

Regional Growth

Table 10 Policy Inconsistency, Reconciliation, and Rationale for Regional Growth

Policy	Description of Inconsistency	Reconciliation	Rationale
Plan Bay Area 2040 (2017)			
Plan Bay Area 2040 identifies as a priority development area, the industrial and vacant lands in Brisbane between Bayshore Boulevard on the west and US 101 on the east, due to its potential for transit-oriented compact development.	The East or West Brisbane LMF sites under both project alternatives would reduce the amount of land available for TOD development in the Brisbane priority development area. As the greatest potential for TOD is in the northwest portion of the priority development area, the West Brisbane LMF under Alternative B would have a greater inconsistency with the plan.	The Authority would work with the City of Brisbane to enhance the public benefits of HSR development to help meet the needs of the local communities, including housing and job opportunities (LU-IAMF#1: HSR Station Area Development: General Principles and Guidelines, and LU-IAMF#2: Station Area Planning and Local Agency Coordination). While the project includes features to implement urban design guidelines to maximize compatible design, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. It is a state-level project that would have regional benefits associated with improved air quality, reduced congestion, and improved transportation safety and travel time. The project design includes measures to minimize conflicts with existing land uses and land use plans.
City of Brisbane General Plan (1994, 2020)			
Policy 8: Maintain and diversify the City's tax base, consistent with community character, in order to generate adequate revenues for City government and sustain a healthy local economy.	Alternative A would displace two industrial businesses and one commercial business in Brisbane while Alternative B would displace three industrial and two commercial businesses. This would result in a small reduction in property tax revenues for the city and county, which would be minimized if these businesses relocate within the same city and county. Project features and compliance with the Uniform Act would minimize the impacts on commercial and industrial property and business owners and City property tax revenues by offering relocation assistance.	The Authority would work with the local government to enhance the public benefits of HSR development to help meet the needs of local communities. Numerous project features have been incorporated to minimize impacts on displacements. The Authority would comply with the Uniform Act to provide relocation assistance for businesses. Despite implementation of project features, the project would remain inconsistent. Not reconciled.	While the project would convert commercial and industrial properties to transportation and industrial rail uses, the Authority is mandated to build and operate the HSR project. This is a state-level project that would have regional benefits associated with improved air quality, reduced congestion, and improved transportation safety and travel time. The project design includes features to minimize impacts from displacements and relocations.

Policy	Description of Inconsistency	Reconciliation	Rationale
	Project features would partially reconcile these impacts; however, some existing commercial and industrial properties may be permanently removed.		
Policy LU.5: Establish a mix of uses with a diversified economic base to maintain and increase tax revenues and contribute to the City's ability to provide services.	The East or West Brisbane LMF would be inconsistent with General Plan designations for residential and commercial development in the Brisbane Baylands. Both options would convert private land to public land, thus reducing property tax revenues to the City. Alternative A would have a greater impact on commercial development potential and Alternative B would have a greater impact on residential development potential.	The Authority would work with the local government to enhance the public benefits of HSR development to help meet the needs of local communities, including housing and job opportunities (LU-IAMF#1, LU-IAMF#2). While the project includes features to implement urban design guidelines to maximize compatible design for the LMF, the project would reduce the amount of land available for TOD in the Brisbane priority development area. Not reconciled.	The Authority is mandated to build and operate the HSR project. It is a state-level project that would have regional benefits associated with improved air quality, reduced congestion, and improved transportation safety and travel time. The project design includes measures to minimize conflicts with existing land uses and land use plans.

Sources: ABAG and MTC 2017; City of Brisbane 1994, 2020b
The Project Section's inconsistency with regional and local plans and policies is assessed for adopted plans only and was conducted in January 2019.
Authority = California High-Speed Rail Authority
HSR = high-speed rail
LMF = light maintenance facility
TOD = transit-oriented development

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