

CITY OF SOUTH SAN FRANCISCO

CHECKLIST TO THE DOWNTOWN STATION AREA SPECIFIC PLAN

A. PROJECT INFORMATION

1. **Project Title:** 100 East Grand Avenue Project
2. **Lead Agency Name and Address:** City of South San Francisco
315 Maple Avenue
South San Francisco, CA 94083
3. **Contact Person(s) and Phone Numbers:** Terezia Nemeth
ARE-100 E Grand, LLC
415-554-8847
4. **Project Location:** 100 East Grand Avenue
South San Francisco, CA 94080

INTRODUCTION AND PROJECT DESCRIPTION

The City of South San Francisco (“City”) approved the Downtown Station Area Specific Plan (“DSASP”) in February 2015, following the City’s certification of an Environmental Impact Report (“DSASP EIR”) under the California Environmental Quality Act (“CEQA”). The DSASP EIR analyzed the impacts of 1,435 residential units, 511,780 square feet of commercial business space, 21,250 square feet of industrial space, 268,800 square feet of commercial retail space, and 1,185,000 square feet of office and research and development space. (DSASP, p. 3.9; Draft EIR, p. 3-13.) As of the date hereof, no office / R&D development contemplated under the DSASP has been approved and/or constructed pursuant to the DSASP.

ARE-100 E Grand, LLC (“ARE”) ground leases an approximately 5.5 acre site located at 100 East Grand Avenue (the “Project Site”), within the DSASP Boundary. The Project Site is zoned Transit Office/R&D Core, which permits uses including offices and research and development (“R&D”) at a base floor area ratio (“FAR”) of 1.5 to 2.5, increasing up to 3.5 with an incentive program providing community benefits.

ARE proposes to demolish the existing industrial buildings and improvements on the Project Site and develop an R&D campus with parking (the “Project”). The Project would include two new office/R&D buildings, A and B, and an 8-story parking structure with 782 parking spaces. Building A would be a 10-story office/R&D building of approximately 300,000 square feet with a café of approximately 8,800 square feet. Building B would be an 8-story office/R&D building of approximately 250,000 square feet. It is anticipated that the Project would consist of approximately 60 percent R&D laboratory uses and 40 percent office uses. It also would provide needed infrastructure improvements along Sylvester Road and East Grand Avenue to better incorporate more convenient circulation in the Eastern Neighborhood.

ARE has applied for the following City approvals for the Project:

- Design Review
- TDM Plan
- Vesting Tentative Parcel Map

- Conditional Use Permit for reduced parking

The City is the Lead Agency for review of the proposed Project under CEQA and is responsible for determining whether any further environmental review of the Project is required by CEQA in connection with the current applications, and if so, for determining the scope of such review.

CEQA GUIDELINES SECTION 21155.4 OVERVIEW AND APPLICABILITY

California Public Resources Code Section 21155.4 establishes a statutory exemption from CEQA review for “employment center” projects that meet specified requirements.

Employment Center Project

For purposes of this exemption, an “employment center project” is defined per California Public Resources Code Section 21099, subsection (a)(1), as a project located on a property zoned for commercial use with a FAR no less than 0.75 and that is located within a transit priority area. A transit priority area is defined per California Public Resources Code Section 21099, subsection (a), as “an area within one-half mile of a major transit stop that is existing or planned, if the planned stop is scheduled to be completed within the planning horizon in a Transportation Improvement Plan or applicable regional transportation plan.” California Public Resources Code Section 20164.3 defines “major transit stop” to include an existing rail transit station. The Project is an “employment center project” because: the Property is zoned Transit Office/R&D Core, which permits commercial uses, including offices and research and development; the Project proposes an FAR of 2.5; and the Property is located within one-half mile of the City’s CalTrain station.

Specific Plan Consistency

California Public Resources Code Section 21155.4 requires that the project be consistent with a specific plan for which an environmental impact report has been certified. The DSASP guides development in portions of the City within a 1/2-mile radius of the Caltrain Station. (DSASP, p. 1.1.) The City certified the EIR for the DSASP in 2014. As described below, the Project is consistent with the DSASP.

DSASP EIR Development Capacity

The DSASP EIR analyzed the impacts of 511,780 square feet of commercial business space, 21,250 square feet of industrial space, 268,800 square feet of commercial retail space, and 1,185,000 square feet of office and research and development space. (DSASP, p. 3.9; Draft EIR, p. 3-13.) As of the date hereof, no office / R&D development has been approved and/or constructed pursuant to the DSASP. The DSASP EIR concluded that implementation of the DSASP would have significant unavoidable impacts in the areas of air quality, cultural resources, noise, and traffic/transportation. All other impacts would be less than significant or less than significant with mitigation. The Project would be within the development capacity analyzed in the DSASP EIR.

DSASP Eastern Neighborhood Area

The Project Site is within the “Eastern Neighborhood” designation of the DSASP, which is a “higher density area” for “[o]ffice and R&D uses,” two uses that are “most suitable here at significant densities.”

(DSASP, p. 2.8.) In addition, “large scale development [is] suitable here.” (*Id.*) The DSASP provides for the Eastern Neighborhood to increase development opportunities consistent with East of 101 trends, provide significant office/R&D employment opportunities in close proximity to Downtown and the Caltrain Station, and create a unique employment neighborhood based on the walkable development pattern of the Downtown. (DSASP, p. 2.8.)

The Project is the type of large-scale and higher-density development that the DSASP envisions in the Eastern Neighborhood. The Project would provide significant office/R&D employment opportunities close to transit and Downtown.

DSASP Land Use

The DSASP designates the Eastern Neighborhood as an area “highly suitable . . . for high-density employment” including “a more urban, corporate office format[.]” (DSASP, p. 3.7.) Relevant guiding principles include:

- Guiding Principle 10: Encourage high-density employment.
- Guiding Principle 11: Enhance the few existing streets with a more fine-grained pattern of vehicular and bicycle/pedestrian routes to allow convenient circulation throughout the area.
- Guiding Principle 12: Provide a direct connection from the planned pedestrian and bicycle underpass of the tracks through the northern part of the area along Grand Avenue to allow station drop-off and shuttle pick-ups as well as direct bicycle and pedestrian access to the station and to Downtown.
- Guiding Principle 13: Allow retail uses along Grand Avenue to provide amenities for the office population and a strong visual and physical linkage to the Downtown to the west.

The DSASP Land Use Plan designates the Property as “Transit Office/R&D Core.” (DSASP, Fig. 3.01.) This urban employment district is to be characterized by a “walkable street pattern” and “connect[ivity] to the Downtown[.]” (DSASP, p. 3.8.) Taller buildings are appropriate here, and the area lends itself to “corporate office, hotels, and other major facilities” due to its high visibility. (*Id.*) Development intensity is permitted from 1.5 to 2.5 FAR, but FAR of up to 3.5 is allowed with the provision of incentives. (*Id.*; DSASP, Table 3.01.)

Guiding Principle 16 indicates that the Eastern Neighborhood street network should be improved to provide better vehicular connections and complete pedestrian and bicycle access. (DSASP, p. 3.18.) The DSASP also indicates that Sylvester Road will be improved to provide adequate pedestrian and bicycle access. (*Id.*; DSASP, Fig. 3.15.) Guiding Principles 25 and 26 require an improvement of sidewalks and adjoining open spaces to create attractive pedestrian environments as well as a street tree plan. (DSASP, p. 3.35.) Finally, Guiding Principle 24 requires new development to provide a significant amount of publicly accessible open space within the development concepts for new office, R&D, or supporting uses. (DSASP, p. 3.32.)

The Project would be consistent with the DSASP land use designation and Guiding Principles. The proposed higher-density office/R&D development would provide the type of employment anticipated within the Eastern Neighborhood. It also would provide needed infrastructure improvements along Sylvester Road and East Grand Avenue to better incorporate more convenient circulation in the Eastern Neighborhood. In addition, the Project would activate over a third of the public-facing frontage along

East Grand Avenue with a café occupying the corner near the intersection with Sylvester Road that would provide amenities for the office population. This café, visible from the intersection, would help to activate the pedestrian frontage and create a linkage to Downtown.

The office/R&D development proposed by the Project is consistent with the DSASP's "Transit Office/R&D Core" Land Use Plan designation. In addition, the proposed eight and 10-story Project buildings are consistent with the plan for major corporate facilities and taller buildings due to the high visibility of the area. The proposed Project FAR would be within the maximum permitted base FAR of 2.5.

The Project is consistent with the DSASP's goals for an enhanced street network for better vehicular connections and enhanced pedestrian and bicycle access along East Grand Avenue and Sylvester Road. The café, lobby, and courtyard facing Sylvester Road and East Grand Avenue will be a convenient place for employees to gather en route to the Caltrain Station. A secure bicycle storage facility with lockers, showers, and changing facilities also will be located in Building A, accessed off of the central courtyard. The courtyard between Buildings A and B would serve as an attractive publicly-accessible open space area for pedestrians.

DSASP Circulation

Within the Eastern Neighborhood area, the DSASP describes East Grand Avenue as a "Main Street" and Sylvester Road as a "Major Vehicular Street". (DSASP, pp. 4.2–4.3.) As a Main Street, East Grand Avenue would be the centerpiece of the Pedestrian Priority Zone prioritizing vehicle access for local businesses but also calming traffic through design features. (DSASP, p. 4.2.) As a Major Vehicular Street, Sylvester Road must be compatible with active nearby uses with wider sidewalks, transit improvements, or bicycle facilities where feasible. (DSASP, p. 4.2.)

The Project would be consistent with the DSASP's planned circulation updates for East Grand Avenue and Sylvester Road and would provide needed infrastructure improvements along Sylvester Road (between East Grand Avenue and the proposed Access Road) to better incorporate more convenient circulation in the Eastern Neighborhood. The Project would provide better connections to the Caltrain Station and Downtown by providing a pedestrian crossing at East Grand Avenue and Sylvester Road, provide an internal circulation route, have access for bike riders through the pedestrian sidewalks, and provide for a secure bicycle storage facility, showers, and changing facilities.

DSASP Design

Within the Eastern Neighborhood, the DSASP provides that block patterns should limit block lengths to 600 feet and where they exceed 300 feet provide mid-block pedestrian connections in the form of a pedestrian access way or a shared pedestrian/emergency/services path. (DSASP, p. 5.2.) New development is encouraged to provide useable open space, which should be visible and accessible from the street or other public way. (DSASP, p. 5.14.)

The DSASP provides that building heights in the Eastern Neighborhood will be greatest in close proximity to the Caltrain Station. Generally, however, building heights in the Eastern Neighborhood area are regulated by the Federal Aviation Administration. (DSASP, Fig. 5.02.)

DSASP Guiding Principle 49 requires buildings in the Eastern Neighborhood to have minimal setbacks and active ground floor uses to create an attractive pedestrian environment. (DSASP, p. 5.6.) In this way, new development will have a more urban and visually interesting character and will be located adjoining the public environment of streets and walkways. (*Id.*)

The DSASP provides that buildings will be sited along streets and sidewalks and not behind landscaped front yards; on-site parking should be provided at the rear of the site, preferably in a structure, but screened from the street; parking access should be from minimum feasible curb cuts or from nearby lanes or side streets; architectural elements should be utilized to provide visual interest and variation on major facades; and active uses, such as lobbies, retail, conference rooms, or similar spaces, should be used on the ground floor to provide visual interest to pedestrians. (DSASP, p. 5.12.) In particular, parking structures should be located away from primary pedestrian walkways and create visual interest and reduction of mass through varied dimensions and proportions, and decorative elements. (DSASP, p. 5.17.) The Project would be consistent with the DSASP design principles. Under existing conditions, block length of the Project Site is approximately 457 feet East-to-West and 759 feet North-to-South. East-west access through the site is not possible due to the US 101 ROW bordering the entire west side of the Project Site. Due to safety, there can be no pedestrian access to that ROW nor a crossing from the northwest corner of the site to the west. The Project would result in construction of paved interior pathways and sidewalks accessible from East Grand Avenue, Sylvester Road, and Associated Road, breaking up the existing longer blocks around the Project perimeter and allowing for easy pedestrian and cyclist access to and movement through the Project site. The Project would also provide a visible courtyard in between Buildings A and B directly off of the sidewalk along Sylvester Road, allowing for mid-block pedestrian access to useable open space. Further, the Project would provide taller building heights near the Caltrain Station and be consistent with the applicable height regulations of the Federal Aviation Administration.

