15183 CEQA Compliance Checklist

The Gateway (Railroad Avenue) Townhouse Project

File #: P23-0061, PUD24-0001, DR23-002 & TDM23-0004

Prepared by

CITY OF SOUTH SAN FRANCISCO
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Section 1.0 Introduction and Purpose

1.1 Overview of Guidelines Section 15183

The City of South San Francisco as the Lead Agency, has prepared this Compliance Checklist for The Gateway (Railroad Avenue) Townhouse in compliance with the California Environmental Quality Act (CEQA), the CEQA Guidelines (California Code of Regulations §15000 et. seq.) and the regulations and policies of the City of South San Francisco, California.

The project proposes to develop 70 single-family attached (townhouse) residential units and construct a new five-foot sidewalk along the project frontage on Railroad Avenue. This Compliance Checklist evaluates the environmental impacts that might reasonably be anticipated to result from implementation of the proposed project.

1.1.1 City of South San Francisco General Plan EIR

On October 12, 2022, the City of South San Francisco (City) adopted the Shape South San Francisco: 2040 General Plan (2040 General Plan) to provide a roadmap for the City to implement policies and actions that create a resilient community, improve the quality of life of its residents, and expand economic development opportunities. There are 11 sub-areas within the city, one of which is Lindenville. The project site is located within the Lindenville sub-area (i.e., Lindenville Specific Plan area). Lindenville is an approximately 400-acre area located in the southern portion of the city, bounded by U.S. Highway 101 (US 101) to the east, the City of San Bruno and Centennial Way Trail to the south, Fir Avenue and Magnolia Avenue to the west, and Railroad Avenue to the north. Colma Creek runs through the northern portion of Lindenville between North Canal Street and South Canal Street.

Lindenville is situated among multiple regional and local transportation facilities, including the Bay Area Rapid Transit (BART) San Bruno and South San Francisco stations, the Caltrain South San Francisco station, US 101, and the Centennial Way and Bay Trails. Lindenville is primarily made up of industrial space, representing 40 percent of the citywide industrial inventory and 15 percent of all industrial space in San Mateo County.

The 2040 General Plan identifies Lindenville as an opportunity area to introduce new residential uses that can help meet local and regional housing goals. It also strives to locate mixed use development and higher-density employment land uses near public transportation. To facilitate this opportunity in Lindenville, the 2040 General Plan identifies a range of policies and implementation actions related to housing, employment, connectivity, and open space with the following mission statement: Lindenville is a vibrant and inclusive neighborhood that maintains a base of job opportunities, promotes the creative economy, and creates a new residential neighborhood where all people can thrive.

1.1.2 Applicability of CEQA Guidelines Section 15183

Pursuant to CEQA Guidelines section 15183(d), no further environmental review is required for a project if the following conditions are met:

1. The project is consistent with:
    a. A community plan adopted as part of the general plan,
    b. A zoning action which zoned or designated the parcel on which the project would be located to accommodate a particular density of development, or
    c. A general plan of a local agency, and

2. An EIR was certified by the lead agency for the zoning action, the community plan, or the general plan.

Section 15183 applies only to the extent that all feasible mitigation measures for a significant effect specified in the EIR are or will be undertaken by the public agency having jurisdiction to implement such mitigation measures (CEQA Guidelines, §15183(e)(1), (2)). As required by CEQA, on October 12, 2022, the City certified a Final EIR, State Clearinghouse Number: State Clearinghouse [SCH]#: 2021020064, and adopted a Statement of Overriding Considerations and Mitigation Monitoring and Reporting Program for the 2040 General Plan. The Final EIR analyzed the environmental impacts of the City of South San Francisco General Plan. In October 2023, the City Council adopted the Lindenville Specific Plan Specific Plan Addendum to the 2040 General Plan EIR, which accounted for the following changes to the General Plan development assumptions for the Lindenville Specific Plan area (refer to Table 1.1-1)

Table 1.1-1: Total Allowed 2040 General Plan Development in the Lindenville Specific Plan Area

Retail (square feet)	Services	Hotel (square feet/rooms)	Office/Research & Development (square feet)	Industrial (square feet)	Other* (square feet)	Residential (dwelling units)
A. 2040 General Plan Allowed Development for the Lindenville Specific Plan Area (Prior to Adopted Specific Plan Amendments)						
217,501	595,724	40,076/229	4,246,663	4,695,567	4,137	5,580
B. Total Allowed 2040 General Plan Including the Adopted Lindenville Specific Plan Amendments						
217,721	621,038	31,341/179	4,295,896	4,938,467	4,137	5,581
C. Change between 2040 General Plan for Lindenville and Adopted Lindenville Specific Plan (B-A)						
+220	+25,314	-8,375/-50	+49,233	+242,900	0	+1
* This category represents the square footage of public uses.						

Section 15183 applies because the proposed project is consistent with the City of South San Francisco General Plan, the General Plan EIR was certified for the City of South San Francisco General Plan, and all feasible mitigation measures identified in the General Plan EIR as being

applicable to the proposed project will be implemented, as further discussed herein. As discussed in Section 4.11 Land Use and Planning, the project, which proposes a density of 35.8 dwelling units per acre, is consistent with the site's existing General Plan designation of Medium Density Mixed Use (which allows a maximum residential density of 120 dwelling units per acre). The project site is in the T4 Lindenville (T4L) Zoning District, which allows a minimum of 80 residential units per acre and a maximum of 120 residential units per acre. The prosed project's density would be 35.8 dwelling units per acre; therefore, the project proposes a rezoning to Planned Development Zoning to allow for the proposed townhouse development. A reduced density is proposed because the project parcel shape restricts the site from being developed with a high-density residential building that meets the T4L zoning district development standards. While the project proposes a density lower than the minimum requirement of the existing zoning, it is consistent with the City's vision to create new residential neighborhood in the northern part of the Lindenville sub-area and contributes to having a mix of housing diversity in the sub-area. Developing the site at a reduced density due to property's inefficient shape would not lead to greater impacts than evaluated in General Plan EIR given the reduced density would result in reduced construction activity and fewer residents than assumed for the site according to the General Plan.

1.1.3 Scope of Section 15183

In evaluating whether further environmental review is required for a project consistent with the City of South San Francisco General Plan and the General Plan EIR, CEQA Guidelines section 15183(b) specifies that examination of environmental effects shall be limited to those effects that:

1. Are peculiar to the project or the parcel on which the project would be located,
2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent,
3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
4. Are previously identified significant effects which, as a result of substantial new information that was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

An additional EIR, or other environmental document, need not be prepared for a project solely on the basis of an impact that is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards (CEQA Guidelines §15183(c)). An impact is not peculiar if uniformly applied development standards or procedures have been previously adopted by the City with a finding that the development standards or procedures will substantially mitigate that environmental impact (CEQA Guidelines §15183(f)). The finding shall be based on substantial evidence which does not need to be addressed in an EIR and such uniformly adopted policies or procedures do not need to be included in the general plan or any community plan (Id.).

Given the above, the analysis contained herein evaluates whether the project's impacts fall within one of the section 15183(b) categories, thereby triggering the need for an additional EIR or other environmental document.

Section 2.0 Project Information

2.1 Project Title

The Gateway (Railroad Avenue) Townhouse Project, South San Francisco (P23-0061, PUD24-0001, RZ25-0002, PM25-0001, DR23-002, and TDM23-0004)

2.2 Lead Agency Contact

Victoria Kim, Associate Planner
City of South San Francisco, Department of Economic and Community Development
Planning Division
315 Maple Avenue
South San Francisco, CA 94080
Direct Phone Number: (650) 877-8535
Email: victoria.kim@ssf.net

2.3 Project Applicant

Newlife Investments, LLC
3646 Maxon Street
Chino, CA 91710

2.4 Project Location

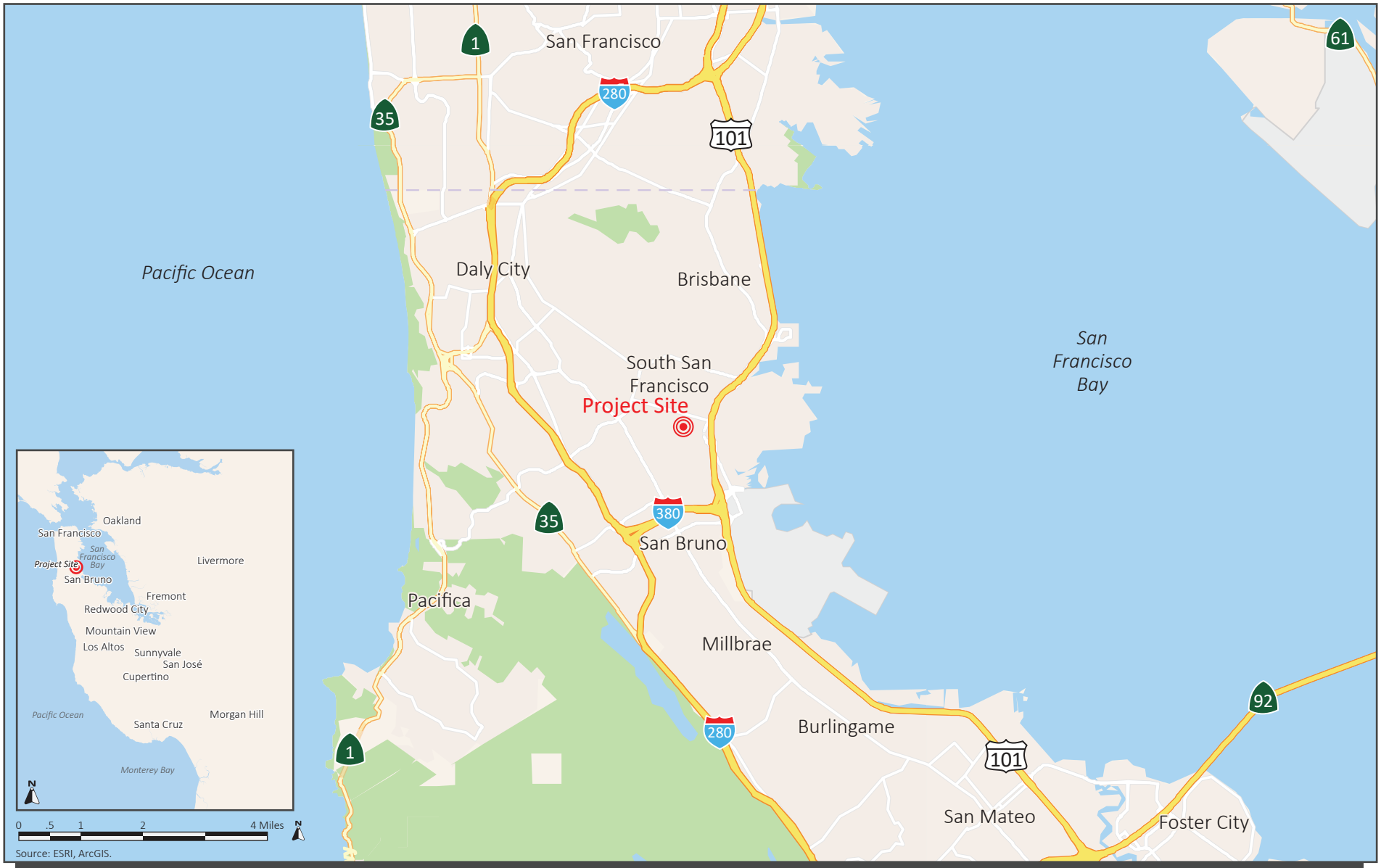
The site is surrounded by Railroad Avenue and residential uses to the north, light industrial uses and Linden Avenue to the east, light industrial uses to the west, and industrial uses, North Canal Street, and Colma Creek to the south. Regional, vicinity and aerial maps are shown of Figures 2.4-1, 2.4-2, and 2.4-3, respectively.

2.5 Assessor's Parcel Number

Assessor's Parcel Numbers: 014-061-170 and 014-072-050

2.6 General Plan Designation and Zoning District

General Plan Designation: Medium Density Mixed Use
Zoning District: T4L Zoning District



REGIONAL MAP | FIGURE 2.4-1

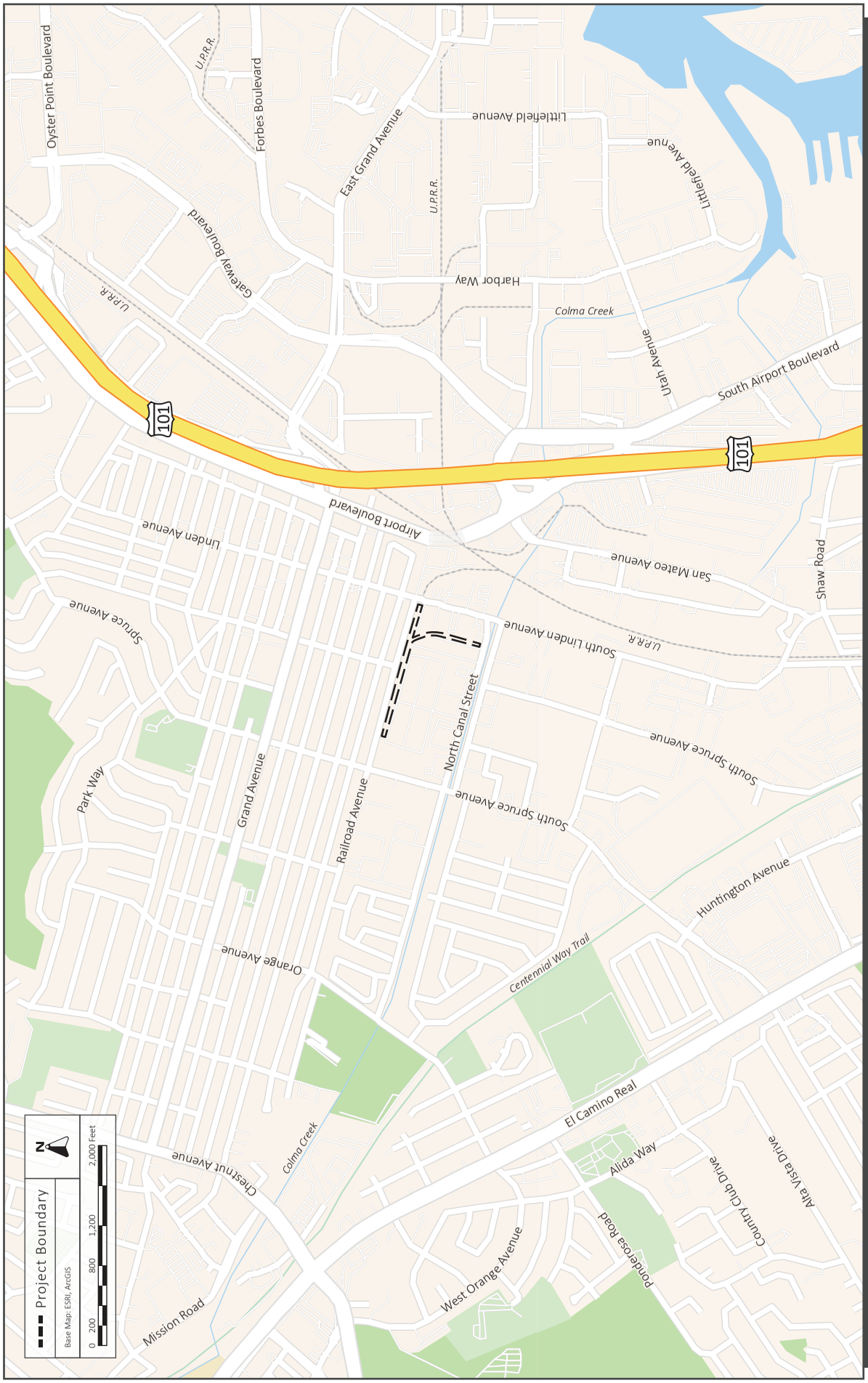
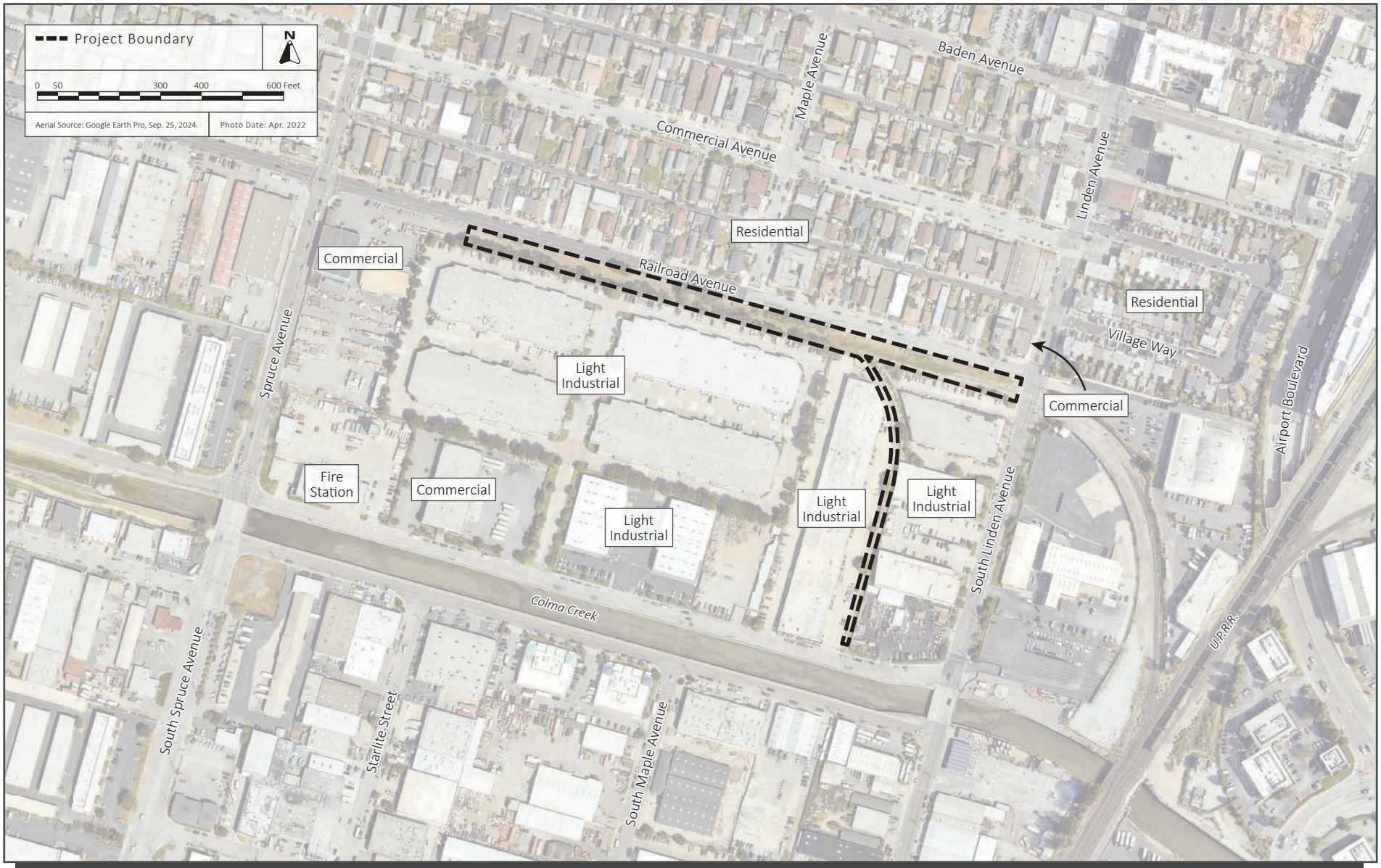


FIGURE 2.4-2

VICINITY MAP



AERIAL PHOTOGRAPH AND SURROUNDING LAND USES | FIGURE 2.4-3

2.7 Project-Related Approvals, Agreements, and Permits

The project would require approval of a rezoning from the T4L Zoning District to a Planned Development Zoning district and Planned Development Permit. A Design Review/Approval and Tentative Map by the City will also be required. In addition, the project will require a Tree Removal Permit and Grading Permit.

Section 3.0 Project Description

3.1 Project Location and Setting

The project site is 2.0 acres and is located within the Lindenville Specific Plan area at 500 Railroad Avenue [Assessor's Parcel Numbers (APNs) 014-061-170 and 014-072-050]. The site is vacant and consists of a narrow rectangular portion fronting onto Railroad Avenue on the northern end and a spur line that extends to the south. The site is unpaved with grassland and trees, with the exception of a small segment of the spur line that consists of a paved area. The site is surrounded by Railroad Avenue and residential uses to the north, light industrial uses and Linden Avenue to the east, light industrial uses to the west, and industrial uses, North Canal Street, and Colma Creek to the south.

The site has a General Plan designation of Medium Density Mixed Use (which allows a maximum residential density of 120 dwelling units per acre) and is in the T4 Lindenville (T4L) Zoning District, which allows a minimum of 80 residential units per acre and a maximum of 120 residential units per acre.

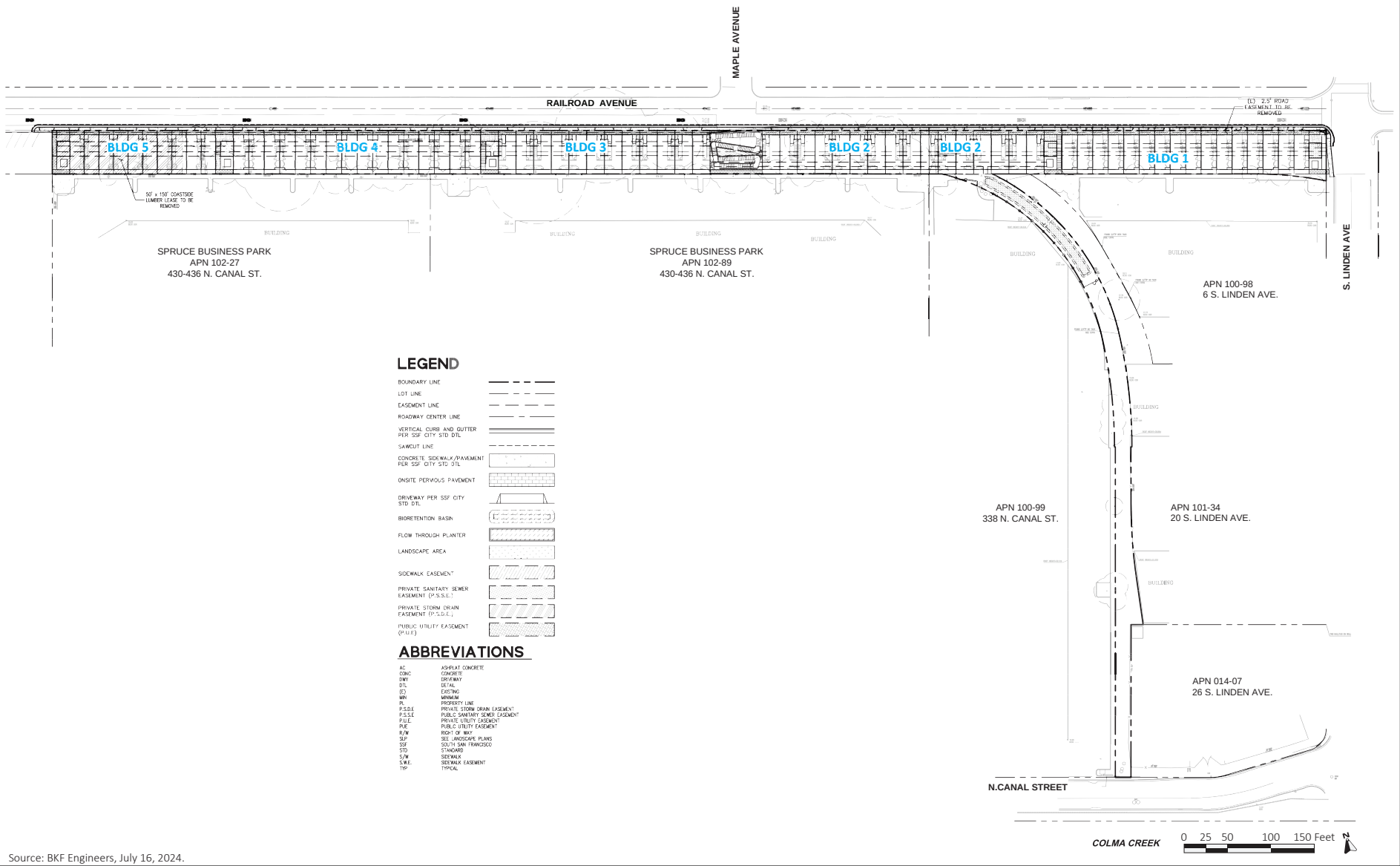
3.2 Project Description

The proposed project would develop 70 market-rate single-family attached (townhouse) units and construct a new five-foot sidewalk along the project frontage on Railroad Avenue. To satisfy the project's affordable housing requirements, the applicant proposes to pay in lieu fees instead of constructing units within the project site. The project would have a residential density of 35.8 dwelling units per acre and a 1.86 floor area ratio.[1] The project site requires rezoning from a T4L Zoning District to a Planned Development Zoning. The project would also require a Planned Development Design Review by the City, as well as a Tentative Map (refer to the Site Plan and two Tentative Maps on Figures 3.2-1, 3.2-2, and 3.2-3, respectively). The project site would retain the existing General Plan Land Use Designation.

3.2.1 Proposed Development

The proposed project would develop five buildings (Buildings 1 through 5), which would be located adjacent to each other, on the northern portion of the project site, fronting Railroad Avenue. The five buildings would consist of 70 single-family attached (townhouse) units total, with Buildings 1, 2, and 4 consisting of 16 units, Building 3 consisting of 12 units, and Building 5 consisting of 10 units. The townhouse development would include 42 two-bedroom units and 28 three-bedroom units. Each townhouse would include a two-car tandem parking garage and private deck/patio areas.

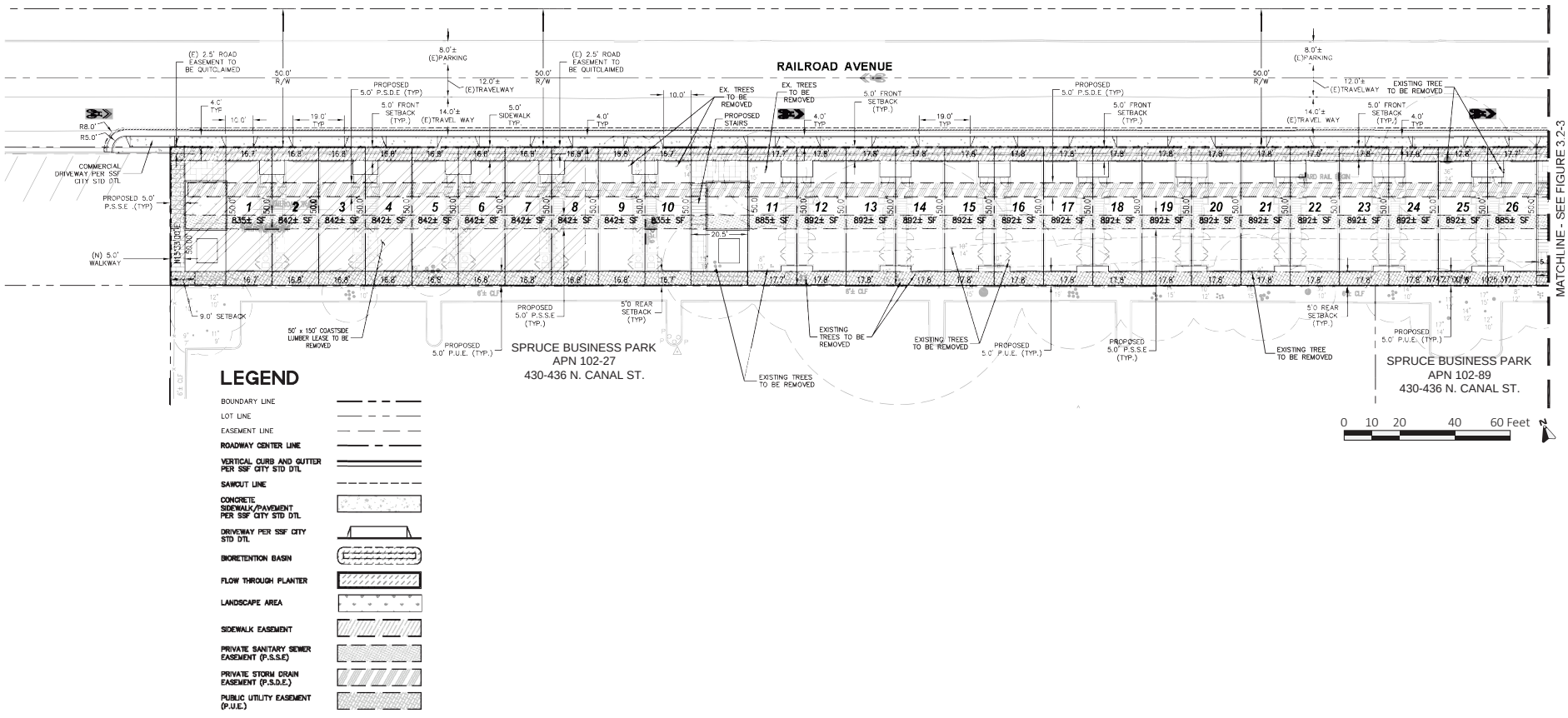
[1] Floor area ratio refers to the ratio of the floor area (with some exceptions such as the areas of basements) of all buildings on a site to the site area. To calculate FAR, floor area is divided by site area, and typically expressed as a decimal.
City of South San Francisco. Rules of Measurement: Section 20.040.009 Determining Floor Area Ratio. Accessed January 30, 2025. https://ecode360.com/43450120.



Source: BKF Engineers, July 16, 2024.

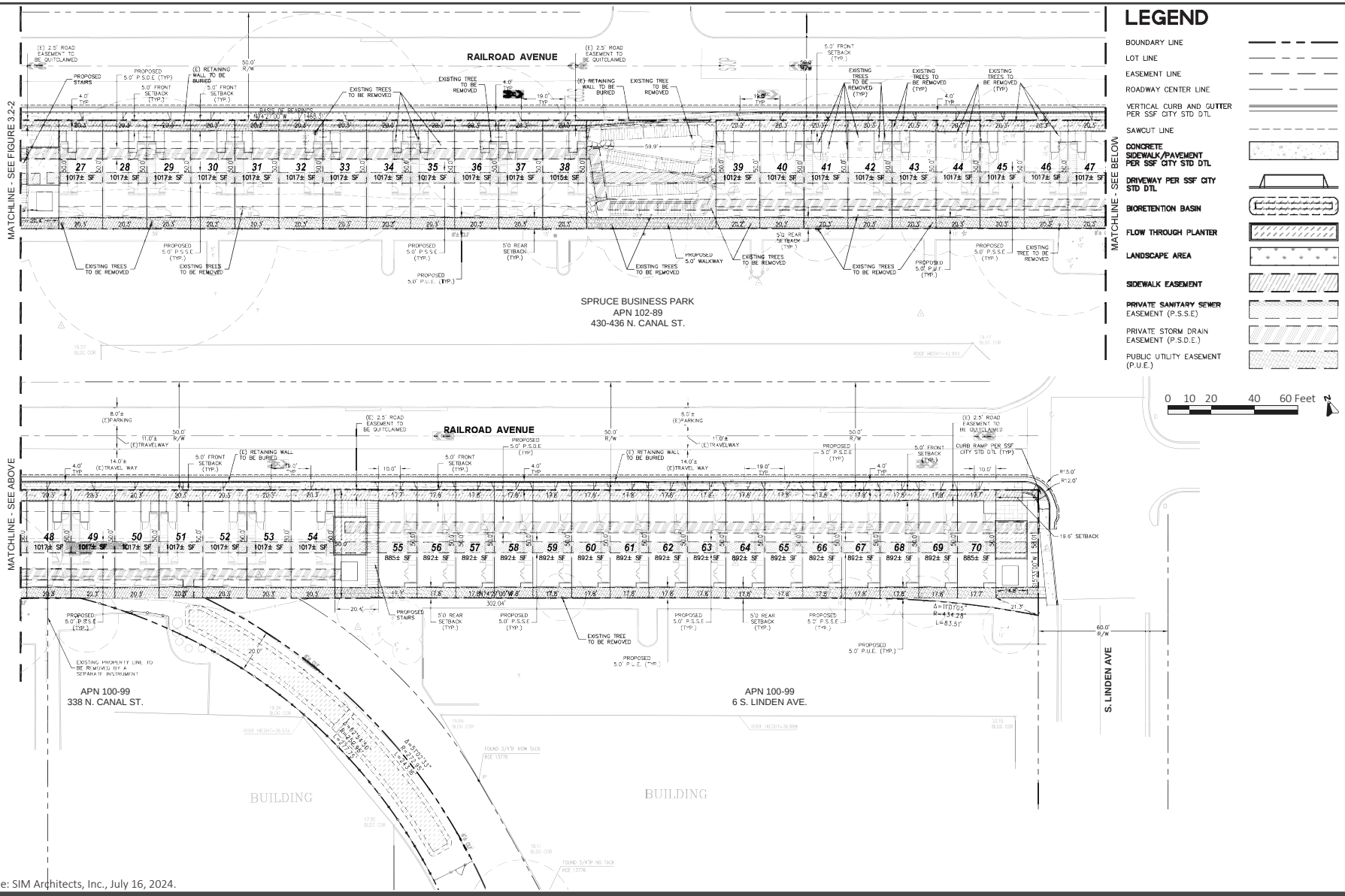
SITE PLAN

FIGURE 3.2-1



Source: SIM Architects, Inc., July 16, 2024.