The Project buildings along Sylvester Road would have a zero-foot setback from the sidewalk, activating the environment for nearby pedestrians. There would be no sidewalk along E. Grand Avenue due to pedestrian safety concerns stemming from the Highway 101 offramp at the northwest corner of the Project site. However, the Project building along E. Grand Avenue would be set back approximately 34 feet from the curb to accommodate a utility easement and would be well landscaped to maintain an attractive environment in the area. Additionally, the current conditions of E. Grand Ave. prohibit safe pedestrian crossing at the uncontrolled intersection of E. Grand Ave. and the Hwy 101 off-ramp, and while improvements are planned for East Grand Avenue and the Hwy 101 off-ramp intersection as part of the City's East Access Study, the final design and implementation timeframe is unknown at this time. To safely address the current condition, the project provides a service pathway to access building service areas and egress doors, and utilities within the right-of-way. Conceived in consultation with The City Planning Department, the pathway, along with an extensive landscape is designed to discourage pedestrians from walking towards the uncontrolled intersection, while maintaining an attractive street frontage. Should the outcomes of the East Access Study enable safe pedestrian crossing at the E. Grand/Hwy 101 off-ramp intersection, the Project frontage could accommodate the City's sidewalk condition consistent with the DSASP. Additionally, the Project building has been designed to incorporate a future entrance directly onto E. Grand Avenue to further activate the street frontage.

The Building A entrance, café, and lobby uses would activate the ground floor and would be visible from the East Grand Avenue and Sylvester Road intersection. The Building B conference center, accessed from inside of the lobby, would be visible from Sylvester Road. The on-site parking structure would be located

near the rear of the Project Site, away from pedestrian walkways on Sylvester Road, and have access via two curb cuts. Architecture of the buildings will provide for variation and visual interest; and ground floor space will be activated with entrances, lobbies, café, conference center uses to provide visual interest from streets, sidewalks, and courtyard spaces.

DSASP Utilities and Public Services

The stormwater provisions of the DSASP require projects to implement best practice stormwater management and treatment improvements to support existing and new development; such improvements must meet or exceed state and regional requirements. (DSASP, pp. 6.2, 6.4.) The DSASP also requires inclusion of water-conserving features, irrigation, and other measures in new construction and also utilization of low water use, native, or other appropriate plantings. (DSASP, p. 6.7.)

Regarding schools, police services, fire protection, and parks and recreation, the DSASP requires continued monitoring, and in certain instances funding, to ensure that adequate public services are maintained for the growth envisioned in the plan. (DSASP, pp. 6.8–6.11.) The DSASP also requires continued work with property owners in the Eastern Neighborhood to provide useable open spaces along East Grand Avenue, in dedicated parks or in publicly accessible portions of development sites. (DSASP, p. 6.11.)

Consistent with the DSASP, the Project would implement stormwater management and treatment improvements best practices that would meet or exceed state and regional requirements. The Project also would include water-conserving features, irrigation, and appropriate plantings for water conservation.

The Project would provide funding in the form of development impact fees to enhance and/or expand public services. The courtyard proposed by the Project allows for a publicly accessible portion of the development adjacent to the Sylvester Avenue pedestrian sidewalk.

In sum, the Project is consistent with the DSASP and, as described herein, within the scope of the DSASP EIR.

Consistency with Sustainable Communities Strategy

California Public Resources Code Section 21155.4 requires that the project be consistent with the general use designation, density, building intensity, and applicable policies specific for the project area in a sustainable communities strategy that the California Air Resources Board (“CARB”) has determined will achieve greenhouse gas (“GHG”) reduction targets. On June 25, 2018, CARB issued Executive Order G-18-047 accepting the Metropolitan Transportation Commission (“MTC”) and Association of Bay Area Governments (“ABAG”) finding that *Plan Bay Area 2040* would achieve GHG reductions targets. On October 21, 2021, ABAG and MTC approved *Plan Bay Area 2050*, but it has not yet been approved by CARB. As shown in Tables 1 and 2 below, the Project is consistent with the general use designation, density, building intensity, and applicable policies specified for the Project area in both *Plan Bay Area 2040* and *Plan Bay Area 2050*.

Plan Bay Area 2040 concentrates development within transit priority areas and priority development areas. As noted above, the Project is located within a transit priority area. (*Plan Bay Area 2040*, Map 4.4.) *Plan Bay Area 2050* concentrates development within growth geographies, which are areas used to guide

where growth in housing and jobs would be focused over the next 30 years. (*Plan Bay Area 2050*, p. 20.) The Property is within a Transit-Rich Area, a growth geography in which at least 50 percent of the area is within one-half mile of an existing rail station, a bus stop with peak service frequency of 15 minutes or less, or a planned rail station. (*Plan Bay Area 2050*, pp. 20, 21.)

Table 1. Consistency of Project with Plan Bay Area 2040

Category	Strategy	Project Consistency
Climate Protection	Reduce per-capita CO ₂ emissions	<p>Consistent. The Project would implement a TDM program and is designed to meet a target of 45 percent of peak hour trips being made by non-single occupant vehicle modes. The Project TDM program may include, but is not limited to, the following measures:</p> <ul style="list-style-type: none"> • Infrastructure <ul style="list-style-type: none"> ○ Pick-up/drop-off zones adjacent to main entries of Buildings A & B ○ Intra-campus walkability ○ Pedestrian connections to both Downtown and Caltrain Station ○ Secure, indoor bike parking ○ Sufficient bicycle and auto parking ○ Designated parking and charging facilities for carpools, carshares, electric and accessible vans and vehicles ○ On-site amenities to support trip reduction, such as food service, health and wellness, and small meeting/social spaces • Programs and Services <ul style="list-style-type: none"> ○ Shuttles (to local ferries and BART) ○ Carpooling and vanpooling ○ Guaranteed ride home ○ Transit subsidies and/or pre-tax payroll programs ○ Mobile services that support trip reduction, such as food trucks and possibly pop-ups • Marketing and Information Regarding Project Site TDM Measures <ul style="list-style-type: none"> ○ Onboarding for new hires with information about all transportation options ○ Pre-move in planning and promotion with new tenants with presentations and demonstrations for employees ○ Ongoing marketing of programs on-site ○ Ongoing marketing of programs through tenant websites, e-communications ○ Annual promotional events for campus employees

		<ul style="list-style-type: none"> Leasing and Reporting <ul style="list-style-type: none"> On-site employee transportation coordinator Inclusion of TDM measures in leases Annual survey Annual reporting to City Triennial reporting demonstrating TDM program efficacy or description of additional trip reduction measures to TDM ordinance <p>Proximity to the newly designed and expanded Caltrain Station and pedestrian tunnel to Downtown and new residential development uniquely advantage the Project Site to benefit from the TDM program. This, in addition to the proximity of the Project to shuttle stops from BART and the emergence of e-scooters and e-bikes with longer ranges particularly from origins within Downtown with new housing, will reduce mobile source emissions from Project operations.</p>
Adequate Housing	House the region's population	Not applicable. This action is not directly applicable to the proposed Project.
Healthy and Safe Communities	Reduce adverse health impacts	Consistent. Furthermore, the Project would use Tier 4 construction equipment for the majority of Project construction activities, which reduces the health impact on the community. The Project's location close to transit and the proposed TDM program would reduce the health impact from mobile sources. Project emergency generators would be subject to BAAQMD permitting and require compliance with applicable regulations. In addition, the project is located over 1,000 feet from the nearest residence and 2,000 feet from the nearest daycare.
Open Space and Agricultural Preservation	Direct development within urban footprint	Consistent. The proposed Project is redevelopment of an underutilized site in the urban footprint.
Equitable Access	Decrease share of lower-income households' budgets spent on housing and transportation	Not applicable. This action is not directly applicable to the proposed Project.
	Increase share of affordable housing	Not applicable. This action is not directly applicable to the proposed Project.
	Do not increase share of households at risk of displacement	Consistent. The proposed Project would include the demolition of existing industrial buildings. The Project would not result in displacement of existing housing.

Economic Vitality	Increase share of jobs accessible in congested conditions	Consistent. The proposed Project would collocate jobs adjacent to Downtown, where more housing is being developed.
	Increase jobs in middle-wage industries	Consistent. The proposed Project would add an approximately 9,000 square foot café, as well as providing a variety of maintenance, security, and property operation job opportunities, increasing middle-wage jobs.
	Reduce per-capita delay on freight network	Not applicable. This action is not directly applicable to the proposed Project.
Transportation System Effectiveness	Increase non-auto mode share	Consistent. The Project would develop office and R&D space near existing residential, office, commercial, and light manufacturing uses, reducing the demand for travel by single occupancy vehicles. The Project would also implement a TDM program that is designed to meet the target of 45 percent of peak hour trips being made by non-single occupant vehicle modes. See above for a summary of potential TDM measures.
	Reduce vehicle operating and maintenance costs due to pavement conditions	Not applicable. This action is not directly applicable to the Project.
	Reduce per-rider transit delay due to aged infrastructure	Not applicable. This action is not directly applicable to the Project. The Project would include improved intersections, shared use lanes, improved pedestrian connections and improved roadways within the project limits that would benefit transit.

Table 2. Consistency of Project with Plan Bay Area 2050

Category		Strategy	Project Consistency
Housing Strategies	Protect and Preserve Affordable Housing	Further strengthen renter protections beyond state law	Not applicable. This action is not directly applicable to the Project as it would not develop housing.
		Preserve existing affordable housing	Not applicable. This action is not directly applicable to the Project. The Project would include the demolition of existing industrial buildings. The Project would not result in displacement of existing housing.
	Spur Housing Production for Residents of All Income Levels	Allow a greater mix of housing densities and types in Growth Geographies	Not applicable. This action is not directly applicable to the Project as the Project would not develop housing.
		Build adequate affordable housing to ensure homes for all	Not applicable. This action is not directly applicable to the Project as the Project would not develop housing.
		Integrate affordable housing into all major housing projects	Not applicable. This action is not directly applicable to the Project as the Project would not develop housing.
		Transform aging malls and office parks into neighborhoods	Consistent. The Project would demolish aging industrial buildings and would better connect through infrastructure improvements the Project Site to Downtown.
	Create Inclusive Communities	Provide targeted mortgage, rental and small business assistance to Equity Priority Communities	Not applicable. This action is not directly applicable to the Project as it requires Municipal action.
		Accelerate reuse of public and community-owned land for mixed-income housing	Not applicable. This action is not directly applicable to the Project as the Project does not utilize any public or community-owned land and it would not develop housing.
Economic Strategies	Improve Economic Mobility	Implement a statewide universal basic income	Not applicable. This action is not directly applicable to the Project as it requires statewide action.
		Expand job training and incubator programs	Not applicable. This action is not directly applicable to the Project as it requires municipal action.

		Invest in high-speed internet in underserved low-income communities	Not applicable. This action is not directly applicable to the Project as it requires municipal action.
	Shift the Location of Jobs	Allow greater commercial densities in Growth Geographies	Not applicable. This action is not directly applicable to the Project as it requires municipal action. The proposed would increase office/R&D density on the Project Site, which is within a Growth Geography.
		Provide incentives to employers to shift jobs to housing-rich areas well served by transit	Not applicable. This action is not directly applicable to the Project; however, the proposed Project would co-locate jobs in proximity to the Caltrain Station and Downtown, where new housing is being built.
		Retain and invest in key industrial lands	Consistent. The Project would develop R&D uses on land designated for such use.
Transportation Strategies	Maintain and Optimize the Existing System	Restore, operate and maintain the existing system	Not applicable. This action is not directly applicable to the Project. However, the Project would include improved intersections, shared use lanes, improved pedestrian connections and improved roadways within the project limits that would benefit roadways, pedestrian and bicycle circulation systems.
		Support community-led transportation enhancements in Equity Priority Communities.	Not applicable. This action is not directly applicable to the proposed Project. However, the Project would include improved intersections, shared use lanes, improved pedestrian connections and improved roadways within the project limits that would enhance transportation in the community.
		Enable a seamless mobility experience	Not applicable. This action is not directly applicable to the Project as it requires coordination among the regions existing transit agencies.

		Reform regional transit fare policy	Not applicable. This action is not directly applicable to the Project as it requires coordination among the regions existing transit agencies.
		Implement per-mile tolling on congested freeways with transit alternatives	Not applicable. This action is not directly applicable to the Project as it requires regional/Caltrans action.
		Improve interchanges and address highway bottlenecks	Not applicable. This action is not directly applicable to the Project. The Project would implement TDM programs and would include improved intersections, shared use lanes, improved pedestrian connections and improved roadways within the project limits that would benefit transportation and decrease single-occupancy commuter vehicles.
		Advance other regional programs and local priorities	Not applicable. This action is not directly applicable to the proposed Project. The Project would include improved intersections, shared use lanes, improved pedestrian connections and improved roadways within the project limits, which would help fulfill local transportation priorities.
	Create Healthy and Safe Streets	Build a Complete Streets network	Consistent. The proposed Project would enhance streets to promote walking, biking, and other micro-mobility by improving biking and walking networks and providing bicycle amenities.
		Advance regional Vision Zero policy through street design and reduced speeds	Consistent. The Project would comply with City of South San Francisco requirements in support of Vision Zero.
	Build a Next-Generation Transit Network	Enhance local transit frequency, capacity and reliability	Not applicable. This action is not directly applicable to the proposed Project; however, the project will participate in the existing County run shuttles as well as the areawide East 101 District Shuttle program operated by Genentech and funded by private developments in the area.

Environmental Strategies		Expand and modernize the regional rail network	Not applicable. This action is not directly applicable to the Project as it requires regional and state level action.
		Build an integrated regional express lanes and express bus network	Not applicable. This action is not directly applicable to the proposed Project as it requires regional and Caltrans action.
	Reduce Risks from Hazards	Adapt to sea level rise	Not applicable. This action is not directly applicable to the proposed Project as it requires regional and municipal action. As part of the Project design, building finished floor elevations would meet City of South San Francisco code.
		Provide means-based financial support to retrofit existing residential buildings	Not applicable. This action is not directly applicable to the Project as the Project does not include retrofit of any existing buildings.
		Fund energy upgrades to enable carbon neutrality in all existing commercial and public buildings	Not applicable. The Project is new construction and would not convert any existing buildings. The Project would replace older, less efficient buildings with new efficient buildings.
	Expand Access to Parks and Open Space	Maintain urban growth boundaries	Consistent. The Project would be constructed within an incorporated city on a site currently developed with urban uses.
		Protect and manage high-value conservation lands	Not applicable. This action is not directly applicable to the Project as the Project is not located in high-value conservation lands.
		Modernize and expand parks, trails and recreation facilities	Consistent. The Project would include a publicly accessible open space for employees, visitors, and the surrounding neighborhood.
	Reduce Climate Emissions	Expand commute trip reduction programs at major employers	Consistent. The Project would implement trip reduction programs as part of the TDM program. See above regarding potential TDM measures.
		Expand clean vehicle initiatives	Consistent. The Project would provide designated parking and charging facilities for electric vehicles.

		Expand transportation demand management initiatives	Consistent. The proposed Project would implement TDM programs that is designed to meet a target of 45 percent alternative mode usage.
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Pursuant to California Public Resources Code Section 21155.4, further environmental review of projects that meet the foregoing statutory criteria is required only if any of the events specified in Public Resources Code Section 21166 have occurred. Public Resources Code Section 21166 requires further environmental review when:

- Substantial changes are proposed in the project that will require major revisions of the EIR;
- Substantial changes occur in the circumstances under which the project is undertaken that will require major revisions to the EIR; or
- New information becomes available that was not known and could not have been known at the time the EIR was certified.

CEQA Guidelines Sections 15162 through 15164 further clarify the implementation of Public Resources Code Section 21166. Guidelines Section 15162 establishes that a subsequent EIR is not required unless:

- Substantial changes are proposed in the project that require major revisions to the previous EIR due to the involvement of new or substantially more severe environmental impacts;
- Substantial changes occur in the circumstances under which the project is undertaken that require major revisions to the previous EIR due to the involvement of new or substantially more severe environmental impacts; or
- New information of substantial importance that was not known and could not have been known at the time the EIR was certified shows:
 - The project will have new or substantially more severe environmental impacts.
 - Mitigation measures or alternatives that (i) previously were found infeasible are in fact feasible or (ii) are considerably different than those identified in the EIR, would substantially reduce environmental impacts, but the project proponent declines to adopt them.

The California Supreme Court explained these limits on redundant subsequent CEQA review in *Friends of College of San Mateo Gardens v. San Mateo County Community College Dist.* (2016) 1 Cal. 5th 937, 950:

Once a project has been subject to environmental review and received approval, Section 21166 and CEQA Guidelines 15162 limit the circumstances under which a subsequent or supplemental EIR must be prepared. These limitations are designed to balance CEQA's central purpose of promoting consideration of the environmental consequences of public decisions with interests of finality and efficiency.

USE OF PUBLIC RESOURCES CODE SECTION 21166 WITH THE DSASP EIR

As noted above, the City is required to evaluate the Project under Public Resources Code Section 21166 with respect to the DSASP EIR. This environmental consistency checklist ("Checklist") uses the CEQA Guidelines Appendix G Environmental Checklist modified for use in the context of Public Resources Code Section 21166. In other words, the Checklist addresses each of the Appendix G topic areas, but instead of asking whether there would be impacts in the first instance, the Checklist asks whether there would be new or substantially more severe impacts, or mitigation measures or alternatives that would substantially reduce impacts, as defined in Public Resources Code Section 21166 and Guidelines Section 15162.

ANALYSIS

The information and analysis presented in the accompanying Checklist demonstrates that no further environmental review is required for the Project because it is within the scope of the DSASP EIR and none of the events specified in Public Resources Code Section 21166 or Guidelines Section 15162 have occurred since the certification of the DSASP EIR.

Aesthetics

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Aesthetics -					
Would the Project:					
a) Have a substantial adverse effect on a scenic vista?	No	No	No	N/A	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No	No	No	N/A	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No	No	No	N/A	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No	No	No	N/A	No

Discussion: SB 743, enacted in 2013, added Chapter 2.7 to the Public Resources Code and exempts from environmental consideration aesthetic impacts of an employment center project on an infill site within a transit priority area. Because the Project is an employment center project on an infill site within a transit priority area, aesthetic impacts of the Project are not considered significant impacts, and the discussion of aesthetics that follows is for informational purposes only.

The DSASP EIR indicated that the study area does not include any panoramic view of scenic resources and that implementation of the DSASP would not have a substantial adverse effect on a scenic vista. (DSASP EIR, pp. 4.1-9–10.) Implementation of the proposed DSASP project would not substantially damage scenic resources, the impact for which would be less than significant with no mitigation required. (DSASP EIR, p. 4.1-10.) Further, implementation of the DSASP would not degrade the existing visual character or quality of the site and its surroundings. (DSASP EIR, p. 4.1-13.) No new sources of substantial light or glare would result from implementation of the DSASP and no further analysis was required in the EIR. (DSASP EIR, p. 4.1-8.) Cumulative impacts on scenic vistas and scenic vistas within a state scenic highway and visual character and quality all would be less than significant. (DSASP EIR, pp. 4.1-13–14.)

Analysis of the Project

The Project proposes building heights—8 to 10 stories—that are consistent with DSASP land use designations applicable to the Project Site. Consistent with the conclusions of the DSASP EIR, implementation of the DSASP through the Project would not have a substantial adverse effect on a scenic vista.

As anticipated by the DSASP EIR, the Project would have the potential to include sources of light and glare, such as security lighting or new glass panels on building structures. The Project would replace existing buildings that also include lighting and glass. The surrounding area, however, currently is developed with similar land uses. The Project, therefore, would not result in a substantial net increase in nighttime lighting or daytime glare sources. In addition, the City Municipal Code includes multiple building and construction regulations and zoning requirements intended to minimize localized light and glare impacts. (*See e.g.*, SSFMC § 20.300.010.G.) The Project would comply with the DSASP Performance Standards, which require that all new pedestrian light fixtures be designed to focus light onto sidewalks and to minimize light spillover into adjacent upper level building windows or into the night sky.

The Project therefore will not have any adverse impacts on scenic views, will not degrade scenic resources, and will not create a new source of substantial light and glare that would adversely affect day or nighttime views in the area. Therefore, the Project would not adversely affect the visual quality and aesthetics of the Project Site. The Project is consistent with the DSASP EIR analysis and would not result in any aesthetic impacts not analyzed in the DSASP EIR. Given that the Project would remain consistent with all established City standards and will adhere to established restrictions, guidelines, standards, policies, and criteria, the Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to aesthetic resources as compared to the conclusions reached in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce aesthetics impacts identified in the DSASP EIR, and no new information related to aesthetics exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Agricultural Resources

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
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AGRICULTURAL RESOURCES: – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the Project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	No	No	No	N/A	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No	No	No	N/A	No

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	No	No	No	N/A	No
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No	No	No	N/A	No
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No	No	No	N/A	No

Discussion: The DSASP EIR indicated that the environmental impacts related to agricultural resources were not considered significant. (DSASP EIR, p. 1-2.) The DSASP EIR study area is located in an urbanized area of San Mateo County and is currently developed with commercial, industrial, and residential uses. (DSASP EIR, p. 5-1.) The DSASP EIR indicated that the area has not been designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; no agricultural uses or related operations are present in the study area or its vicinity; and that the area is not zoned for agricultural uses. Therefore, the DSASP EIR found that there would be no impact on agricultural resources as a result of implementation of the DSASP.

Analysis of the Project

The Project is consistent with the DSASP EIR's analysis. The Project will be constructed on a Project Site that is currently developed with and surrounded by industrial uses. As such, the Project would not result in any agricultural resources impacts. The Project also would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to agricultural resources as compared to the conclusions reached in the DSASP EIR. The Project does not include substantial changes relative to the DSASP EIR, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce agricultural resources impacts identified in the DSASP EIR, and no new information

related to agricultural resources exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Air Quality

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
AIR QUALITY - Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.					
Would the Project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	No	No	No	N/A	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	No	No	No	Yes	No
c) Expose sensitive receptors to substantial pollutant concentrations?	No	No	No	Yes	No
d) Result in other emissions (such as those leading to odors) affecting a substantial number of people?	No	No	No	Yes	No

Discussion: The DSASP EIR indicated that implementation of the DSASP has the potential to conflict with or obstruct implementation of the 2010 Clean Air Plan. (DSASP EIR, p. 4.2-12.) Although implementation of mitigation measure MM4.2-2 would reduce this impact, it would not be reduced to a

less-than-significant level. MM4.2-2 requires project-specific implementation of recommended BAAQMD operational mitigation measures as necessary to reduce operational emissions of criteria air pollutants to below significance criteria. (DSASP EIR, p. 4.2-21.) The recommended measures include, but are not limited to, increasing on-street parking fees; daily parking charges for employees; providing a parking “cash-out” incentive for employees who use alternative transportation to commute; providing subsidized or free transit passes to employees; encouraging alternative compressed work schedules and telecommuting; and providing a ridesharing program. (DSASP EIR, pp. 4.2-21–22.) Notwithstanding this mitigation measure, the DSASP EIR concluded that, this impact would remain a significant and unavoidable impact. (DSASP EIR, pp. 4.2-14–15.)