WESTERN TENTATIVE MAP | FIGURE 3.2-2



Source: SIM Architects, Inc., July 16, 2024.

EASTERN TENTATIVE MAP

FIGURE 3.2-3

The proposed buildings would be two to three stories and have a maximum height of 45 feet at the top of the parapet (refer to Figures 3.2-4 through 3.2-8 for the building elevations). An eight foot tall fence is proposed to be constructed to the rear of the proposed development, adjacent to the proposed buildings' southern facades. The proposed buildings would be set back five feet from Railroad Avenue to north and the light industrial uses to the south, and approximately 20 feet from Linden Avenue to the east and the industrial uses to the west.

In addition, a three-by-three foot heating, ventilation, and air conditioning (HVAC) unit would be located inside the utility closet at the garage level within each residential unit.

3.2.1.1 *Common Outdoor Spaces and Landscaping*

The townhouse development would include a total of 5,330 square feet of outdoor paseo areas with seating, landscaping, and lighting available to the proposed residents. The paseo areas would be located between all buildings. To the south of the proposed residential development, the former railroad spur which extends to North Canal Street would be landscaped and contain a stormwater treatment area (discussed below).

The project would remove 77 (including 19 protected trees) of the 98 existing trees. The project would comply with Municipal Code Section 13.30.080 by planting 57, 15-gallon size trees or 38, 24-inch box trees on-site, as determined by the Department of Parks and Recreation Director. The project would also plant new shrubs, grasses, and groundcover at the project site. The project would include drought-tolerant and native species landscaping.

3.2.1.2 *Green Building Measures*

The project proposes to meet the California Building Standards Code (CalGreen) Mandatory Measures and GreenPoint Rated Checklist. The project would incorporate green building measures including, but not limited to, the following:

- Water efficient/drought tolerant landscaping
- Solar hot water heating systems
- Low emitting materials for flooring
- Energy Star appliances
- Recycling and/or salvaging for reuse a minimum of 65 percent of the nonhazardous construction
- Electric vehicle charging circuits and receptables

NORTH ELEVATION- RAILROAD AVENUE

SOUTH ELEVATION- REAR

Source: SIM Architects, Inc., July 16, 2024.

NORTH AND SOUTH BUILDING 1 ELEVATIONS | FIGURE 3.2-4

NORTH ELEVATION- RAILROAD AVENUE

SOUTH ELEVATION- REAR

Source: SIM Architects, Inc., July 16, 2024.

NORTH AND SOUTH BUILDING 2 ELEVATIONS | FIGURE 3.2-5

NORTH ELEVATION- RAILROAD AVENUE

SOUTH ELEVATION- REAR

Source: SIM Architects, Inc., July 16, 2024.

NORTH AND SOUTH BUILDING 3 ELEVATIONS | FIGURE 3.2-6

NORTH ELEVATION- RAILROAD AVENUE

SOUTH ELEVATION- REAR

Source: SIM Architects, Inc., July 16, 2024.

NORTH AND SOUTH BUILDING 4 ELEVATIONS | FIGURE 3.2-7

NORTH ELEVATION- RAILROAD AVENUE

SOUTH ELEVATION- REAR

Source: SIM Architects, Inc., July 16, 2024.

NORTH AND SOUTH BUILDING 5 ELEVATIONS | FIGURE 3.2-8

3.2.1.3 *Site Access and Parking*

Vehicular access to the individual garages (attached to each unit) on the project site would be via Railroad Avenue. The project's residents would park vehicles within the individual garages. In addition, bicycle racks would be included within each individual garage. For each townhome unit, the project would install a complete electric vehicle (EV) charging circuit and receptacle. The circuit shall be 208/240 volt, 40 amp rated, with an EV charging receptacle.

3.2.1.4 *Utility and Stormwater Improvements*

New six- to eight-inch sanitary sewer lines would connect the proposed residential development to existing six-inch sanitary sewer lines at Railroad Avenue. Each residential unit would have a below grade water meter box installed one foot north from the site's northern property line. New water lines would connect from the project site to the six-inch water main at Railroad Avenue.

The proposed residential development would include new six-inch storm drains. Stormwater runoff from the project site would be directed to the on-site stormwater treatment area located at the former railroad spur south of the residential development. The treated stormwater would then be directed (via the project's new 12-inch storm drain), to an existing storm drain on North Canal Street. Stormwater runoff would also be directed to and treated by flow through planters on-site.

The project voluntarily proposes to be 100 percent electric. No connections to natural gas are proposed.

3.2.2 Construction Activities

Project construction activities include site preparation, grading and excavation, building construction, architectural coatings, and paving. Project construction is estimated to take a total of 24 months. Soil excavation to a maximum depth of 10 feet would be necessary to accommodate the project's utilities, building foundations, and footings. In addition, the project would export up to 585 cubic yards of lead-contaminated from the site.

Section 4.0 Environmental Setting, Checklist, and Impact Discussion

This section presents the discussion of impacts related to the following environmental subjects in their respective subsections:

4.1	Aesthetics	4.11	Land Use and Planning
4.2	Agriculture and Forestry Resources	4.12	Mineral Resources
4.3	Air Quality	4.13	Noise
4.4	Biological Resources	4.14	Population and Housing
4.5	Cultural Resources	4.15	Public Services
4.6	Energy	4.16	Recreation
4.7	Geology and Soils	4.17	Transportation
4.8	Greenhouse Gas Emissions	4.18	Tribal Cultural Resources
4.9	Hazards and Hazardous Materials	4.19	Utilities and Service Systems
4.10	Hydrology and Water Quality	4.20	Wildfire

The discussion for each environmental subject includes the following subsections:

- **Environmental Setting** – This subsection 1) provides a brief overview of relevant plans, policies, and regulations that compose the regulatory framework for the project and 2) describes the existing, physical environmental conditions at the project site and in the surrounding area, as relevant.
- **Impact Discussion** – This subsection provides an analysis of the potential environmental effects of the proposed project. Following the format of CEQA Guidelines Appendix G, and in accordance with CEQA Guidelines Section 15183, the project has been analyzed to determine whether the project would result in the following factors:
    - A significant impact that is peculiar to the project or the parcel on which the project would be located;
    - A new significant impact that was not previously analyzed as a significant effect in the prior EIR, with which the project is consistent;
    - A significant off-site impact and cumulative impact which was not discussed in the prior EIR; or
    - A previously identified significant effect which, as a result of substantial new information which was not known at the time the EIR was certified, is determined to have a more severe adverse impact than discussed in the EIR.

A discussion for each of the checklist questions is provided following the table included for each environmental factor. The discussion provides information about the environmental issue and what

the analysis in the General Plan EIR and Subsequent 2023 Addendum concluded about the issue, how the project relates to the issue, and the project's compliance with applicable Specific Plan requirements and policies, other uniformly applied development policies and standards, and/or project-specific mitigation to reduce significant impacts. Where an impact is not peculiar to the project or the parcel, has been addressed as a significant effect in the prior EIRs, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, an additional EIR need not be prepared for the impact. As set forth in more detail below, none of the factors laid out in CEQA Guidelines Section 15183 have been triggered, and no further analysis is required.

4.1 Aesthetics

4.1.1 Environmental Setting

The existing aesthetics setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR or the subsequent adoption of the Lindenville Specific Plan.

The project site is T-shaped, contains no structures, and consists of mostly grassland, trees, along with segments of gravel and concrete. The northern portion of the site, adjacent to Railroad Avenue, is rectangular and consists of patches of grassland and trees. The southern portion of the site that consists of a former railroad spur is curved and extends from the northern area of the site to North Canal Street. This southern area of the site includes a segment of concrete and the remaining area consists of patches of grass and trees. The site is surrounded to the north by the paved Railroad Avenue and two- to three-story residences primarily made of stucco, wood, and concrete that include gable-, hipped, and flat roofs, one-story concrete industrial buildings with flat roofs and sheds with gable roofs to the west and east of the site, and North Canal Street with an engineered channel (Colma Creek) bordered by concrete walls. Refer to Photos 1 through 4 for the existing site and the surrounding areas.

Photo 1: View of the of the portion of the site designated for residential use and residences across Railroad Avenue, looking east.

Photo 2: View of the portion of the site designated for the pedestrian path, looking north.

PHOTOS 1 & 2

Photo 3: View of South City Lumber (City historic landmark), looking west.

Photo 4: View of Colma Creek and industrial uses south of North Canal Street.

PHOTOS 3 & 4

4.1.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Except as provided in Public Resources Code Section 21099, would the project:					
a) Have a substantial adverse effect on a scenic vista?	Less than Significant	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	Less than Significant	No	No	No	No
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings?[2] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant	No	No	No	No

As stated in the 2040 General Plan EIR, pursuant to SB 743, "aesthetic and parking impacts of a residential, mixed-use residential, or employment center on an infill site within a transit priority area (TPA) shall not be considered significant impacts on the environment." The project site is 0.4 mile southeast of the South San Francisco Caltrain Station (located at 590 Dubuque Avenue) and is within a TPA (refer to Figure 4.1-1). The proposed project is a residential development located within a TPA, therefore, pursuant to SB 743, the project would result in less than significant aesthetics impacts, as disclosed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

[2] Public views are those that are experienced from publicly accessible vantage points.

TRANSIT PRIORITY AREA | FIGURE 4.1-1

4.2 Agriculture and Forestry Resources

4.2.1 Environmental Setting

The existing agricultural and forestry resources setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and the adoption of the Subsequent Addendum to the EIR for the adoption of the Lindenville Specific Plan.

According to the San Mateo County Important Farmland map, the project site is designated as Urban and Built-Up Land, meaning the land contains a building density of at least six units per ten-acre parcel or is used for industrial or commercial purposes, golf courses, landfills, airports, or other utilities.[3] The project site also does not include forest land or timberland.

4.2.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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 non-agricultural use?	No Impact	No	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact	No	No	No	No

[3] California Department of Conservation. "California Important Farmland Finder." Accessed January 22, 2025. https://maps.conservation.ca.gov/DLRP/CIFF/

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
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 Impact	No	No	No	No
d) Result in a loss of forest land or conversion of forest land to non-forest use?	No Impact	No	No	No	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 Impact	No	No	No	No

a-e. The 2040 General Plan EIR concluded there is no existing agriculture or forestry land use activities occur within the General Plan area boundaries, and none of the General Plan area is designated as relevant for agriculture or forestry resources by the City of South San Francisco or by the State of California. The 2040 General Plan EIR concluded that implementation of the 2040 General Plan would have no impact on agricultural or forestry resources. There is no existing farmland or forestry land within the Specific Plan area. In addition, the project site is zoned for urban development. For these reasons, the project would not result in the conversion of Prime Farmland or Farmland of Statewide Importance to nonagricultural uses, nor would it conflict with any zoning for agricultural use or a Williamson Act Contract, or any zoning for forestland or timberland and would not result in loss or conversion of forestland to non-forest uses. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.3 Air Quality

This section is based, in part, on an Air Quality Assessment completed for the project by Illingworth & Rodkin, Inc. on November 22, 2024. The report is attached as Appendix A of this Compliance Checklist.

4.3.1 Environmental Setting

4.3.1.1 *Background Information*

The description of criteria pollutants and toxic air contaminants provided in the 2040 General Plan EIR has not changed.

Pursuant with the federal and State Clean Air Acts, the United States Environmental Protection Agency (EPA) and the California Air Resources Board (CARB) have established and enforced the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), respectively. The NAAQS and CAAQS address the following criteria air pollutants: ozone (O_3), nitrogen dioxide (NO_2), carbon monoxide (CO), particulate matter with a diameter of 10 microns or less (PM_{10}), particulate matter with a diameter of 2.5 micros or less ($PM2_{.5}$), sulfur dioxide (SO_2), and lead.

Toxic air contaminants (TACs) include airborne chemicals that are known to have short- and long-term adverse health effects. TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, diesel fuel combustion, and commercial operations (e.g., dry cleaners). DPM is the predominant TAC in urban air and is estimated to represent about three-quarters of the cancer risk from TACs. Medium- and heavy-duty diesel trucks represent the bulk of DPM emissions from California highways/roadways.

Sensitive Receptors

The description of sensitive receptors provided in the 2040 General Plan EIR has been updated to reflect that specific ages of children and elderly are considered sensitive receptors. Some groups of people are more affected by air pollution than others. The California Air Resources Board (CARB) has identified the following groups who are most likely to be affected by air pollution: children under 16, the elderly over 65, and people with cardiovascular and chronic respiratory diseases. These groups are classified as sensitive receptors. Locations that may contain a high concentration of these sensitive population groups include residential areas, hospitals, daycare facilities, elder care facilities, and elementary schools. For cancer risks, infants and children are the most sensitive receptors, since they are more susceptible to cancer causing TACs. Residential locations are assumed to include infants and small children.

Worker Receptors

In addition to the sensitive receptors mentioned above, based on the April 2023 BAAQMD CEQA Guidelines, adopted after the 2022 certification of the 2040 General Plan EIR, BAAQMD considers worker receptors when reviewing impacts from air pollution and TACs. Worker receptors are adults (i.e., 16 years and older) that work indoors and/or outdoors at off-site locations zoned for commercial and industrial uses. Typical developments that include worker receptors are offices, retail shops, manufacturing uses, light industrial uses, or heavy industrial uses.[4]

4.3.1.2 *Regulatory Framework*

The existing regulatory framework has not substantially changed since certification of the 2040 General Plan. Since the 2022 certification of the 2040 General Plan EIR, BAAQMD adopted new CEQA Air Quality Guidelines. The remainder of the 2040 General Plan EIR regulatory framework is the same for the proposed project.

The BAAQMD CEQA Air Quality Guidelines are intended to serve as a guide for those who prepare or evaluate air quality impact analyses for projects and plans in the San Francisco Bay Area. Jurisdictions in the San Francisco Bay Area Air Basin utilize the thresholds and methodology for assessing air quality impacts developed by BAAQMD within their CEQA Air Quality Guidelines. The guidelines include information on legal requirements, BAAQMD rules, methods of analyzing impacts, and recommended mitigation measures. The latest CEQA Air Quality Guidelines are the 2022 CEQA Air Quality Guidelines adopted on April 20, 2023 by the BAAQMD's Board of Directors. The 2023 CEQA Air Quality Guidelines recommend health risks consider impacts to worker receptors, in addition to sensitive receptors. The 2017 CEQA Air Quality Guidelines did not include a recommendation to consider worker receptors in health risks assessments. The 2023 Guidelines also recommend a newer model to calculate air pollutant emissions (California Emissions Estimator Model), which includes the most recent emissions factors, to estimate air pollutant emissions.

4.3.1.3 *Existing Conditions*

The existing conditions have not substantially changed since certification of the 2040 General Plan EIR. Permitted stationary sources of air pollution near the project site were identified using BAAQMD's Permitted Stationary Sources 2022 website. The locations of stationary and mobile TAC sources within the project site's vicinity are shown on Figure 4.3-1. The stationary TAC sources within the site's vicinity include six generic sources (such as automobile body shops and collision centers), four gas dispensing facilities, and three emergency diesel generators. BAAQMD frequently updates the permitted stationary sources as development and stationary sources change or move. Nearby mobile sources include Caltrain rail lines, approximately 700 feet southeast of the eastern side of the project site, and nearby roadways based on BAAQMD's database of roadways in the San Francisco Bay Area.

[4] Bay Area Air Quality Management District. *California Environmental Quality Act Air Quality Guidelines Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards*. Page E-14. April 2023.

Source: Illingworth & Rodkin, Inc.

PROJECT SITE AND NEARBY TAC AND $PM_{2.5}$ SOURCES | FIGURE 4.3-1

4.3.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Significant Unavoidable Impacts	No	No	No	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?	Significant Unavoidable Impacts	No	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	No	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	No	No	No	No

Bay Area Air Quality Management District

As discussed in CEQA Guidelines Section 15064(b), the determination of whether a project may have a significant effect on the environment calls for judgment on the part of the lead agency and must be based to the extent possible on scientific and factual data. The City of South San Francisco has considered the air quality thresholds updated by BAAQMD in April 2023 and regards these thresholds to be based on the best information available for the San Francisco Bay Area Air Basin and conservative in terms of the assessment of health effects associated with TACs and $PM_{2.5}$. The BAAQMD CEQA Air Quality thresholds used in this analysis are identified in Table 4.3-1 below.

Table 4.3-1: BAAQMD Air Quality Significance Thresholds			
Pollutant	**Construction Thresholds**	**Operation Thresholds**	
	Average Daily Emissions (pounds/day)	**Annual Daily Emissions (pounds/year)**	**Annual Average Emissions (tons/year)**
Criteria Air Pollutants			
ROG, NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
CO	Not Applicable	9.0 ppm (eight-hour) or 20.0 ppm (one-hour)	
Fugitive Dust	Dust Control Measures/Best Management Practices	Not Applicable	
Health Risks and Hazards for New Sources (within a 1,000-foot Zone of Influence)			
Health Hazard	**Single Source**	**Combined Cumulative Sources**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental Annual $PM_{2.5}$	0.3 µg/m^3	0.8 µg/m^3 (average)	

a. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would result in significant and unavoidable air quality impacts even with mitigation incorporated due to inconsistency with the 2017 Clean Air Plan and a cumulatively considerable net increase in criteria air pollutants as a result of an increase in vehicle miles traveled (VMT) that outpaces the forecasted population growth through 2040. The 2040 General Plan EIR also concluded that buildout of the 2040 General Plan would result in a less than significant impact with mitigation incorporated for impacts to sensitive receptors, and a less than significant impact from odor emissions.

The BAAQMD CEQA Air Quality Guidelines set forth criteria for determining consistency with the 2017 CAP. A project is considered consistent if a) the plan supports the primary goals of the 2017 CAP; b) it includes relevant control measures; and c) it does not interfere with implementation of the 2017 CAP control measures. Further, BAAQMD has established thresholds of significance for ground-level O_3 precursor pollutants (ROG and NO_X), $PM_{2.5,}$ and PM_{10}. The 2040 General Plan EIR and the subsequent Lindenville Specific Plan Addendum concluded that buildout of the General Plan (including the Lindenville Specific Plan) would exceed these significance levels, resulting in significant and unavoidable operational air quality impacts.

The 2040 General Plan EIR disclosed that the San Francisco Bay Area Air Basin is a non-attainment area for particulate matter ($PM_{2.5}$ and PM_{10}) and that future construction activities would generate fugitive dust emissions that would contribute to future non-attainment unless adequately controlled. The 2040 General Plan EIR included Mitigation Measure MM AIR-1a, which requires that future developments implement the following BAAQMD Construction Best Management Practices (BMPs) to reduce construction criteria pollutant emissions as well as fugitive dust. The 2040 General Plan EIR concluded that impacts from construction fugitive dust emissions (from PM_{10} and $PM_{2.5}$) would be reduced to a less than significant level with the implementation of MM AIR-1a. The General Plan EIR did not include a discussion of impacts related to construction ROG or NO_X (criteria pollutants) emissions.

MM AIR-1a: Individual development projects facilitated by the General Plan shall incorporate the following Basic Construction Mitigation Measures recommended by the Bay Area Air Quality Management District (BAAQMD):

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
- All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure [ATCM] Title 12, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Prior to the commencement of construction activities, individual project proponents shall post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number shall also be visible to ensure compliance with applicable regulations.

Construction

Construction period emissions of criteria pollutants for on-site and off-site construction activities were estimated using the California Emissions Estimator Model (CalEEMod) for the proposed project. A construction duration for the proposed project would be 24 months (400 construction workdays), with the earliest year of full operation assumed to be 2027. The CalEEMod model provides emissions estimates for both on-site and off-site construction activities. On-site activities primarily include construction equipment emissions, while off-site activities include worker, hauling, and vendor traffic.

The average construction criteria pollutant daily emissions summary for the proposed project are shown in Table 4.3-2 below. Compared to thresholds recommended by BAAQMD, project construction criteria pollutant emissions would be less than significant.

Table 4.3-2: Construction Period Emissions – Unmitigated

Year	ROG	NOx	PM_{10} Exhaust	$PM_{2.5}$ Exhaust
Construction Emissions Per Year (Tons)				
2025	0.27	0.22	0.01	0.01
2026	0.86	0.01	<0.01	<0.01
Average Daily Construction Emissions Per Year (pounds/day)				
2025 (261 construction workdays)	2.04	1.69	0.06	0.05
2026 (241 construction workdays)	7.14	0.08	<0.01	<0.01
BAAQMD Thresholds (pounds per day)	*54* lbs./day	*54* lbs./day	*82* lbs./day	*54* lbs./day
Exceed Threshold?	No	No	No	No

Construction activities, particularly during site preparation and grading, would temporarily generate fugitive dust in the form of PM_{10} and $PM_{2.5}$. Sources of fugitive dust would include disturbed soils at the construction site and trucks carrying uncovered loads of soils. Unless properly controlled, vehicles leaving the site would deposit mud on local streets, which could be an additional source of airborne dust after it dries. BAAQMD recommends all projects include a "basic" set of BMPs (per Mitigation Measure MM AIR-1a listed above) to manage fugitive dust and considers impacts from dust (i.e., fugitive PM_{10} and $PM_{2.5}$) to be less than significant if BMPs are implemented to reduce these emissions.

The project would implement the BAAQMD recommended BMPs, required by General Plan EIR MM AIR-1a listed above, during all phases of construction to reduce dust and other particulate matter emissions. The City's required BMPs are consistent with BAAQMD-recommended basic BMPs for reducing fugitive dust contained in the BAAQMD CEQA Air Quality Guidelines. For this analysis, only the basic set of BMPs (i.e., MM AIR-1a) are required as the Project emissions and $PM_{2.5}$ impacts were below the BAAQMD thresholds. Given the emissions are below BAAQMD thresholds for the criteria pollutants, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

Operations

BAAQMD has screening levels for evaluating whether a single land use would be expected to result in significant levels of operational criteria pollutants. If the size of the project is below the applicable screening level, the project is considered to have a less than significant operational criteria pollutant emissions impact. The BAAQMD operational criteria pollutant screening level for condominiums/townhouses is 637 units. The project would develop 70 townhouse units, which is below the BAAQMD screening level for townhouses, and therefore, the project's operational criteria pollutant emissions are less than significant.

In addition, the proposed project would implement the following Transportation Demand Management (TDM) measures, in compliance with the City's TDM Ordinance 20.400 described in the 2040 General Plan EIR to reduce vehicle miles traveled, which would reduce operational vehicle criteria pollutant emissions.

TDM Measures

- The proposed development's Homeowner's Association (HOA) will provide transit subsidies for every unit for the first year after purchasing. The transit subsidies will be provided on a Clipper Card that can be used on SamTrans, BART, and Caltrain.
- The project would construct a new five-foot-wide sidewalk along the project frontage on Railroad Avenue.
- The project would provide long-term bicycle racks within each townhouse unit's garage.

For the above reasons, the project would have less than significant operational criteria pollutant emissions and provide a less than cumulatively considerable contribution to the significant operational criteria air pollutant emissions impact disclosed in the General Plan EIR. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

b. As described above, the 2040 General Plan EIR concluded that if a project includes the dust control BMPs in MM AIR-1a then construction fugitive dust emissions would be less than significant. As described in the response to checklist question a), consistent with the 2040 General Plan EIR, the project will implement Mitigation Measure MM AIR-1a to reduce the project's fugitive dust emissions to a less than significant level. In addition, as shown in Table 4.3-2 above, the project's construction criteria pollutant emissions would be well below BAAQMD thresholds for construction criteria pollutants and would, therefore, not result in a cumulatively considerable net increase of any criteria pollutant.

As described under checklist question a), the proposed townhouse project would consist of 70 townhouse units, which is below BAAQMD screening levels for townhouse units (i.e. 637 units). Therefore, the project would not result in a cumulative net increase in operational criteria pollutants. For the above reasons, the project would not result in a new criteria air pollutant impact nor would it increase the severity of the significant criteria pollutant impact identified in the 2040

General Plan EIR or of the subsequent Addendum to the EIR for the Lindenville Specific Plan. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183, and no further analysis is required.

c. The 2040 General Plan EIR and the subsequent 2023 Addendum to the EIR for the Lindenville Specific Plan concluded that future development under the General Plan and Lindenville Specific Plan would be subject to the City's standard CEQA review process, and as required under Mitigation Measures MM AIR-1a and MM AIR-1b, required to implement fugitive dust BMPs during construction, and development proposed within 1,000 feet of a sensitive receptor would be required to complete a health risk assessment to identify any health risk impacts and mitigation measures to reduce such impacts to a less than significant level. Mitigation Measures MM AIR-1b is listed below (MM AIR-1a is listed in the response to checklist question a), above):

MM AIR-1b: Projects that may result in additional toxic air contaminants (TACs) that are located within 1,000 feet of a sensitive receptor(s) or would place sensitive receptors within 1,000 feet of uses generating TACs, such as roadways with volumes of 10,000 average annual daily trips or greater, shall implement Bay Area Air Quality Management District (BAAQMD) Guidelines and California Office of Environmental Health Hazard Assessment (OEHHA) policies and procedures requiring a Health Risk Assessment (HRA) for residential development and other sensitive receptors.

Consistent with MM AIR-1b, an HRA was prepared for the proposed townhouse project. Health risk impacts were addressed by predicting increased cancer risk, the increase in annual $PM_{2.5}$ concentrations, and by computing the Hazard Index (HI) for non-cancer health risks. The risk impacts from the project are the combination of risks from construction and operation sources. These sources include on-site construction activity, construction truck hauling, and increased traffic from the project.

Health Risk from Project Construction

The primary health risk impact issues associated with construction projects are cancer risks associated with diesel exhaust (i.e., DPM), which is a known TAC, and exposure to high ambient concentrations of dust (i.e., $PM_{2.5}$). DPM poses both a potential health and nuisance impact to nearby receptors. A health risk assessment of the project construction activities was completed, which evaluated potential health effects to nearby sensitive receptors from construction emissions of DPM and $PM_{2.5}$. This assessment included dispersion modeling to estimate the off-site concentrations from project construction, and the associated lifetime cancer risks and non-cancer health effects.

The California Emissions Estimator Model (CalEEMod) was used to estimate annual PM_{10} exhaust emissions (assumed to be DPM) for the off-road construction equipment and for exhaust emissions from on-road vehicles. The on-road emissions are a result of haul truck travel during grading activities, worker travel, and vendor deliveries during construction. A trip length of one mile was

used to represent vehicle travel while at or near the construction site. It was assumed that the emissions from on-road vehicles traveling at or near the site would occur at the construction site.

The U.S. Environmental Protection Agency (U.S. EPA) American Meteorological Society/ Environmental Protection Agency Regulatory Model (AERMOD, i.e., dispersion mode) was used to estimate DPM and $PM_{2.5}$ concentrations at sensitive receptors (i.e., residences) in the vicinity of the project construction area. The AERMOD dispersion model is a BAAQMD-recommended model for use in modeling analysis of these types of emission activities.

Summary of Construction-Related Health Risks at the Off-Site Sensitive Receptors

The maximum increased cancer risks were calculated using the modeled TAC concentrations combined with BAAQMD CEQA guidance for age sensitivity factors and exposure parameters. Age-sensitivity factors reflect the greater sensitivity of infants and small children to cancer causing TACs. Third trimester, infant, child, and adult exposures were assumed to occur at all residences during the entire construction period, while child exposures were assumed at the Da Hao Preschool at 200 Linden Avenue, approximately 740 feet north of the project site.

Non-cancer health hazards and maximum $PM_{2.5}$ concentrations were also calculated. The maximum modeled annual $PM_{2.5}$ concentration was calculated based on combined exhaust and fugitive concentrations. The maximum computed HI value was based on the ratio of the maximum DPM concentration modeled and the chronic inhalation DPM reference exposure level of five (5) µg/m3.

The modeled maximum annual DPM and $PM_{2.5}$ concentrations were identified at nearby sensitive receptors to find the project's maximally exposed individual (MEI). The model assumed the MEI would be exposed to project emissions from 24 months of construction. Results of this assessment showed the MEI was located on the second floor (15 feet above the ground) at a multi-family residence, approximately 50 feet north of the project site. The location of the MEI and nearby sensitive receptors are shown in Figure 4.3-2 below. The model assumed the MEI would be exposed to project emissions from 24 months of construction.

Source: Illingworth & Rodkin, Inc.

PROJECT CONSTRUCTION SITE, OFF-SITE SENSITIVE RECEPTORS, AND MEI | FIGURE 4.3-2

In addition, modeling was completed to estimate cancer risks, non-cancer health hazards, and maximum $PM_{2.5}$ concentrations associated with construction activities at the nearby Da Hao Preschool. The maximum increased cancer risks were adjusted using child exposure parameters at the preschool. Table 4.3-3 summarizes the maximum cancer risks, PM2.5 concentrations, and health hazard indexes for project related construction activities.

Table 4.3-3: Construction Risk Impacts at Off-Site Receptors

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction Unmitigated	1.23 (infant)	0.01	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold? Unmitigated	*No*	*No*	*No*
Da Hao Preschool			
Project Construction Unmitigated	0.03 (child)	<0.01	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold? Unmitigated	*No*	*No*	*No*

The cancer risk, $PM_{2.5}$ concentration, and HI at the MEI or preschool do not exceed the respective BAAQMD single-source significance thresholds, as shown in Table 4.3-3. Consistent with the 2040 General Plan EIR requirement for future developments, the project would implement MM AIR-1a (BAAMQD construction BMPs) to reduce fugitive dust emissions impacts to less than significant. Consistent with the 2040 General Plan EIR conclusions, the project would have a less than significant impact on off-site sensitive receptors with the implementation of MM AIR-1a. Given the project's resulting cancer risk, $PM_{2.5}$ concentration, and HI at the MEI does not exceed BAAQMD thresholds, no other mitigation is required to reduce the impacts from TAC and $PM_{2.5}$ construction emissions on sensitive receptors to less than significant level.

Health Risks from Project Operation

The project does not include diesel stationary equipment that could emit substantial TACs (e.g., emergency generators). Diesel powered vehicles are the primary concern with local traffic-generated TAC impacts. Based on CalEEMod default results, this project would generate 512 daily trips with a majority of the trips being from light-duty gasoline-powered vehicles (i.e., passenger cars). The project is not anticipated to generate significant truck trips that would involve diesel vehicles. In addition, projects with the potential to cause or contribute to increased cancer risk from vehicle-related emissions include those that have high numbers of diesel-powered on road trucks or use off-road diesel equipment on site, such as a distribution center, a quarry, or a manufacturing facility. Emissions from project traffic resulting from the proposed townhouse development are considered negligible and a quantitative operational health risk analysis was not required. The project's impacts related to operational health risks would be less than significant.

Cumulative Health Risks of all TAC Sources at the Off-Site Project MEI

The health risk assessment analyzed the effects of all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of a project site (i.e., influence area). These sources include rail lines, highways, busy surface streets, and stationary sources identified by BAAQMD.