The DSASP EIR found that implementation of the DSASP would result in construction air pollutant emissions. (DSASP EIR, p. 4.2-16.) The DSASP EIR’s estimate of construction emissions indicated that development allowed under the proposed project would result in significant emissions of ROG and NO_x during construction and that a potentially significant impact would occur. (DSASP EIR, p. 4.2-17.) Implementation of mitigation measure MM4.2-1 has the potential to reduce construction emissions. MM4.2-1 requires implementation of the BAAQMD Basic and Additional Construction Mitigation Measures as necessary for individual projects to reduce construction emissions to below significance thresholds. (DSASP EIR, p. 4.2-17.) The recommended measures include, but are not limited to, watering for dust control, limiting onsite speeds, requiring low-VOC coatings, and using construction equipment and trucks with Best Available Control Technology for NO_x and PM. (DSASP EIR, p. 4.2-18.) Implementation of the Additional Construction Mitigation Measures would reduce construction emissions of ROG but not NO_x to below significance criteria. Therefore, even with implementation of mitigation, construction emissions would be a significant and unavoidable impact. (DSASP EIR, p. 4.2-22.)

The DSASP EIR found that implementation of the DSASP would result in operational air pollutant emissions from area and vehicular sources. (DSASP EIR, pp. 4.2-16, -18.) Area sources of air pollutant emissions associated with the proposed project include fuel combustion emissions from space and water heating, fuel combustion from landscape maintenance equipment, and ROG emissions from periodic repainting of interior and exterior surfaces. (DSASP EIR, pp. 4.2-19–20.) Implementation of the DSASP would not result in significant ROG, NO_x, CO, SO₂, and PM_{2.5} emissions because emissions of NO_x and CO would be reduced at the planning horizon of the plan compared to existing conditions, and emissions of ROG and PM_{2.5} would not exceed the significant thresholds. (DSASP EIR, p. 4.2-20.) The DSASP EIR found that implementation of the DSASP would result in a level of PM₁₀ emissions that would exceed the significance thresholds. (DSASP EIR, pp. 4.2-20–21.) Mitigation measure MM4.2-2 requires compliance with BAAQMD operational mitigation measures as necessary to reduce operational emissions of criteria air pollutants to below significant criteria. (DSASP EIR, p. 4.2-22.) Even with implementation of MM4.2-2, however, the DSASP EIR concluded that operational emissions would be significant and unavoidable impacts since the mitigation measure cannot guarantee that emissions would be lessened to below a significance level. (*Id.*)

In addition, implementation of the DSASP would result in a cumulatively considerable contribution with respect to conflicts with air quality plans since the proposed project has the potential to hinder implementation of the Clean Air Plan. (DSASP EIR, p. 4.2-28.) Also, the construction and operation of the DSASP has the potential to exceed significance criteria for criteria pollutants; therefore, the DSASP would result in a cumulatively considerable contribution to a potentially significant cumulative impact associated with criteria pollutants. (DSASP EIR, p. 4.2-29.) The DSASP, in combination with other cumulative projects in the region, would result in a less than significant cumulative impact associated with sensitive receptors. (DSASP EIR, pp. 4.2-29–30.) Finally, the DSASP, in combination with other

cumulative projects, would result in a less than significant cumulative impact associated with objectional odors. (DSASP EIR, p. 4.2-30.)

The DSASP EIR also found that implementation of the DSASP would expose sensitive receptors to substantial pollutant concentrations. (DSASP EIR, p. 4.2-22.) Although considered a potentially significant impact, implementation of mitigation measures MM4.2-3 and MM4.2-4 would reduce this impact to a less-than-significant level. (DSASP EIR, p. 4.2-24–25.) Mitigation measures MM4.2-3 requires health risk assessments for development of projects that would introduce new sensitive receptors in the study area within the siting distance for certain uses. (DSASP EIR, p. 4.2-25.) Mitigation measure MM4.2-4 requires health risk assessments before approval of any project that includes potential sources of TAC emissions that are not subject to a BAAQMD permit and in close proximity to a sensitive receptor. The Project would not result in the siting of new sensitive land uses in close proximity to TAC sources and does not include potential sources of TAC emissions that are not subject to a BAAQMD permit and in close proximity to a sensitive receptor (the Project is located over 1,000 feet from the nearest existing sensitive receptor). Therefore, an HRA is not required. (DSASP EIR, p. 4.2-26.)

Finally, implementation of the DSASP would create objectionable odors affecting a substantial number of people. (DSASP EIR, p. 4.2-27–28.) This is considered a potentially significant impact; however, implementation of mitigation measure MM4.2-6 would reduce this impact to a less-than-significant level. (*Id.*) Mitigation measure MM4.2-6 would require the demonstration of implementation of best management practices to minimize odors before issuance of a certificate of occupancy for new industrial land uses identified in the BAAQMD CEQA Guidelines or ARB Air Quality and Land Use Handbook as a typical source of odors. (DSASP EIR, p. 4.2-28.)

Analysis of the Project

The Project is consistent with the analysis in the DSASP EIR. Since the circulation of the DSASP EIR, BAAQMD has adopted the 2017 Clean Air Plan (“CAP”), which updates the 2010 CAP. As with the 2010 CAP, the 2017 CAP is designed to limit emissions of reactive organic gases and nitrogen oxides into the atmosphere. Consistency with the CAP can be determined if a project: 1) supports the goals of the CAP; 2) includes applicable control measures from the CAP; and 3) would not disrupt or hinder implementation of any control measures from the CAP. The primary goals of the CAP are to: attain air quality standards; reduce population exposure and protect public health in the Bay Area; and reduce GHG emissions and protect climate. The control strategies of the CAP include measures in the following categories: stationary source measures, transportation measures, energy measures, building measures, agricultural measures, natural and working lands measures, waste management measures, water measures, and super-GHG pollutants measures.

Construction of the Project would comply with mitigation measures MM4.2-1 and MM4.2-2 contained in the DSASP EIR. Further, construction technologies have improved and regulations for construction equipment emissions have become more stringent since 2014, so construction-related equipment emissions would likely be less than those disclosed in the DSASP EIR.

In addition, operational mobile source impacts would be reduced through implementation of a TDM program, which, as discussed in the transportation impacts analysis in this Checklist, has been highly successful in nearby developments reducing trips. Even with these mitigation measures, however, it is anticipated that the Project would exceed BAAQMD thresholds for operational and construction emissions, and as a result would be inconsistent with the 2017 CAP, resulting in the same significant and unavoidable impacts identified in the DSASP EIR with respect to inconsistency with the CAP’s goals and operational and construction air quality emissions.

The Project does not include uses that would emit substantial pollutant concentrations that would significantly impact sensitive receptors. New diesel emergency back-up generators for the office/R&D buildings will be required as a safety requirement and to provide backup power for laboratories. These generators would be required to obtain permits from BAAQMD and to comply with applicable regulations. Because the operation of such generators is expected to be limited to emergencies, emissions of criteria air pollutants from anticipated Project emergency generator operations are expected to be minimal and regulated by the BAAQMD. The DSASP EIR concludes that emissions sources that require a BAAQMD permit would not result in a substantial increase in risk of exposure to TAC emissions. (DSASP EIR, p. 4.2-24.) Thus, the Project is consistent with the DSASP EIR's conclusions and it would not expose sensitive receptors to substantial pollutant concentrations.

R&D uses in the Project would not emit objectionable odors and would conform to all applicable air quality regulations. Thus, the Project is consistent with the DSASP EIR's conclusions that operational odor impacts would be less than significant.

Further, because the Project will conform to an aggressive TDM program that will substantially reduce vehicle trips, the Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to air quality. Therefore, the Project is consistent with the DSASP EIR's conclusion regarding a potentially significant cumulative impact associated with criteria pollutants. (DSASP EIR, p. 4.2-29.)

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce air quality impacts identified in the DSASP EIR, and no new information related to air quality exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Biological Resources

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
BIOLOGICAL RESOURCES -					
Would the Project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	No	No	No	N/A	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	No	No	No	N/A	No
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No	No	No	N/A	No

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No	No	No	N/A	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No	No	No	N/A	No
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No	No	No	N/A	No

Discussion: The DSASP EIR indicated that the environmental impacts related to biological resources were not considered significant. (DSASP EIR, p. 1-2.) The DSASP EIR indicated that the study area is currently developed with residential, commercial, and office uses, and that there are no large open spaces in the project area. (DSASP EIR, p. 5-1.) The study area is not located in an area that supports biological resources. (*Id.*) Construction and development associated with implementation of the DSASP EIR would not occur within an area containing habitat that supports biological resources. (DSASP EIR, p. 5-2.) Further, there is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat plan that is applicable to the study area. (*Id.*) The DSASP EIR indicated that landscaping vegetation within the study area could provide potential nesting habitat for migrating birds, but that access to and use of native wildlife nursery sites would not be substantially interrupted by the proposed project. (DSASP EIR, p. 5-2.)

Analysis of Project

The Project is consistent with the DSASP EIR's analysis. The Project will be constructed on a Project Site that is currently developed with and surrounded by industrial uses. Further, for any trees that are planned to be removed for Project development, the Project will comply with the City's Tree Preservation Ordinance (South San Francisco Municipal Code ("SSFMC"), Ch. 13.30) with respect to the existing landscaping trees that must be removed to allow for the Project. Tree and vegetation removal is not expected to occur as part of the Project. However, any tree or vegetation removal that might occur will be completed in compliance with the City's Tree Preservation Ordinance (South San Francisco Municipal Code ("SSFMC"), Ch. 13.30) and California Fish and Game Code provisions (including sections 3503,

3513, and/or 3800) protective of nesting birds. Therefore, the Project is consistent with the DSASP EIR's conclusion that access to and use of native wildlife nursery sites will not be substantially interrupted. As such, the Proposed Project would not result in any biological resources impacts that were not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to biological resources as compared to the conclusions reached in the DSASP EIR.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce biological resources impacts identified in the DSASP EIR, and no new information related to biological resources exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Cultural Resources/Tribal Cultural Resources

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
CULTURAL RESOURCES/TRIBAL CULTURAL RESOURCES -					
Would the Project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in Guidelines § 15064.5?	No	No	No	Yes	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Guidelines § 15064.5?	No	No	No	Yes	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	No	No	No	N/A	No

d) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

No

No

No

N/A

No

Discussion: The DSASP EIR indicated that implementation of the DSASP could cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5. (DSASP EIR, p. 4.3-11.) Implementation of mitigation measure MM4.3-1 would require a qualified professional to conduct site-specific historical resource evaluations for future developments within the study area that would demolish or otherwise physically affect buildings or structures 45 years old or older or would otherwise affect their historic setting. (*Id.*) This impact would remain significant due to the potential for future physical demolition of a historical resource. (*Id.*)

Development projects under the DSASP are required through mitigation measures MM4.3-2 through MM4.3-4, if applicable, to conduct preconstruction surveys of previously undisturbed soils, to retain an archaeologist to document any cultural resources within the development area; require that earth-moving activities be halted if an archaeological resource is discovered; and require that all construction personnel

receive environmental awareness training. (DSASP, p. 4.3-13.) Implementation of these mitigation measures would reduce this impact to less than significant. (*Id.*)

Compliance with Public Resources Code Section 5097.98 would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant and no mitigation would be required. (DSASP EIR, p. 4.3-15.)

Finally, the DSASP EIR does not identify any significant tribal cultural resources within the DSASP area.

Analysis of Project

The Project will be constructed on a portion of the Project Site that is currently developed. Before development of the existing 100 East Grand Avenue building, the Project Site was developed with surface parking, access roads, and industrial uses, and so was already a disturbed site. The area thus is developed and has been disturbed through multiple stages of development.

The existing buildings on the Project Site are more than 50 years old. Consistent with DSASP mitigation measure MM4.3-1, the applicant retained a historic resource professional to conduct a site-specific historical resource evaluation of the existing buildings on the Project Site (Attachment A to this analysis). The historic resource professional confirmed that the existing buildings are not historic and that the Project would not cause a substantial adverse change in the significance of a historical resource. In addition, the Project will implement MM4.3-3 and MM4.3-4, which require that earth-moving activities be halted if an archeological resource is discovered and that all construction personnel receive environmental awareness training.

Regarding tribal cultural resources, there are no known tribal cultural resources beyond what is anticipated as an archeological resource; therefore, impacts on any unknown tribal cultural resources would be equally reduced to less than significant by implementing the mitigation measures for unknown archeological resources introduced above.

As such, the Project would not result in any cultural, historical, or tribal resources impacts that were not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to cultural, historical, or tribal resources as compared to the conclusions reached in the DSASP EIR.

In the event a cultural or historical resource is discovered during Project construction, compliance with Public Resources Code Section 21083.2(b) and Guidelines Section 15126.4(c) will be implemented, which require avoidance of the resource, preservation of the resource in place, or, if preservation in place is not feasible, the excavation and analysis of the “scientifically consequential information from or about the resource.” Regarding tribal resources, compliance with Public Resources Code Section 5024.1(c) would help the City, in coordination with a California Native American tribe, better understand and analyze whether a resource should be listed as a historical resource, and whether any impacts to that resource would be significant. Compliance with existing laws regarding impacts to cultural or tribal resources will ensure that impacts remain less than significant.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce cultural resources or tribal cultural resources impacts identified in the DSASP EIR, and no new information related to cultural resources or tribal cultural resources exists that meet the thresholds of Public Resources Code Section 21166 or CEQA Guidelines Section 15162.

Energy

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
ENERGY -					
Would the Project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	No	No	No	Yes	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No	No	No	Yes	No

Discussion: The DSASP EIR found that the DSASP is consistent with the City’s General Plan Public Facilities Element because, although future development under the DSASP could include the expansion of energy infrastructure, electricity demand generated by future development projects could be supplied without the need for additional construction or expansion of energy facilities beyond that which was previously planned. (DSASP EIR, p. 4.11-52.) Therefore, DSASP EIR found that the DSASP would not conflict with the applicable goals, objectives, and policies of the City’s General Plan Public Facilities Element.

The DSASP EIR stated that implementation of the DSASP would not require or result in the construction of new energy production or transmission facilities, or expansion of existing facilities, the construction of which could cause a significant environmental impact. (DSASP EIR, 4.11-53–54.) Even though the DSASP would increase the use of electricity within the study area, the DSASP would also be required to comply with the energy conservation measures contained in Title 24, which would reduce the amount of energy needed for the operation of any buildings constructed as part of the Specific Plan. (DSASP EIR, pp. 4.11-53–54.) Electricity and natural gas are currently provided to the project site by PG&E. South San Francisco also has partnered with Peninsula Clean Energy (PCE), a Community Choice Aggregation, which allows the purchase of electricity from renewable sources through PG&E infrastructure.

PG&E confirmed that existing energy supplies and infrastructure would be adequate to serve the DSASP. (DSASP EIR, p. 4.11-54.) In addition, the natural gas demand projected for the DSASP would not exceed available or planned supply, and new infrastructure for natural gas would not be required to serve the study area. (DSASP EIR, p. 4.11-55.)

Finally, cumulative energy impacts would be less than significant since PG&E is able to meet future projected demands, and an action plan has been identified to address energy issues on a broader scale.

(DSASP EIR, p. 4.11-55-56.) Also, the cumulative impact related to the supply of natural gas and to the need for additional or expanded facilities is less than significant. (DSASP EIR, p. 5.11-56.)

Analysis of Project

The Project would have an incremental increase in the demand on utilities and services, such as nonrenewable energy resources, for construction and operation of the Project. The Project Site's current building and other buildings in the vicinity are being served by existing utility capacities. Further, PG&E infrastructure already is present on the Project Site. The Project Site is already subject to all applicable federal, state, and local energy standards and efficiency regulations. In addition, because the Project is both within the DSASP EIR plan area boundary and within development assumed by the DSASP EIR, Project demand would be within what was projected for the DSASP EIR.

The Project would not result in a new or substantially increased significant impact with respect to energy consumption. Although the Project would be anticipated to generate some additional energy demand, the Project would continue to be consistent with all applicable energy standards. Buildings anticipated when the DSASP EIR was adopted in 2014 would have been constructed under the 2013 version of Title 24, Parts 6 and 11 (Building Energy Efficiency Standards). There have since been two updates, with each update resulting in more energy efficient buildings. The California Energy Commission estimated that non-residential buildings constructed to meet the 2019 Title 24 standards would use about 30 percent less energy due mainly to lighting upgrades compared to buildings constructed to meet 2016 Title 24, and likely even more energy savings compared to the 2013 Title 24 standards assumed in the DSASP EIR analysis. (See https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf.)

In addition, the Project is proposed to meet the standards for Leadership in Energy and Environmental Design ("LEED") Gold certification, which encourages the construction of energy and resource-efficient buildings. In sum, the Project would achieve efficient energy usage through compliance with revised Title 24 requirements, LEED Gold standards, and energy efficiency design features. Therefore, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources.

Further, due to the Project Site's proximity to the Caltrain station and that the Project would implement a TDM program, the Project would not increase transportation energy use from employees or other visitors to the Project Site and may actually reduce vehicle trips relative to existing uses on the Site. Because the Project is being developed in an urban area that is already served by existing utilities and transit services, and that the Project would be developed to achieve efficient energy usage, the Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to energy.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce energy impacts identified in the DSASP EIR, and no new information related to energy demand exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Geology and Soils

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
GEOLOGY AND SOILS -					
Would the Project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	No	No	No	N/A	No
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	No	No	No	N/A	No
ii) Strong seismic ground shaking?	No	No	No	N/A	No
iii) Seismic-related ground failure, including liquefaction?	No	No	No	N/A	No
iv) Landslides?	No	No	No	N/A	No
b) Result in substantial soil erosion or the loss of topsoil?	No	No	No	N/A	No
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	No	No	No	N/A	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	No	No	No	N/A	No

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No	No	No	N/A	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No	No	No	N/A	No

Discussion: The DSASP EIR determined that there would be a less-than-significant impact on geology and soils as a result of implementation of the proposed project. (DSASP EIR, pp. 1-2, 5-4.) No known active or potentially active faults traverse the study area and the study area is not subject to a substantial risk of surface fault ruptures. (DSASP EIR, p. 5-2.) Despite this, portions of the study area are located in areas potentially subject to extremely high or very high levels of ground shaking. (DSASP EIR, p. 5-3.)

The structural design of any proposed buildings must adhere to state and City building code standards, such as the California Building Code (“CBC”), which defines minimum acceptable levels of risk and safety. (*Id.*) In addition, all construction activities would comply with CBC Chapter 18, regulating grading activities, including drainage and erosion control. (*Id.*) Development would also be required to comply with a NPDES general permit for construction activities, requiring construction site erosion and sedimentation control best management practices to be implemented. (*Id.*)

Finally, the DSASP EIR found that implementation of the DSASP could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, which is considered a potentially significant impact. (DSASP EIR, p. 4.3-14.) The DSASP EIR found that implementation of mitigation measures MM4.3-5 and MM4.3-6 would reduce this impact to less than significant. (*Id.*) Mitigation measure MM4.3-5 requires a project applicant to retain a professional paleontologist to determine if the project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature before any earth-disturbing activities that could encounter undisturbed soils. (*Id.*) Mitigation measure MM4.3-6 requires construction to stop within 100 feet of the find and notification of the City should paleontological resources or unique geologic features be identified at a particular site during project construction. (DSASP EIR, p. 4.3-15.)

Analysis of Project

The Project is consistent with the DSASP EIR analysis. The Project would continue to comply with California Building Code standards and the recommendations of a Geotechnical Engineer and would conform to structural design plans. With respect to paleontological resources or unique geologic features, implementation of mitigation measures MM4.3-5 and MM4.3-6, which require the retaining of a professional paleontologist to determine if the Project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature and the ceasing of construction activities if such paleontological resources or unique geologic features are identified at the site during construction, respectively, would reduce this impact to less than significant. (DSASP EIR, p. 4.3-14.) The Project will implement mitigation measures MM4.3-5 and MM4.3-6. With respect to cumulative geology and soils impacts, the Project would be one of numerous sites anticipated to undergo development/redevelopment

in the vicinity and would contribute to a cumulative increase in sites facing these impacts. However, each new development, including the Project, must comply with state, regional, and local laws concerning erosion control and storm water pollution. As such, the Project-specific contribution would be reduced through applicable measures and would be less than cumulatively considerable.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce geology and soils impacts identified in the DSASP EIR, and no new information related to geology and soils exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Greenhouse Gas Emissions

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
GREENHOUSE GAS EMISSIONS -					
Would the Project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	No	No	No	Yes	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No	No	Yes	No

Discussion: The DSASP EIR determined that construction emissions within the study area are not cumulatively considerable if development incorporates the BAAQMD recommended BMPs and is consistent with the General Plan policies and the City’s Climate Action Plan (“City CAP”) policies regarding construction. (DSASP EIR, p. 4.4-20.) The City CAP demonstrates how the City will reduce GHG emissions in conjunction with other State requirements. (DSASP EIR, p. 4.4-17.) In addition, the DSASP EIR noted that the City CAP is more stringent than BAAQMD thresholds, and if a project was able to meet the City CAP requirements, the project will not hinder the region’s ability to meet AB 32 goals. (DSASP EIR, p. 4.4-21.)

Regarding cumulative construction impacts, the DSASP EIR states that implementation of the General Plan and City CAP policies, along with mitigation measure MM4.4-1, which requires incorporation of most recent BMPs for GHGs as indicated by BAAQMD, would reduce the impact to less than cumulatively significant level. (DSASP EIR, pp. 4.4-22–23.) In addition, incorporation of the General Plan and City CAP policies would reduce the generation of waste from construction activities and reduce the emission of GHGs associated with waste disposal and decomposition. (DSASP EIR, p. 4.4-23.)

Regarding cumulative operational impacts, the DSASP EIR concluded that, with the incorporation of mitigation measures, the proposed DSASP emissions would meet the City CAP threshold of 3.08 MT CO₂e per service population by 2035. (DSASP EIR, p. 4.4-24.) MM4.4-2 through MM4.4-10 concerns expanding public and private transit programs, smart parking policies, expansion of alternative-fuel vehicles, reducing emissions of off-road vehicles, maximizing energy efficient in built environment through standards and the plan review process, addressing heat island issues, promoting energy information sharing and education, energy reduction, and water reduction, respectively. (DSASP EIR, pp. 4.4-24–26.) With implementation of mitigation measures MM4.4-2 through MM4.4-10, this cumulative impact would be less than significant. (*Id.*)

Moreover, the DSASP EIR indicated that VMT generated under the DSASP could further or hinder the region's ability to achieve SB 375 targets. (DSASP EIR, p. 4.4-26.) With implementation of mitigation measures MM4.4-1 through MM4.4-10, however, this potentially significant cumulative impact would be reduced to a less than significant level. (DSASP EIR, p. 4.4-27.)

Analysis of Project

The Project is consistent with the analysis in the DSASP EIR. The Project will incorporate the BAAQMD recommended BMPs, would be consistent with all applicable General Plan policies and City CAP policies regarding construction, and will implement mitigation measures MM4.4-1 through MM4.4-10, which incorporate the applicable measures from the City CAP, to reduce any GHG impacts anticipated from implementation of the Project. Therefore, the Proposed Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to greenhouse gas emissions.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce air quality impacts identified in the DSASP EIR, and no new information related to air quality exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Hazards and Hazardous Materials

Issues	Could Proposed Changes Involve New Significant Impacts or More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Hazards and Hazardous Materials -					
Would the Project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No	No	No	N/A	No
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	No	No	No	N/A	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No	No	No	N/A	No
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No	No	No	N/A	No

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No	No	No	N/A	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No	No	No	N/A	No
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	No	No	No	N/A	No

Discussion: The DSASP EIR concluded that there would be no impact with regard to hazards and hazardous materials as a result of implementation of the DSASP. (DSASP EIR, pp. 1-2, 5-6.) Particularly, safety procedures for the use, storage, transportation, and disposal of hazardous materials are mandated by the federal, state, and local laws and regulations (including RCRA and the California Waste Control Law), and principles prescribed by the US Department of Homeland Security and Cal OSHA. These safety procedures, laws, regulations, and principles would reduce the risks to employees, visitors, or the nearby public resulting from the routine use, transport, or disposal of hazardous materials to less-than-significant levels. (DSASP EIR, p. 5-4.)