A review of the project area using BAAQMD's geographic information systems (GIS) screening maps identified the existing health risks from a nearby roadway, railway, and stationary sources at the MEI. Thirteen existing stationary sources, multiple nearby roadways, and one railway (i.e., a Caltrain railway) were identified as TAC sources with the potential to affect the project MEI. Figure 4.3-1, provided above in section 4.3.1.3, shows the sources affecting the MEI. The cancer risks, annual $PM_{2.5}$, and HI from the cumulative TAC and $PM_{2.5}$ sources at the project MEI are shown in Table 4.3-4.

Table 4.3-4: Cumulative Health Risk Impacts at the Project MEI

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts			
Project Construction Unmitigated	1.23 (infant)	0.01	<0.01
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold? Unmitigated	*No*	*No*	*No*
Cumulative Impacts			
Cumulative Roadways – BAAQMD Raster	6.80	0.18	0.02
Caltrain	0.67	<0.01	<0.01
NOD Auto Body Shop, Inc. (Facility ID #15132, Generic Source), MEI at 970 feet.	0.00	0.00	0.00
City of SSF Water Quality Plant (Facility ID #13866, Generator), MEI at 1000+ feet.	0.83	<0.01	<0.01
South San Francisco Water Quality (Facility ID #16753, Generator), MEI at 940 feet.	0.36	<0.01	<0.01
E & S Auto Collision, Inc. (Facility ID #18877, Generic Source), MEI at 305 feet.	0.00	0.00	<0.01
Altitude Apartments (Facility ID #202457, Generator), MEI at 1000+ feet.	1.10	<0.01	<0.01
Starlite/Canal Building LLC (Facility ID #24523, Generic Source), MEI at 1000+ feet.	<0.01	0.00	0.00
Transform Auto Body (Facility ID #23757, Generic Source), MEI at 185 feet.	0.00	0.00	0.00
Bayside Collision Center (Facility ID #201564, Generic Source), MEI at 1000+ feet.	0.00	0.00	0.00

Table 4.3-4: Cumulative Health Risk Impacts at the Project MEI			
Source	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Lindenville Auto Body Center, Inc. (Facility ID #201912, Generic Source), MEI at 1000+ feet.	0.00	0.00	0.00
Penske Truck Leasing (Facility ID #109444, Gas Dispensing Facility), MEI at 1000+ feet.	0.05	0.00	0.01
South City Shell (Facility ID #110695, Gas Dispensing Facility), MEI at 635 feet.	0.76	0.00	0.11
Speedway #4874 (Facility ID #110777, Gas Dispensing Facility), MEI at 1000+ feet.	0.76	0.00	0.02
South San Francisco Fire Dept (Facility ID #111840, Gas Dispensing Facility), MEI at 1000+ feet.	0.08	0.00	0.01
Combined Sources Unmitigated	<12.65	<0.23	<0.23
BAAQMD Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Exceed Threshold? Unmitigated	*No*	*No*	*No*

Table 4.3-4 shows both the project and cumulative health risk impacts at the sensitive receptors most affected by project construction (i.e., the MEIs). None of the BAAQMD single-source or cumulative-source thresholds are exceeded by the project. Therefore, the proposed project combined with other TAC sources, would not result in a cumulative health risk impact to sensitive receptors.

Nearby approved projects on 7 South Linden Avenue, 423 Commercial Avenue, 428 Baden Avenue, and 205 Baden Avenue are located within 1,000 feet of the project site. However, based on the construction schedule for these approved projects, the projects would be fully constructed prior to the start of the proposed project's construction. As a result, the nearby approved projects were not included in the cumulative health risk analysis.

Consistent with the conclusions of the 2040 General Plan EIR and the subsequent 2023 Addendum to the EIR for the Lindenville Specific Plan, with the implementation of construction BMPs to reduce fugitive dust emissions (MM AIR-1a), the project would result in a less than significant health risk impact, from TAC and PM2.5 sources, to off-site sensitive receptors. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

d. As stated in the 2040 General Plan EIR and subsequent 2023 Addendum to the EIR for the Lindenville Specific Plan, future projects' compliance with the applicable regulations in the Zoning Ordinance as well applicable BAAQMD rules and regulations, would minimize odor emissions from adversely affecting a substantial number of people within the City and impacts would be less than significant. The City's Municipal Code, Section 20.300.010 (Performance Standards) establishes

regulations related to odors and restricts uses, processes, or activities that produce objectionable odors that are perceptible without instruments by a reasonable person at the lot lines of a site.

- Section 20.300.010 (Performance Standards) from the City's Zoning Ordinance states the following:

    - **Odors.** No use, process, or activity shall produce objectionable odors that are perceptible without instruments by a reasonable person at the lot lines of a site. Odors from temporary construction, demolition, and vehicles that enter and leave the subject lot (e.g., construction equipment, trains, trucks, etc.) are exempt from this standard.

According to the BAAQMD CEQA Air Quality Guidelines, land uses associated with odor complaints typically include agricultural operations, wastewater treatment plants, landfills, and certain industrial operations such as chemical and other manufacturing. While odors do not present a health risk of themselves, they are often considered a nuisance by people who live, work, or otherwise are located near outdoor odor sources. The BAAQMD CEQA Air Quality Guidelines identify a screening distance for one and two miles for the most common odor-generating land uses. Projects located outside of these screening distances would be presumed to not be exposed to odors, while projects within these screening distances present a potential to be exposed to odors. As stated in the Addendum to the General Plan EIR for the Lindenville Specific Plan, residential development under the Lindenville Specific Plan (including the proposed project) would not be a land use associated with odor complaints. During construction, the various diesel-powered equipment and vehicles on-site would create localized odors, but these odors would be temporary and not likely to be noticeable for extended periods of time outside the site boundaries. Consistent with the 2040 General Plan EIR conclusions, the project would comply with the City's Zoning Ordinance Section 20.300.010 and BAAQMD Guidelines related to odors and would, therefore, result in a less than significant impact to off-site receptors. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

4.3.3 Non-CEQA Effects

Per California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal. 4th 369 (BIA v. BAAQMD), effects of the environment on the project are not considered CEQA impacts. The following discussion is included for informational purposes only because the City of South San Francisco requires health risk assessments for new residential developments near sources of air pollution. Where risks are above thresholds, the City encourages the use of proper actions to reduce exposures. General Plan Policy CHEJ-3.5 related to the exposure of new sensitive receptors to existing TAC sources are as follows:

- **General Plan Policy CHEJ-3.5:** Discourage development of sensitive uses near sources of pollution. Discourage the development of sensitive land uses (schools, healthcare facilities, and elder and childcare centers) within 500 feet of highways and stationary sources of

pollution. For sensitive land uses that cannot be sited at least 500 feet away, potential design mitigation actions include:

- Locate air intake systems for heating, ventilation, and air conditioning (HVAC) systems as far away from existing air pollution sources as possible.
- Using high-efficiency particulate matter (HEPA) filters in the HVAC system and develop a maintenance plan to ensure the filtering system is properly maintained.
- For non-residential buildings, consider utilizing only fixed windows next to any existing sources of pollution.
- Plant landscape barriers between highways and residential areas to reduce noise and air pollution from residents.

The proposed project residences would be located within 500 feet of stationary TAC sources (refer to Figure 4.3-1, above). Therefore, a health risk assessment was completed to determine the effect that existing air pollutant and TAC sources would have on the new proposed sensitive receptors (project residents) that the project would introduce. The same TAC sources identified above were used in this assessment. The cancer risk, PM2.5 concentrations, and HI at the site's future sensitive receptors are shown in Table 4.3-5.

Table 4.3-5: Effects from Combined TAC and $PM_{2.5}$ Sources on Project Site Receptors

Source	Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Cumulative Roadways – BAAQMD Raster	8.74	0.20	0.03
Caltrain	0.67	<0.01	<0.01
NOD Auto Body Shop, Inc. (Facility ID #15132, Generic Source), MEI at 805 feet.	0.00	0.00	0.00
City of SSF Water Quality Plant (Facility ID #13866, Generator), MEI at 870 feet.	1.04	<0.01	<0.01
South San Francisco Water Quality (Facility ID #16753, Generator), MEI at 330 feet.	1.96	<0.01	<0.01
E & S Auto Collision, Inc. (Facility ID #18877, Generic Source), MEI at 190 feet.	0.00	0.00	<0.01
Altitude Apartments (Facility ID #202457, Generator), MEI at 705 feet.	2.21	<0.01	<0.01
Starlite/Canal Building LLC (Facility ID #24523, Generic Source), MEI at 805 feet.	0.00	0.00	0.00
Transform Auto Body (Facility ID #23757, Generic Source), MEI at 380 feet.	0.00	0.00	0.00
Bayside Collision Center (Facility ID #201564, Generic Source), MEI at 1000 feet.	0.00	0.00	0.00
Lindenville Auto Body Center, Inc. (Facility ID #201912, Generic Source), MEI at 390 feet.	0.00	0.00	0.00

Table 4.3-5: Effects from Combined TAC and $PM_{2.5}$ Sources on Project Site Receptors			
Source	**Cancer Risk (per million)**	**Annual $PM_{2.5}$ ($\mu g/m^3$)**	**Hazard Index**
Penske Truck Leasing (Facility ID #109444, Gas Dispensing Facility), MEI at 820 feet.	0.08	0.00	0.03
South City Shell (Facility ID #110695, Gas Dispensing Facility), MEI at 605 feet.	0.76	0.00	0.11
Speedway #4874 (Facility ID #110777, Gas Dispensing Facility), MEI at 380 feet.	5.47	0.00	0.32
South San Francisco Fire Dept (Facility ID #111840, Gas Dispensing Facility), MEI at 500 feet.	0.35	0.00	0.13
BAAQMD Single-Source Threshold	***>10.0***	***>0.3***	***>1.0***
Exceed Threshold?	*No*	*No*	*No*
Combined Total	21.28	<0.24	<0.67
BAAQMD Cumulative Source Threshold	***>100***	***>0.8***	***>10.0***
Exceed Threshold?	*No*	*No*	*No*

As shown in Table 4.3-5, none of the TAC and/or $PM_{2.5}$ sources exceed the BAAQMD single-source or combined-source thresholds for health risks. The project would, therefore, not conflict with the City's General Plan Policy CHEJ-3.5 or BAAQMD CEQA Air Quality Guidelines.

4.4 Biological Resources

This discussion is based in part upon an Arborist Report completed by HortScience/Bartlett Consulting in March 2024. The report is included in Appendix B of this Compliance Checklist.

4.4.1 Environmental Setting

The existing biological setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum to the General Plan EIR.

The 2.0 acre project site is vacant and consists of patches of grass, trees, and a segment that includes paved concrete. The site was previously used as a railroad spur. The site is located in an urban area and is surrounded by residential development to north, industrial development to the east and west, and North Canal Street and the channelized Colma Creek approximately 50 feet to the south of the southern portion of the site adjacent to North Canal Street. The site and Colma Creek are separated by North Canal Street. As described in the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum, the majority of the Lindenville Specific Plan area (which includes the project site) is urban land and does not contain any ecologically sensitive habitat, except for the channelized portion of Colma Creek that runs through the northern portion of the Specific Plan area, and the Navigable Slough, which passes through the southern portion of the Specific Plan area. The primary biological resources within the Specific Plan area are landscaped trees, Colma Creek, and the Navigable Slough (located south of Colma Creek in the southeastern portion of the City, approximately 0.5 mile south of the project site), which can provide nesting and foraging habitat to birds. Colma Creek and the Navigable Slough within the project area can also provide habitat for aquatic species. However, due to the modified conditions of Colma Creek and the Navigable Slough, these habitats are not likely to contain special-status plant and wildlife species.

4.4.1.1 *Trees*

South San Francisco Municipal Code Section 13.30 Tree Preservation

As stated in the 2040 General Plan EIR, City-protected trees cannot be removed without a tree removal permit. Based on the City's Municipal Code Section 13.30, the following trees are City-protected:

- Certain Heritage species (such as oaks) 9 inches and greater in trunk diameter (30 inches in circumference)
- Most species 15 inches and greater in diameter (48 inches in circumference),
- Certain species (such as blackwood acacia) 24 inches and greater in trunk diameter (75 inches in circumference),
- A stand of trees whereby each tree is dependent upon the others for survival, and

- A tree or stand of trees so designated based on findings that it is unique and is of importance to the public due to its unusual appearance, location, or historical significance.

South San Francisco requires replacement of Protected trees with three 15-gallon-size or two 24-inch box minimum-size landscape trees for each tree removed, as determined by the Department of Parks and Recreation Director.

On-site Trees

The project site contains a total of 98 trees including blackwood acacia, river red gum, blue gum, compact blue gum, Brisbane box, Canary Island pine, and Monterey pine trees. Ninety four (94) of 98 trees are in poor or fair condition, and the remaining four are in good condition. Twenty eight (28) of the 98 trees are City-protected trees. Figure 4.4-1 shows the location of the on-site trees and Table 4.4-1 includes the species and size of the trees, and identifies City-protected trees. City-protected trees are bolded in text.

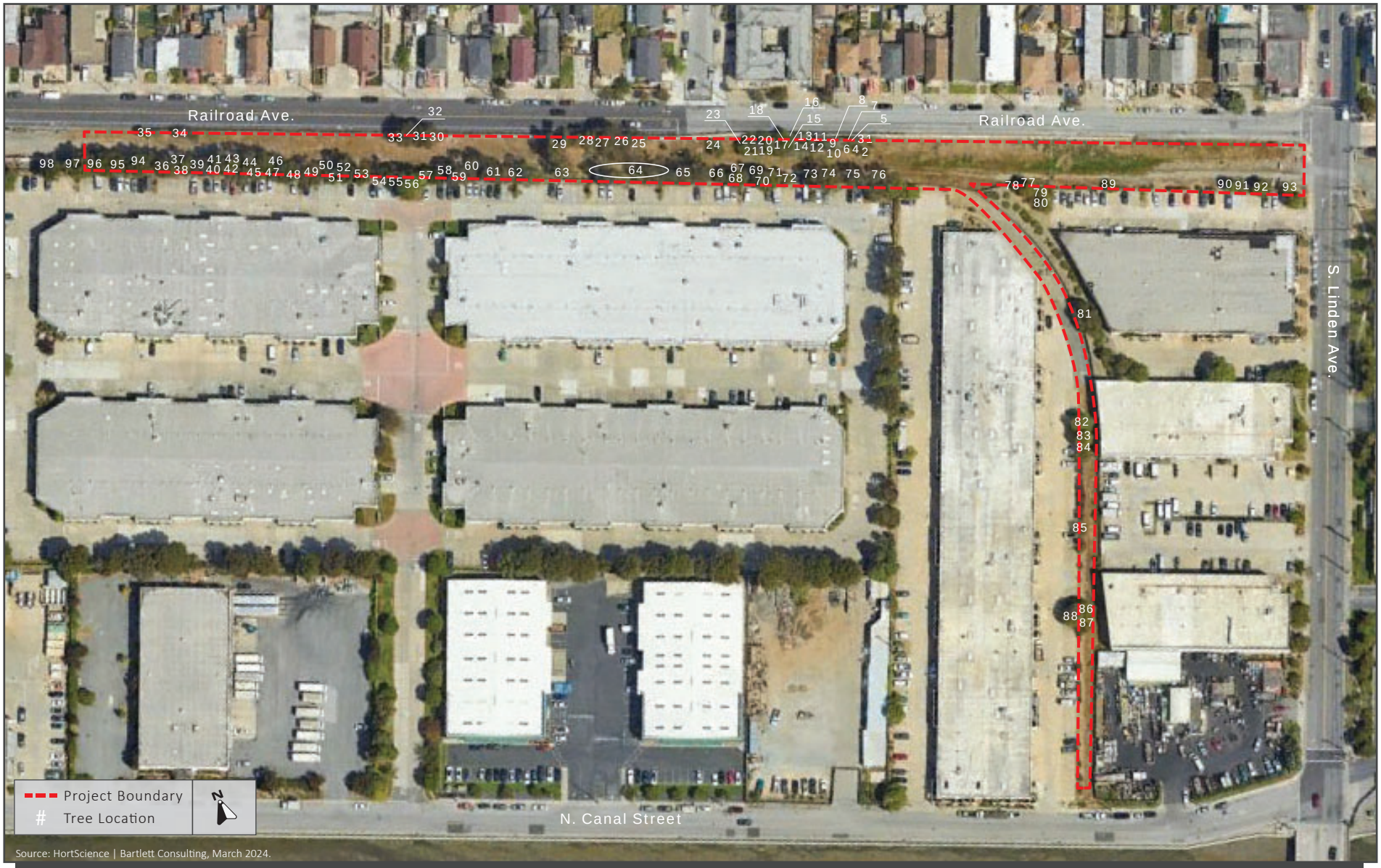
Table 4.4-1: On-site Trees

Tree Number	Species	Trunk Diameter (inches)
1	Blackwood acacia	6
2	Blackwood acacia	7,5
3	Blackwood acacia	7,6
4	Blackwood acacia	7
5	Blackwood acacia	6
6	Blackwood acacia	9
7	Blackwood acacia	8,6
8	Blackwood acacia	6
9	Blackwood acacia	7
10	Blackwood acacia	9
11	Blackwood acacia	7,7
12	Blackwood acacia	6
13	Blackwood acacia	7
14	Blackwood acacia	6
15	Blackwood acacia	6,6,5
16	Blackwood acacia	7,6
17	Blackwood acacia	7,6,6,6
18	Blackwood acacia	7
19	Blackwood acacia	8
20	Blackwood acacia	9

Table 4.4-1: On-site Trees		
Tree Number	**Species**	**Trunk Diameter (inches)**
21	Blackwood acacia	13
22	Blackwood acacia	7
23	Blackwood acacia	7,6,5,5,4,4,4
24	Blackwood acacia	10
25	**River red gum**	**22**
26	River red gum	7
27	**River red gum**	**20**
28	**River red gum**	**20**
29	**River red gum**	**35**
30	River red gum	9
31	Blue gum	15,11
32	Compact blue gum	7,6,4,4
33	**Compact blue gum**	**30**
34	Blackwood acacia	13,8
35	Compact blue gum	7,6
36	**Compact blue gum**	**24,22,12**
37	Blue gum	12, 7, 5
38	Blue gum	7,5,3
39	Compact blue gum	20,16,16,12,12,9
40	**Compact blue gum**	**24,20,20,20,12**
41	Blue gum	13
42	Blue gum	14
43	Blue gum	12,4,4
44	Blue gum	16
45	**Compact blue gum**	**30**
46	Compact blue gum	13
47	**Compact blue gum**	**45,20,15**
48	Compact blue gum	17,16,15,14,12,8
49	Compact blue gum	13,12,10, 10,10,7
50	Compact blue gum	12
51	**Compact blue gum**	**24,20,20,19**
52	**Compact blue gum**	**32**
53	Compact blue gum	20,17,16,14,10,9

Table 4.4-1: On-site Trees		
Tree Number	**Species**	**Trunk Diameter (inches)**
54	Canary Island pine	13
55	Canary Island pine	16
56	Canary Island pine	18
57	Compact blue gum	14,12,12,12,10,10,10,6,5
58	River red gum	10
59	**River red gum**	**29**
60	River red gum	14
61	**River red gum**	**24,18**
62	River red gum	12,9,8,8,7,4
63	River red gum	14
64	River red gum	1'-10" range
65	**River red gum**	**26**
66	**Monterey pine**	**15**
67	Blackwood acacia	16
68	**River red gum**	**22**
69	Blackwood acacia	9,5
70	Compact blue gum	18,13,13,7,3,3,3
71	Monterey pine	9
72	**Compact blue gum**	**28**
73	Blackwood acacia	12
74	Compact blue gum	16
75	**Compact blue gum**	**24,17,16,13,12,10,9,8**
76	**River red gum**	**27**
77	Blackwood acacia	11
78	Brisbane box	7,6,6,6,4,4
79	Brisbane box	8,6,3
80	Brisbane box	8,7,6,4,4,3
81	**Blackwood acacia**	**27**
82	**Brisbane box**	**15**
83	**Brisbane box**	**16**
84	Brisbane box	14
85	Brisbane box	13
86	**Brisbane box**	**16**
87	Brisbane box	8

Table 4.4-1: On-site Trees		
Tree Number	**Species**	**Trunk Diameter (inches)**
88	**Brisbane box**	**19**
89	Brisbane box	12,4,4,2,2
90	Brisbane box	10,6,3
91	Brisbane box	6,4,4
92	Brisbane box	8,8,7,6,2
93	Brisbane box	8,7,4,4,3
94	Blue gum	13,10
95	**Blue gum**	**37**
96	**Blue gum**	**42**
97	**Compact blue gum**	**50**
98	**Compact blue gum**	**40**
Notes: **bold text** indicates a protected tree		



TREE LOCATION MAP

FIGURE 4.4-1

4.4.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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 Wildlife (CDFW) or United States Fish and Wildlife Service (USFWS)?	Less than Significant with Mitigation	No	No	No	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 CDFW or USFWS?	Less than Significant Impact	No	No	No	No
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Less than Significant with Mitigation	No	No	No	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, impede the use of native wildlife nursery sites?	Less than Significant with Mitigation	No	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Less than Significant	No	No	No	No

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
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?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum to the General Plan EIR concluded that implementation of the General Plan (including the Lindenville Specific Plan) would have a less than significant impact on special-status species. Biological concerns identified in the 2040 General Plan EIR specific to the Specific Plan area are in regard to migratory and nesting birds, Colma Creek, and the Navigable Slough along the southeastern edge of the Specific Plan area.

Based on the 2040 General Plan EIR, future projects within 80 feet of Colma Creek would be required to implement General Plan Policy ES-3.3 to reduce impacts to the creek to less than significant.

- **General Plan Policy ES-3.3**: Maintain development standards along Colma Creek to support habitat. Maintain development standards and guidelines for new construction within 80 feet that support urban ecology and ecosystem resilience. Provide project applicants with a process for exemptions and/or offsets under limited circumstances. Standards include:

    - Requiring no net new impervious areas.
    - Maintaining (or increasing) building setbacks to support habitat areas.
    - Encouraging new construction to construct bioswales or similar features to treat runoff before it enters the creek.
    - Using a planting palette consisting of native species and species that provide valuable resources for native wildlife.

The 2040 General Plan EIR also requires future projects under the General Plan to complete focused surveys, where necessary, to determine whether special-status species, nesting birds, or migratory birds occur on a given project site, and that potential impacts to special-status species be avoided and minimized, and that any losses be fully compensated on-site or at a habitat mitigation bank. The 2040 General Plan EIR concluded that with mandatory regulatory compliance and implementation of MM BIO-1 below, future development projects would not result in significant adverse effects to biological resources and impacts would be considered less than significant with mitigation.

2040 General Plan EIR Mitigation Measure

MM BIO-1: **Special-status Species, Migratory Birds, and Nesting Birds** Special-status species are those listed as Endangered, Threatened or Rare, or as Candidates for listing by the United States Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW), or as Rare Plant Rank 1B or 2B species by the California Native Plant Society (CNPS). This designation also includes CDFW Species of Special Concern and Fully Protected Species. Applicants or sponsors of projects on sites where potential special-status species, migratory birds, or nesting birds are present shall retain a qualified Biologist to conduct a focused survey per applicable regulatory agency protocols to determine whether such species occur on a given project site. The project applicant or sponsor shall ensure that, if development of occupied habitat must occur, species impacts shall be avoided or minimized, and if required by a regulatory agency or the CEQA process, loss of wildlife habitat or individual plants shall be fully compensated on the site. If off-site mitigation is necessary, it shall occur within the South San Francisco Planning Area whenever possible, with a priority given to existing habitat mitigation banks. Habitat mitigation shall be accompanied by a long-term management plan and monitoring program prepared by a qualified Biologist, and include provisions for protection of mitigation lands in perpetuity through the establishment of easements and adequate funding for maintenance and monitoring.

The project site does not contain wetlands and is surrounded by urban development. As stated in Section 4.1.1, the site and the channelized Colma Creek are separated by North Canal Street and the Navigable Slough is approximately 0.5 mile south of the project site. The project would be consistent with the measure in General Plan Policy ES-3.3 since bioretention areas that treat stormwater runoff before entering the City's stormwater system and Colma Creek are proposed by the project. Due to the separation by a roadway and distance from the site, the project would not result in significant impacts to the Colma Creek and Navigable Slough riparian habitats. In addition, the proposed townhouse buildings, which require the majority of the project's excavation and grading, would be located approximately 715 feet north of the creek. The portion of the site that is within 80 feet of Colma Creek is proposed to be landscaped and contain a stormwater treatment area, which would not require substantial grading. Although the project would add impervious surfaces to the site, the proposed stormwater treatment area would treat stormwater on-site before it is directed to the City's storm drain system and Colma Creek. For these reasons, the proposed project would not result in a significant impact to ecologically sensitive areas identified by the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum or sensitive status species at these habitats.

Migratory and Nesting Birds

The proposed project contains mature trees that migratory and nesting birds could nest in that would be removed from the site to allow for the proposed townhouse development. Raptors (birds of prey) and nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code. Urban-adapted raptors and other nesting birds could be disturbed by construction activities on the site that could result in the loss of fertile eggs or nestlings, or otherwise lead to nest abandonment. Disturbance that causes abandonment and/or loss of reproductive efforts is considered a taking by the California Department of Fish and Wildlife (CDFW) and would constitute an impact. In compliance with the MBTA and CDFW standard species management practices, the project will implement 2040 General Plan EIR mitigation measure MM BIO-1 to reduce the impacts to nesting birds to a less than significant level. Implementation of MM BIO-1 would protect raptors and nesting birds as it would require the project applicant to retain a qualified biologist to complete habitat and pre-construction nesting surveys to avoid the disturbance of species and any loss of wildlife habitat. In addition, the project will implement mitigation measure MM BIO-1a and MM BIO-1b which provide more specific requirements for pre-construction bird surveys based on state law.

Mitigation Measures: The following mitigation measures would be reduced to a less than significant level and/or avoid impacts to nesting birds (if present on or adjacent to the site).

MM BIO-1a: Prior to the issuance of any tree removal, demolition, or grading permits (whichever occurs first), the project applicant shall schedule demolition and construction activities to avoid the nesting season. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1st through August 31st, inclusive.

MM BIO-1b: If demolition and construction cannot be scheduled between September 1st and January 31st, The Project Sponsor, or designated representative shall retain a licensed biologist to conduct a preconstruction survey for protected birds on the site and in the immediate vicinity if any project construction activities occur during nesting season. The survey shall be done no more than 15 days prior to the initiation of tree removal and grading and other construction activities. In the event that nesting birds are found on the Project site or in the immediate vicinity, Project Sponsor, or designated representative shall notify the City, locate and map the nest site(s) within three (3) days, submit a report to the City and the California Department of Fish and Wildlife ("CDFW"), establish a no disturbance buffer of 250-feet, and conduct on-going weekly surveys to ensure the no-disturbance buffer is maintained. In the event of destruction of a nest with eggs, or if a juvenile or adult raptor should become stranded from the nest, injured or killed, the qualified biologist shall immediately notify the CDFW. The licensed biologist shall coordinate with the CDFW to have the injured bird either transferred to a raptor recovery center or, in the case of mortality, transfer it to

the CDFW within 48 hours of notification.

Consistent with the conclusions in the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum, the project would implement MM BIO-1 to reduce impacts to migratory and nesting birds. In addition, the project will implement mitigation measures MM-BIO-1a and MM-BIO-1b which provide more specific requirements for pre-construction bird surveys based on state law. With the implementation of the MM BIO-1, MM-BIO-1a and MM-BIO-1b, the project would have a less than significant impact on nesting birds. The impact to migratory and nesting birds was identified in the General Plan EIR and mitigation related pre-construction surveys for nesting/migratory birds is typical for all projects containing trees. Therefore, the impact to nesting/migratory birds is not peculiar to the project the project and will be reduced to a less than significant level. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

b. Based on the 2040 General Plan EIR, sensitive habitats know to occur within 10 miles of the General Plan area include Northern Coastal Salt Marsh, Northern Maritime Chaparral, Serpentine Bunchgrass, and Valley Needlegrass Grassland. The riparian areas of Colma Creek and a Navigation Slough south of the creek are also considered ecologically sensitive areas. The 2040 General Plan EIR concluded that with the implementation of policies (such as General Plan Policy ES-3.3 mentioned above), actions, and requirements would reduce potential impacts to below a level of significance on riparian habitat and other sensitive natural communities by avoiding the most biologically sensitive areas, requiring site-specific biological assessments, concentrating development in previously disturbed areas, and by emphasizing avoidance, minimization, and mitigation of impacts through development guidelines and standards.

As shown Figure 3.4-1 in the Lindenville Specific Plan Addendum and Exhibit 3.3-2 in the General Plan EIR, the project site is not located within an ecologically sensitive habitat (i.e., a riparian area or sensitive natural community). The project site does not contain and is not immediately adjacent to a riparian habitat. The project would be consistent with General Plan Policy ES-3.3 as it would not include planting of vegetation adjacent to Colma Creek. For these reasons, consistent with the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum to the General Plan EIR, the project would result in a less than significant impact on riparian habitat and sensitive natural communities. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General Plan EIR identifies that within the Lindenville Specific Plan area, estuarine and marine wetlands line parts of Colma Creek and the Navigable Slough is located south of Colma Creek in the southeastern portion of the City. The 2040 General Plan EIR requires projects on sites where potential jurisdictional wetlands or waterways are present to implement General Plan MM BIO-3 which requires a project proponent to retain a qualified Biologist/wetland regulatory specialist to conduct a site investigation and assess whether wetland or waterway features are jurisdictional with regard to the United States Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or California Department of Fish and Wildlife (CDFW). The 2040 General Plan EIR concluded that with mandatory regulatory compliance and implementation

of MM BIO-3, future development projects would not result in significant adverse effects to federally protected wetlands, waters of the United States, or waters of the State, and impacts would be considered less than significant with mitigation.

As stated above, the project site does not contain water features or wetlands, and is not immediately adjacent to wetlands. As a result, the project would not be subject to MM BIO-3. The project would be consistent with General Policy ES-3.3 that protects the water quality in Colma Creek, such as including on-site stormwater treatment to reduce contamination that enters Colma Creek. For these reasons, with the implementation of the applicable General Plan policies, the project would result in a less than significant impact on Colma Creek (i.e., a wetland). The project would not have a substantial adverse effect on state or federally protected wetlands. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

d. The 2040 General Plan EIR concluded that implementation of the General Plan would have a less than significant impact on wildlife movement corridors and nursery sites with implementation of mitigation measures MM BIO-1 and MM BIO-3 described above. In addition, the adopted Lindenville Specific Plan includes the following exterior lighting standard that requires lighting to be diverted away from wildlife habitat.

Lindenville Specific Plan Chapter 5.7.9 Exterior Lighting

- **Habitat areas.** Lighting near habitat areas should be designed to minimize impact to wildlife, and light fixtures should be designed to only illuminate areas of human use, which includes pathways/circulation, building egress and any safety features. Lighting should be diverted away from wildlife habitat. Light fixtures near areas of habitat shall have a light temperature of greater or equal to 2,700 kelvins.

The project site is approximately one mile west of the San Francisco Bay, which was identified in the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum as a major wildlife movement corridor and nursery site. As stated above, the project site does not contain wetlands and would not be subject to MM BIO-3 which requires site investigations for sites with wetland habitats. In addition, the project would comply with the Lindenville Specific Plan Chapter 5.7.9 Exterior Lighting. The project's exterior lighting for the proposed townhouse development would be located approximately 700 feet north of Colma Creek and separated by the industrial buildings south of the site. The project's lighting would, therefore, not have a significant impact on the habitat areas of Colma Creek. As stated above, the project would implement MM BIO-1.1, MM BIO-1.1a, and MM BIO-1.1b which protects nesting migratory birds during project construction. The site is surrounded by urban development and the General Plan does not identify the site and surroundings as a native wildlife nursery site. Consistent with the conclusions of the 2040 General Plan EIR and Lindenville Specific Plan Addendum, with the implementation of applicable policies and mitigation, the project would not interfere native resident or migratory wildlife corridors, or impede the use of wildlife nursery sites. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

e. The 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum to the General Plan EIR concluded that implementation of the 2040 General Plan would not conflict with local polices or ordinances protecting biological resources, including Municipal Code Chapter 13.28 and 13.30 of the Municipal Code outlining the City's Street Tree Preservation Policy and Tree Preservation standards, respectively.

The project site contains 98 trees, including 28 protected trees. The project would remove 77 trees on the site and preserve 21 trees (Tree Numbers #45, 47-49, 51- 57, 65, 68, 75, 88 -93, and 101 in Table 4.4-1). Nineteen (19) of the trees proposed for removal are City-Protected. The City requires replacement of protected trees with three 15-gallon-size or two 24-inch box minimum-size landscape trees for each tree removed, as determined by the Department of Parks and Recreation Director. Therefore, as replacement for removing 19 protected trees, the project would plant 57, 15-gallon size trees or 38, 24-inch box trees on-site in accordance with Municipal Code Chapter 13.30.

There are no street trees along Railroad Avenue or North Canal Street, adjacent to the site. In addition, the project would not plant trees in ecologically sensitive areas identified in the General Plan EIR. Therefore, the project would not impact street trees. Consistent with the 2040 General Plan EIR and the 2023 Lindenville Specific Plan Addendum, the project would not conflict with local policies or ordinances protecting biological resources (i.e., trees), and impacts would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

f. The 2040 General Plan EIR and the 2023 Lindenville Specific Plan Addendum to the General Plan EIR concluded that implementation of the 2040 General Plan would not conflict with an adopted habitat plan. There are two areas within the City covered by habitat conservation plans; Sign Hill Park and San Bruno Mountain State Park. In addition, the Bay Conservation and Development Commission (BCDC) has jurisdiction over land near the San Francisco Bay and the tidally influenced Navigable Slough. The project site is approximately 0.8 mile south of Sign Hill Park and three miles south of San Bruno Mountain State Park. Therefore, the site is not located within the Sign Hill Park or San Bruno Mountain habitat conservation plan areas. Therefore, consistent with the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum to the General Plan EIR conclusions, the proposed project would not conflict with an adopted habitat conservation plan or natural community conservation plan.

4.5 Cultural Resources

The following discussion is based upon an Archaeological Sensitivity Assessment completed by Archaeological/Historical Consultants (A/HC) in March 2024. A copy of the Archaeological Sensitivity Assessment, which is a confidential report, is on file at the City of South San Francisco Department of Economic and Community Development and is available upon request with appropriate credentials.

4.5.1 Environmental Setting

The existing cultural resources setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and the adoption of the Addendum to the EIR for the Lindenville Specific Plan adoption.

Historic Resources

There are no structures that exist on the project site. Table 3.4-4 of the 2040 General Plan EIR includes City-designated Historic Landmarks within the City. There is one known historic resource/landmark located within the Lindenville Specific Plan area and the vicinity of the project site. The historic resource is located at 499 Railroad Avenue and is the South City Lumber building, approximately 130 feet southwest of the project site. This building is a two-story, wood-sided industrial building. There is a historic one-story residence at 429 Commercial Avenue, approximately 260 feet north of the site; the project site and the 429 Commercial Avenue residence are separated by Railroad Avenue and other residences. There are no other known historic resources within the immediate vicinity of the site.

Archaeological Resources

Based on the 2040 General Plan EIR, there are several known archaeological sites within the City in both developed and undeveloped areas. The EIR stated that the areas closest to water sources, such as Colma Creek, have the greatest potential for buried archaeological resources to be found. The project area is on a gentle slope between 15 to 30 feet above sea level. During the early historic era, the bay tidal marsh ran 200 to 400 feet south of the former Railroad Avenue alignment (northern portion) of the project site. Before Colma Creek was channelized, it ran approximately 600-800 feet south of the site's former Railroad Avenue alignment.

The 2040 General Plan EIR requires proposed new development to complete a records search with the Northwest Information Center (NWIC) to determine the archaeological sensitivity of the site. A record search for the project site and a one quarter-mile radius around it was completed at the NWIC on March 19, 2024 (NWIC #23-1183). Two resources have previously been recorded within the project site. Eighteen (18) resources and one informal resource have been recorded within the one quarter-mile radius. Twenty-two (22) studies were completed within one quarter-mile radius of the project area. Most of the studies were linear studies focused on Colma Creek/San Bruno Canal,

nearby roadways and railways, or utility alignments. No previous studies have included the project site; however, 22 studies included areas that are within a one quarter mile radius of the project site.

One resource within the project site was part of the Southern Pacific South San Francisco branch line, completed in the early 1890s and connected to the San Francisco Peninsula main line. There is evidence that the spur was rebuilt in the 1930s when the Southern Pacific Railroad was upgrading its facilities along the peninsula. The spur on the southern portion of the site's purpose was to service the industrial and commercial businesses in South San Francisco, and short sections of the track that were parallel to the main line were built to serve some of these businesses directly. The line was fully decommissioned by 1990. The spur on the southern portion of the site was found to be ineligible for the National Register of Historic Places.

A second resource was one of four shellmounds recorded in 1907 on the site; the remaining three were recorded within one quarter-mile of the site. The NWIC maps P-41-000050 on the eastern third of the project alignment along Railroad Avenue and encompasses the entirety of the alignment.

The site's previously recorded Native American sites, and proximity to fresh water and the tidal marsh make the project area sensitive for Native American resources. Some of the shallow deposits may have been disturbed by the historic construction, including the railroad within the project area, but the extent of the disturbance is unknown. Additionally, because native soils are Pleistocene-era alluvium, the project site has only a moderate sensitivity for deeply buried archaeological deposits.

During the historic era, the project site was used for cattle ranching until the 1860s, when it became part of the Southern Pacific Railroad. It continued to be used as a railroad over the subsequent 100 years, and the site was left unused once trains no longer ran on the former alignment. These land uses are not likely to have resulted in deposits of historic artifacts such as privies or trash deposits. Some remains of railroad infrastructure may remain on the site; however, the rail line is well-documented historically, and it is unlikely that fragmented infrastructure elements would have sufficient data potential to achieve significance under National Register of Historic Places Criterion D (which states a resource is eligible for listing if it has yielded, or may be likely to yield, information important in history or prehistory). The project site, therefore, has low sensitivity for historic-era archaeological deposits.

4.5.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5?	Less than Significant	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource as pursuant to CEQA Guidelines Section 15064.5?	Less than Significant	No	No	No	No
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would have a less than significant impact on historic resources through implementation of 2040 General Plan Policies and compliance with the City's Municipal Code. As discussed above, the project does not require demolition or alteration of structures more than 45 years of age, and there is one known historic resource in the vicinity of the project site, which is the South City Lumber building, approximately 130 feet southwest of the site. The project site and historic lumber building are separated by surface parking lot and an industrial building. The project construction does not include pile driving or use of high vibratory equipment that would cause physical damage to the historic building (refer to Section 4.13 Noise). Section 2.56.130 of the City's Municipal Code requires future development to preserve existing historic resources and obtain a permit for any alterations. The project would have no impact on historic resources. For these reasons, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would have a less than significant impact on archaeological resources through implementation of General Polices, discussed below. As described above, the site is in an archaeologically sensitive area for Native American resources given its proximity to Colma Creek and a former tidal marsh. Development of the site could impact previously undiscovered archaeological resources or human remains during excavation, construction, or utility trenching. The project would comply with General Plan Policy ES-10.1, which requires the City to maintain formal procedures for minimizing and mitigating impacts to archaeological resources. The project includes mitigation (Mitigation Measures MM CUL-1.1 through MM CUL-1.3) to reduce impacts to undiscovered archaeological resources to less than

significant. The project is also subject to General Plan Policy ES-10.5, which mandates, if construction or grading activities result in the discovery of historic or prehistoric archaeological artifacts, all work within 100 feet of the discovery shall cease, the Economic and Community Development Department shall be notified, and the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures. Mitigation Measure MM CUL-1.2 is consistent with this measure but requires all work within 50 feet of discovery of an archaeological artifact, which is consistent with standard practice.

Impact CUL-1: Due to the project site's sensitivity for Native American archaeological resources, it is possible that project construction could encounter unearthed archaeological resources, which could result in a significant impact.

Mitigation Measures: Consistent with General Plan Policy ES-10.1, the project will implement the following mitigation measures to reduce impacts to undiscovered archaeological resources to less than significant.

MM CUL-1.1: A qualified archaeologist shall prepare a monitoring plan in coordination with a Native American monitor that identifies areas of the site to be monitored. The monitoring plan shall be submitted to the City of South San Francisco Department of Economic and Community Development for approval prior to the start of any ground disturbing activities associated with the project. Ground disturbing activities (including, but not limited to demolition/excavation, grading, and utility trenching) shall be monitored by a qualified archaeologist, and a Native American monitor provided by a tribe that is registered with the Native American Heritage Commission (NAHC) for the City of South San Francisco and is traditionally and culturally affiliated with the geographic area. The archaeologist or Native American monitor shall have authority to halt construction activities temporarily in the immediate vicinity of unanticipated find until its significance can be assessed. After observing a representative sample of ground disturbing activity, the archaeologist and Native American monitor may recommend that monitoring move to a part-time or intermittent schedule by mutual agreement.

MM CUL-1.2: In the event that archaeological resources are exposed during construction, work within 50 feet of the find shall cease, and the archaeologist and Native American monitor will examine the find to determine if it meets the definition of a historical, unique archaeological, or tribal cultural resource as defined in the CEQA Guidelines. The determination shall be provided to the City of South San Francisco Department of Economic and Community Development to confirm the appropriate conditions for the resumption of construction activity. If the find does not meet the definition of a historical, unique archaeological, or tribal cultural resource, no further study or protection is necessary for work to continue. If the find does meet the definition of a historical, unique

archaeological, or tribal cultural resource, then it shall be avoided by project activities..

MM CUL-1.3: If avoidance is not feasible, adverse effects to archaeologist resources shall be mitigated through the implementation of a treatment plan prepared by the project archaeologist in consultation with the Native American monitor. The scope of the treatment plan shall be commensurate with the level of proposed impacts and determined in consultation with a Native American representative. The treatment plan shall outline the potential data categories associated with the find, and detail methods of data collection, recording, and analysis of significant cultural materials. The treatment plan shall be submitted to the City of South San Francisco Department of Economic and Community Development for approval prior to implementation. After field testing, an evaluation report shall be prepared documenting the fieldwork, analyzing the cultural materials recovered, defining the resource boundaries on the project site, and evaluating the resource per the California Register of Historic Resources. The report shall be submitted to the City of South San Francisco, the NAHC (for tribal cultural resources), and the Northwest Information Center..

Implementation of Mitigation Measures MM CUL-1.1 through MM CUL-1.3 would include the preparation of a monitoring plan by a qualified archaeologist, monitoring during demolition/ excavation, grading, and utility trenching activities, and preparation of a treatment plan if avoidance of discovered archaeological resources is not feasible. Consistent with General Plan Policy ES-10.1, the project would implement the above mitigation measures to reduce impacts to archaeological resources to a less than significant level. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General EIR concluded that future development under the General Plan would have a less than significant impact on human remains since projects would be required to comply with General Plan Policy ES-11.1, and Public Resources Code Section 5097.98. Policy ES-11.1 encourages the identification, preservation, and protection of tribal cultural resources, traditional cultural landscapes, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites in consultation or coordination with the appropriate Native America tribe(s), and ensures appropriate treatment of Native American and other human remains discovered during project construction. Public Resources Code Section 5097.98 states that whenever the NAHC receives notification of a discovery of Native American human remains from a County Coroner, it shall immediately notify those persons it believes to be most likely descended from the deceased Native American. In the event that Native American human remains are discovered during excavation or construction activities, consistent with the General Plan Policy ES-11.1 and Public Resources Code Section 5097.98, the project will implement Mitigation Measure MM CUL-2.1

Impact CUL-2: Due to the project site's sensitivity for Native American cultural resources, it is possible that project construction could encounter unearthed human remains, which could result in a significant impact.

Mitigation Measures: The project will implement the following mitigation measures to reduce impacts to undiscovered human remains to less than significant.

MM CUL-2.1: **Finding of Human Remains During Excavation.** In the event that human remains are discovered during excavation and/or grading of the site, all activity within a 50-foot radius of the find shall be stopped. The San Mateo County Coroner shall be notified and shall make a determination as to whether the remains are of Native American origin or whether an investigation into the cause of death is required. If the remains are determined to be Native American, the Coroner shall notify the NAHC immediately. Once the NAHC identifies the most likely descendants, the descendants will make recommendations regarding proper burial, which will be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines.

Consistent with the 2040 General Plan EIR, the proposed project would comply with the General Plan Policy ES-11.1 and Public Resources Code Section 5097.98, by implementing Mitigation Measure MM CUL-2.1 to reduce the project's impacts to human remains during excavation or construction to a less than a significant level, in the event human remains are discovered. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.6 Energy

4.6.1 Environmental Setting

4.6.1.1 *Existing Conditions*

The existing energy setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum. However, the existing conditions discussion has been updated to include the most recent energy data for the State of California and San Mateo County.

Total energy usage in California was approximately 6,882 trillion British thermal units (Btu) in the year 2022, the most recent year for which this data was available.[5] Out of the 50 states, California is ranked second in total energy consumption and 49th in energy consumption per capita. The breakdown by sector was approximately 18 percent (1,204 trillion Btu) for residential uses, 17 percent (1,193 trillion Btu) for commercial uses, 22 percent (1,539 trillion Btu) for industrial uses, and 43 percent (2,916 trillion Btu) for transportation.[6] This energy is primarily supplied in the form of natural gas, petroleum, nuclear electric power, and hydroelectric power.

Electricity

Electricity in San Mateo County in 2022 was consumed primarily by the non-residential sector (62 percent), followed by the residential sector consuming 38 percent. In 2022, a total of approximately 4,177 gigawatt hours (GWh) of electricity was consumed in San Mateo County.[7]

Peninsula Clean Energy (PCE) is a public and locally controlled electricity provider for the County of San Mateo. Electricity provided by PCE is delivered through PG&E transmission lines. Commercial and residential customers in San Mateo County are included in the PCE service area and can choose to have 50 to 100 percent of their electricity supplied from carbon-free and renewable sources. Customers are automatically enrolled in the ECOplus plan, which generates its electricity from 100 percent carbon-free sources, with at least 50 percent from renewable sources. Customers have the option to enroll in the ECO100 plan, which generates its electricity from 100 percent carbon-free, renewable sources. [8]

[5] United States Energy Information Administration. "California State Energy Profile." Accessed January 27, 2025. https://www.eia.gov/state/print.php?sid=CA.
[6] Ibid.
[7] California Energy Commission. Energy Consumption Data Management System. "Electricity Consumption by County." Accessed January 27, 2025. http://ecdms.energy.ca.gov/elecbycounty.aspx.
[8] Peninsula Clean Energy. "Rate Choices." Accessed January 27, 2025. https://www.peninsulacleanenergy.com/residential/rates-billing/rate-choices/.

Natural Gas

PG&E provides natural gas services within San Mateo County. In 2024, California's natural gas supply came from a combination of in-state production and imported supplies from other western states and Canada.[9] In 2022, San Mateo County used 1.7 percent of the state's total consumption of natural gas.[10]

Fuel for Motor Vehicles

In 2023, California produced 118 million barrels of crude oil and in 2019, 15.4 billion gallons of gasoline were sold in California.[11, 12] The average fuel economy for light-duty vehicles (autos, pickups, vans, and sport utility vehicles) in the United States has steadily increased from about 13 miles per gallon (mpg) in the mid-1970s to 27.1 mpg in 2023.[13] Federal fuel economy standards have changed substantially since the Energy Independence and Security Act was passed in 2007. That standard, which originally mandated a national fuel economy standard of 35 miles per gallon by the year 2020, was updated in April 2022 to require all cars and light duty trucks achieve an overall industry average fuel economy of 49 mpg by model year 2026.[14,15]

On-Site Energy Use

The project site is currently vacant and undeveloped, therefore,, electricity and natural gas are not consumed by the site. Vehicle trips for maintenance may occasionally occur, but the site does not generate a high number of vehicle trips in its current undeveloped state.

[9] California Gas and Electric Utilities. 2024 *California Gas Report.*. https://www.socalgas.com/sites/default/files/2024-08/2024-California-Gas-Report-Final.pdf.
[10] Ibid.
[11] U.S. Energy Information Administration. "Petroleum & Other Liquids, California Field Production of Crude Oil." February 28, 2023. Accessed January 27, 2025. https://www.eia.gov/dnav/pet/hist/LeafHandler.ashx?n=pet&s=mcrfpca1&f=a.
[12] California Department of Tax and Fee Administration. "Net Taxable Gasoline Gallons." Accessed January 27, 2025. https://www.cdtfa.ca.gov/dataportal/dataset.htm?url=VehicleTaxableFuelDist.
[13] United States Environmental Protection Agency. "The 2024 EPA Automotive Trends Report: Greenhouse Gas Emissions, Fuel Economy, and Technology since 1975." November 2025. Accessed January 27, 2025. https://nepis.epa.gov/Exe/ZyPDF.cgi?Dockey=P101CUU6.pdf.
[14] United States Department of Energy. *Energy Independence & Security Act of 2007.* Accessed January 27, 2025. http://www.afdc.energy.gov/laws/eisa.
[15] United States Department of Transportation. USDOT Announces New Vehicle Fuel Economy Standards for Model Year 2024-2026." Accessed January 27, 2025. https://www.nhtsa.gov/press-releases/usdot-announces-new-vehicle-fuel-economy-standards-model-year-2024-2026.

4.6.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less than Significant	No	No	No	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR concluded that future development under the General Plan would be required to comply with requirements of the City's Municipal Code and the General Plan policies and actions that directly and indirectly reduce energy consumption during construction. The General Plan EIR also stated that future development would be required to comply with California Code of Regulations Title 13, Sections 2449(d)(3) and 2485, which would limit idling from both on-road and off-road diesel-powered equipment and are enforced by the California Air Resources Board. As a result, activities associated with implementation of the General Plan would not result in wasteful, inefficient, or unnecessary consumption of energy. Therefore, implementation of the General Plan was concluded to have a less than significant impact related to energy use during construction.

The 2040 General Plan EIR concluded that new development from implementation of the General Plan would be designed and built to reduce energy consumption and would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary. Also, implementation of the General Plan would reduce petroleum fuel use (i.e., by requiring future projects to comply with the City's TDM Ordinance, Municipal Code Chapter 20.400 that includes TDM measures such as the provision of transit subsidies, bicycle storage, and bicycle and pedestrian-oriented site access) for transportation. Future projects under the General Plan would also comply with General Plan Policy LU-2.1 Prioritize development near transit centers, which requires the City to collaborate with developers and property owners to locate new housing, mixed use, and employment uses near transit centers to minimize reliance on personal automobiles. Therefore, transportation fuel consumption would also not be wasteful, inefficient, or unnecessary. The impacts were concluded to be less than significant.

Construction

Project construction is estimated to take a total of 24 months. The construction of the project would include site preparation, grading and excavation, building construction, architectural coatings, and paving. The overall construction schedule and process is designed to be efficient to avoid excess monetary costs. Equipment and fuel would not be used wastefully on the site because of the added expense associated with renting, maintaining, and fueling equipment. Therefore, the opportunities for future efficiency gains during construction are limited.

Energy is consumed during construction due to the use of petroleum fuel for heavy equipment and worker trips and material delivery trips to the construction site. However, the project would implement measures in the General Plan and Municipal Code requirements to reduce energy during construction. As described in Section 4.3 Air Quality, the project would implement MM AIR-1a (BAAQMD BMPs) which requires idling times to be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. The project would comply with Chapter 15.60 of the Municipal Code which requires development projects to complete and submit a construction recycling management plan. CALGreen also requires projects to recycle and/or salvage for reuse a minimum 65 percent of the nonhazardous construction and demolition waste. Therefore, the construction of the proposed project would not consume energy in wasteful, inefficient, or unnecessary manner and would result in the same less than significant impact as identified in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Operation

Operation of the proposed project would consume 898,756 kWh of electricity annually as outlined in Table 4.6-1 below. Energy consumption from the project would result from activities typically associated with residential uses. The project proposes to install all electric appliances and would therefore not utilize any natural gas.

Table 4.6-1: Operational Energy

Development	Electricity Use (kWh)	Natural Gas Use (kBtu)	Gasoline (gal/year)[3]
A. Existing Development[1]	0	0	0
B. Project[2]	898,756	0	47,028
Net Total (B-A)	898,756	0	47,028

[1] The site is currently vacant and undeveloped.

[2] Illingworth & Rodkin, Inc. *500 Railroad Avenue Air Quality Assessment*. November 22, 2024.

The project would comply with, and be consistent with, the applicable energy-related 2040 General Plan policies. The project would incorporate green building measures and include features such as water efficient/drought tolerant landscaping, solar hot water heating systems, low emitting materials for flooring, and Energy Star appliances that would reduce energy usage.

Moreover, the project would be required to comply with Title 24 of the State Building Code (Building Energy Efficiency Standards for Residential and Nonresidential Buildings), including the mandatory measures set forth in the CALGreen Code for planning and design, water conservation, energy efficiency, and environmental quality (Title 24, Part 11). The project would also be required to comply with the City's water conservation in landscaping requirements (Municipal Code Section 18.17.040), thus reducing the energy expended to irrigate landscaping. By meeting these mandatory measures, the project's operational energy use would be minimized.

Vehicle Usage

The project would generate approximately 504 total daily trips.[16] However, the project's VMT would not be significant because the project meets the City's transit priority screening criteria because it 1) has a FAR of 1.86 (i.e. greater than 0.75), 2) does not exceed the parking required by the zoning code, 3) is consistent with the land use classifications in the City's General Plan and Lindenville Specific Plan[17], and 4) does not remove or reduce the number of existing affordable residential units.[18]

The project is within one half mile of the South San Francisco Caltrain Station. The project proposed bicycle racks in the garage of each townhouse unit and 140 residential vehicle parking spaces located within the garages attached to the townhouse units in compliance with Table 20.330.004 and Section 20.330.007.B of the City's Municipal Code. For these reasons, the project would have a less than significant impact on vehicles miles traveled (VMT), which would serve to minimize the amount of energy required for residents' transportation needs.

A TDM Checklist, which includes the TDM measures proposed by the project, was prepared for the project in accordance with the City's Transportation Guidelines. The project would offer free transit passes to residents for the first year of tenant's residency, engage in active transportation gap closure/improvement by adding a sidewalk along the frontage of Railroad Avenue, provide bicycle parking, construct a sidewalk oriented pedestrian entrance, and have pedestrian oriented street lighting. These TDM measures would encourage alternative modes of transportation and decrease the number of vehicle trips, and associated gasoline consumption, resulting from the project.

b. The 2040 General Plan EIR concluded that compliance with the Climate Action Plan (CAP) Actions, General Plan Update policies and actions, and adherence to the development standards in the South San Francisco Municipal Code and Zoning Ordinance, would ensure that potential new development associated with implementation of the General Plan would not conflict with or

[16] Hexagon Transportation Consultants, Inc. *Transportation Study for the Proposed Residential Development at 500 Railroad Avenue in South San Francisco, California.* August 28, 2024.

[17] The project is consistent with the site's existing General Plan designation of Medium Density Mixed Use (which allows a maximum residential density of 120 dwelling units per acre). The prosed project's density would be 35.8 dwelling units per acre; a reduced density is proposed because the project parcel shape restricts the site from being developed with a high-density residential building. The project is consistent with the City's vision to create a new residential neighborhood in the northern part of the Lindenville sub-area and contributes to having a mix of housing diversity in the sub-area.

[18] Ibid.

obstruct State or local plans for renewable energy or energy efficiency. Therefore, implementation of the General Plan would have a less than significant impact related to state/local plans that address energy efficiency.

Section 20.300.008 (revised) establishes regulations that allow outdoor lighting while minimizing energy waste which increases impacts on the environment through energy production byproducts.

The project would be required to meet the building energy efficiency standards set forth in Title 24 and the CALGreen Code, thereby satisfying General Plan policies regarding waste reduction and energy discussed above. By being located less than ½ mile from high-quality transit, the project would encourage alternative modes of transportation. The project would include water efficient/drought tolerant landscaping, solar hot water heating systems, low emitting materials for flooring, and Energy Star appliances that would reduce energy usage, bicycle storage facilities, and would be 100 percent electric as discussed under checklist question a), consistent with the City's General Plan and Climate Action Plan. The project does not propose any features that would obstruct, or be in conflict with any state or local plans for renewable energy or energy efficiency. The project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.7 Geology and Soils

Information in this section is based in part on the Geotechnical Investigation completed by Rockridge Geotechnical on September 18, 2023. This is included in this report as Appendix C.

4.7.1 Environmental Setting

The existing setting for Geology and Soils, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum to the General Plan EIR. The discussion below discusses site specific geological conditions.

Onsite Geological Conditions

Topography and soils

The project site is close to grade on Railroad Avenue at the eastern and western ends, and slopes down south by approximately 20 feet from Railroad Avenue near the center of the site, supported by an existing retaining wall along Railroad Avenue. The portion of the site designation for the townhouses is underlain very stiff to hard clayey soil, dense to very dense sandy soil, and bedrock. The southern portion of the proposed linear park is underlain by fill overlying Bay Mud tidal deposits. The fill may contain medium dense clayey sand and silty sand and sandy silt. The site is not within a mapped landslide hazard zone (refer to Figure 5 in the geotechnical investigation report for the site).

Groundwater

Groundwater at the project site was determined to range between two feet below the ground surface at the southern portion of the site adjacent to North Canal Street and approximately 10 feet below the ground surface for the northern residential portion of the site fronting Railroad Avenue.

Seismic Hazards

The major active faults in the area are the San Andreas, San Gregorio, and Hayward faults. The San Andreas fault is located approximately 2.6 miles southwest of the site, the San Gregorio fault is located approximately 8.1 miles west of the site, and the Hayward fault is approximately 15.5 miles east of the site. These faults are all capable of causing strong ground shaking at the project site during an earthquake event.

Liquefaction and Associated Hazards

When saturated, cohesionless soils liquefy, they experience a temporary loss of strength created by a rise in excess pore pressure generated by strong ground motion. Soils susceptible to liquefaction includes loose to medium dense sand and gravel, low-plasticity silt, and some low-plasticity clay deposits. Lateral spreading, sand boils, differential settlement are evidence of excess pore pressure

generation and liquefaction. Based on the geotechnical investigation of the site, the area of the site designated for the proposed townhouses is not within a designated zone of liquefaction potential zone. The clayey and sandy soils beneath these areas are not susceptible to liquefaction due to their cohesion and/or relative density. Therefore, we conclude the potential for liquefaction to occur in these two areas is very low.

The southern portion of the former railroad spur is located within a liquefaction potential zone (refer to Figure 5 in the geotechnical investigation report for the site). The Bay Mud tidal deposits beneath this portion of the site could contain silty sand and sandy silt that may be susceptible to liquefaction.

In addition, liquefaction-induced settlement would be less than three quarters of an inch and less than one-half inch across a horizontal distance of 30 feet. The non-liquefiable soil overlying the potentially liquefiable soil layers is sufficiently thick and the potentially liquefiable layers are sufficiently thin and, therefore, the potential for sand boils is low. The liquefiable layers are not continuous and, therefore, the risk of lateral spreading is low.

4.7.1.1 *Existing Conditions*

4.7.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
- 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)?	Less than Significant	No	No	No	No
- Strong seismic ground shaking?	Less than Significant	No	No	No	No

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
- Seismic-related ground failure, including liquefaction?	Less than Significant	No	No	No	No
- Landslides?	Less than Significant	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	No	No
c) Be located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less than Significant	No	No	No	No
d) Be located on expansive soil, as defined in the current California Building Code, creating substantial direct or indirect risks to life or property?	Less than Significant	No	No	No	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Less than Significant	No	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR concluded that compliance with local codes, mandatory CBC requirements, and implementation of General Plan policies and actions (listed below), would ensure that seismic hazards that could affect future development projects are appropriately investigated in terms of potential seismic hazards and that any new buildings and site improvements are constructed to withstand the anticipated range of seismic events. This impact was concluded be less than significant.

- **General Action CR-4.4.1:** Require site-specific soils and geologic reports for projects located in high hazard areas, on a parcel-by-parcel basis, require that permit applications for projects located within areas susceptible to geologic hazards, as shown on Figure 43 (in the

General Plan), prepare site-specific soils and geologic reports for review and approval by the City Engineer, and incorporation of the recommended actions during construction.

- **General Plan Policy CR-4.1**: Protect buildings, infrastructure, and other assets from seismic hazards, require future developments to protect existing and new buildings, infrastructure, and other assets from seismic hazards.

Chapter 15.08 of the City's Municipal Code, which implements the California Building Code (CBC), requires that foundations and other structural support features would be designed to resist or absorb damaging forces from strong ground shaking, liquefaction, lateral spreading, and subsidence. In addition, future projects must comply with Section 20.170.004 of the City's Municipal Code, which requires site-specific soils and geologic reports be prepared prior for review and approval by the City Engineer prior to development, and incorporation of the recommended actions during construction.

Impacts from the Project

Based on the presence of nearby faults, and their potential for strong earthquakes, it is predicted that strong to severe ground shaking could occur at the site during a large earthquake. The noted faults are at least two miles away from the site and the probability of fault rupture at the site from a known active fault is very low. Further, probability of surface faulting and ground failure from previously unknown faults is also very low because the project is not located in an Alquist-Priolo Earthquake Fault Zone.

As stated in Section 4.7.1, the portion of the site designated for the proposed townhouses and the northern portion of the former railroad spur is not located in a liquefaction potential zone and the liquefaction potential is very low. The southern portion of the former railroad spur may consist of soils that contain silty sand and sandy silt that may be susceptible to liquefaction. However as stated in Section 4.7.1, the potential of lateral spreading would be low since liquefiable soils on-site are not continuous and liquefaction-induced settlement would not be significant (i.e., less than one half inch across a horizontal distance of 30 feet).

The project site is not sloped significantly and is not near any cliffs or other severe topographic features. The proposed project would include stabilization improvements including retaining walls and foundation stabilization so that loss of ground stability as a result of earthquakes would be low.

The General Plan EIR determined that compliance with local codes and mandatory California Building Code requirements would prevent impacts resulting from geologic hazards. Consistent with General Plan Policy CR-4.4.1, since the project is located within an area susceptible to seismic ground shaking (identified on Figure 43 of the General Plan), the project applicant will prepare a site-specific soils and geologic report for review and approval by the City Engineer (prior to issuance of a grading permit). Therefore, consistent with the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum conclusions, the proposed project would have a less than significant impact

resulting from geologic hazards. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that, assuming compliance with mandatory NPDES permit and South San Francisco Municipal Code and Zoning Ordinance requirements, implementation of General Plan Update policies and actions would reduce the potential for soil erosion and loss of topsoil from construction-related soil disturbance. As such, potential impacts related to soil erosion and loss of topsoil would be reduced to less than significant levels.

The proposed project would disturb approximately 2.0 acres of soil which makes it subject to the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ) adopted by the California State Water Resources Control Board (State Water Board). This would require development of a Stormwater Pollution Prevention Plan (SWPPP), which must describe the site, facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls.

In addition, the project would implement the construction BMPs to reduce erosion (see Section 4.10 Hydrology and Water Quality) including covering all stockpiled soils, using berms on stockpiled soils, and using silt fencing with straw mats and hand broadcast seed. Therefore, consistent with the 2040 General Plan EIR and 2023 Subsequent Addendum conclusions, the proposed project would have a less than significant impact resulting from soil erosion and loss of topsoil.

c. The 2040 General Plan EIR concluded that with the implementation of the policies and actions in the General Plan Update, as well as applicable State and local codes, potential impacts associated with development on unstable geologic units or unstable soils would be less than significant. The 2040 General Plan EIR states that General Policy CR-4.1, which requires the City to protect existing and new buildings, infrastructure, and other assets from seismic hazards, would also be protective of development within unstable geologic units or unstable soils. As stated above, Action CR-4.4.1 requires that permit applications for projects located within areas susceptible to geologic hazards, prepare site-specific soils and geologic reports for review and approval by the City Engineer and incorporate the recommended actions during construction.