As described in the DSASP EIR, there are several open and closed hazardous materials cases within the DSASP area. The DSASP EIR concluded that redevelopment and development activities would be required to comply with all applicable regulations for remediation of hazards, and that compliance with those legal requirements would reduce related impacts to less-than-significant levels. (DSASP EIR at p. 5-5.)

The study area is located approximately 0.75 mile north of the San Francisco International Airport (“SFO”). The study area is located outside of all airport Safety Compatibility Zones; however, the study area is located within Airport Influence Area B of SFO and is subject to FAA notification requirements. (DSASP EIR, p. 5-5.)

Finally, the study area is currently urbanized and intensified development would not introduce new land uses to the study area that would physically interfere with emergency response. (*Id.*)

Analysis of the Project

The Project is consistent with the analysis in the DSASP EIR. Excavation and earth moving work for the Project would comply with Cal-EPA, Cal/OSHA, and/or Regional Water Quality Control Board requirements, as applicable, and with dust suppression and other procedures as required by applicable laws and regulations.

There is no current environmental agency oversight for the 100 E Grand portion of the Project site. Previous environmental investigations at 105 Associated Road identified Volatile organic compounds (VOCs) in soil vapor and shallow groundwater, primarily on the northeastern side of 105 Associated Road and beneath the northeastern portion of the building at 105 Associated Road. The contamination likely resulted from historical incidental surficial releases of chemicals related to former on-site operations and improper storage of chemicals by occupants and/or the adjacent business operations. 105 Associated Road is under a voluntary oversight agreement with the San Mateo County Department of Environmental Health (SMCDEH), and in 2017 a soil vapor extraction system was installed underneath the building at 105 Associated Road to mitigate potential vapor intrusion concerns. Soil characteristics and relatively low groundwater concentrations indicate that active groundwater remediation is not warranted (and would be unlikely to be effective). The extent of VOCs has been characterized, vapor intrusion measures appear to appropriately protect occupants at 105 Associated Road, and no active remediation is warranted under the current land use. Aside from routine monitoring, SMCDEH has no other requests for investigation or remediation at the site under the current land use.

105 Associated Road will remain under the jurisdiction of SMCDEH pursuant to the voluntary oversight agreement with the agency, and the applicant would be required to comply with any regulatory orders or requirements imposed by SMCDEH related to hazard remediation. Therefore, consistent with the analysis in the DSASP EIR, the project would be required to comply with regulatory requirements related to hazard remediation that would address any potential impacts related to soil and groundwater contamination. With respect to airport-related safety hazard, the Project Site is located within the jurisdiction of the Airport Land Use Plan for the San Francisco International Airport but is outside of all airport Safety Compatibility Zones. The DSASP area is located within Airport Influence Area B and is subject to Federal Aviation Administration notification requirements. (See SFO ALUCP, Exhibit IV 10.) Therefore, implementation of the Project would not result in a safety hazard for people residing or working in the Project vicinity, consistent with the analysis of the DSASP EIR. The Airport Land Use Commission reviewed the DSASP and found it consistent with the ALUCP. Because the Project is consistent with the DSASP, further Airport Land Use Commission review is not required.

With respect to cumulative hazardous impacts, the Project would be one of numerous sites in the vicinity that are anticipated to undergo development/redevelopment and would contribute to a cumulative increase in the number of sites that could include handling of hazardous materials. However, each new development, including the Project, must comply with state, regional, and local laws concerning hazardous materials. As the Project will not handle or use any hazardous substances (other than ordinary office supplies and cleaning products) and will comply with all applicable laws pertaining to hazardous substances and hazard remediation, the Project-specific contribution to the cumulative impact would be less than cumulatively considerable.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce hazards and hazardous materials impacts identified in the DSASP EIR, and no new information related to hazards and hazardous materials exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Hydrology and Water Quality

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
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Hydrology and Water Quality -

Would the Project:

a) Violate any water quality standards or waste discharge requirements?	No	No	No	N/A	No
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	No	No	No	N/A	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	No	No	No	N/A	No
i) result in substantial erosion or siltation on- or off-site;	No	No	No	N/A	No
ii) substantially increase the rate or amount of surface runoff in a manner which would	No	No	No	N/A	No

result in flooding on- or offsite;

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	No	No	No	N/A	No
iv) impede or redirect flood flows?	No	No	No	N/A	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	No	No	No	N/A	No
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	No	No	No	N/A	No

Discussion: The DSASP EIR concluded that there would be a less-than-significant impact on hydrology and water quality as a result of implementation of the proposed project. (DSASP EIR, pp. 1-2, 5-7.) Redevelopment under the DSASP would require new drainage structures and localized on-site storm drain systems. No additional stormwater would need to be accommodated in existing stormwater drainage facilities since no additional stormwater runoff would be created. (DSASP EIR, p. 5-6.) The San Mateo Countywide STOPPP has a Site Design Standards Checklist to evaluate proposed projects against guidelines intended to reduce stormwater pollution. (*Id.*)

Analysis of Project

The Project is consistent with the DSASP EIR's analysis. The existing Project Site consists of primarily impervious surfaces. The Project would be developed on an impervious portion of the Project Site that is developed and would not result in an increase in impervious surface. Given that the Project Site has been previously developed, the Project would not interfere substantially with groundwater recharge as a result of increased impervious surfaces and would not substantially decrease the amount of rainwater recharged to the groundwater at the Project Site.

The Project would not alter drainage patterns at the Project Site and the runoff from the Project can be accommodated by the existing system. The Project will continue to comply with all applicable federal, state, and local requirements intended to protect water quality. The Project will implement water quality Best Management Practices ("BMPs") for stormwater runoff and also would implement the Project

Stormwater Pollution Prevention Plan (“SWPPP”) pursuant to the City’s National Pollution Discharge Elimination System Permit (“NPDES”), as required by law. The Project would not result in any hydrology and water quality impacts that were not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to hydrology and water quality as compared to the conclusions reached in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce hydrology and water quality impacts identified in the DSASP EIR, and no new information related to hydrology and water quality exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Land Use and Planning

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Land Use and Planning -					
Would the Project:					
a) Physically divide an established community?	No	No	No	N/A	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No	No	No	N/A	No

Discussion: The DSASP EIR found that the DSASP does not include barriers or changes to the circulation system that would physically divide an existing neighborhood, implementation of the proposed project would have no impact related to physically dividing an established community, and no further analysis of the issue was required. (DSASP EIR, p. 4.5-10.)

The DSASP EIR also found that the DSASP is not subject to any applicable habitat conservation plan or natural community conservation plan. (*Id.*) Although implementation of the DSASP entailed adopting new standards and permitting land uses not previously allowed within the study area, the DSASP would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of mitigating an environmental effect. Therefore, this impact would be less than significant. (DSASP EIR, p. 4.5-11.)

Regarding cumulative impacts, the DSASP EIR found that the DSASP would be consistent with the broad vision and policies of the City General Plan, the City Zoning Ordinance, and the community vision for the Downtown area. Therefore, there would be no conflicts with adopted plans and policies resulting from future development within the study area as a result of the DSASP and the cumulative impact would be less than significant.

Analysis of Project

The Project is consistent with the analysis under the DSASP EIR. The Project remains consistent with the General Plan and Zoning Ordinance. The density of development of the Project is less than the maximum FAR allowed on the Project Site. The Project would not result in any land use or planning impacts not analyzed in the DSASP EIR. The Project would not result in physically dividing an established community, or conflict with any applicable habitat conservation plan or natural community conservation plan, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to land use as compared to the conclusions reached in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce land use and planning impacts identified in the DSASP EIR, and no new information related to land use and planning exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Mineral Resources

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Mineral Resources -					
Would the Project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No	No	No	N/A	No
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No	No	No	N/A	No

Discussion: The DSASP EIR concluded that the study area is not known to have any mineral resources that may be of value to the region or the state, including as delineated on a local general plan, specific plan, or other land use plan. (DSASP EIR, p. 5-7.) Therefore, no impact on mineral resources would occur, and further analysis is not required. (*Id.*)

Analysis of Project

The Project is consistent with the DSASP EIR analysis. The Project will be constructed on a portion of the Project Site that is currently developed. As noted above, no mineral resources of value have been identified at the Project Site and the Project Site has not been identified as a locally important mineral recovery site. As such, the Project would not result in any mineral resources impacts not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to mineral resources as compared to the conclusions reached in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce mineral resources impacts identified in the DSASP EIR, and no new information related to mineral resources exists that meet the thresholds of Public Resources Code Section 21166 or CEQA Guidelines Section 15162.

Noise

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Noise -					
Would the Project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	No	No	No	Yes	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	No	No	No	Yes	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No	No	No	N/A	No

Discussion: The DSASP EIR found that implementation of the DSASP has the potential to expose new development to stationary sources of noise and transportation noise levels that exceed the City's normally acceptable compatibility standards. (DSASP EIR, p. 4.6-17.) This is considered a potentially significant

impact, but with implementation of mitigation measures MM4.6-1 through MM4.6-3, it would be reduced to less than significant. (*Id.*) Mitigation measure MM4.6-1 requires for non-residential development the submittal of a design plan for the project demonstrating that the noise level from operation of mechanical equipment will not exceed the exterior noise level limits for a designated receiving land use category. (DSASP EIR, p. 4.6-17.) Mitigation measure MM4.6-2 requires for new non-residential land uses where exterior noise levels exceed 70dBA CNEL an acoustical analysis to determine appropriate noise reduction measures such that exterior noise levels shall be reduced to be below 70 dBA CNEL in most circumstances. (*Id.*) Mitigation measure MM4.6-3 requires an acoustical analysis to ensure interior noise levels due to exterior noise sources shall be below 45 dBA CNEL for multifamily residences and residential units. (*Id.*)

Additionally, DSASP EIR found that there is the potential for construction to occur within 25 feet of existing sensitive receptors, which is considered a potentially significant impact related to groundborne noise levels and vibration. (DSASP EIR, p. 4.6-18.) But with implementation of mitigation measure MM4.6-4, this impact would be reduced to less than significant. (*Id.*) Mitigation measure MM4.6-4 requires the construction contractor to implement measures during construction, including notifying all residential units and nonresidential tenants within 115 feet of the construction site to inform them of the start date and duration of the vibration-generating activities, locating stationary sources far from off-site receptors, and prohibiting trucks from idling along streets serving the construction site. (DSASP EIR, p. 4.6-19.)

The DSASP EIR also indicated that the DSASP has the potential to locate new land uses within the applicable screening distance of light-rail and freight lines. (DSASP EIR, p. 4.6-19.) New development that is proposed within the screening distances would require further analysis to determine vibration-sensitive impacts. (*Id.*) Although this is considered a potentially significant impact, implementation of mitigation measure MM4.6-5 would reduce this impact to less than significant. (*Id.*) Mitigation measure MM4.6-5 would implement the current Federal Transit Administration and Federal Railroad Administration guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains. (DSASP EIR, p. 4.6-19.)

Regarding roadway noise, besides noise barriers and installation of noise walls, there are no other mitigation measures available to reduce roadway noise besides limiting/reducing residential or consumer traffic, which would contradict the TOD goals of the DSASP. (DSASP EIR, p. 4.6-21.) Because no certain feasible mitigation is available to reduce this impact to a less-than-significant level, this impact would remain significant and unavoidable. (*Id.*)

Future construction under the DSASP is required to comply with all applicable City ordinances, including limits on construction hours. Therefore, the DSASP EIR found that impacts related to construction noise would be less than significant and no mitigation is required.