As discussed above in response to checklist question a), the proposed project would be located on unstable soils (as the southern portion of the site is subject to liquefaction) and would be required to comply with the CBC and other policies requiring compliance with structural stability regulations in the General Plan, including General Plan Action CR-4.4.1 which requires a site-specific soils and geologic report for the project site. Therefore, consistent with the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum conclusions, the proposed project would have a less than significant impact resulting from being located on a geologic unit or soil that is unstable, or that will become unstable as a result of the project.

d. The 2040 General Plan EIR concluded that compliance with the regulations of the South San Francisco Municipal Code and Zoning Ordinance, including compliance with the CBC, and implementation of the policies and actions in the General Plan (including Action CR-4.4.1), would ensure that potential impacts related to expansive soils remain less than significant.

The soils underlaying the project site were not found to have expansive qualities and remediation was not recommended as a part of the geotechnical evaluation prepared for the proposed project. Therefore, through compliance with the General Plan policies/actions (including Action CR-4.4.1 that requires a site-specific soils and geologic study) and CBC, the proposed project would have a less than significant impact from expansive soils. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

e. The 2040 General Plan concluded that the Implementation of policies and actions in the General Plan, as well as applicable local codes, would ensure that new septic tanks or alternative wastewater disposal systems are constructed on soils that can support such systems. Therefore, impacts would be less than significant.

The proposed project would connect to existing sewer lines and would not require septic or other alternative wastewater treatment. Therefore, the proposed project would have no impact from soils incapable of supporting these alternative wastewater methodologies, and the General Plan Policies and Municipal Code pertaining to soil stability and the construction of alternative wastewater systems in the General Plan are not applicable to the proposed project. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

f. The 2040 General Plan EIR determined that sites located in the Merced Formation and Colma Formation geologic groups have high sensitivity and a moderate potential for paleontological resources. Mitigation Measure MM GEO-6, which requires paleontological monitoring, would be required for all proposed excavations within the Merced Formation and Colma Formation. The other geological units in the General Plan area were found to have low sensitivity and low potential to discover these resources. The General Plan EIR concluded that Compliance with Section 5097 of the Public Resources Code would reduce the potential to impact paleontological resources directly and indirectly within the portions of the General Plan area that have a low paleontological sensitivity and low paleontological potential, and impacts would be less than significant.

- **California Public Resources Code Section 5097 of the California Public Resources Code** specifies procedures for unexpected discovery of paleontological resources. Section 5097.5 of the Code states that no person shall knowingly and willfully excavate upon, or remove, destroy, injure, or deface any vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, or any other paleontological feature, situated on public lands, except with express permission of the public agency having jurisdiction over such lands.

The proposed project would require approximately 10 feet of excavation to construct the project structures. Based on Exhibit 3.6-3 of the General Plan EIR, the site is not located in either the Merced Formation or Colma Formation, and the project site is located on a geologic unit defined as Holocene colluvium, which is an area of low sensitivity.

Consistent with the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum, even in low sensitivity areas, there is a potential to uncover paleontological resources during earthmoving activities. The General Plan EIR determined that in these low sensitivity areas, compliance with Section 5097 of the Public Resources Code would reduce the potential to impact paleontological resources. The project would be in an area with low paleontological sensitivity and would comply with Section 5097 of the Public Resources Code. Therefore, impacts of the proposed project on paleontological resources would be less than significant.

4.8 Greenhouse Gas Emissions

4.8.1 Environmental Setting

The existing greenhouse gas (GHG) emissions setting, including regulatory framework, has not substantially changed since certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum.

4.8.1.1 *Regulatory Framework*

The GHG thresholds utilized in the 2040 General Plan EIR were based on BAAQMD's 2017 Air Quality Guidelines. Since the 2040 General Plan EIR has been prepared, BAAQMD in April 2022 updated its CEQA GHG Thresholds.

BAAQMD CEQA Thresholds for Evaluating Climate Impacts from Land Use Projects and Plans

In April 2022, the BAAQMD Board of Directors adopted the Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plans. The report includes BAAQMD's recommended thresholds of significance for use in determining whether a proposed project or plan will have a significant impact on climate change and provides substantial evidence to support these thresholds. The April 2022 GHG thresholds replace the GHG thresholds set forth in the May 2017 BAAQMD CEQA Air Quality Guidelines and represent what is required of new land use development projects and plans to achieve California's long-term climate goal of carbon neutrality by 2045.

Project-Level GHG Emissions

The current BAAQMD CEQA Guidelines recommend that lead agencies utilize the following threshold for land use projects to result in a less than significant GHG emissions impact; the land use project would need to comply with threshold A or B below.

A. Projects must include, at a minimum, the following project design elements:
    1. Buildings
        a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
        b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    2. Transportation
        a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's

Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:

i. Residential projects: 15 percent below the existing VMT per capita
ii. Office projects: 15 percent below the existing VMT per employee
iii. Retail projects: no net increase in existing VMT

b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

4.8.1.2 *Existing Conditions*

The project site is currently vacant and undeveloped and the site does not generate significant greenhouse gas emissions. Greenhouse gas emissions may be associated with minimal vehicle trips to the site for maintenance, but the greenhouse gas emissions associated with these trips would be negligible.

4.8.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant Impact with Mitigation Incorporated	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?	Less than Significant Impact	No	No	No	No

a. Construction and Operational GHG Emissions Impacts

Construction Emissions

The 2040 General Plan EIR concluded that future development under the General Plan would be required to comply with the requirements of the City's Municipal Code, relevant General Plan policies and actions, and MM AIR-1a (which requires BAAQMD construction best management practices, refer to Section 4.3 Air Quality above) to reduce GHG emissions during construction. The 2040 General Plan EIR stated that future development would be required to comply with California

Code of Regulations Title 13, Sections 2449(d)(3) and 2485, that limit idling from both on-road and off-road diesel-powered equipment and are enforced by the California Air Resources Board. As a result, the 2040 General Plan EIR concluded that construction of future development under the General Plan would not result in potentially significant impacts related to GHG emissions after inclusion of identified mitigation and compliance with local policies and regulations. Therefore, the General Plan EIR concluded that the General Plan's future projects' construction emissions would be less than significant with incorporation of MM AIR-1a.

Short-term GHG emissions from the construction phase of the project would consist of primarily heavy equipment exhaust, worker travel, materials delivery, and solid waste disposal. The project would implement the identified MM AIR-1a during all phases of construction to reduce dust and other particulate matter emissions as discussed in Section 4.3, Air Quality. Neither the City of South San Francisco nor BAAQMD have an adopted numeric threshold of significance for construction related GHG emissions. Because construction would be temporary (24 months) and would not result in a permanent increase in emissions, the construction of the project would not interfere with the state's GHG reduction goals contained in either AB 32 or SB 32. Consistent with the conclusions of the 2040 General Plan EIR, with the implementation of Mitigation Measure MM AIR-1a, the project would not generate construction GHG emissions that would have a significant impact on the environment. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Project Level Impacts

Operational Emissions

The 2040 General Plan EIR forecast the City is estimated to generate approximately 872,000 MT CO_2e per year in 2040 with a service population of an estimated 245,700 residents and employees combined. As such, citywide GHG emissions per service population are projected to be 3.55 MT CO2e in 2040 with implementation of future development facilitated by the General Plan, which would not exceed the 4.0 MT $CO2_e$ per service population threshold used in the General Plan EIR. The threshold was derived based on plan-level GHG emissions thresholds recommended in the California Air Resources Board Scoping Plan and represents the rate of emission reductions necessary for the City to achieve a fair share of Statewide GHG reductions necessary to meet the State's long-term GHG reduction targets. Since the annual per service population GHG emissions of 3.55 MT CO_2e for General Plan buildout was estimated to be below the established significance threshold of 4.0 MT CO_2e per service population, the operational GHG emissions impact from General Plan buildout was concluded to be less than significant.

As noted above in Section 4.8.1.1 Regulatory Setting, the BAAQMD recommends lead agencies use one of two qualitative thresholds in evaluating individual projects. Threshold A consists of a series of qualitative performance targets listed above in Section 4.8.1.1 Regulatory Setting, while Threshold B relies on a project conforming with a qualified Climate Action Plan adopted by the lead agency. The City adopted a Climate Action Plan in 2022 which includes measures for projects to reduce GHG emissions (see the response to checklist b)). However, the 2022 Climate Action Plan is

not a qualified GHG reduction strategy that meets criteria under State CEQA Guidelines Section 15183.5(b) since it does not achieve the required SB 32 reduction of 40 percent below 1990 levels by 2030. Therefore, the project's GHG impacts are analyzed using the criteria under Threshold A.

1a. The proposed townhouse project would be all electric and would not include natural gas appliances or natural gas plumbing.

1b. As described in Section 4.6 Energy of this Compliance Checklist, the project would not result in a wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. The project construction would implement measures described in MM AIR-1a (BAAQMD BMPs) which requires idling times to be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes. The project would also include a TDM checklist which encourages alternatives mode of transit and reduce fuel consumption. The project, therefore, meets this criteria.

2a. As discussed in Section 4.17 Transportation, under the City of South San Francisco's Transportation Guidelines, the proposed townhouse project meets the screening criteria that allows projects within a Transit Priority Area and residential projects in low VMT areas, to be considered as having a less than significant impact on VMT. The project would qualify for both of the above criteria. The project meets the locally adopted (i.e., City of South San Francisco) Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA.

2b. The project would comply with off-street electric vehicle (EV) charging requirements for townhouses in the most recently adopted version of CALGreen Tier 2, which requires new one- and two-unit single family dwellings or townhouses with attached private garages to have an electrical conduit installed that is capable of supporting a Level 2 electric vehicle (EV) charger (i.e., 208/240 volt, 40 amp power supply units). For each townhome unit, the project will install a complete EV charging circuit and receptacle. The circuit shall be 208/240 volt, 40 amp rated, with an EV charging receptacle and ready to charge. The project, therefore, meets this CalGreen requirement.

Since the project complies with the above BAAQMD GHG thresholds for land use projects, the project would result in a less than significant GHG impact, which is consistent with the conclusions in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded future development under the General Plan would be required to comply with requirements of the General Plan, the City's 2022 Climate Action Plan, and South San Francisco Municipal Code and Zoning Ordinance to reduce GHG emissions. In addition, it was concluded that future projects would be required to comply with existing and new federal, State, and local statutes and regulations related to GHG emissions. The General Plan EIR concluded that future development would not conflict with the applicable plans for reducing GHG emissions and compliance with the plans and codes would result in a less than significant impact.

2017 Clean Air Plan

The BAAQMD 2017 CAP focuses on two goals: protecting public health and protecting the climate. The 2017 CAP includes air quality standards and control measures designed to reduce emissions of methane, carbon dioxide, and other super-GHGs. The project would be consistent with the 2017 Clean Air Plan by implementing transportation control measures, building control measures, natural and land control measures, waste management control measures, and water control measures as discussed outlined in Section 3.7 of the General Plan EIR. These measures include 2017 Clean Air Plan measure TR2 (Trip Reduction Program) which encourages rideshare, transit, cycling, and walking for work trips. The project would comply with TDM measures such as issuing transit passes to residents and by locating the project within one half mile of the Caltrain Station. The project also complies with 2017 CAP measure TR9 which encourages planning for bicycle and pedestrian facilities. The project would also construct a new five-foot wide sidewalk along Railroad Avenue to encourage the use of pedestrian facilities. The project would be consistent with the 2017 BAAQMD CAP measures. Therefore, consistent with the General Plan EIR conclusions, the project would not conflict with the 2017 BAAQMD CAP measures.

Plan Bay Area 2050

Plan Bay Area 2050 establishes a course for reducing per capita GHG emissions through the promotion of compact, high-density, mixed-use neighborhoods near transit, particularly within identified Priority Development Areas (PDAs). The project would be located in a PDA. The project would provide high-density residential uses within one half mile of the South San Francisco Caltrain Station. In addition, the project would be required to implement the measures in the TDM Checklist to reduce single-occupancy vehicle trips (refer to Section 4.3 Air Quality). Therefore, consistent with the 2040 General Plan EIR conclusions, the project is consistent with the goals of Plan Bay Area 2050.

South San Franciso Climate Action Plan

The project would be subject to the City's 2022 Climate Action Plan. As summarized in Table 3.8-1 below, the project would comply with the applicable 2022 Climate Action Plan measures.

Table 4.8-1: Project Consistency with Applicable Climate Action Plan Actions		
Action	**Description**	**Consistency**
TL 1.1	Implement EV reach code	The project would be subject to the City's EV Reach Code. For each townhome unit, the project will install a complete EV charging circuit and receptacle. The circuit shall be 208/240 volt, 40 amp rated, with an EV charging receptacle and ready to charge.
TL 2.2	Implement, monitor, and enforce compliance with the City's TDM Ordinance.	The project would comply with a TDM Checklist that includes measures to issue transit passes to residents, construct a new sidewalk along Railroad Avenue, and inclusion of bicycle racks with townhouse garages.
TL 2.5	For all new land use and transportation projects, adhere to the City's VMT Analysis Guidelines and qualitatively assess the project's effect on multimodal access. Use the development review process to identify opportunities to enhance bicycle, pedestrian, and transit connectivity.	As further discussed in Section 4.17 Transportation, in accordance with the City's 2022 Transportation Analysis Guidelines, a qualitative VMT analysis was completed for the project. The project includes TDM measures that would enhance pedestrian and transit connectivity such as construction of a new sidewalk.
WW 1.1	Achieve greater water use reductions than Water Efficient Landscape Ordinance (WELO) by requiring all landscapes obtain a landscape permit, decreasing the size threshold to capture all landscape renovations, adding prescriptive irrigation plant lists, or water budget requirements.	The project would require a landscape permit and comply with the water reduction requirements of the permit.
WW 2.1	Require high-efficiency fixtures in all new construction and major renovations, comparable to CALGreen Tier 1 or 2 standards.	The project proposes to include high-efficiency fixtures comparable to CALGreen Tier 1 standards.
CL 1.7	Adopt municipal TDM policy or participate in City ordinance that encourages alternatives to SOVs and established telecommute policy to allow remote work when feasible.	The project is subject to the City's TDM ordinance. The project includes a TDM Checklist which applies to Tier 1 residential projects under the City's ordinance.

Given the project is consistent with applicable plans intended to reduce GHG emissions, the project would result in the same less than significant impact as identified in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.9 Hazards and Hazardous Materials

The following discussion is based in part upon a Subsurface Investigation Report and a Phase I Environmental Site Assessment completed by Intertek PSI in February 2020 and April 10, 2024, respectively. The reports are included in Appendix D of this CEQA Compliance Checklist.

4.9.1 Environmental Setting

The existing hazards and hazardous materials setting, including regulatory framework, has not substantially changed since certification of the 2040 General Plan EIR and adoption of the 2023 Addendum to the EIR for the Lindenville Specific Plan.

History of the Project Site

The 2.0-acre project site is vacant and consists of patches of grass, trees, and segments of gravel or concrete. From the mid-1890s until 2010, the project site contained a railroad spur. Since 2010, the project site has been vacant.

On-Site Sources of Contamination

The site's former use as a railroad spur represents a recognized environmental condition (REC). Since the site operated as a railroad spur, a soil and groundwater investigation was completed at the site in February 2020. Groundwater was sampled and analyzed for VOCs, metals, and total petroleum hydrocarbons (TPHs). The results of the groundwater analyses did not represent an environmental concern. Soil sampling was completed for lead and other metals, arsenic, pesticides, TPH-s, polychlorinated biphenyls (PCBs), and polynuclear aromatic hydrocarbons (PAHs); a total of 25 samples were collected.. None of the chlorinated pesticides, PAHs, or metals, other than lead, had concentrations greater than their regulatory Environmental Screening Level (ESL). Lead was found in three of the 25 soil samples above the ESL. Additionally, six soil samples had lead concentrations greater than the screening criteria of soluble threshold limit concentration (STLC).

The only contaminant of concern that was found from the above sample results was lead. The above investigation has defined the lateral and vertical extent of lead impacted soil. Soluble lead concentrations were found to be above the STLC, but below the toxicity characteristic leaching potential (TCLP) waste criteria in five soil samples. The soil represented by these samples would be classified as a State of California waste not regulated by the Resource Conservation and Recovery Act (Non-RCRA waste) upon excavation and classification of soil as a waste material. The soil identified as a Non-RCRA waste appears to be confined to the upper two feet on the far western portion of the project site. The estimated volume of Non-RCRA soil is approximately 425 cubic yards at the site.

Total lead concentrations were found to be above the TTLC and the TCLP waste criteria in one soil sample (B-15-1), referred to in Figure 2 of the Phase I Environmental Site Assessment prepared for the project site. The soil represented by this sample would be classified as a Federal RCRA waste

upon excavation and classification as a waste material. The soil identified as a Federal RCRA waste is confined to the upper one foot. The volume of federal RCRA soil is approximately 160 cubic yards. Based on the results of the investigation and sampling, including the one-foot sample with the elevated lead concentrations, the volume of soil that would be considered to be a Federal RCRA or Non-RCRA hazardous waste is currently estimated at 585 cubic yards (425+160 = 585 cubic yards). However, this is a conservative estimate, and further investigation in the area of boring B-15 and borings B-23 through B-25 (on Figure 2 of the Phase I ESA) could demonstrate reduced amounts of soil considered to be Federal RCRA or Non-RCRA hazardous waste.

Asbestos-Containing Materials and Lead-Based Paint

The Consumer Product Safety Commission banned the use of lead as an additive in paint in 1978. There are no are structures on the project site. The site was a former railroad spur and has not historically contained buildings/or structures. Therefore, asbestos containing materials and lead-based paint are not likely on the site.

Regulatory Databases

An environmental regulatory database search was completed for the project site. Environmental databases published by local, state, tribal, and federal agencies and maps were used for the electronic searches. The project site was not listed on the searched governmental databases as a spill site or regulated facility. In addition, the site is not listed as a hazardous materials site on the Cortese List pursuant to Government Code Section 65962.5.[19]

Surrounding Properties

The project site is surrounded by residential uses across Railroad Avenue to the north, industrial uses to the east and west, and North Canal Street and Colma Creek to the south. Industrial and commercial uses are also located south of Colma Creek.

From 1899 to 1910 the uses to the north included Railroad Avenue and a small number of residences. Since 1924, the properties to the north have been developed with more residences. The properties to the south and west of the site have consisted of industrial uses since the 1930s. The properties to the east of the site have been developed with industrial uses since 1925.

Off-Site Sources of Contamination

An environmental regulatory database search was completed for the site's surrounding properties. Environmental databases published by local, state, tribal, and federal agencies and maps were used for the electronic searches.

[19] California Environmental Protection Agency. *Cortese List Data Resources.* Accessed January 28, 2025. https://calepa.ca.gov/sitecleanup/corteselist/.

There were seven industrial properties within 500 feet of the project site found in the search to be a potential concern associated with the storage and disposal of hazardous materials substances. These properties are located at 338 N. Canal Street, 6 South Linden Street, 436 North Canal Street, 432 North Canal Street, 26 South Linden Street, 499 Railroad Avenue, and 20 South Linden Street. Given no violations were noted, other than administrative items that were returned to compliance, and subsurface sampling at the properties showed there was no environmental concern pertaining to the contaminants of concern, the above listings are not considered to represent a REC to the project site.

Other Hazards

Aircraft Hazards

The Federal Aviation Regulations, Part 77 Objects Affecting Navigable Airspace (FAR Part 77) sets forth standards and review requirements for protecting the airspace for safe aircraft operation, particularly by restricting the height of potential structures and minimizing other potential hazards (such as reflective surfaces, flashing lights, and electronic interference) to aircraft in flight. These regulations require that the Federal Aviation Administration (FAA) be notified of certain proposed construction projects located within an extended zone defined by an imaginary slope radiating outward for several miles from an airport's runways, or which would otherwise stand at least 200 feet in height above the ground. Based on Comprehensive Land Use Plan for the San Francisco International Airport (SFO), Exhibit IV-13, structures that exceed 75 to 80 feet above the ground surface at the project site would be required to notify the FAA.

Wildfire Hazards

The project site is located within an urbanized area that is not within a fire hazard state responsibility area (SRA) or classified very high fire hazard severity zone (VHFHSZ). The nearest designated fire hazard area is at the San Bruno Mountain, within a SRA moderate zone, approximately one mile north of the project site.[20]

[20] California Department of Forestry and Protection: Office of the State Marshal. Fire Hazard Severity Zones in State Responsibility Area. September 29, 2023 – Effective April 1, 2024. Accessed January 22, 2025. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

4.9.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	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, will it create a significant hazard to the public or the environment?	Less than Significant	No	No	No	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, result in a safety hazard or excessive noise for people residing or working in the project area?	Less than Significant	No	No	No	No
f) Impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?	Less than Significant	No	No	No	No

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR states that the General Plan identifies future land uses but does not describe specific development projects that will be undertaken during the planning horizon. Therefore, analyzing project-specific impacts would be speculative. Therefore, the General Plan EIR concluded that future projects would be subject to completing an environmental analysis at the time a specific project is defined. The EIR concluded that at the time a specific development is proposed, the City would determine which General Plan Update policies and actions and Zoning Ordinance chapters apply, depending on the specific characteristics of the project type and/or project site during the development review process.

The General Plan EIR disclosed that while development envisioned by the General Plan could result in an increase in the transportation, use, and disposal of hazardous materials in the Planning Area, future projects would be required to comply with requirements and regulations set forth by the City of South San Francisco, U.S. Environmental Protection Agency (U.S. EPA), Occupational Safety and Health Administration (OSHA), United States Department of Transportation (U.S. DOT), California Department of Toxic Substances Control (DTSC), the California Department of Transportation (Caltrans), local Certified Unified Program Agency (CUPA), and BAAQMD. For these reasons, the 2040 General Plan EIR concluded that impacts related to the transportation, use, and disposal of hazardous materials would be less than significant.

Construction of the proposed townhouse project would require export of up to 585 cubic yards of lead-contaminated soil from historical activities and have the potential to create hazard during transportation. With implementation of mitigation measures MM HAZ-1.1 through MM HAZ-1.3, discussed under checklist question b) below, the project would not result in a significant hazard from the transport, use, or disposal of hazardous materials.

In addition, as stated in the General Plan EIR, soil excavated during construction is regulated under Title 22 of the California Code of Regulations. As described in the 2040 General Plan EIR, the California Code of Regulations Title 22, Division 4.5 contains the Environmental Health Standards for the Management of Hazardous Waste, which includes California waste identification and classification regulations. California Code of Regulations, Title 22, Chapter 11, Article 3, “Soluble Threshold Limits Concentrations/Total Threshold Limits Concentration Regulatory Limits,” identifies the concentrations at which soil is determined to be a California hazardous waste. The local CUPA is

responsible for ensuring that the California Code of Regulations and all other programs related to hazardous materials are implemented during construction activities. While the project may be required to remove and transport up to 585 cubic yards of lead impacted soil from the site, the project would also comply with General Policy CHEJ-4.4 which requires projects to maintain an up-to-date truck routes map that minimizes exposures to sensitive land uses from vehicles carrying hazardous materials and toxic waste.

The proposed residences would use and storage small quantities of chemicals for janitorial cleaning and landscape maintenance. The use of these materials would be in regulated quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. The chemicals would be disposed of in compliance with applicable federal, state, and local regulations, as described above such as regulations established by the City of South San Francisco, U.S. U.S. EPA, OSHA, DTSC, and the local CUPA.

For these reasons, the proposed project through compliance with the City's Municipal Code, General Plan Policies, and mitigation measures (MM HAZ-1.1 through MM HAZ-1.3) for soil removal during construction, would result in a less than significant impact. Lead contamination from historical uses is common for sites used as a railroad in the region and the impact is not peculiar to the site. The 2040 General Plan EIR states that common contaminants that may be present on sites undergoing redevelopment as part of the General Plan include lead, oil, tar, solvents, pesticides, and contaminated soil and groundwater. Therefore, the likelihood for projects to address soils with elevated lead contamination was disclosed in the General Plan EIR, and the strategy being employed by the project to remove lead impacted soil is common and well-regulated by existing programs. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. As discussed in the response to checklist question a), the 2040 General Plan EIR described that future projects would be subject to conducting an environmental analysis at the time a specific project is defined. In reviewing individual project applications, the City would determine which General Plan Update policies and actions and Zoning Ordinance chapters apply depending on the specific characteristics of the project type and/or project site during the development review process.

The 2040 General Plan EIR states that compliance with State laws and implementation of federal, State, and local General Plan Update policies and actions and the Zoning Ordinance during construction activities would ensure that future development under the General Plan would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials into the environment. Therefore, this impact was concluded to be less than significant.

As described in Section 4.9.1, the project site formerly contained a railroad spur. Based on a February 2020 subsurface investigation report, surficial soils (i.e. within the first two feet below the ground surface) at four of the 25 sample locations showed elevated levels of lead in soil from the former railroad spur use, with an estimated volume of approximately 585 yards. The project would

comply with General Plan Policy CHEJ-4.2, which requires that contaminated sites are adequately remediated before allowing new development, and Policy CHEJ-4.3, which requires projects to reduce residents' risk of exposure to hazardous materials and toxic wastes. Consistent with the above General Plan policies, the project will implement the following mitigation.

Impact HAZ-1: Residual concentrations of lead for the prior railroad spur use could expose construction workers, neighboring uses, and the environment to hazardous materials.

Mitigation Measures: The project applicant will implement the following mitigation measures during project construction to reduce impacts to construction workers, neighboring uses, and the environment related to lead-contaminated soil.

MM HAZ-1.1: Prior to the issuance of any demolition or grading permits (whichever occurs first), the project applicant shall enter into an agreement with the San Mateo Environmental Health Services (SMEHS) Site Cleanup Program to provide regulatory oversight. The applicant shall meet with the SMEHS and perform additional soil sampling and testing to adequately define the known and suspected contamination. A Corrective Action/Risk Management Plan (e.g., Remedial Action Work Plan and/or Soil Management Plan) shall be prepared and submitted to the agency for their approval to demonstrate that cleanup standards shall be met for the development of the site. The Corrective Action/Risk Management plan shall describe measures necessary to protect the health and safety of construction workers and future site occupants and establish appropriate management practices for handling and monitoring impacted soil, that potentially may be encountered during construction activities. All measures identified in the plan(s) shall be implemented during all phases of construction, as applicable. The Corrective Action/Risk Management Plan shall also describe protocols for profiling of soil planned for off-site disposal. The plan shall be prepared by an environmental professional and submitted to the SMEHS.

MM HAZ-1.2: Prior to the issuance of any demolition or grading permits (whichever occurs first), a Health and Safety Plan (HASP) shall be prepared to establish health and safety protocols for construction workers at the site. All measures identified in the plan(s) shall be implemented during all phases of construction, as applicable. The HASP shall be prepared by an environmental professional and submitted to the SMEHS.

MM HAZ-1.3: Prior to the issuance of any demolition or grading permits (whichever occurs first), the project applicant shall complete additional sampling under the oversight of SMEHS for lead down to two feet at sample locations B-15 and B-23 through B-25 to further define the extent of lead impacted soil and determine if the volume of soil designated for removal (currently estimated at 585 cubic yards) could be reduced. The sample results shall be submitted to SMEHS and the City's Director of Economic and Community Development for review and approval.

Consistent with General Plan Policy CHEJ-4.2, which requires that contaminated sites are adequately remediated before allowing new development, the project would implement the above Mitigation Measures MM HAZ-1.1 through MM HAZ-1.3 to reduce the impacts from lead-contaminated soil to a less than significant level. With the implementation of the above mitigation measures, the project would not 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. The impact is not peculiar to the site and lead contamination from historic uses of a site is common throughout the City and region. The 2040 General Plan EIR states that common contaminants that may be present on sites undergoing redevelopment as part of the General Plan include lead, oil, tar, solvents, pesticides, and contaminated soil and groundwater. Therefore, the likelihood for projects to address soils with elevated lead contamination was disclosed in the General Plan EIR, and the strategy being employed by the project to remove lead impacted soil is common and well-regulated by existing programs. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General Plan EIR concluded that the South San Francisco Fire District (SSFFD) and South San Francisco Building Division would coordinate review of building permits to ensure hazardous materials requirements are met prior to construction, including required separation between hazardous materials and sensitive land uses and proper hazardous materials storage facilities. Future development (including redevelopment of existing developed sites) under the General Plan would be required by the local CUPA to store, manage, and dispose of the materials in accordance with the Unified Program. The General Plan EIR concluded future development's hazardous emissions and materials impact on schools would be less than significant.

The Da Hao Preschool is located at 200 Linden Avenue, approximately 740 feet north of the project site. In addition, the Shiloh United School, a private pre-Kindergarten through 12th grade school, is located at 500 Miller Avenue, approximately 0.3 mile north of the site. As described in Section 4.3 Air Quality (Table 4.3-3), the health risks from TACs and $PM_{2.5}$ emissions are below BAAQMD thresholds at off-site sensitive receptors (which includes nearby schools), and, as a result, would be less than significant. Further, the removal of up to 585 cubic yards of lead impacted soil, discussed above under checklist question b), would be conducted in accordance with Mitigation Measures MM HAZ-1.1 through MM HAZ-1.3, and the project would also comply with General Policy CHEJ-4.4 which requires projects to maintain an up-to-date truck routes map that minimizes exposures to sensitive land uses from vehicles carrying hazardous materials and toxic waste. Consistent with the conclusions of the 2040 General Plan EIR, the project would have a less than significant impact related to hazardous materials, wastes, and substances affecting nearby schools.

d. As stated in the response to checklist question b), the 2040 General Plan EIR concludes that if any hazardous materials are inadvertently encountered during construction activities, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations established by the City of South San Francisco, EPA, OSHA, US DOT, DTSC, Caltrans, CHP, local CUPA, and BAAQMD. The General Plan EIR states that in reviewing individual project applications, the City will determine which General Plan Update policies and actions and Zoning Ordinance chapters apply, depending on the specific characteristics of the

project type and/or project site during the development review process. This impact was concluded to be less than significant.

As stated in Section 4.9.1, the project site is not located on any lists compiled pursuant to Government Code Section 65962.5. Therefore, there would be no hazard to the public or the environment due to the project's listing as a hazardous materials site, and the project would not result in a peculiar effect, a new significant impact, or a more severe adverse effect. For these reasons, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

e. The 2040 General Plan EIR concluded that implementation of the General Plan could result in an incremental increase in the exposure of people residing or working in the General Plan area to a safety hazard or excessive noise because of proximity to the South San Francisco Airport (SFO). The EIR concluded that future projects would be required to comply with the policies and actions within the General Plan and the City's Municipal Code regarding maximum building heights permitted under Federal Aviation regulations. In addition, the EIR concluded that continued consultation with the City/County the Association of Governments of San Mateo County (C/CAG) and Federal Aviation Administration (FAA) for projects located in the vicinity of SFO will reduce the exposure of people residing or working in the City to a safety hazard or excessive noise because of proximity to SFO. Therefore, this impact is considered to be less than significant.

The project site is approximately 1.75 miles northwest of the San Francisco International Airport (SFO). The project site is within airport influence area (AIA) Area A shown on Exhibit IV of the SFO Comprehensive Land Use Plan (CLUP). The project would be consistent with the Federal Aviation Administration (FAA) Part 77 Notification Requirements pertaining to height restrictions. Based on Comprehensive Land Use Plan for the San Francisco International Airport (SFO), Exhibit IV-13, projects that exceed 75 to 80 feet above the ground surface at the site would be required to notify the FAA. The proposed townhouses would have a maximum height of 45 feet above the ground surface, which would be consistent with the SFO CLUP and FAA regulations, and notification to the FAA would not be required. The project would also not be located in a safety compatibility zone, which is consistent with the CLUP's policies to reduce the public's exposure to the risk associated with potential aircraft accidents in the airport vicinity. The project is outside the 65 decibel Community Noise Equivalent Level (CNEL) on Exhibit IV-5 of the SFO CLUP and, therefore, would not be subject to noise hazards.