Finally, with incorporation of applicable mitigation measures MM4.6-1, MM4.6-2, and MM4.6-3, the DSASP EIR found that the cumulative impact from operational noise sources would not be cumulatively considerable and the cumulative impact would be less than significant. (DSASP EIR, p. 4.6-22.) Cumulative roadway noise would remain significant and unavoidable, and the project would make a cumulatively considerable contribution to roadway noise, while the cumulative impact from excessive groundborne vibration would be less than significant. (DSASP EIR, p. 4.6-23.)

Analysis of the Project

Consistent with the analysis in the DSASP EIR, construction noise related to development of Project would be of a commercially reasonable duration (two to three year) and would comply with the City's Noise Ordinance (SSFMC, Chapter 8.32). Under SSFMC Section 8.32.050(d), construction activities are exempted from the City's Noise Ordinance if they occur between the hours of 8:00 am to 8:00 pm on weekdays, 9:00 am to 8:00 pm on Saturdays, and 10:00 am to 6:00 pm on Sundays and holidays, or as authorized by the construction permit. The City's Municipal Code further provides that construction is generally permissible between the hours of 7 am and 7pm on weekdays, 9am and 8pm on Saturdays, and 10 am and 6 pm on Sundays, and the Project's construction permit is anticipated to allow construction within these time periods. Consistent with the DSASP EIR's analysis of construction noise impacts, construction noise that occurs during these hours is outside of the recognized sleep hours for residents and outside of evening and early morning hours and time periods where residents are most sensitive to exterior noise. Project construction would occur within these time periods and would not significantly affect any sensitive receptors, the closest of which is located at least 1,000 feet from the Project Site. Noise impacts resulting from Project construction therefore falls within the scope of the DSASP EIR's analysis, and., the Project would not generate a substantial temporary or periodic increase in ambient noise levels from the use of construction equipment.

Project traffic noise will be no worse than that analyzed under the DSASP EIR. The Project also will implement a comprehensive TDM program that promotes use of public transit, ridesharing, and bicycle transportation options, thereby reducing traffic-related noise. Noise from mechanical equipment would comply with applicable City standards and so would be less than significant, consistent with the DSASP EIR analysis.

Also, the DSASP area is located approximately 0.75 miles from SFO. Due to distance and the orientation of the airport runways, the DSASP area is not located within the 65 dBA CNEL noise contour of SFO. A noise level of below 65 dBA during working hours for commercial uses is acceptable pursuant to the City's Municipal Code. (SSFMC, Table 8.32.030.) Under foreseeable conditions, therefore, the Project Site will be exposed to a CNEL of less than 65 dBA since the project site is not within the 65dBA noise contour.

Given that construction and operation of the Project would comply with the City's Noise Ordinance (SSFMC, Chapter 8.32) and applicable mitigation measures MM4.6-1, -2, -4, and -5, the Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to noise as compared to the conclusions reached in the DSASP EIR.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce noise impacts identified in the DSASP EIR, and no new information related to noise exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Population and Housing

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Population and Housing -					
Would the Project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No	No	No	N/A	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No	No	No	N/A	No

Discussion: The DSASP EIR indicated that the DSASP would be consistent with all governing documents and policies regulating the City and would not exceed the build-out estimated population of the amended General Plan; therefore, the impact of direct population growth would be less than significant. (DSASP EIR, p. 4.7-11.) The DSASP EIR indicated that the DSASP would not result in indirect growth due to extension of infrastructure and the impact would be less than significant and no mitigation would be required. (*Id.*) Because most new development would occur on commercial or vacant sites, the DSASP would not displace substantial numbers of people or existing housing units necessitating construction of replacement housing elsewhere. (DSASP EIR, p. 4.7-12.)

Finally, regarding cumulative impacts, population growth would remain consistent with regional and county population growth rates and the cumulative impact on the displacement of housing or people would be less than significant. (DSASP EIR, p. 4.7-13.)

Analysis of Project

The Project is consistent with the DSASP EIR. The Project would remain consistent with the permitted FAR allowed under the General Plan and the zoning, and therefore, would not induce any population and housing impacts not previously analyzed. The amount of new uses within the Project would fall within the total development evaluated under the DSASP EIR. The Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to population and housing as compared to the conclusions reached in the DSASP EIR.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would reduce the population and housing impacts identified in the DSASP EIR, and no new information related to population and housing exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Public Services

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Public Services -					
Would the Project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	No	No	No	N/A	No
i) Fire protection?	No	No	No	N/A	No
ii) Police protection?	No	No	No	N/A	No
iii) Schools?	No	No	No	N/A	No
iv) Parks?	No	No	No	N/A	No
v) Other public facilities?	No	No	No	N/A	No

Discussion: The DSASP EIR indicated that implementation of the DSASP would not result in substantial adverse impacts associated with the provision of new or physically altered government facilities, or in the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and emergency response. Therefore, this would be a less-than-significant impact. (DSASP EIR, p. 4.8-8.) Compliance with Municipal Code requirements and payment of Public Safety Impact Fees would ensure that this impact remains less than significant. (DSASP EIR, p. 4.8-9.)

As for cumulative public services impacts, the DSASP EIR found that the contribution of the proposed project to cumulative impacts on fire services, police protection, schools, and libraries would not be cumulatively considerable with compliance with Municipal Code requirements and payment of the Public Safety Impact Fee. (DSASP EIR, p. 4.8-9.) Therefore, this would also be a less-than-significant cumulative impact.

Analysis of Project

The Project is consistent with the DSASP EIR analysis. The Project would be within the total development evaluated under the DSASP EIR. The Project will pay applicable impact fees intended to mitigate the impacts of new development on public services. These include the Parks and Recreation Impact Fee (SSFMC § 8.67), Childcare Impact Fee (SSFMC § 20.310), Library Impact Fee (SSF Resolution 121-2020), Public Safety Impact Fee (SSF Resolution 123-2020), School District Fee, Citywide Transportation Fee (SSF Resolution 120-2020), Commercial Linkage Fee (SSFMC § 8.69), East of 101 Sewer Impact Fee (Resolution 97-2002), and Sewer Capacity Charge (Resolution 56-2017). As such, the Project would not result in any public services impacts not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to public services as compared to the conclusions reached in the DSASP EIR.

The Proposed Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the public services impacts identified in the DSASP EIR, and no new information related to public services exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Recreation

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Recreation -					
Would the Project:					
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No	No	No	N/A	No
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	No	No	No	N/A	No

Discussion: The DSASP EIR indicated that implementation of the DSASP would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. This impact would be less than significant. (DSASP EIR, p. 4.9-8.) Adherence to the existing land dedication and in-lieu fee requirements and applicable 1990 and 1997 Park, Recreation, and Open Space Master Plan regulations, addressing specific deficiencies in park and recreational opportunities, as well as the on-site open space requirements established in the DSASP would ensure that parks and open space are acquired, developed, improved, and expanded as future residential projects are constructed. (DSASP EIR, p. 4.9-9.)

Additionally, the DSASP EIR found that the cumulative impact to existing parks and recreational facilities would also be less than significant and the DSASP's contribution to this cumulative impact would not be cumulatively considerable. (DSASP EIR, p. 4.9-11.)

Analysis of Project

The Project is consistent with the DSASP EIR analysis. The Project would be within the total development evaluated under the DSASP EIR. Therefore, the Project would not result in a significant increase in use of parks and recreational facilities beyond that anticipated in the DSASP EIR and construction of new parks and recreational facilities would not be required. As such, the Project would not result in any recreation impacts not previously analyzed, and would not result in a new or substantially

more severe cumulatively considerable contribution to significant cumulative impacts with respect to recreational facilities as compared to the conclusions reached in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the recreation impacts identified in the DSASP EIR, and no new information related to recreation exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Transportation and Circulation

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Transportation and Circulation -					
Would the Project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No	No	No	Yes	No
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	No	No	No	Yes	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No	No	No	N/A	No
d) Result in inadequate emergency access?	No	No	No	N/A	No

Discussion:

The DSASP EIR indicated that implementation of the DSASP would result in the addition of project traffic to intersection #1 (Miller Avenue/Linden Avenue), #10 (Grand Avenue/Airport Boulevard), #12 (Baden Avenue/Linden Avenue), #15 (South Airport Boulevard/Gateway Boulevard), #16 (US-101 Northbound/South Airport Boulevard Off Ramp/South Airport Boulevard) but that implementation of mitigation measures MM4.10-1, MM4.10-3, MM4.10-4, MM4.10-6, MM4.10-7 would reduce these impacts to a less-than-significant level for AM peak hour travel, but not for PM peak hour travel for #10 or queuing at #15. (DSASP EIR, pp. 4.10-61, 62.)

In addition, the DSASP EIR found that impacts to public transit facilities would be less than significant since implementation of the DSASP is intended to increase transit access and use, and will be accompanied by future investments in transit service and expanded services in the study area. (DSASP, p. 4.10-63.) The DSASP EIR indicated that the impact to pedestrian facilities would be significant and unavoidable at identified intersections (#6, #9, #12, #14, and #15) by potentially increasing crossing distances for pedestrians, creating greater pedestrian exposure, and increasing delay for pedestrians. (DSASP EIR, pp. 4.10-63, 64.) Further, pedestrian and bicycle impacts would be considered significant if the proposed project would alter existing facilities with a negative impact on pedestrians or is inconsistent with adopted plans and programs. (DSASP EIR, p. 4.10-64.)

The DSASP EIR found that the proposed roadway improvements would not include design features such as sharp curves or dangerous intersections or incompatible uses that would increase hazards in the study area. (DSASP EIR, p. 4.10-41.) Additionally, emergency vehicles would be able to use the roadways surrounding the project site and through the project site, maintaining emergency access. (*Id.*) Therefore, the DSASP would result in no impacts related to design hazards or emergency access vehicles. (*Id.*)

Analysis of Project

With regard to the transportation analysis, the DSASP EIR used Level of Service, (“LOS”) methodology to evaluate whether implementation of the DSASP is likely to cause automobile delay at intersections and congestion on nearby individual highway segments to exceed LOS thresholds. SB 743, enacted in 2013, changed how lead agencies evaluate transportation impacts under CEQA. Starting on July 1, 2020, CEQA Guidelines Section 15064.3 directs agencies to utilize vehicle miles travelled (“VMT”), which measures the amount and distance of auto travel attributable to a project, as the primary metric for measuring transportation impacts. Pursuant to CEQA Guidelines Section 15064.3, projects within one-half mile of a major transit stop generally are presumed to cause a less than significant transportation VMT impact. The State Office of Planning and Research has suggested that this presumption might not be appropriate for projects with an FAR of less than .75, projects that provide parking in excess of City requirements, or projects that are inconsistent with the applicable Sustainable Communities Strategy (SCS). State Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (December 2018), https://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

For projects consistent with an EIR prepared prior to the new requirements for VMT analysis, CEQA permits reliance on the prior analysis. Because the Project is consistent with the uses and densities analyzed in the DSASP EIR, the Project would not have any new or substantially more severe LOS impacts, nor be a new or substantially more severe contribution to cumulatively significant LOS impacts, than analyzed in the DSASP EIR.

In any case, however, pursuant to CEQA Guidelines Section 15064.3(a), the Project is presumed to have a less than significant VMT impact. The Project is within one-half mile of an existing major transit stop (i.e., the South San Francisco Caltrain Station) and, as detailed in the Project Description above, has a FAR greater than .75 and is consistent with the SCS. In addition, the Project would not provide parking in excess of City requirements.

The Project would utilize the existing roadways in the vicinity. The Project design would be required to comply with all applicable City codes and regulations pertaining to emergency access, as well as fire protection and security. Additionally, the City has implemented a Public Safety Impact Fee (Resolution 97-2012), which the Project would pay. This fee is intended to fund improvements in infrastructure or public services brought about by new development to ensure adequate emergency access.

The Project therefore would not result in a cumulatively considerable contribution to previously identified significant impacts beyond what was evaluated in the DSASP EIR because of its adjacency to the Caltrain Station (less-than-significant VMT presumption) and compliance with all applicable City codes and regulations regarding roadways and emergency access. The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the transportation and circulation impacts identified in the DSASP EIR, and no new information related to transportation and circulation exists that meet the thresholds of Public Resources Code Section 21166 or CEQA Guidelines Section 15162. A project traffic study prepared by Kittelson and Associates is attached, for reference and in support of this ECA.

Utilities and Service Systems

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Utilities and Service Systems -					
Would the Project:					
a) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	No	No	No	N/A	No
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	No	No	No	N/A	No
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	No	No	No	N/A	No
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No	No	No	N/A	No
e) Comply with federal, state, and local statutes and regulations related to solid waste?	No	No	No	N/A	No

Discussion: The DSASP EIR indicated that the City is served by Cal Water, which obtains water from a purchasing agreement with the San Francisco Public Utilities Commission (“SFPUC”). SFPUC, in turn, is supplied by local surface water sources and from its own groundwater sources. (DSASP EIR, p. 4.11-21.) Cal Water prepared a Water Supply Assessment (“WSA”) for the DSASP pursuant to Water Code sections 10910 *et seq.* The DSASP WSA identified deficiencies in the City’s water supplies during dry years and concluded that the City could achieve demand reductions necessary to address dry year deficiencies through implementation of its water shortage contingency plan to balance demand against curtailed supplies. The DSASP EIR states that water demand generated with implementation of the DSASP combined with demand generated by the current population is within the water demand projects in the WSA for the DSASP. (*Id.*) The WSA concluded under normal year conditions that Cal Water would have sufficient capacity to meet the water demands of the DSASP project without compromising existing demands. (DSASP EIR, p. 4.11-23.) Further, SB x7-7 (the Water Conservation Act of 2009) calls for reducing demand by 10 percent conservation per capita in 2015 and 20 percent by 2020. (*Id.*) Therefore, there would be sufficient water supplies available to serve DSASP development from existing entitlements and resources, and new or expanded entitlements would not be necessary, which would be a less-than-significant impact. (DSASP EIR, p. 4.11-21.)

Additionally, the DSASP EIR concluded that no more water treatment facilities are required to meet water demands associated with the implementation of the DSASP and the DSASP would not require the construction or expansion of water treatment facilities. (DSASP EIR, p. 4.11-24.) Further, cumulative development would have adequate water supplies with existing entitlements and would not require or result in the construction of new water facilities or expansion of existing facilities. (DSASP EIR, p. 4.11-28.)

The DSASP EIR found that implementation of the DSASP would not exceed wastewater treatment requirements of the applicable Regional Board, which would be a less-than-significant impact. (DSASP EIR, p. 4.11-40.) Although implementation of the DSASP would require additional wastewater to be treated, it would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. (*Id.*) As for cumulative wastewater impacts, the DSASP EIR anticipated that cumulative development would not exceed the capacity of the wastewater treatment system and all wastewater would be treated adequately. Therefore, the impact of cumulative development on wastewater treatment would be less than significant. (DSASP EIR, p. 4.11-42.)

Finally, the DSASP EIR found that the increase in solid waste generated under the DSASP would be sufficiently served by the MRF/TS and the Ox Mountain Landfill and the impact would be less than significant. (DSASP EIR, p. 4.11-48.) Further, cumulative impacts associated with solid waste in the study area would be considered less than significant. (DSASP EIR, p. 4.11-49.)

Analysis of Project

The Project is consistent with the DSASP EIR analysis. The Project is within the development anticipated by the DSASP and is not expected to substantially increase impacts on the City and other service providers to provide water supply, wastewater, stormwater drainage, solid waste, and energy services.

The Project is within the scope of and consistent with the project analyzed in the DSASP WSA, and there have been (1) no changes in the project that would result in a substantial increase in water demand, and (2) no changes in circumstances or conditions substantially affecting the City’s ability to provide sufficient water supplies to the project. There is also no significant new information indicating the project would result in water supply impacts more severe than those identified in the DSASP EIR. The Project’s water supply impacts were therefore already addressed in the DSASP WSA and EIR, and a Project-specific WSA

is not required. The DSASP WSA concluded the City could achieve demand reductions necessary to address dry year supply deficiencies through implementation of its water shortage contingency plan, and there have been no changes in circumstances or conditions substantially affecting the City's ability to provide sufficient water supplies to the Project. There is also no significant new information that has become available since the DSASP WSA was prepared that was not known and that could not have been known at that time. The City's water supplies are insufficient during dry years to satisfy the demands of the Project in addition to existing and planned future uses, thereby requiring the City to implement its water shortage contingency plan to achieve necessary demand reductions.

In addition, the Project would comply with the requirements of the model water efficient landscape ordinance ("WELO"), as required by City Code Chapter 20.300.007. In particular, the Project:

- will utilize low-water-using plants for 100 percent of the plant area;
- will not utilize turf for the landscape area or in parkways;
- will group plants by hydrozones;
- provide at least 4 cubic yards of compost per 1,000 sq. ft. to a depth of 6 inches;
- provide at least 3 inches of mulch on exposed soil surfaces;
- use automatic irrigation controllers that use evapotranspiration or soil moisture sensor data and a rain sensor;
- use irrigation controllers that will not lose programming data when power source is interrupted;
- provide that the irrigation system will include pressure regulators;
- include manual shut-off valves near the connection to the water supply;
- document that all sprinkler heads in the landscape distribute uniformity low quarter of 0.65 or higher;
- provide that areas less than 10 feet must be irrigated with subsurface irrigation; and
- separate irrigation submeters for landscape areas greater than or equal to 1,000 sq. ft.

Regarding wastewater, the Project would be required to comply with all provisions of the NPDES program, as well as all applicable wastewater discharge requirements issued by the San Francisco Bay Area RWQCB. The City would maintain local sewer lines and perform upgrades on an as-needed basis. Also, the Project would pay the City's Sewer Capacity Charge and the East of 101 Sewer Impact Fee. It is anticipated that the increased flows from development under the DSASP, including this Project, would not result in required upgrades to the reclamation plants and the Project is consistent with the DSASP EIR analysis.

Regarding stormwater, each project is required to submit documentation consistent with the State and County Water Pollution Prevention Programs requirements, which are peer reviewed by the Water Quality Division of the City's Department of Public Works. Further, the DSASP EIR concluded that no significant increase in stormwater runoff was anticipated to be created by projects within the DSASP. The Project is consistent with the DSASP EIR analysis.

Finally, the Project would comply with all applicable solid waste regulations and land fill capacity exists for future DSASP buildout. Solid waste disposal and recycling in the City is regulated by the City's SSFMC, particularly Chapters 8.16 and 8.28. Under the SSFMC, future development would be required to have its solid waste and recyclable materials collected by the Scavenger Company. The Project would comply with federal, state, and local statutes and regulations related to solid waste, and, therefore, is consistent with the DSASP EIR analysis. Therefore, the Project is not expected to generate a significant impact to utility services and is consistent with the conclusions of the DSASP EIR.

The Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to utilities and service systems as compared to the conclusions reached in the DSASP EIR. The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the utilities and service systems impacts identified in the DSASP EIR, and no new information related to utilities and service systems exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Wildfire

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Wildfire -					
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No	No	N/A	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No	No	No	N/A	No
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No	No	No	N/A	No
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes??	No	No	No	N/A	No

Discussion: Wildfire-related risks were not examined within the DSASP EIR. The DSASP area is not within a state responsibility area or within lands classified as very high fire hazard severity zones.

Analysis of the Project

The Project Site is not within a state responsibility area or within lands classified as very high fire hazard severity zones. The Project Site is located in an urban environment and is not expected to generate any wildfire impacts. The Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts related to wildfire as compared to the conclusions reached in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the wildfire impacts identified in the DSASP EIR, and no new information related to wildfire exists that meet the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

Mandatory Findings of Significance

Issues	Could Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	New Circumstances that could Result in New Significant Impacts or Substantially More Severe Impacts?	Any New Information Indicating New or Substantially More Severe Significant Impacts?	Do the DSASP EIR Mitigation Measures Address Impacts?	Any New Mitigation Measures/Alternatives that would Substantially Reduce Impacts?
Mandatory Findings of Significance -					
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	No	No	No	N/A	No
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	No	No	No	N/A	No
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	No	No	No	N/A	No

Discussion: The DSASP EIR determined that implementation of the DSASP would have the following significant and unavoidable impacts:

- Air Quality—implementation would violate an air quality standard or contribute substantially to an existing or projected air quality violation;
- Cultural Resources—implementation could cause a substantial adverse change in the significance of a historical resource as defined in Guidelines Section 15064.5;
- Noise—implementation would result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project;
- Traffic/Transportation—implementation of the DSASP would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system; implementation of the DSASP would add traffic greater than 1 percent to the freeway segment volume and deteriorate LOS from E to F on two northbound segments and one southbound segment of US-101 and would add traffic greater than 1 percent to a freeway segment already operating at LOS F under No Project Conditions for one northbound segment and two southbound segments, resulting in a significant project contribution under Existing Plus Project Conditions; implementation of the DSASP would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system under Cumulative Plus Project conditions; implementation of the DSASP would conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system under Cumulative Plus Project conditions for two intersections; implementation of the DSASP would add traffic greater than 1 percent to the freeway segment volume and deteriorate LOS from E to F on one northbound segment of US-101 and would add traffic greater than 1 percent of the freeway segment volume to a segment already operating at LOS F under No Project Conditions on five northbound segments and five southbound segments of US-101 under cumulative conditions; implementation of the DSASP would add traffic greater than 1 percent of the freeway ramp volume and deteriorate LOS from E to F for one southbound US-101 ramp during the PM peak hour under cumulative conditions.

Analysis of Project

The Project is consistent with this DSASP EIR analysis.

With respect to transportation, because the Project is consistent with the uses and densities analyzed in the DSASP EIR, the Project would not have any new or substantially more severe LOS impacts, nor be a new or substantially more severe contribution to cumulatively significant LOS impacts, than analyzed in the DSASP EIR. As noted in the discussion of Transportation above, CEQA Guidelines Section 15064.3 now directs agencies to utilize vehicle miles travelled (“VMT”), which measures the amount and distance of auto travel attributable to a project, as the primary metric for measuring transportation impacts.

Pursuant to CEQA Guidelines Section 15064.3 the Project is presumed to have a less than significant VMT impact due to its location within one-half mile of the South San Francisco Caltrain Station. As noted above, the Project would have an FAR greater than 0.75 FAR, would not provide parking in excess of City requirements, and would be consistent with the SCS. Further, the Project would not contribute to the significant and unavoidable impact to historical resources identified in the DSASP EIR because a historic consultant evaluated and determined that the on-site buildings, although greater than 50 years old, are not historic and that the Project would not cause a substantial adverse change in the significance of a historical resource.

In regards to mandatory findings of significance, as indicated above, the Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal

community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Further, the Project would not have environmental effects which will cause substantial adverse effects on humans, either directly or indirectly.

The potential cumulative impacts of the Project have been considered for each environmental topic evaluated above. The Project is not anticipated to have any cumulatively considerable impacts beyond those identified and analyzed in the DSASP EIR.

The Project does not include substantial changes relative to anticipated development previously analyzed in the EIR, will not be developed under substantially changed circumstances, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the impacts identified in the DSASP EIR, and no new information exists that meets the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162.

CONCLUSION

Based on the findings and information contained in the adopted DSASP EIR, the analysis above, and the CEQA statute and CEQA Guidelines, including Sections 15164 and 15162, the Project will not result in any new or substantially more severe environmental effects than identified in the DSASP EIR, there are no new or substantially different mitigation measures or alternatives that would substantially reduce the impacts identified in the DSASP EIR, no new information related to the impacts identified in the DSASP EIR exists that meets the thresholds of Public Resources Code Section 21166 or Guidelines Section 15162, and the potential environmental effects of the Project have been adequately addressed in the DSASP EIR. Therefore, this Checklist is appropriate under CEQA Guidelines Section 15164 and no further environmental review of the Project is required.

Attachments:

1. Historical Resources Evaluation
2. Traffic Study Memorandum