The project is consistent with the SFO CLUP regarding safety and noise and FAA Part 77 height standards. Therefore, consistent with the General Plan EIR conclusions, the project would not result in an aircraft safety hazard; the project's impact would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

f. The 2040 General Plan EIR states that development and growth in the City under the General Plan could result in an increase in demand for emergency evacuation routes within the General Plan area. General Plan Action CR-1.3.1 requires the City to update emergency operations plans and

protocols to account for regularly updated hazard information. General Plan Policy CR-1.6 requires the City to strengthen emergency management capacity and coordination with the San Mateo County Emergency Operations Center. In addition, Action CR-1.6.5 requires the City to maintain and communicate evacuation route plans for businesses and residents. The General Plan EIR concludes that given the existing inter-jurisdictional programs that are in place, and because the City maintains emergency management capacity and evacuation routes in the event of emergency, implementation of the General Plan would not impair implementation of or physically interfere with an adopted emergency response plan (including the San Mateo County Emergency Operations Plan) or emergency evacuation plan.

Construction activity would be staged on-site to the extent feasible; however, as construction progresses, staging may need to occur off-site.

Condition of Approval

- Prior to issuance of any demolition or grading permits (whichever occurs earliest), the Applicant shall prepare a detailed Construction Traffic Control Plan and submit it for review and approval by the City of South San Francisco Department of Public Works to ensure acceptable operating conditions on local roadways, such as Railroad Avenue, are maintained during construction.

With implementation of the condition of approval, the project would not obstruct public streets or otherwise interfere with emergency operations. The proposed townhome structures would be constructed in accordance with current building and fire codes to ensure structural stability and safety in the event of a seismic or seismic-related hazard. In addition, the SSFFD would review the site development plans to ensure fire protection design features are incorporated and adequate emergency access is provided. For these reasons, the proposed project would not impair implementation of or physically interfere with the City of South San Francisco's Emergency Operations and Evacuation Plans. For these reasons, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The project would not result in a peculiar effect, new significant impact, or more severe adverse effect. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

g. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would have a less than significant wildfire impact through compliance with 2040 General Plan Policies and the City Municipal Code. As discussed above, the site is not located within a fire hazard zone and the nearest one is located one mile north at San Bruno Mountain. The land between San Bruno Mountain and the project site is fully developed with urban uses; thus, the site would not be exposed to wildfire. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.10 Hydrology and Water Quality

4.10.1 Environmental Setting

The existing hydrology and water quality setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and the adoption of the Addendum to the EIR for the Lindenville Specific Plan.

The project site is located within the Colma Creek watershed, which drains into San Francisco Bay, and is located within the boundaries of the Westside Groundwater Basin. The elevation at the Specific Plan area ranges from approximately 15 feet to 30 feet above mean sea level (amsl). The project site is located in the Federal Emergency Management Agency (FEMA) designated Zone X, which is an area with minimal flood hazard. The southern edge of the site, adjacent to North Canal Street, borders Zone A, which is a FEMA Special Flood Hazard Area for Colma Creek. Flood hazard Zone A is within a 100-year flood, or one percent annual chance, flood zones. The project site is not located within a tsunami inundation zone.[21] Seiches are changes or oscillations of water levels within a confined water body. As described in the 2040 General Plan EIR, there are no large, confined water bodies within the City of South San Francisco, including the project site.

Based on the geotechnical investigation report completed for the project site in September 2023, the depth to groundwater at the portion of the site adjacent to Railroad Avenue is 10 feet below the ground surface and two feet below the ground surface on the southern portion of the site that extends to North Canal Street.

4.10.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less than Significant	No	No	No	No

[21] California Department of Conservation: California Geological Survey. Tsunami Hazard Area Map. Accessed January 25, 2025. https://maps.conservation.ca.gov/cgs/informationwarehouse/ts_evacuation/.

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less than Significant	No	No	No	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:	Less than Significant	No	No	No	No
- result in substantial erosion or siltation on- or off-site;	Less than Significant	No	No	No	No
- substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	Less than Significant	No	No	No	No
- 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	Less than Significant	No	No	No	No
- impede or redirect flood flows?	Less than Significant	No	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less than Significant	No	No	No	No

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR concluded that buildout of the General Plan would require excavation, grading, and potentially dewatering of sites, which could result in sediment and other pollutants being transported from active construction sites to nearby creeks, marshes, and the Bay through soil erosion, wind-blown dust, and stormwater runoff. The 2040 General Plan EIR concluded that future development under the General Plan, in compliance with City and Regional Water Quality Control Board (RWQCB) requirements (which include compliance with the statewide National Pollutant Discharge Elimination System (NPDES) General Construction Permit, implementation of stormwater control BMPs, and implementation of construction sediment and erosion control plans), would reduce water quality impacts during construction activities to a less than significant level.

The 2040 General Plan EIR also discussed how post-construction water quality impacts could occur from new development. The 2040 General Plan EIR concluded that future development, in compliance with the Municipal Regional Stormwater Permit Provision C.3 requirements, General Plan policies, and the City's Municipal Code (which include Low Impact Development [LID] requirements, stormwater control BMPs, hydromodification management, and site design measures), would ensure new development would not result in significant post-construction water quality impacts.

Construction-Related Water Quality Impacts

Construction

Construction of the proposed project, including grading and excavation activities, may result in temporary impacts to surface water quality. Surface runoff that flows across the site may contain sediments that are ultimately discharged into the storm drainage system. The project would disturb approximately two acres of soil. As stated in the 2040 General Plan EIR, since construction of the project would disturb more than one acre of soil, compliance with the NPDES General Permit for Construction Activities is required. As part of development of the proposed project, a Notice of Intent (NOI) would be submitted to the RWQCB. Prior to initiation of construction or demolition activities, a Storm Water Pollution Prevention Plan (SWPPP) would be prepared in accordance with the NPDES requirements. The applicant is then required to submit copies of the NOI and SWPPP to the City of South San Francisco's Technical Services Supervisor within the Water Quality Control

Unit of the Public Works Department prior to issuance of building and/or grading permits. The SWPPP would identify specific BMPs that would be used at the project site to treat and control stormwater, reduce sedimentation, and prevent erosion. The project would comply with Municipal Code Section 14.04.180 (Reduction of Pollutants in Stormwater) which requires BMPs for all construction sites in the City for erosion control, run-on and runoff control, sediment control, active treatment systems (as appropriate), and good site management through all phases of construction (including, but not limited to, site grading, building and finishing of lots) until the site is stabilized by landscaping or the installation of permanent erosion control measures. The requirements will be monitored by City Water Quality Control personnel. Construction stormwater protection measures include and are not limited to the following measures:

- Identify all storm drains, drainage swales and creeks located near construction sites and prevent pollutants from entering them by the use of filter fabric cloth, rock bags, straw wattles, slope hydroseeding, cleaning up leaks, drips or spills immediately, use dry cleanup methods to clean up spills, use of berms, temporary ditches and check dams to reduce the velocity of surface flow.
- Place rock bags at all drain inlets to filter silt and along curb and gutter to filter water before the drain inlets.
- Place straw wattles and hydroseed the sloped areas.
- Place straw matting at the temporary sloped areas for erosion control.
- Place drain systems to filter and then drain into drain inlets.
- Use silt fencing with straw mats and hand broadcast seed for erosion control.
- Construct temporary drainage systems to filter and divert water accordingly.
- Construct temporary rock and asphalt driveways and wheel washers to buffer public streets from dirt and mud.
- Use part- and full-time street sweepers that operate along public streets and roads.
- Cover all stockpiled soils to protect from erosion. Use berms around stockpiled soils.
- Cover and protect from erosion plaster, concrete and other powders which create large amounts of suspended solids.
- Store all hazardous materials (paints, solvents, chemicals) in accordance with secondary containment regulations and cover during wet weather.
- Use terracing to prevent erosion.
- Through grading plan review and approval, phase grading operations to reduce disturbed areas during wet weather, limit vegetation removal, delineate clearing limits, setbacks, easements, sensitive or critical areas, trees, drainage courses and buffer zones to prevent unnecessary disturbance and exposure. Limit or prohibit grading during the wet weather season, October 15 to April 15th.
- Prevent spills and leaks by maintaining equipment, designating specific areas of a site for such activities that are controlled and away from water courses and perform major maintenance off-site or in designated areas only
- Cover and maintain all dumpsters, collect and properly dispose of all paint removal wastes, clean up paints, solvents, adhesives and all cleaning solvents properly. Recycle and salvage appropriate wastes and maintain an adequate debris disposal schedule.

- Avoid roadwork and pavement stormwater pollution by following manufacturers' instructions.

Consistent with the 2040 General Plan EIR and subsequent 2023 Addendum to the EIR for the Lindenville Specific Plan, with the implementation of the above NPDES requirements, construction BMPs, and Municipal Code Section 14.04.180 which includes requirement to reduce pollutants in stormwater the project's construction water quality impacts would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Dewatering During Construction

The depth to groundwater at the project site could range from two feet to 10 feet below the ground surface. The project's maximum depth of excavation to access utilities during construction is 10 feet below the ground surface. Therefore, groundwater could be encountered during construction. If shallow groundwater is encountered, dewatering of the excavation or trenching site may be required.

Consistent with 2040 General Plan EIR conclusions, in accordance with the Statewide General Waste Discharge Requirements for Extracted Groundwater from Structural Dewatering Requiring Treatment in the San Francisco Bay Region, discharges of dewatered groundwater to a storm drain will comply with the San Francisco Bay RWQCB Order No. R2-2015-0049, Municipal Regional Stormwater NPDES Permit (MRP).

Consistent with the conclusions of the General Plan EIR, the project would comply with mandatory NPDES permit requirements that ensure that impacts related to water quality degradation from the discharge of dewatered groundwater would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Post-Construction Water Quality Impacts

The 2040 General Plan EIR also discussed how post-construction water quality impacts could occur from new development. The 2040 General Plan EIR concluded that future development, in compliance with the Municipal Regional Stormwater Permit Provision C.3 requirements (Low Impact Development [LID] requirements and site design measures), General Plan policies (including General Policy ES-7.3 below), and the City's Municipal Code (which include stormwater control BMPs), would ensure new development would not result in significant post-construction water quality impacts.

- **General Plan Policy ES-7.3:** Require stormwater management practices for new and redevelopment projects. Continue to require new development and redevelopment projects to meet federal, State, regional, and local stormwater requirements, including site

design, stormwater treatment, stormwater infiltration, peak flow reduction, and trash capture.

- **General Plan Policy ES-7.4:** Encourage pervious surfaces. Encourage pervious surfaces in new developments.

- **General Plan Policy ES-8.1:** Optimize groundwater recharge in new development. Continue to optimize groundwater recharge from new and redevelopment projects by infiltrating stormwater in accordance with State, regional, and local requirements.

- **Municipal Code Section 14.04.180 (g)** (Reduction of pollutants in stormwater) includes source control measures for all new development and redevelopment projects that are subject to planning, building, development or other comparable review. These source control measures shall be included on regulated projects consistent with the NPDES permit:
    - Storm drain stenciling—No Dumping-Flows to Bay.
    - Landscaping that minimizes irrigation and runoff, promotes surface infiltration where possible, minimizes the use of pesticides and fertilizers and incorporates appropriate sustainable landscaping practices and programs such as Bay-Friendly Landscaping.
    - Appropriate covers, drains and storage precautions for outdoor material storage areas, loading docks, repair/maintenance bays and fueling areas.
    - Covered trash, food waste, and compactor enclosures.

Consistent with the NPDES requirements and General Plan Policy ES-3.3, the project would include an on-site stormwater treatment area (bioretention area) and flow-through planters that would treat stormwater runoff; stormwater would then be directed to the City's storm drain system. The project would also implement measures in Municipal Code Section 14.04.180 (g) and General Plan Policy ES-7.3to reduce the amount of pollutants that enter the stormwater system. Implementation of the site design, source control and LID-based runoff treatment controls described above would reduce the rate of stormwater runoff while also removing pollutants. Consistent with the conclusions of the 2040 General Plan EIR and subsequent 2023 Lindenville Specific Plan Addendum to the General Plan EIR, the project would result in a less than significant impact to water quality post-construction. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that buildout of the General Plan could increase impervious surfaces within the City and increase demand for water, which could lead to an increase in groundwater pumping. The 2040 General Plan EIR concluded that future development, in compliance with the City's Municipal Code and General Plan polices, would not deplete groundwater supplies or interfere with groundwater recharge.

The project would be located in the Westside Groundwater Basin. Given the project would include excavation to a depth of 10 feet below the ground surface and the depth to groundwater levels at the site range from two to 10 feet below the ground surface, groundwater would likely be

encountered during excavation and temporary dewatering would be needed. The project will be required to obtain a Groundwater Dewatering Discharge Permit from the City of South San Francisco and shall be subject to the requirements of said permit.[22] Dewatering during construction would temporarily lower the groundwater table at the project site. Due to the temporary nature, dewatering during construction is not considered a substantial decrease in groundwater supplies.

The project would add approximately 67,890 square feet of impervious surfaces, increasing current site conditions from 16 percent impervious to 84 percent impervious under proposed project conditions. The project would include pervious bioretention areas (pervious) and flow through planters to improve stormwater infiltration in accordance with General Plan Policy ES-7.3 which requires new development and redevelopment projects to meet federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, and stormwater infiltration. The project would also comply with General Plan Policy ES-7.4, which encourages developments to include pervious surfaces, and General Plan Policy ES-8.1 which requires the City to optimize groundwater recharge from new and redevelopment projects by infiltrating stormwater in accordance with State, regional, and local requirements.

The project would comply with the City's policies to include stormwater infiltration and the project would not substantially interfere with groundwater recharge. Consistent with the 2040 General Plan EIR and the subsequent 2023 Lindenville Specific Plan Addendum to the General Plan EIR, with the implementation of the above City policies, the project would not impede groundwater management of the Westside Basin and the impact would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General Plan EIR concluded that buildout of the General Plan would contribute runoff to the storm drain system serving the City. The 2040 General Plan EIR concluded that future development, in compliance with General Plan polices and the City Municipal Code, does not cause exceedances in the storm drain system and would reduce the risks of flooding to a less than significant level.

The existing City stormwater system collects untreated stormwater from the site and surrounding area and discharges it directly to Colma Creek. Development of the proposed project would change the existing drainage pattern of the project site by adding more impervious surfaces and adding new LID-based treatment controls (bioretention basins). The project would result in approximately 83,570 square feet (84 percent) of impervious surfaces and 16,090 square feet (16 percent) of pervious surfaces. This would be a net increase in impervious surfaces on-site of approximately 67,890 square feet, or 68 percent, which would lead to an increase in runoff. Stormwater runoff would be captured and treated by the bioretention basins and flow through planters prior to entering the off-site stormwater drainage system and discharging to Colma Creek, and then the San

[22] City of South San Francisco. Environmental Compliance: Pretreatment Program. Accessed January 25, 2025. https://www.ssf.net/Departments/Public-Works/Divisions/Water-Quality-Control-Plant-Division/Environmental-Compliance.

Francisco Bay. Directing runoff through the on-site stormwater system would reduce the rate of runoff and amount of pollutants entering the stormwater system, which is consistent with General Plan Policy ES-7.3.

In addition, the project must comply with the NPDES Construction General Permit including development of a SWPPP that includes erosion and sediment controls. The project would implement the erosion control measures during construction, listed in the response above to checklist question a). The site is in FEMA designated Zone X (areas of minimal flood hazard). Therefore, the addition of the townhouse structures is not anticipated to impede or redirect flood flows. Although the southern edge of the project site (proposed walkway) adjacent to Canal Street, borders Zone A (a flood hazard area), the proposed townhouse development is approximately 700 feet north of the flood hazard area. Therefore, consistent with the 2040 General Plan EIR and subsequent 2023 Lindenville Specific Plan Addendum to the General Plan EIR, with the implementation of the applicable NPDES requirements and City Municipal Codes and General Plan Policies, the project would not substantially alter the existing drainage pattern of the project site or area, resulting in a less than significant impact. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

d. As discussed in the 2040 General Plan EIR, parts of the City could be affected by tsunamis, flooding, and sea level rise that could potentially lead to a release of pollutants. The 2040 General Plan EIR, however, concluded that future development, in compliance with the City's Municipal Code and General Plan policies, would not result in a release of pollutants due to a tsunami, sea level rise, or flooding.

As stated in Section 4.10.1, the project site is not located within a tsunami or seiche hazard zone. In addition, the site is not located within a flood hazard area. Therefore, there is no risk regarding the release of pollutants due to inundation. Further, as discussed in Section 3.9 Hazards and Hazardous Materials under checklist question a, compliance with the City's Municipal Code and General Plan Policies would ensure the proper storage and use of hazardous materials to ensure appropriate containment to prevent spills. For these reasons, consistent with the 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum to the General Plan EIR, the project would result in a less than significant impact related to the risk for releasing pollutants due to inundation. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

e. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan could increase impervious surfaces within the City and increase demand for water, which could lead to increased groundwater pumping and conflict with an adopted groundwater management plan. The 2040 General Plan EIR, however, concluded that compliance with the City's Municipal Code and General Plan polices would ensure buildout of the 2040 General Plan would not conflict with groundwater management plans.

The Specific Plan area is located within the Westside Groundwater Basin, which is managed by the California Water Service Company (Cal Water) 2020 Urban Water Management Plan, South San

Francisco District. As described in the 2040 General Plan EIR, the project site is within the jurisdiction of the San Francisco Bay RWQCB. The RWQCB established regulatory standards for water quality in San Francisco Bay in its Water Quality Control Plan for the San Francisco Bay Basin (i.e., Basin Plan). As discussed under checklist question a), the project would comply with General Plan policies, the Municipal Code, and the mandatory NPDES permit requirements related to dewatering and groundwater quality. As a result, consistent with the 2040 General Plan EIR and the subsequent 2023 Lindenville Specific Plan Addendum to the General Plan EIR, the project would not violate any water quality standards or otherwise substantially degrade surface or groundwater quality. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.11 Land Use and Planning

4.11.1 Environmental Setting

The existing land use setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum to the General Plan EIR. The site is surrounded by Railroad Avenue and residential uses to the north, light industrial uses and Linden Avenue to the east, light industrial uses to the west, and industrial uses, North Canal Street, and Colma Creek to the south.

4.11.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Physically divide an established community?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	No

The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would result in less than significant land use impacts.

a. The 2040 General EIR concluded that buildout of the General Plan would not physically divide an established community. The project site does not include infrastructure components, such as highways or railways, that would physically divide an existing community. The proposed project's 70 two- to three-story townhouse residential units are consistent with the height of the two-story single-family residential units and three-story multi-family residential uses to the north of Railroad Avenue. Consistent with General Plan Policy LU-1.2 which encourages projects to provide connectivity in complete neighborhoods including improving walk, bike, and accessibility in these neighborhoods, the project would improve connectivity by constructing a new five-foot wide sidewalk on Railroad Avenue, along the project frontage. Consistent with the 2040 General Plan EIR conclusions, the project would not physically divide an established community. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that General Plan buildout would not 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. The project is consistent with the site's existing General Plan designation of Medium Density Mixed Use (which allows a maximum residential density of 120 dwelling units per acre). The project site is in the T4 Lindenville (T4L) Zoning District, which allows a minimum of 80 residential units per acre and a maximum of 120 residential units per acre. The prosed project's density would be 35.8 dwelling units per acre; therefore, the project proposes a rezoning to Planned Development Zoning to allow for the proposed townhouse development. A reduced density is proposed because the project parcel shape restricts the site from being developed with a high-density residential building that meets the T4L development standards. While the project proposes a density lower than the minimum requirement of the existing zoning, it is consistent with the City's vision to create new residential neighborhood in the northern part of the Lindenville sub-area and contributes to having a mix of housing diversity in the sub-area. The proposed townhouse units would be three stories tall from the street level of Railroad Avenue and be compatible with the two-story single-family residential units and three-story multi-family residential uses to the north of Railroad Avenue.

The project would be less than 0.5 mile southwest of the South San Francisco Caltrain Station and, therefore be consistent with General Plan Policy LU-2.1 which encourages developers and property owners to locate new housing, mixed use, and employment uses near transit centers to minimize reliance on personal automobiles. The project would be consistent with the Federal Aviation Administration (FAA) Part 77 Notification Requirements pertaining to height restrictions. Based on Comprehensive Land Use Plan for the San Francisco International Airport (SFO), Exhibit IV-13, projects that exceed 75 to 80 feet above the ground surface at the site would be required to notify the FAA. The proposed townhouses would have a maximum height of 45 feet above the ground surface, which would be consistent with the SFO CLUP and FAA regulations. The project would also not be located in a safety computability zone which is consistent with the CLUP's policies to reduce the public's exposure to the risk associated with potential aircraft accidents in the airport vicinity.

The project's conformance with various City policies adopted for the purpose of avoiding or mitigating an environmental effect is discussed in various other sections of this EIR (e.g., Air Quality, Biological Resources, and Noise, Hazards and Hazardous Materials). The project would require a rezoning of the site from a T4L Zoning District to a Planned Development Zoning. Upon approval of the Planned Development Rezoning, the proposed project would be consistent with the City's land use policies and zoning. The proposed zoning would be consistent with the surrounding the residential uses to the north of Railroad Avenue. The area to the north is designated as - High Density – Residential which allows for townhouses and a density of 30 dwelling units per acre or more. For these reasons, consistent with the conclusions of the 2040 General Plan EIR, the project would not create a significant environmental impact or create a conflict with any plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.12 Mineral Resources

4.12.1 Environmental Setting

The existing mineral resources setting, including regulatory framework, has not substantially changed since certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum to the General Plan EIR.

There are no mineral resources within or adjacent to the project site, based on the California Geological Survey Mineral Land Classification Map.[23] Based on the General Plan EIR, Sign Hill Park is located within an area where adequate information indicates that significant mineral deposits are present, or where it is assumed that a high likelihood exists for their presence. The project site is 0.6 mile south of Sign Hill Park.

4.12.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Result in the loss of availability of a known mineral resource that will be of value to the region and the residents of the state?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	No

a, b. The 2040 General Plan EIR states there are no mineral resource recovery sites within the General Plan area. The 2040 General Plan EIR concluded that since the City is fully built out, new development would primarily occur on parcels that already contain some existing residences or businesses. Therefore, the 2040 General Plan EIR concluded that construction and operation of future projects under the General Plan would not result in the loss of availability of a known mineral resource of value to the region and residents of the State. Therefore, impacts related to mineral resources were concluded to be less than significant.

[23] California Department of Conservation, California Geological Survey. Mineral Land Classification (MLC). Accessed January 29, 2025. https://maps.conservation.ca.gov/cgs/minerals/?page=Mineral-Land-Classification.

Based on the California Geological Survey Map for Mineral Land Classification, the project site does not contain mineral resources and is not adjacent to any mineral resources. Based on the 2040 General Plan EIR, there are no mineral resource recovery sites within the General Plan area (including the project site). Therefore, the project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state, or the loss of availability of a locally important mineral resource recovery site identified in a local land use plan. The project would have no impact on mineral resources. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.13 Noise

This discussion is based in part upon a Construction Noise and Vibration Assessment completed by Illingworth & Rodkin, Inc. in November 2024. This report is included in Appendix E of this CEQA Compliance Checklist.

4.13.1 Environmental Setting

The existing noise and vibration setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum to the General Plan EIR.

The project site is undeveloped and is surrounded by residential uses to the north, industrial uses to the east and west, and industrial uses south of North Canal Street and Colma Creek, as shown on Figure 2.4-3. Existing noise sources in the site's surrounding area are primarily from vehicles traveling on the roadways and aircraft noise from SFO. The existing roadway noise levels are based on the average daily trips (ADT) modeled for the year 2019 (prior to the COVID 19 pandemic). Based on the 2040 General Plan EIR, the Caltrain railroad, US 101, I-380, and El Camino Real are roadways and freeways in the project area that generate noise levels above 65 A-weighted sound level (dBA) Community Noise Equivalent Level (CNEL). The other primarily local-serving roadways with lower traffic volumes in the project area have noise levels of no more than 65 dBA.

The nearest roadway segments to the site that were modeled for existing noise levels were South Spruce Avenue, from North Canal Street to Railroad Avenue, approximately 325 west of the site, and South Spruce Avenue, from Railroad Avenue to Grande Avenue. At 50 feet from the centerline of the outermost lane, the measured noise level for the first noise segments was 61.3 dBA CNEL and 58.9 dBA CNEL for the second segment.

The nearest noise sensitive receptors to the site are residences across Railroad Avenue, 60 feet north of the project site.

4.13.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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?	Less than Significant with Mitigation Incorporated	No	No	No	No
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	No	No	No	No
c) For a project located within the vicinity of a private airstrip or 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 expose people residing or working in the project area to excessive noise levels?	Less than Significant with Mitigation Incorporated	No	No	No	No

a. The following is an impact discussion regarding temporary and permanent noise increase resulting from the proposed residential project.

Temporary Noise Increase from Project Construction

The 2040 General Plan EIR concluded that noise impacts from construction activities for future development projects would include factors such as noise generated by construction equipment, equipment location, sensitivity of nearby land uses, and the timing and duration of the construction activities. The General Plan EIR stated that the City-adopted mandatory requirements in the City's Municipal Code and General Plan will ensure that construction noise associated with General Plan implementation is less than significant. The EIR stated that the Municipal Code Section 8.32.050 regulates the time when construction activities may occur, limiting such activities to the hours specific in the Code. The General Plan Noise Element Policy 1-2 requires enforcement of the City's Noise Ordinance performance standards. The General Plan EIR concluded that compliance with mandatory requirements of the Municipal Code and General Plan will ensure that construction noise occurs only at appropriate times of day and is minimized to acceptable levels. Therefore, construction noise impacts were concluded to be less than significant.

Based on the City Municipal Code Section 8.32.050, a significant temporary noise impact would be identified if the following occurs:

- If construction would occur outside of the hours specified in the City's Municipal Code, which are weekdays between the hours of 8:00 AM and 8:00 PM, on Saturdays between the hours of 9:00 AM and 8:00 PM, and on Sundays and holidays between the hours of 10:00 AM and 6:00 PM

- If an individual piece of construction equipment produces a noise level exceeding 90 dB at a distance of 25 feet from the equipment.

Project construction activities include site preparation, grading and excavation, building construction, architectural coatings, paving, and landscaping. Project construction is estimated to take a total of 24 months. Soil excavation to a maximum depth of 10 feet would be necessary to accommodate the project's utilities, building foundations, and footings. During each phase of construction, there would be a different mix of equipment operating, and noise levels would vary by phase and vary within phases, based on the amount of equipment in operation and the location at which the equipment is operating.

Noise impacts from construction depend upon the noise generated by various pieces of construction equipment, the timing and duration of noise-generating activities, and the distance between construction noise sources and noise-sensitive areas. Construction noise impacts primarily result when construction activities occur during noise-sensitive times of the day (e.g., early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise-sensitive land uses, or when construction lasts over extended periods of time.

The Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) was used to calculate the hourly average noise levels for each phase of construction, assuming the two loudest pieces of equipment would operate simultaneously, as recommended by the Federal Transit Administration (FTA) for construction noise evaluations.

The quantity of construction equipment by phase, the maximum instantaneous noise level (L_{max}) generated by individual pieces of construction equipment at 25 feet, and the average noise level (L_{eq}) at 25 feet assuming the operation of the two loudest pieces of construction equipment for each construction phase, are shown in Table 4.13-1. The modeling results do not include reductions due to intervening buildings or existing barriers. Construction-generated noise levels reduce at a rate of approximately six (6) dBA per doubling of the distance between the source and receptor. Shielding by buildings or terrain often results in lower construction noise levels at distant receptors. Therefore, the construction noise level results in Table 4.13-1 are conservative.

Table 4.13-1: Construction Noise Levels at 25 feet from Equipment				
Phase of Construction	**Total Workdays**	**Construction Equipment (Quantity)**	**Maximum Instantaneous Noise Level, L_{max}**	**Hourly Average Noise Level, L_{eq}**
Demolition	22 days	Excavator (1)[a]	87	83
Site Preparation	10 days	Tractor/Loader/Backhoe (1)[a]	90/85/84	86
Grading/ Excavation	15 days	Excavator (1)[a] Tractor/Loader/Backhoe (1)[a]	87 90/85/84	88
Trenching/ Foundation	15 days	Tractor/Loader/Backhoe (1)[a] Excavator (1)[a]	90/85/84 87	88
Building - Exterior	180 days	Crane (1)[a] Forklift (1) Tractor/Loader/Backhoe (1)[a] Welder (2)	87 81 90/85/84 80	87
Building - Interior	307 days	Air Compressor (1)[a] Aerial Lift (1)[a]	84 81	81
Paving	38 days	Paving Equipment (1) Roller (1)[a] Tractor/Loader/Backhoe (1)[a]	83 86 90/85/84	87

Project construction would occur during the hours described in the City's Municipal Code Section 8.32.050. As shown in Table 4.13-1, none of the construction equipment, which would be used for project construction, would generate maximum instantaneous noise levels exceeding 90 dBA at 25 feet. In addition, none of the construction phases would generate average noise levels exceeding 90 dBA at 25 feet. At 50 feet, which represents the nearest offsite residential receptor locations north of the site (across Railroad Avenue), construction noise levels would be six (6) decibels lower than the levels shown in Table 4.13-1 and below the City's standards. Industrial uses adjacent to the project site towards the south would experience construction noise levels exceeding 90 dBA within 25 feet. Beyond 25 feet, these construction noise levels would not exceed the City's Municipal Code Section 8.32.050 standard for construction noise levels for each piece of equipment to not exceed 90 dBA at 25 feet. In addition, noise levels do not exceed 90 dBA at any point outside the project property line beyond 25 feet. Therefore, the project would not result in a substantial temporary increase in ambient noise levels in the vicinity of the project in excess of standards established in the City's Municipal Code.

Additionally, the project would implement standard best management practices to further reduce construction noise levels generated from the site and reduce disruption and annoyance at existing noise-sensitive receptors in the project vicinity.

Conditions of Approval: Construction Best Management Practices

- Construction shall be limited to the hours from 8:00 AM to 8:00 PM Monday through Friday, Saturdays between 9:00 AM and 8:00 PM and Sundays and holidays between 10 AM and 6:00 PM. The project applicant shall request a specific permit from the City Engineer for any work to be completed by construction contractors outside of these hours.
- The contractor shall use "new technology" power construction equipment with state-of-the-art noise shielding and muffling devices. All internal combustion engines used on the project site shall be equipped with adequate mufflers and shall be in good mechanical condition to minimize noise created by faulty or poorly maintained engines or other components.
- Staging areas and stationary noise-generating equipment shall be located as far as possible from noise-sensitive receptors.
- Substitute nail guns for manual hammering and electrically powered tools for noisier pneumatic tools, where feasible.
- A designated "noise disturbance coordinator" shall respond to any local complaints about construction noise. The disturbance coordinator shall determine the cause of the noise complaint (e.g., bad muffler, etc.) and shall require that reasonable measures be implemented to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule.

Consistent with the General Plan EIR conclusions, the project would have a less than significant impact related to the temporary construction noise. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Permanent Noise Increases (Operational Noise)

Project-Generated Traffic Noise

Based on the 2040 General Plan Land Use/Noise Compatibility guidelines, noise environments with noise levels of up to 65 dBA CNEL are considered normally acceptable for residential, industrial, commercial, open space, and school uses. Based on Municipal Code Chapter 20.300 Lot and Development Standards, noise environments with noise levels of 65 to 70 dBA CNEL are considered conditionally acceptable for residential and school uses.

Based on the 2040 General Plan EIR, a significant traffic noise impact would occur if the General Plan would cause the CNEL to increase by any of the following:

- 5 dBA or more even if the CNEL would remain below normally acceptable levels for a receiving land use.
- 3 dBA or more, thereby causing the CNEL in the vicinity of the proposed project to exceed normally acceptable levels and result in noise levels that would be considered conditionally acceptable for a receiving land use.
- 1.5 dBA or more where the CNEL currently exceeds conditionally acceptable levels.

As a part of the 2040 General Plan EIR analysis, traffic noise modeling was completed to forecast noise in 2040 for various roadway segments in the General Plan area. Several of the modeled roadway segments would experience a reduction in traffic noise levels with the implementation of the General Plan, due to lower anticipated average daily trips generated by the land uses allowed under the General Plan adopted in 2022 compared to the total development that could occur under the previous General Plan. The highest increase that would occur along these modeled roadway segments would occur along Grand Avenue from Linden Avenue to Airport Boulevard and would increase over existing conditions by 1.7 dBA. The Grand Avenue and Linden Avenue intersection is 0.2 mile north of the project site. Since the increase would only be 1.7 dBA (which is below the threshold for noise levels that are normally acceptable), the 2040 General Plan EIR concluded that the operational traffic noise increase impact would be considered less than significant, and no mitigation would be required.

The General Plan EIR traffic modeling accounted for new development on the site consistent with the site's land use designation of Medium Density Mixed Use (which allows a maximum residential density of 120 dwelling units per acre)[24], and therefore the trips from the proposed residential development are reflected in the forecast future noise levels on the roadway segments near the project site that would handle daily project trips.

The project would add approximately 504 average daily trips and would be distributed across the roadway network. The 504 trips were accounted for in the General Plan EIR traffic modeling. The 2040 traffic noise levels (with the implementation of the General Plan, including the 504 trips generated by the proposed project) at the intersections closest to the site would be 61.8 dBA CNEL at the South Spruce Avenue, North Canal Street to Railroad Avenue intersection, and 59.7 dBA CNEL at the South Spruce Avenue, Railroad Avenue to Grand Avenue intersection. The 2040 traffic noise levels with the implementation of the General Plan would decrease by 1.0 dBA and 0.1 dBA, respectively. As stated above, the highest noise increase for the 2040 traffic noise levels including the trips from the proposed residential project would be located at Grand Avenue, from Linden Avenue to Airport Boulevard, which would be 1.7 dBA CNEL above existing conditions (with traffic noise levels at 61.9 dBA CNEL). The traffic noise level at the Grand Avenue segment would be a normally acceptable noise level since it would be below 65 dBA CNEL. As a result, the threshold for the permanent increase in traffic noise levels at this segment is five (5) dBA CNEL. Consistent with the 2040 General Plan EIR conclusions, given the increase in traffic noise levels at the Grand Avenue segment would be less than five (5) dBA CNEL, the permanent increase in traffic noise levels from the General Plan (including the proposed residential project) would not exceed City standards and would be less than significant. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

[24] The project would develop the site at a density (35.8 du/ac) well below what is allowed by the General Plan (120 du/ac) due to the site's inefficient elongated shape.

Permanent Stationary Source Noise Increase

As stated in the 2040 General Plan EIR, a significant operational noise impact would occur if the noise levels generated by stationary noise sources at development projects would exceed the following noise performance standards:

- Residential: 60 dBA maximum dBA (L_{max}) between 7:00 a.m. and 10:00 p.m. and 50 dBA L_{max} between the hours of 10:00 p.m. and 7:00 a.m.
- Light Industrial: 60 dBA L_{max} between 7:00 a.m. and 10:00 p.m. and 55 dBA L_{max} between the hours of 10:00 p.m. and 7:00 a.m.
- Business Park: 65 dBA L_{max} between 7:00 a.m. and 10:00 p.m. and 60 dBA L_{max} between the hours of 10:00 p.m. and 7:00 a.m.

The General Plan EIR concluded that future development would include new stationary noise sources such as parking lot activities, loading/unloading activities, standby/backup emergency generators, and mechanical ventilation system equipment, which could exceed the noise performance standards described above, including noise-sensitive receptors in the vicinity of the General Plan area. The General Plan EIR concluded that operational noise levels could exceed the City's noise performance thresholds at adjacent land uses. The 2040 General Plan EIR identified mitigation measure MM NOI-1 to reduce operational noise impacts to a less than significant level.

2040 General Plan EIR Mitigation Measure

MM NOI-1: Operational Noise Reduction Plan

Prior to issuance of building permits, the project applicant or sponsor shall implement the following measures to limit on-site operational stationary noise source impacts:

- Any proposed development projects that include parking areas, terminals, or loading docks of commercial or industrial land uses within 300-feet of a residential receptor shall demonstrate compliance with Policies NOI-1.1 and NOI-1.2 of the City's Noise Element by submitting a final acoustical report prepared to the satisfaction of the Planning Division that identifies design measures to adequately minimize the potential noise impacts of vehicles on the site to adjacent land uses. The report must be approved by the Planning Division prior to issuance of building permits.

- For any future development project that would include exterior mechanical systems (such as mechanical ventilation systems) within 50 feet of a residential receptor, the project applicant or sponsor shall submit a final acoustical report prepared to the satisfaction of the Planning Division that demonstrates compliance of the project with Policies NOI-1.1 and NOI-1.2 of the City's Noise Element. Noise reduction design features may include, but

are not limited to, locating stationary noise sources on the site to be shielded by structures (buildings, enclosures, or sound walls) or by using equipment that has a quieter rating. The report must be approved by the Planning Division prior to issuance of building permits.

The proposed project would not include emergency generators and the proposed buildings would not include rooftop or exterior mechanical equipment. Individual heating, ventilation and air conditioning (HVAC) units would be included in a utility closet within the garage of each townhouse unit. For truck loading and unloading, delivery/service trucks would park in front of the townhouse driveways on Railroad Avenue. The project is not a commercial or industrial use and does not include a parking lot or truck loading docks. For these reasons, the project would not result in a permanent noise increase in excess of City standards. The Mitigation Measure MM NOI-1 would not be required for the project as the mitigation is only applicable to developments with exterior mechanical systems and commercial or industrial uses with parking areas, terminals, or loading docks. Therefore, the project would not meet any of the factors laid out in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that future development could result in short-term vibration impacts during construction activities, and depending on the equipment used, could exceed the FTA damage threshold criteria of 0.12 in/sec peak particle velocity (PPV).

The 2040 General Plan includes policies to ensure that construction vibration impacts associated with future development under the 2040 General Plan would be less than significant. General Plan Policy NOI-2.1 requires a vibration impact analysis for any construction activities, located within 100-feet of residential or sensitive receptors that require the use of pile driving or other construction methods that have the potential to produce high groundborne vibration levels. General Plan Policy NOI-3.1 requires vibration impact analysis for historic structure protection for construction activities within 150 feet of historic structures. Compliance with these standards is also reiterated in Municipal Code Section 20.300.009. A site-specific analyses would identify measures needed to reduce vibration levels below FTA's threshold, such as setback requirement, use of alternate construction methods, or pre-emptive trenching to interrupt groundborne vibration transmission.

These policies are applied to all construction permits and compliance is mandatory and monitored by City grading and building department personnel to ensure vibration levels do not exceed FTA's threshold. Therefore, the 2040 General Plan EIR concluded that future projects' compliance with General Plan Policies NOI-2.1 and NOI-3.1 and Municipal Code 20.300.009 would reduce construction-vibration noise impacts to a less than significant level.

Construction Vibration Thresholds

The primary concern of the vibration analysis is the potential for construction vibration to damage nearby structures. Demolition and construction activities often require heavy equipment or impact

tools that can generate perceptible vibration levels at nearby sensitive land uses and, in some cases, building damage. Building damage generally falls into three categories:

- Cosmetic damage (also known as threshold damage) is defined as hairline cracking in plaster, the opening of old cracks, the loosening of paint or the dislodging of loose objects.
- Minor damage is defined as hairline cracking in masonry or the loosening of plaster.
- Major structural damage is defined as wide cracking or the shifting of foundation or bearing walls.

Critical factors pertaining to the potential impact of construction vibration include the proximity of the existing structures to the project site, the soundness of the structures, soil conditions, and the methods of construction used.

The City of South San Francisco has not established its own standards for acceptable vibration levels for buildings of conventional construction. However, Caltrans identifies a vibration limit of 0.5 in/sec PPV as the threshold at which there is a potential risk of damage to new residential and modern commercial/industrial structures, 0.3 in/sec PPV for older residential structures, and a limit of 0.12 in/sec PPV for historic buildings. The City of South San Francisco has adopted Caltrans' threshold of 0.12 in/sec PPV to protect historic buildings.

Project Impacts

The City's Municipal Code Section 20.300.10 Performance Standards requires a vibration analysis for project construction activities located within 100 feet of residential or other sensitive receptors that require the use of pile driving or other construction method that has the potential to produce high vibration levels and for any development project that is located within 150 feet of a historic structure and requires either: (1) pile driving within 150 feet; or (2) utilization of mobile construction equipment within 50 feet of the historic structure.

The project would be located within 100 feet of residences to the north and could use vibratory rollers and, therefore, a vibration analysis was prepared for the project. There is one nearby City historic landmark, South City Lumber located at 499 Railroad Avenue, located 130 feet southwest of the site. The 0.12 in/sec PPV threshold will be applicable to protect this historic property. The project would not include pile driving or use mobile construction within 50 feet of the historic structure.

Construction phases would include site preparation, grading/excavation, trenching/foundation, building exteriors, architectural coatings and paving. Project construction activities, such as drilling, the use of jackhammers, rock drills and other high-power or vibratory tools, and rolling stock equipment (tracked vehicles, compactors, etc.), may generate substantial vibration in the immediate vicinity. Jackhammers typically generate vibration levels of 0.035 in/sec PPV and drilling typically generates vibration levels of 0.09 in/sec PPV at a distance of 25 feet.

Construction vibration impacts are assessed based on the potential for damage to buildings on receiving land uses, not at receptors at the nearest property lines. Therefore, the distances used to propagate construction vibration levels (as shown in Table 4.13-2), were estimated under the assumption that each piece of equipment was operating along the nearest portion of the active construction site where the worst vibration-generating equipment would operate, which would represent the worst-case scenario. Table 4.13-2 summarizes the vibration levels at the surrounding buildings in the project vicinity. Vibration levels are highest close to the source and then attenuate with increasing distance.

Table 4.13-2: Vibration Source Levels for Construction Equipment

Equipment		PPV (in/sec) Estimated at Nearest Buildings Adjoining the Project Site	
		North Residences (50 feet)	South Industrial (45 feet)
Clam shovel drop		0.077	0.106
Hydromill (slurry wall)	in soil	0.003	0.004
	in rock	0.006	0.009
Vibratory Roller		0.080	0.110
Hoe Ram		0.034	0.047
Large bulldozer		0.034	0.047
Caisson drilling		0.034	0.047
Loaded trucks		0.029	0.040
Jackhammer		0.013	0.018
Small bulldozer		0.001	0.002

Construction activities at the project site would not exceed the 0.3 in/sec PPV threshold at buildings consisting of conventional materials surrounding the project site or 0.12 in/sec PPV at the historic landmark to the southwest (South City Lumber at 499 Railroad Avenue).

The maximum vibration levels of 0.110 in/sec PPV at the industrial buildings to the south would not result in any chance of cosmetic damage. The vibration levels at the nearest historic structure 130 feet southwest of the site on 499 Railroad Avenue would be 0.034 in/sec PPV or lower. No cosmetic, minor or major damage would be expected at the conventional buildings immediately adjoining the project site or the nearest historic structure to the southwest. At these locations, and in other surrounding areas where vibration would not be expected to cause cosmetic damage, vibration levels may still be perceptible. However, as with any type of construction, this would be anticipated and would not be considered significant, given the intermittent and short duration of the phases that have the highest potential of producing vibration (use of jackhammers and other high-power tools). By use of administrative controls, such as notifying neighbors of scheduled construction activities, the effects of perceptible vibration can be minimized. Impacts due to temporary construction vibration would be considered less than significant. For the above reasons, consistent with the 2040 General Plan EIR conclusions, the project would not generate excessive groundborne vibration, and would result in a less than significant impact. Therefore, the project

would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Once constructed, the townhouse development would not include any vibration inducing uses or equipment; and is not within 200 feet of a rail line. Therefore, consistent with the General Plan EIR impact conclusion, the project would not result in a significant operational vibration impact.

c. The General Plan EIR concluded that the General Plan does not propose changes to the operation of SFO, and therefore, would not result in changes to the geographic extent and location of the 65 dBA CNEL airport noise contours.

The 2040 General Plan EIR concluded that airport activity noise levels could exceed the City's noise/land use compatibility standards for certain land uses and that mitigation would be required to reduce this potential impact. Airport activity noise can be mitigated at the receiving land use using acoustic-rated wall and window assemblies. The General Plan EIR concluded that with implementation of MM NOI-2, which requires preparation of a noise study to identify appropriate design measures, where required, to reduce the potential effect of airport activity noise, impacts generated by future development projects under the proposed project would be reduced to less than significant with mitigation incorporated.

As stated in Section 4.9 Hazards and Hazardous Materials, the project is outside the 65 decibel Community Noise Equivalent Level (CNEL) on Exhibit IV-5 of the SFO CLUP and, therefore, would be in compliance with the SFO CLUP's noise standards. Therefore, the project would not expose people residing or working in the project area to excessive aircraft noise levels, which would result in a less than significant impact. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.14 Population and Housing

4.14.1 Environmental Setting

The existing population and housing setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR.

The project site is located in the Lindenville Specific Plan area which currently contains no housing units and has a total of approximately 9,592 employees between the existing commercial, office, and industrial uses. There have been development projects approved but not yet constructed within the Specific Plan area that would add a population of 2,806 residents and 11,217 employees to the Specific Plan area, resulting in a total of 20,809 employees. The 2040 General Plan buildout, as based on the adopted Lindenville Specific Plan, would result in a total population of 11,773 residents and 23,114 employees within the proposed Specific Plan area[25].

4.14.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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)?	Less than Significant	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Less than Significant	No	No	No	No

a. Based on the 2040 General Plan EIR, the buildout of the 2040 General Plan would result in less than significant impacts with regard to population and housing. The project site is primarily surrounded by residential and industrial development. The 2040 General Plan identifies the Lindenville sub- area as one of the major growth areas within the city. Buildout of the Specific Plan area would result in 11,775 residents and 23,366 employees within the Specific Plan area. Assuming a 2.86 persons per household ratio, the proposed project would accommodate approximately 200

[25] City of South San Francisco. Lindenville Specific Plan Addendum. Table 2.2-3: Summary of Existing, Existing + Recently Approved, Allowed, and Proposed Residential and Non-Residential Population and Employment. September 2023.

of the 11,775 residents assumed for the Lindenville sub-area in the General Plan. Residential development was accounted in the General Plan EIR and the project is consistent with the growth assumptions for the Lindenville sub-area in the General Plan. [26]. In addition, the project would be consistent with the 2040 General Plan vision to create new residential neighborhood in the northern part of the Lindenville sub-area.

The project site is in an urban area served by existing roads, public transit, utilities, and public services. As described in Section 3.0 Project Description, the project also proposes new utility improvements; however, utility improvements are physically limited to the site's vicinity and would not increase capacity beyond what is needed to serve the proposed growth or provide for infrastructure connection to undeveloped areas within the City. For these reasons, implementation of the proposed project would not contribute to substantial unplanned growth in the City and result in the same less than significant population growth impacts as what was identified in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that buildout of the General Plan would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. The project site is vacant; therefore, the project would not displace people or housing. The project complies with General Plan EIR Policy LU-3.7 which requires that there is no net loss in housing and no net loss in the number of residential units during reconstruction or renovation. The project would result in no impacts related to the displacement of people or housing. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

[26] The project would develop the site at a density (35.8 du/ac) well below what is allowed by the General Plan (120 du/ac) due to the site's inefficient elongated shape.

4.15 Public Services

4.15.1 Environmental Setting

The existing public services setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and the adoption of the Addendum to the General Plan EIR for the Lindenville Specific Plan.

Fire and Police Protection

As stated in the 2040 General Plan EIR, the project site is served by the SSFFD. The nearest fire station to the project site is Fire Station #61, located at 480 North Canal Street, approximately one-quarter mile west of the project site. Police protection services are provided by the South San Francisco Police Department (SSFPD). As stated in the 2040 General Plan EIR, the SSFPD has an authorized staff of 85 sworn and 35 civilian positions [divided into three Divisions: Operations, Services and Investigations Services.[27] The SSFFD is headquartered approximately one mile southwest of the site at 1 Chestnut Avenue. The SSFFD staff includes 87 full-time equivalent firefighter and emergency medical employees and five hourly and contract employees. [City Fire Department: Please confirm].

Schools

The project site is located within the South San Francisco Unified School District (SFFUSD), which provides kindergarten through 12th grade education to residents of the city and portions of Daly City and Brisbane. SSFUSD operates nine elementary schools, four middle schools, and three high schools. The project site is within the attendance boundaries of Los Cerritos Elementary School, located on 210 West Orange Avenue, 0.6 mile west of the site, Parkway Heights Middle School, located on 650 Sunset Avenue, approximately 0.8 mile northwest of the site, and South San Francisco High School, located on 400 B Street, located approximately 0.6 mile southwest of the site.

Parks and Open Space

As stated in the 2040 General Plan EIR, the City contains a total of 316 acres of parks and open space, including 131 acres of improved parkland, 108 acres of open space, and 77 acres of joint use facilities. There are currently no parks or open space within the Specific Plan area. The nearest parks to the project site are the City Hall Playground on Miller Avenue and Walnut Avenue, 0.3 mile north of the site, and Orange Memorial Park (on Orange Avenue and Tennis Drive), approximately 0.6 mile west of the site. Per Chapter 8.67 Parks and Recreation Impact Fee of the Municipal Code, the City has set a standard of three acres of improved parkland per 1,000 residents and 0.5-acres of improved parkland per 1,000 new employees.

[27] Kim, Victoria. Associate Planner, City of South San Francisco. Personal Communication. March 10, 2025.

Libraries

As stated in the 2040 General Plan EIR, there are three public libraries in the City of South San Francisco which include the Main Library (901 Civic Campus Way, which changed from the 840 West Orange Avenue location stated in the General Plan EIR and opened in 2023 with expanded library facility access), Grand Avenue Library (306 Walnut Avenue), and the Gene Mullin Community Learning Center (520 Tamarack Lane). The nearest library to the project site is Grand Avenue Library, approximately 0.2 mile north of the project site.

4.15.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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 any of the public services:					
a) Fire Protection?	Less than Significant	No	No	No	No
b) Police Protection?	Less than Significant	No	No	No	No
c) Schools?	Less than Significant	No	No	No	No
d) Parks?	Less than Significant	No	No	No	No
e) Other Public Facilities?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR and subsequent Addendum to the EIR for the Lindenville Specific Plan Addendum concluded that the build-out of the 2040 General Plan would result in less than significant impacts with regard to fire protection services. Buildout of the 2040 General Plan would increase the need for fire suppression, rescue response services, and police protection services, and

as concluded in the 2040 General Plan EIR, could result in the need for new or physically altered fire facilities in order to maintain response times, or other performance objectives. However, no known locations or designs of additional fire facilities are known at this time. Any future fire facilities would be located on land designated as Public in the General Plan and would undergo separate CEQA environmental review in order to reduce any potential environmental impacts. It is anticipated that construction and operation of future new or expanded fire protection facilities would have similar impacts as would construction and operation of other types of new development under the proposed project. As the City proceeds with the construction of new or expanded fire protection facilities, those projects will be reviewed by the City for compliance with the policies and actions of the General Plan, the City's Municipal Code, and the mitigation measures referenced in other sections of the General Plan EIR and this Compliance Checklist. Therefore, the physical effects on the environment from the construction of new or expanded fire protection facilities would be less than significant.

As described in the adopted 2023 Lindenville Specific Plan Addendum to the General Plan EIR, the General Plan allows up to 5,581 residential units within the Lindenville Specific Plan area, and the project site is within the Specific Plan area, such that the proposed 70 residential units (and approximately 200 residents) were accounted for in the General Plan EIR and Lindenville Specific Plan Addendum. The project, therefore, would not require fire protection services and equipment beyond what was evaluated in the 2040 General Plan EIR and Addendum.

As described in the 2040 General Plan EIR, the South San Francisco Municipal Code contains rules and regulations related to fire protection services. Chapter 8.75 of the Municipal Code requires that all residential and nonresidential development projects pay public safety impact fees to provide funding for adequate fire equipment, vehicles, and facilities to meet the broad range of needs of South San Francisco residents and employees. Chapter 15.24 of the Municipal Code implements the California Fire Code on a local level. In accordance with Chapter 15.24, new development projects must meet fire protection and emergency access requirements. In addition, new development projects are required to install fire sprinklers, fire alarms, and fire extinguishers that are up to current code and appropriately located within proposed buildings or structures.

The proposed residential development would be constructed to meet current Fire and City Municipal Code standards to provide fire safety and security overall, and would be required to pay public safety impact fees (used to fund SSFFD facilities) per Chapter 8.75 Public Safety Impact Fee of the Municipal Code. Also, the project would comply with General Plan Policy SA-22.7, which requires the City to coordinate with the SSFFD to ensure public services can accommodate growth impacts of new development in Lindenville Specific Plan area (including the proposed project). For these reasons, the project would have the same less than significant impact on fire protection services and facilities as disclosed in the 2040 General Plan EIR.

Also, as required by the 2040 General Plan EIR, the proposed development will be reviewed by the SSSFD for compliance with the policies and actions of the General Plan Update to ensure that fire protection services keep pace with new development. Therefore, the proposed project would not result in significant adverse effects related to fire protection services and impacts would be less

than significant. For these reasons, the Specific Plan would have the same less than significant impact on fire protection services and facilities as disclosed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR and subsequent Addendum to the General Plan EIR for the Lindenville Specific Plan concluded that the build-out of the 2040 General Plan would result in less than significant impacts with regard to police services.

As stated in the response to checklist question a) above, the project would result in approximately 200 residents and is consistent with the growth assumptions for the Lindenville sub-area in the General Plan. The increase in police protection services demand is consistent with the assumptions in the General Plan EIR and subsequent Addendum to the EIR for the Lindenville Specific Plan Addendum. As stated in the 2040 General Plan EIR, the project would contribute to the possible need to increase staffing and equipment to maintain acceptable service ratios, response times, and other performance standards. This would require existing police stations to be able to accommodate the additional staff and/or equipment. If an existing police station is at capacity for staffing, this could require an expansion of an existing police station or construction of a new police station, the construction of which could cause environmental impacts. However, no known locations or designs of additional fire facilities are known at this time. Any future police facilities would be located on land designated as Public in the General Plan and would undergo separate CEQA environmental review in order to reduce any potential environmental impacts to a less than significant level.

In addition, consistent with the requirements stated in the General Plan EIR, the project applicant will be required to pay public safety impact fees (used to fund SSFPD facilities) per Chapter 8.75 Public Safety Impact Fee of the Municipal Code. For these reasons, the project would have the same less than significant impact on police services and facilities as disclosed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would not require the construction of new or expansion of existing school facilities.

Student enrollment in SFFUSD has declined since 2014. As stated in the 2023 Addendum to the General Plan EIR for the Lindenville Specific Plan, SFFUSD has a maximum capacity of 12,000 students and, for the 2023 to 2024 school year, had 7,770 students enrolled, including the 305 students enrolled in Los Cerritos Elementary, 587 students enrolled at Parkway Heights Middle, and 1.287 students at South San Francisco High School (64.8 percent capacity).[28] The 2023 Addendum to the General Plan EIR for the Lindenville Specific Plan stated the SSFSD was at 65.7 percent

[28] California Department of Education. 2023-24 Enrollment by Grade Los Cerritos Elementary Report (41-69070-6045082). Accessed January 24, 2025. https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=41690706045082&agglevel=school&year=2023-24.

capacity. The 2023 General Plan EIR Addendum for the Lindenville Specific Plan stated, there would continue to be sufficient capacity at SFFUSD with the proposed project (in which residential development was assumed at the project site as a part of the Specific Plan).

In addition, the project applicant would be required to pay school impact fees to offset impacts to local schools. Consistent with state law (Government Code Section 65996) and the 2040 General Plan EIR and subsequent Addendum to the EIR for the Lindenville Specific Plan, payment of fees would reduce impacts to schools to a less than significant level. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

d. As discussed in the 2040 General Plan EIR, the increases in residents and employees from the implementation of the 2040 General Plan would increase the use and demand for park facilities throughout the City. Per City Municipal Code Chapter 8.67 Parks and Recreation Impact Fee, the City has set a standard of three acres of improved parkland per 1,000 residents and 0.5-acres of improved parkland per 1,000 new employees. The proposed project would increase the City's resident population by approximately 200, however, the 200 residents were accounted for among the 5,581 residential units planned in the Lindenville Specific Plan, as described in the 2040 General Plan EIR and subsequent 2023 Addendum to the General Plan EIR for the Lindenville Specific Plan. The project proposes 5,330 square feet of outdoor paseo areas in between the five buildings available to the townhouse development's residents. The proposed project's open space would contribute to the 43.7 acres of parks and open space which would be added under the implementation of the Lindenville Specific Plan. The proposed common open space would help offset the demand on parkland by the project's residents. The project will also pay the park recreation impact fee, per City Municipal Code Chapter 8.67 to offset the recreational impacts. For these reasons, the project would result in the same less than significant impact as identified in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

e. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would increase demand for library services. The proposed project, which would accommodate approximately 200 residents, is consistent with the 2040 General Plan growth assumptions described in the 2040 General Plan EIR and subsequent 2023 Addendum to the EIR for the Lindenville Specific Plan. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan could result in the need for additional library facilities. Since certification of the 2040 General Plan FEIR, the City opened the Main Library in 2023. There are no additional library facilities planned at this time. Any additional future library facilities would be located on land designated as Public in the 2040 General Plan and would undergo separate CEQA environmental review in order to reduce any potential environmental impacts. In addition, future development projects are required to pay a library impact fee, per City Municipal Code Chapter 8.74 Library Impact Fee, which helps finance library facilities. The project applicant would pay the required library impact fees to help finance library facilities. Therefore, the project would result in the same less than significant impact to library facilities as disclosed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

4.16 Recreation

4.16.1 Environmental Setting

The existing setting for recreational facilities, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the 2023 Addendum to the EIR for the Lindenville Specific Plan.

As stated in the 2040 General Plan EIR, the City contains a total of 316 acres of parks and open space, including 131 acres of improved parkland, 108 acres of open space, and 77 acres of joint use facilities. There are currently no parks or open space within the Specific Plan area. The nearest parks to the project site are the City Hall Playground on Miller Avenue and Walnut Avenue, 0.3 mile north of the site, and Orange Memorial Park (on Orange Avenue and Tennis Drive), approximately 0.6 mile west of the site. Per Chapter 8.67 Parks and Recreation Impact Fee of the Municipal Code, the City has set a standard of three acres of improved parkland per 1,000 residents and 0.5-acres of improved parkland per 1,000 new employees.

4.16.2 Impact Discussion

		General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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 will occur or be accelerated?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR concludes the increases in residents and employees from the implementation of the General Plan would increase the use and demand for park facilities throughout the City. Per City Municipal Code Chapter 8.67, the City has set a standard of three acres of improved parkland per 1,000 residents and 0.5-acres of improved parkland per 1,000 new employees. The project proposes 5,330 square feet of outdoor paseo areas available to the townhouse development's residents. The proposed project's open space would contribute to the 43.7 acres of parks and open space which would be added under the implementation of the

Lindenville Specific Plan. The proposed common open space would help offset the demand on parkland by the project's residents. The project will also pay the park recreation impact fee, per City Municipal Code Chapter 8.67 to offset the recreational impacts. For these reasons, the project would result in the same less than significant impact as identified in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would include the construction of additional recreational facilities; however, the environmental effects of their construction would be reduced to a less than significant level. As discussed above, the project proposes 5,330 square feet of outdoor paseo areas. The impacts (e.g., construction related water quality impacts, trees/nesting birds, construction noise, hazards and hazardous materials, and hydrology and water quality) from construction of these facilities would be reduced to less than significant with the implementation of General Plan Policies and mitigation measures described throughout the Compliance Checklist. Therefore, construction of on-site recreational facilities would not result in an adverse physical effect on the environment, and would result in the same less than significant impact as disclosed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors included in CEQA Guidelines Section 15183 and no further analysis is required.

4.17 Transportation

The following discussion is based, in part, on a Transportation Study prepared for the project by Hexagon Transportation Consultants, Inc. A copy of this report is included as Appendix F to this Compliance Checklist.

4.17.1 Environmental Setting

The existing transportation setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR. The existing roadway network in the project vicinity has also been included in Section 4.17.1.2 Existing Conditions.

4.17.1.1 *Regulatory Framework*

The City's Transportation Analysis Guidelines were not included in the 2040 General Plan EIR given the Guidelines were released within a similar timeframe as the certification of the 2040 General Plan EIR. The Transportation Analysis Guidelines are listed below.

South San Francisco Transportation Guidelines

VMT Screening Criteria

The Transportation Analysis Guidelines outlines policies, guidelines, and screening criteria for VMT impact evaluation generally consistent with Senate Bill (SB) 743 and the State of California's Office of Land Use and Climate Innovation (formerly the Office of Planning and Research) recommendations and provides guidelines for transportation studies. In determining potential impacts due to VMT, the City has established seven screening criteria that are applied to quickly identify when a project should be expected to cause a less-than-significant VMT impact without conducting a detailed VMT assessment for CEQA transportation assessment purposes. Land use projects that meet at least one of the seven screening criteria are presumed to not require CEQA VMT analysis.

- **Transit Priority Areas (TPA):** Projects located within ½ mile walkshed around major transit stops2 (i.e., the South San Francisco Caltrain Station, South San Francisco BART Station, and many bus stops along El Camino Real). However, TPA screening will not apply if the project meets any of the following thresholds:
    - The project has a Floor Area Ratio (FAR) of 0.75 or less;
    - The proposed parking exceeds City requirements;
    - The Project is inconsistent with the City's General Plan, applicable Specific Plan, or applicable Sustainable Communities Strategy;
    - The Project removes or reduces the number of existing on-site affordable residential units; or,
    - Significant levels of VMT are projected through project-specific or location-specific information.

- **Affordable Housing**: 50 percent restricted affordable residential projects in infill locations (i.e., development within unused and underutilized lands within existing development patterns).
- **Small Projects**: Projects defined as generating 100 or fewer average daily vehicle trips, absent substantial evidence indicating that a project would generate a potentially significant level of VMT. Each project is required to document the estimated number of trips it will generate. Examples of projects that may generate less than 100 average daily trips include: 20 units of multifamily midrise/high-rise residential, 10,000 square-feet office, and 15,000 square-feet industrial.
- **Locally Serving Public Facility:** Locally serving public facilities that encompasses government, civic, cultural, health, and infrastructure uses and activity which contribute to and support community needs. Locally serving public facilities include police stations, fire stations, passive parks (parks designed for use in an informal way and typically less developed), branch libraries, community centers, public utilities, and neighborhood public schools.
- **Neighborhood-Serving Retail Project:** Neighborhood-serving retail projects that are less than 50,000 square feet, which serve the immediate neighborhoods. Examples include grocery stores, dry cleaners, coffee shops, convenience markets, fitness centers, tutoring centers and daycare centers.
- **Airport/ Business Hotels:** South San Francisco is very close to the San Francisco International Airport, and also attracts business travelers due to its concentrated life science office space. Generally, business and airport hotels serve to provide accommodations to visitors who would otherwise stay in farther flung locations and generate more VMT. As such, hotels designed to serve business travelers or individuals flying in or out of SFO, may be presumed to have a less-than-significant impact on VMT.
- **Residential and Office Projects in Low VMT Areas:** The project is located within a low VMT area for its land use. Based on information from the South San Francisco model, certain areas of the city have lower rates of VMT generation than others. In existing locations where VMT per capita is below the thresholds, projects may be screened from further VMT analysis. To determine whether a project is in a low VMT area, the analysis should identify the Traffic Analysis Zone (TAZ) in which a given project is located, and then determine whether the average VMT per resident (for a residential use) or average VMT per employee (for an office use) for that TAZ is 15 percent below the regional average for the project land use type in the base year version (currently 2015) of the travel model.

Transportation Study Requirements for Tier 1 Residential Projects

The Transportation Guidelines identify Tier 1 projects as a residential project with 20 or more units, that generate more than 100 net new daily trips, is not a senior housing development, and does not consist of at least 50 percent below market rate units. These projects require a Site Access and Circulation Plan and a TDM Checklist. The City does not require a Local Transportation Analysis (that includes a level of services analysis) for Tier 1 projects.

4.17.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadways, bicycle lanes, and pedestrian facilities?	Less than Significant	No	No	No	No
b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	Less than Significant	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment)?	Less than Significant	No	No	No	No
d) Result in inadequate emergency access?	Less than Significant	No	No	No	No

a. The discussion below includes an analysis for project impacts related to the project's consistency with plans, programs and policies for transit, roadways and pedestrian facilities.

Transit

The 2040 General Plan EIER concluded that programs, such as developing a free bus and shuttle service for residents and leveraging employee transit subsidies, would provide incentives for people to access and use transit. Therefore, implementation of the General Plan would not conflict with a program, plan, ordinance, or policy of the circulation system regarding transit systems or otherwise decrease the performance or safety of such facilities. Impacts would be less than significant.

The project is expected to add new transit riders. However, the new riders are expected to be accommodated by the existing and planned services. The City has a commute transit ridership of 14 percent. Assuming 2.86 persons per household, the proposed 70 units would generate about 28 transit riders during the commute hours. The project would not result in a significant impact to local transit or shuttle service. The project would, therefore, not result in a new significant impact, peculiar effect, or more severe adverse impact than analyzed in the 2040 General Plan EIR.

Bicycle and Pedestrian Facilities

The 2040 General Plan EIR concluded that with the future projects' implementation of the South San Francisco Zoning Ordinance, including regulations that assist in reducing impacts related to bicycle and pedestrian facilities, the future development under the General Plan would not conflict with programs, policies and ordinances related to bicycle facilities. The General Plan includes an Action MOB-2.1.3 Implement Active South City Pedestrian and Bicycle Plan, which requires all capital improvements and development projects to incorporate bicycle and pedestrian improvements identified in the Active South City Plan, such as trails, bikeways, bicycle detection at traffic signals, high-visibility crosswalks, and pedestrian-oriented site plans. In addition, Section 20.330.007 (Bicycle Parking) establishes short-term and long-term bicycle parking requirements for new buildings and land uses, reconstruction, expansion, and change in the use of nonresidential buildings, additions and alternations to existing dwelling units, and alterations that increase the number of dwelling units.

The project would not encroach into the existing bike lane on Railroad Avenue, except at the project driveways during deliveries or pick-ups. The project would provide long-term bicycle storage racks within each individual garage to meet the requirements of the South San Francisco Municipal Code. The project would not remove any bicycle facilities, nor would it conflict with any adopted plans or policies for new bicycle facilities. The Active South City Plan identifies a Class IV separated bikeway for Railroad Avenue, but the exact configuration of this bikeway will be subject to future study. The project as proposed would not preclude a Class IV bikeway along Railroad Avenue. The project would therefore not result in a new significant impact, peculiar effect, or more severe adverse impact than analyzed in the 2040 General Plan EIR. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

The proposed project would provide an outdoor open space/pedestrian paseo between two of the buildings across from Maple Avenue and a new five-foot-wide sidewalk along the project frontage on the south side of Railroad Avenue. The project would not remove any pedestrian facilities, nor would it conflict with any adopted plans or policies for new pedestrian facilities. The project would therefore not result in a new significant impact, peculiar effect, or more severe adverse impact than analyzed in the 2040 General Plan EIR. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Roadways

The 2040 General Plan EIR did not include an impact analysis related to future roadways conflict with a programs, plans, and policies. However, the General Plan includes policies and actions to improve roadways. General Plan Policy MOB-3-2 encourages the City to optimize traffic operations on City streets while avoiding widening roadways or otherwise pursuing traffic operations changes at expense of multimodal safety, transit reliability, or bicycle and pedestrian comfort.

Vehicle and roadway-related impacts are discussed further under Checklist Questions b) through d). Intersection operations were not analyzed for this project as level of service (LOS) is no longer used

as a CEQA metric and the project screened out from a Local Transportation Analysis per the City's Transportation Analysis Guidelines. Therefore no transportation improvements that would result in physical changes to the environment, including widening of roadways, would be required. The project would not conflict with a plan, policy or program addressing roadways. Therefore, this impact would be less than significant. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR concluded that while implementation of General Plan Policies and actions and MM TRANS-1 (which includes implementation of a TDM Ordinance) would support VMT reduction, the forecast VMT reduction in Total VMT Per Service Population and Work-Based VMT Per Employee for the 2040 plus project scenario would not be 15 percent below the corresponding average baseline rates for the Bay Area region. Therefore, the buildout of the General Plan would result in significant and unavoidable Total VMT Per Service Population and Work VMT Per Employee. The General Plan EIR concluded that the effectiveness of VMT reduction strategies cannot be quantified in that programmatic analysis, and the City of South San Francisco may not achieve the overall VMT threshold reduction level.

The City has established seven screening criteria that are applied to quickly identify when a project should be expected to cause a less-than-significant VMT impact without conducting a detailed VMT assessment for CEQA transportation assessment purposes. Land use projects that meet at least one of the seven screening criteria are presumed to not require CEQA VMT analysis. The proposed townhouse project meets the following VMT screening criteria and, therefore, does not require a VMT analysis.

> **Residential Projects in Low VMT Areas**: Based on information from the South San Francisco Travel Demand Model, certain areas of the city have lower rates of VMT generation than others. In existing locations where VMT per capita is below the thresholds, projects may be screened from further VMT analysis.

The project site is located in an existing residential low-VMT zone. For this reason, the project is anticipated to result in a less than significant VMT impact and would not require a VMT analysis.

Additionally, based on the South San Francisco Municipal Code Chapter 20.400 and the Transportation Analysis Guidelines Chapter 6, the project falls under Tier 1 land use projects for Transportation Demand Management (TDM) requirements. Tier 1 projects are subject to implementing a list of TDM measures selected from those identified by the City in its TDM ordinance (see Appendix F) to encourage residents to use alternative modes of transportation. Implementation of these measures would further reduce the project's less than significant VMT impact even further. The project's TDM measures include the HOA's issuance of transit passes to residences for the first year after purchasing, and the inclusion of bicycle racks in each townhouse unit's garages. The project would therefore not result in a new significant impact, peculiar effect, or more severe adverse impact than analyzed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General Plan EIR concluded that, even with the implementation of General Plan policies and actions and implementation of MMs TRANS-4, given the uncertainty around specific operational conditions and ability to mitigate such conditions in a constrained right-of-way, and exacerbating vehicle queuing hazards on off-ramps, this impact was significant and unavoidable. MM TRANS-4 requires the City to minimize queuing hazards by working with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections that help manage offramp queues. These measures may include geometric changes, changes to signal timing and phasing, and new connections. Such improvement measures shall not adversely affect pedestrian, bicycle, and transit conditions or otherwise undermine the City's VMT mitigation efforts described in MM TRANS-1. MM TRANS-1 is also applicable here and should be implemented to minimize freeway offramp queues. All projects in the City shall be required to pay Citywide Transportation Impact Fee, the funds of which would be used for identified improvements, including freeway off-ramp improvements. However, due to the programmatic nature of the General Plan, no additional mitigation measures are available, and the impact was considered significant and unavoidable.

The project would provide vehicular access to the proposed residential garages via driveways connected directly to Railroad Avenue. To reduce the number of curb-cuts along Railroad Avenue, the project would use shared driveways where possible for adjacent units. Based on trip generation estimates calculated using the Institute of Transportation Engineers' Trip Generation Manual, 11th Edition, the project would result in approximately 34 AM peak hour trips and 40 PM peak hour trips. Due to the low project trips at the driveways and low/moderate volumes on Railroad Avenue, vehicles would be able to easily enter and exit the project driveways and would not pose a hazard to oncoming traffic.

For loading and unloading, rideshare vehicles and large delivery/service trucks would park in front of the driveways, which would block the eastbound bike lane and part of the eastbound vehicle lane on Railroad Avenue. As a result, eastbound bikes and vehicles would need to travel around the parked trucks by partially encroaching into the opposite lane. These would be infrequent events and the traffic volume on Railroad Avenue is relatively low, so it is not expected to substantially increase hazards along Railroad Avenue.

The project does not propose any uses that are incompatible with the surrounding urban environment. The project would therefore not result in a new significant impact, peculiar effect, or more severe adverse impact than analyzed in the 2040 General Plan EIR. The project would increase vehicle trips on the City's freeway ramps, the project would generate 34 AM peak hour trips and 40 PM peak hour trips which would be distributed across the roadway network. The project would not result in a more substantial impact to vehicle queuing hazards. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

d. The 2040 General Plan EIR concluded that with future projects' implementation of Zoning Code Requirements such as Section 20.400.005 (Submittal Requirements and Approvals) that requires a project to be subject to the TDM Ordinance and submit TDM documentation a with the development application, which includes a completed TDM checklist of the trip reduction measures

and a description of how the applicable performance requirements would be achieved over the life of the project, the General Plan would have a less than significant impact to emergency access. Future projects would also be required to implement applicable trip reduction measures identified in Section 20.400.003 (Trip Reduction Measures and Requirements) that promote carpooling and the use of transit, pedestrian facilities, and bicycle facilities, and these measures would assist in reducing the number of vehicles on the road, thereby reducing traffic congestion throughout the City that could impede emergency access.

Emergency response vehicles would be able to access the project site via the project frontage on Railroad Avenue during project construction with the implementation of condition of approval identified in Section 4.9 Hazards and Hazardous Materials, and once the project is constructed. The project would not include any features that would prohibit emergency access to the site or through Railroad Avenue. The project would include TDM measures such as the HOA's issuance of transit passes and inclusion of bicycle racks in the proposed townhouse units' garages which could in turn reduce vehicle use on roadways that provide access to the site (e.g., Railroad Avenue). The project would therefore not result in a new significant impact, peculiar effect, or more severe adverse impact than analyzed in the 2040 General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.18 Tribal Cultural Resources

The following discussion is based upon an Archaeological Sensitivity Assessment completed by Archaeological/Historical Consultants (A/HC) in March 2024. A copy of the Archaeological Sensitivity Assessment, which is a confidential report, is on file at the City of South San Francisco Department of Economic and Community Development and is available upon request with appropriate credentials.

4.18.1 Environmental Setting

The existing tribal cultural resources setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the 2023 Lindenville Specific Plan Addendum.

As stated in Section 4.5 Cultural Resources, the site's previously recorded Native American sites, and proximity to fresh water (Colma Creek) and a former tidal marsh make the site sensitive for buried Native American resources.

AB 52, effective July 2015, established a category of resources for consideration by public agencies called Tribal Cultural Resources (TCRs). For non-exempt projects subject to a Notice of Intent (NOI) or Notice of Availability (NOA), AB 52 requires lead agencies to provide notice to tribes that are traditionally and culturally affiliated with the geographic area if they have requested to be notified. Given that the project qualifies for CEQA Guidelines section 15183 streamlining and will not be subject to a NOI or NOA, no tribal consultation under AB 52 is required for this project.

SB 18 (Government Code § 65352.3) incorporates the protection of California traditional tribal cultural places into land use planning for cities, counties, and agencies by establishing responsibilities for local governments to contact, refer plans to, and consult with California Native American tribes as part of the adoption or amendment of any general or specific plan proposed on or after March 1, 2005. The project is not a general/specific plan or an amendment to a general/specific plan, therefore SB 18 consultation is not required for the project.

On January 14, 2022, as a part of the preparation of the General Plan EIR, in accordance with requirements promulgated by Senate Bill SB 18 and AB 52, the City notified the Amah Mutsun Tribal Band, the Coastanoan Rumsen Carmel Tribe, the Indian Canyon Mutsun Band, the Muwekma Ohlone Indian Tribe of San Francisco Bay, and the Ohlone Indian Tribe of the General Plan and invited the tribes to participate in consultation. On April 6, 2022, in accordance with SB 18 and AB 52 requirements, the City notified the Wuksache Indian Tribe/Eshom Valley Band of the proposed General Plan Update and invited the tribe to participate in consultation. No responses were received by the tribes.

In addition, a Sacred Lands File Search (SLF) request was submitted to the Native American Heritage Commission (NAHC) for the project site. On February 28, 2024, a response was received stating that the search results were negative, i.e., no tribal cultural resources were identified during the SLF search.

4.18.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project 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:					
a) 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)?	Less than Significant	No	No	No	No
b) 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.	Less than Significant	No	No	No	No

a, b. The 2040 General Plan EIR and Lindenville Specific Plan Addendum to the General Plan EIR concluded that future projects would be required to adhere to the policies and actions in the General Plan, as well as the provisions under SB 18 and AB 52, and potential impacts to existing or undiscovered eligible TCRs within the General Plan and Lindenville Specific area would be reduced to less than significant.

- **General Plan Policy ES-11.1** requires the City to identify, preserve, and protect TCRs, traditional cultural landscapes, sacred sites, places, features, and objects, including historic

or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites in consultation or coordination with the appropriate Native America tribe(s).

There are no known TCRs within or adjacent to the project site. As previously discussed, the project site has a moderate sensitivity for buried Native American resources due to its distance from freshwater sources and the age of the soils on-site. It is possible, though unlikely, that undiscovered buried TCRs exist on-site and could be disturbed during project construction. Implementation of Mitigation Measures MM CUL-1.1 through MM CUL-1.3 described in Section 4.5 Cultural Resources and General Plan Policy ES-11.1 (which requires the City and projects to identify, preserve, and protect TCRs) would ensure that any TCRs encountered during project construction would be properly handled and any impacts would be reduced to a less than significant level. Therefore, the project would not result in a new significant impact or more severe adverse impact. The project would not meet any of the factors laid out in CEQA Guidelines Section 15183 and no further analysis is required.

4.19 Utilities and Service Systems

4.19.1 Environmental Setting

The existing setting for utilities and service systems, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the Lindenville Specific Plan Addendum to the General Plan EIR.

Water services in the City are provided by Cal Water South San Francisco District, with the exception of the Westborough neighborhood, approximately two miles west of the site, which is served by the Westborough Water District. The majority of the water supply to the Cal Water South San Francisco District (i.e., approximately 80 percent, not including in-lieu surface water deliveries) is treated water purchased from the City and County of San Francisco's Regional Water System (RWS), which is operated by the San Francisco Public Utilities Commission (SFPUC). In addition, Cal Water pumps groundwater from the Westside Basin to supplement the supply from SFPUC. Cal Water operates five wells within the South San Francisco District boundaries. Groundwater has historically supplied 10 to 15 percent of the South San Francisco District's water demand.

Wastewater services are provided by the City of South San Francisco Public Works Department and collected wastewater is sent to the South San Francisco/San Bruno Water Quality Control Plant (WQCP). The WQCP pumps wastewater to the Noth Bayside System Unit outfall and discharges to the San Francisco Bay. The WQCP has a design capacity to treat 13 mgd average daily flow for wastewater. The average dry weather flow through the WQCP is nine (9) million gallons per day (mgd). Peak wet weather flows can exceed 60 mgd.[29]

Solid waste collection and recycling services for residents and businesses in the City are provided by South San Francisco Scavenger Company and Blue Line Transfer, respectively. Solid waste and recyclable materials are hauled to the Blue Line Materials Recovery Facility and Transfer Station for processing. After processing to remove usable materials, the remaining solid waste is hauled to the Corinda Los Trancos Landfill (Ox Mountain) and Newby Island Sanitary Landfill. The landfills have a combined remaining capacity of 28.5 million cubic yards (15.7 million cubic yards for Ox Mountain and 12.8 million cubic yards for Newby Island).[30]

The electrical power distribution network within the City of South San Francisco is owned and operated by PG&E. The electrical power grid consists of both overhead and underground electrical lines. Provision of electricity is through PG&E with the option of purchasing electricity through Peninsula Clean Energy, which is delivered by PG&E. Peninsula Clean Energy is a community-controlled, not-for-profit electricity provider that has been serving the City since 2016. Landline

[29] City of South San Francisco. Water Quality Control Plant. Accessed January 26, 2025. https://www.ssf.net/Departments/Public-Works/Divisions/Water-Quality-Control-Plant-Division.

[30] Personal Communications. Huber, Rachel, Newby Island Landfill. RE: Newby - remaining capacity and est. closure date needed. June 2, 2022.
Personal Communications. Republic Services, Devincenzi, Monica. Re: Ox Mtn - remaining landfill capacity. March 20, 2024.

(telecommunication) service is provided by a variety of local providers, including Ooma, Community Phone Landline, and Xfinity Landline.

4.19.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
Would the project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less than Significant	No	No	No	No
b) Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less than Significant	No	No	No	No
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	No
e) Be noncompliant with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less than Significant	No	No	No	No

a. The 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum to the General Plan EIR concluded that future development under the General Plan, including within the Lindenville Specific Plan area, would result in less than significant impacts related to the relocation and/or expansion of utilities as discussed below.

Water Service

The 2040 General Plan EIR concluded that individual infrastructure improvements that may occur under the applicable Urban Water Management Plans (UWMPs) would be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Implementation of the General Plan would not result in insufficient water supplies from Cal Water and Westborough Water District, and no new or expanded water treatment facilities would be needed to accommodate growth allowed under the General Plan.

The project would use 6,955 gallons of water per day for indoor use and 4,400 gallons per day for outdoor use, which has been accounted for among the 554,530 gallons of water per day for indoor use and 350,880 that will be used in total for the 5,581 residential units included in the Lindenville Specific Plan.[31] The proposed townhouse project would construct new water lines that would connect to a six-inch water main in Railroad Avenue. The project would not require or result in the expansion of the existing water conveyance system, the construction of new water infrastructure, or relocation of existing infrastructure. The project would install-on-site water lines during grading of the site, which would result in minimal impacts. In the event that excavation would potentially reach groundwater levels, and dewatering is needed, groundwater pumping would be temporary which would not result in significant impacts, as discussed in Section 4.10 Hydrology and Water Quality. In the event that excavation of the site unearths potentially significant cultural materials, mitigation measures MM CUL-1.1 through MM CUL-1.3 would be implemented. The construction of this piping would be subject to the construction-related measures described within the previous sections of this CEQA Compliance Checklist (i.e., Section 4.3 Air Quality, Section 4.10 Hydrology and Water Quality, etc.) that would reduce any impacts to a less than significant level. Therefore, the project would not result in significant environmental effects related to the relocation or construction of new or expanded water facilities and would result in a less than significant impact, consistent with the 2040 General Plan EIR conclusions. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Wastewater Treatment/Sanitary Sewer

The 2040 General Plan EIR also concluded the implementation of General Plan Update policies and actions ensures that the City will continue to comply with state and federal regulatory requirements related to wastewater. Therefore, the General Plan project would not result in insufficient

[31] Illingworth and Rodkin, Inc. Air Quality Assessment, Attachment 1 CalEEMod Results. November 2024.
South Coast Air Quality Management District and the California Air Districts. Default Data Tables (Appendix D and G). 2021 and 2022.
99.36 gallons per day per townhouse unit for indoor uses and 62.87 gallons per day per unit for outdoor uses.

wastewater collection and treatment and no new or expanded wastewater treatment facilities would be needed.

The project would generate approximately 4,521 gallons of wastewater per day for the proposed townhouse use, which has been accounted for within the 526,530 gallons of wastewater per day for the Lindenville Specific Plan.[32]

The proposed project would connect to the City's existing sanitary sewer system. New six- to eight-inch sanitary sewer lines would connect the project to existing six-inch sanitary sewer lines at Railroad Avenue. The project would comply with all applicable Public Works requirements to ensure sanitary sewer lines would have capacity for sewer services required by the proposed project. In addition, In accordance with City requirements, the proposed project would comply with the latest adopted edition of the California Plumbing Code and CALGreen Code, including the provisions for water-efficient fixtures and toilets, which would reduce the amount of effluent entering the wastewater system.

The proposed project would require wastewater treatment at the WQCP, which has adequate capacity to accommodate the increased demand created by the project (4,521 gpd) given the treatment capacity at the WQCP is 13 mgd, and the current average dry weather flow through the WQCP is nine mgd. Since the proposed development is consistent with planned growth in the General Plan, the project would not exceed the City's allocated capacity at the WQCP. The project would not result in the relocation or construction of wastewater facilities that would cause significant environmental effects beyond those analyzed in the 2040 General Plan EIR, resulting in the same less than significant impact as the General Plan. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Stormwater Drainage

The 2040 General Plan EIR concluded that City requirements and policies (such as General Plan Policy ES 7.3 that require stormwater management practices for new and redevelopment projects) would ensure that stormwater runoff would not inundate downstream storm drainage facilities such that new or expanded facilities would be required.

The proposed residential development would include new six-inch storm drains. Stormwater runoff from the new impervious surfaces on the site would drain into stormwater treatment/bioretention areas and flow through planters on-site, which would have sufficient capacity to treat the runoff prior to it entering the storm drainage system. The proposed stormwater retention facilities would reduce the volume and rate of stormwater runoff from the site (in compliance with NPDES requirements and General Plan Policy ES-7.3) and avoid significant impacts to the existing storm drainage system serving the site. Installation of storm drains would occur during grading of the site and would result in minimal impacts. The project would not require the construction of additional storm drainage facilities that could cause significant environmental effects. The project would not

[32] It is assumed the wastewater generation would be 95 percent of the indoor water use.

result in the relocation of new stormwater facilities. Consistent with the conclusions of the 2040 General Plan EIR and the 2023 Lindenville Specific Plan Addendum, this impact would be less than significant. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Electric Power, Natural Gas and Telecommunications

The 2040 General Plan EIR concluded that since the update to the General Plan would not result in unplanned growth, the majority of growth would be infill, and because the utility providers take into consideration all future growth projections in their planning efforts, the General Plan would not be expected to require or result in new or expanded electricity, natural gas, or telecommunications facilities beyond those already planned. Impacts would be less than significant.

The project voluntarily proposes to be 100 percent electric and no connections to natural gas are proposed. Existing utility lines would be utilized by the project for electric power and telecommunications services. Connecting to the City's energy and communications grid would require trenching on the site, which would not require substantial excavation and would result in minimal impacts. The project would be required to detail the exact locations for all utility connections and utility plans would be subject to review by the City. The project applicant would coordinate with the appropriate electric power, including PG&E and Peninsula Clean Energy, and telecommunication providers, on providing service to the site. Therefore, the proposed project would not result in significant impacts from construction or relocation of new or expanded electric power, natural gas, or telecommunications utilities. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

b. The 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum concluded that Cal Water would have sufficient water supplies to serve the buildout of the 2040 General Plan through the year 2045, under normal water years. During single or multiple drought years, water consumption reduction measures, consistent with Cal Water's Water Shortage Contingency Plan and 2020 Urban Water Management Plan (UWMP), would be implemented on all City customers to ensure sufficient water supplies. In addition, future development would be required to implement applicable General Plan Policies and measures from the City's Climate Action Plan to conserve water (includes the policies and measure listed below). The impact to water supplies from General Plan Buildout would be less than significant.

2040 General Plan

- **General Plan Policy ES-5.3:** Use a waterwise planting palette during new construction. During new construction or landscape renovations, prioritize xeriscaping, low-water-use plants, and native plants, minimizing the total area of high-water-use plants (e.g., turf and water features).

- **General Plan Policy ES-5.8**: Design irrigation systems for water conservation. Install weather- or soil moisture based irrigation controllers in all new development. Cluster plants

together with similar water requirements to conserve water. Use the Water Use Classification of Landscape Species (WUCOLS) ratings to establish watering needs.

City of South San Francisco 2040 Climate Action Plan

- **Climate Action Plan WW.1 Landscaping Water Requirements**: Achieve greater water use reductions than WELO by requiring all landscapes obtain a landscape permit, decreasing the size threshold to capture all landscape renovations, adding prescriptive irrigation plant lists, or water budget requirements.

As described above, the project would have a water demand of 6,955 gallons of water per day gallons per day for indoor use and 4,400 gallons per day for outdoor use, which was accounted for among the 554,530 gallons of water per day for indoor use and 350,880 that will be used for the 5,581 residential units included in the Lindenville Specific Plan.

As discussed in the 2023 Lindenville Specific Plan Addendum to the 2040 General Plan EIR which accounted for development within the Specific Plan area (including the proposed project), the Specific Plan is fundamentally consistent with the growth assumptions in the 2040 General Plan, therefore, the Specific Plan's water demand was accounted for in the 2040 General Plan EIR and Cal Water's 2020 UWMP, and the Specific Plan would not result in water demand substantially greater than evaluated in the 2040 General Plan EIR. Therefore, the project's water demand is consistent with the water supply evaluation included in the 2040 General Plan EIR and Cal Water's 2020 UWMP assumptions for water demand. In addition, the project would be consistent with General Plan Policies ES-5.3 and ES-5.8 and Climate Action Plan WW.1 which require water-efficient landscaping, to reduce demand. The proposed project would result in the same less than significant impact as disclosed in the 2040 General Plan EIR. As a result, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

c. The 2040 General Plan EIR and 2023 Lindenville Specific Plan Addendum concluded that full buildout of the 2040 General Plan would not exceed the treatment capacity at the WQCP and implementation of the Lindenville Specific Plan (which accounts for the proposed residential development at the project site) would not prevent the WQCP from meeting wastewater treatment requirements. The impact to wastewater treatment capacity from buildout of the General Plan (including the Specific Plan) was concluded to be less than significant.

As described in the response to checklist question a), the proposed project is estimated to generate approximately 4,521 gallons of wastewater per day, which was accounted for among the 526,530 gallons of wastewater per day for the Lindenville Specific Plan. Since the WQCP can accommodate an additional four (4) mgd of wastewater, the wastewater demands of the proposed townhouse project would not result in an exceedance of wastewater treatment capacity at the WQCP. Further, increased demand at the WQCP created by planned development under the General Plan is expected and accounted for in long-term infrastructural planning by the City. The proposed project is consistent with planned growth analyzed in the General Plan EIR; therefore, the proposed project would not result in an unanticipated increase in wastewater treatment requirements at the WQCP.

The project would have the same less than significant to wastewater treatment capacity as disclosed in the General Plan EIR. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

d and e. The 2040 General Plan EIR and the 2023 Lindenville Specific Plan Addendum concluded that buildout of the 2040 General Plan would not generate solid waste in excess of regulatory standards or in excess of local landfill capacity, or otherwise impair the attainment of waste management or reduction goals. In addition, the General Plan EIR and Addendum concluded that future development would comply with General Plan Policy CP-5.4, which requires 75 percent waste diversion for municipal construction and demolition projects. Future projects would also comply with the California-mandated 50 percent waste diversion and CALGreen standards (including a construction waste recycling requirement and readily accessible areas for recycling). Additionally, construction and demolition debris from future development would be required to be recycled (Municipal Code Chapter 15.60). Future projects would be required to implement statewide ordinances that require waste reduction and recycling, including Senate Bill 1383 which establishes targets to achieve a 75 percent reduction by 2025. The bill grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food is recovered for human consumption by 2025.

The proposed project is estimated to generate 52 tons of solid waste per year (i.e., 37 cubic yards per year). The proposed project would increase the solid waste generated at the site when compared to existing conditions; however, this increase would not result in an exceedance of capacity for disposal of solid waste in the City, and the project would not result in a peculiar effect, new significant impact, or more severe adverse effect than what was analyzed by the 2040 General Plan EIR. The project would comply with Senate Bill 1383, applicable General Plan Policies, and Municipal Code provisions listed above. Solid waste generated by the project would represent an incremental increase in demand upon the remaining capacity of the Ox Mountain Landfill and Newby Island Sanitary Landfill and thus, would not be a considerable contribution to a cumulative impact.

The project would be compliant with federal, state, and local waste management and reduction statutes and regulations related to solid waste, and the project would not result in a peculiar effect, new significant impact, or more severe adverse effect than was analyzed by the General Plan EIR. All projects throughout the City would be subject to the same regulations governing solid waste and thus, the project would not contribute to a cumulative impact. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

4.20 Wildfire

4.20.1 Environmental Setting

4.20.1.1 *Existing Conditions*

The existing wildfire setting, including regulatory framework, has not substantially changed since the certification of the 2040 General Plan EIR and adoption of the subsequent Addendum to the EIR for the Lindenville Specific Plan. The project site is located within an urbanized area that is not within a fire hazard state responsibility area (SRA) or classified very high fire hazard severity zone (VHFHSZ). The nearest designated fire hazard area is in a SRA moderate zone, at San Bruno Mountain, approximately one mile north of the project site.[33]

4.20.2 Impact Discussion

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
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?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	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?	Less than Significant	No	No	No	No

[33] California Department of Forestry and Protection: Office of the State Marshal. Fire Hazard Severity Zones in State Responsibility Area. September 29, 2023 – Effective April 1, 2024. Accessed January 22, 2025. https://osfm.fire.ca.gov/what-we-do/community-wildfire-preparedness-and-mitigation/fire-hazard-severity-zones

	General Plan EIR Determination	Significant Effect Peculiar to the Project or Parcel?	Significant Effect Not Previously Analyzed?	Significant Off-site or Cumulative Impact Not Previously Analyzed?	New Information Showing More Severe Adverse Impact than Previously Discussed?
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:					
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?	Less than Significant	No	No	No	No

a-d. The 2040 General Plan EIR concluded that buildout of the 2040 General Plan would have a less than significant wildfire impact through compliance with 2040 General Plan Policies and the City Municipal Code. As discussed above, the site is not located within a fire hazard zone and the nearest one is located one mile north at San Bruno Mountain. The land between San Bruno Mountain and the project site is fully developed with urban uses; thus, the site would not be exposed to wildfire. Therefore, the project would not meet any of the factors listed in CEQA Guidelines Section 15183 and no further analysis is required.

Section 5.0 References

The analysis in this Initial Study is based on the professional judgement and expertise of the environmental specialists preparing this document, based upon review of the site, surrounding conditions, site plans, and the following references:

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Section 6.0 Lead Agency and Consultants

6.1 Lead Agency

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Victor Kim, Associate Planner

6.2 Consultants

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Section 7.0 Acronyms and Abbreviations

AB	Assembly Bill
ABAG	Association of Bay Area Governments
ACM	asbestos-containing material
ALUC	Airport Land Use Commission
APN	Assessor's Parcel Number
ATCM	air toxic control measure
BAAQMD	Bay Area Air Quality Management District
Bay Area	San Francisco Bay Area
bgs	below ground surface
Btu	British thermal unit
CAAQS	California Ambient Air Quality Standard
CAL FIRE	California Department of Forestry and Fire Protection
Cal/OSHA	California Department of Industrial Relations, Division of Occupational Safety and Health
CalARP	California Accidental Release Prevention
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Standards Code
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CGS	California Geological Survey
CH_4	methane
CLUP	Comprehensive Land Use Plan
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO_2	carbon dioxide

CO_2e	carbon dioxide equivalents
CRHR	California Register of Historical Resources
CUPA	Certified Unified Program Agency
dBA	A-weighted decibel
DNL	Day/Night Average Sound Level
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FAR	Federal Aviation Regulations
FHSZ	Fire Hazard Severity Zone
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GHGRS	Greenhouse Gas Reduction Strategy
GWh	gigawatt hour
GWP	Global Warming Potential
HSWA	Hazardous and Solid Waste Amendments
ibid	Same source as previous footnote
L_{eq}	Energy-Equivalent Sound/Noise Descriptor
L_{max}	Maximum A-weighted noise level during a measurement period
LBP	lead-based paint
LOS	Level of Service
LRA	Local Responsibility Area
MBTA	Migratory Bird Treaty Act
$MMTCO_2e$	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
mpg	miles per gallon
MSL	mean sea level
MTC	Metropolitan Transportation Commission

N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standard
NAHC	Native American Heritage Commission
NCP	National Contingency Plan
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOD	Notice of Determination
NO_x	nitrogen oxides
NRHP	National Register of Historic Places
O_3	ozone
PCB	polychlorinated biphenyls
PFC	perfluorocarbon
PDA	Priority Development Areas
PG&E	Pacific Gas and Electric Company
PM	particulate matter
PM_{10}	particulate matter with a diameter of 10 microns or less
$PM_{2.5}$	particulate matter with a diameter of 2.5 microns or less
PPV	Peak Particle Velocity
R&D	Research and Development
RAP	Removal Action Plan
RCRA	Resource Conservation and Recovery Act
ROG	reactive organic gases
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SB	State Bill
SCS	Sustainable Communities Strategy
SF_6	sulfur hexafluoride
SHMA	Seismic Hazards Mapping Act
SMARA	Surface Mining and Reclamation Act
SMGB	State Mining and Geology Board
SMP	Site Management Plan

SO_x	sulfur oxides
SR	State Route
SRA	State Responsibility Area
SWRCB	State Water Resources Control Board
TACs	Toxic Air Contaminants
Title 24	Title 24, Part 6 of the California Code of Regulations
TSCA	Toxic Substances Control Act
USACE	United States Army Corps of Engineers
USFWS	United States Fish and Wildlife Service
VMT	vehicle miles traveled
Williamson Act	California Land Conservation Act
WUI	wildland-urban interface
ZNE	zero net carbon emission