

**CEQA Findings of Fact and
Statement of Overriding Considerations
South San Francisco General Plan Update Zoning Code
Amendments and Climate Action Plan
City of South San Francisco, San Mateo County, California
State Clearinghouse Number 2021020064**

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Attachment A: Mitigation Monitoring and Reporting Program

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CEQA FINDINGS OF FACT AND STATEMENT OF OVERRIDING CONSIDERATIONS

1.1 - Introduction

The State Guidelines (Guidelines) promulgated pursuant to the California Environmental Quality Act (CEQA) provide:

No public agency shall approve or carry out a project for which an EIR has been completed which identifies one or more significant environmental effects of the project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

- (a) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the Final EIR (hereinafter referred to as “finding (1)”).
- (b) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency (hereinafter referred to as “finding (2)”).
- (c) Specific economic, legal, social, technological or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the Final EIR (hereinafter referred to as “finding (3)”).

The required findings shall be supported by substantial evidence in the record. (CEQA Guidelines § 15091).

The Final EIR incorporates the Draft Program EIR. References to the “EIR” are to the collective documentation contained in the Draft Program EIR and Final EIR. All acronyms used within this document shall have the same meaning as defined in the Draft Program EIR.

1.2 - Statement of Findings

An Environmental Impact Report (EIR) pursuant to CEQA has been prepared by the City of South San Francisco. The EIR for the City of South San Francisco General Plan Update, Zoning Code Amendments and Climate Action Plan (proposed project) identifies significant effects on the environment, which may occur as a result of the proposed project. Section 1.5 sets forth potential environmental effects of the project which are not significant because of the design of the project, or they can feasibly be mitigated below a level of significance. Section 1.6 sets forth those potential environmental effects of the proposed project which are not significant because of the design of the proposed project or because they can feasibly be mitigated below a level of significance. Section 1.7

discloses the environmental impacts that remain significant and unavoidable even with the incorporation of feasible mitigation. Section 1.8 summarizes the alternatives discussed in the EIR and makes findings with respect to the feasibility of alternatives and whether the alternatives would lessen the significant environmental effects of the proposed project.

The following sets forth all significant effects of the project and with respect to each effect, makes one or more of the findings set forth in Section 1.1, Introduction, and provides facts in support of such findings.

The EIR provides additional facts in support of the findings herein. The mitigation measures set forth in the Mitigation Monitoring and Reporting Program (MMRP) (Attachment A) are incorporated by reference in these findings, and the findings in Sections 1.6 and 1.7 refer to individual mitigation measures as appropriate. In the event of any inconsistencies between the mitigation measures set forth herein and the MMRP, the MMRP shall control.

1.3 - Project Summary

1.3.1 - Project Description

The proposed project includes the implementation of the South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan. The General Plan Update anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040. The Proposed Land Use Map designates the general location, distribution, and extent of land uses within the Planning Area and identifies proposed land use designations for each parcel within the City of South San Francisco and within the City's Sphere of Influence (SOI).

The proposed project includes amendments to the Zoning Code necessary to implement the General Plan Update. The Zoning Code Amendments also incorporate a number of major policies from documents that were previously adopted.

The updated 2022 Climate Action Plan (CAP) includes a community-wide inventory of greenhouse gas (GHG) emissions and identifies strategies and measures to reduce GHG emissions generated by existing and future uses in the City.

The proposed project has been developed to be largely self-mitigating in that the policies, actions, and strategies in the General Plan Update, Zoning Code Amendments, and CAP recognize the importance of the natural environment and are designed to protect the environment and environmental resources. In certain instances, mitigation is included to reinforce and enhance the protections identified in the policies, actions, and strategies. However, even with implementation of all available mitigation, the proposed project would result in significant unavoidable impacts related to project-level vehicle miles traveled, project-level roadway safety, cumulative vehicle miles traveled, cumulative roadway safety, project-level conflict with the 2017 Bay Area Clean Air Plan, and cumulative criteria air pollutants.

1.3.2 - Project Objectives

The project objectives include:

- Reflect the current goals and vision expressed by South San Francisco residents, businesses, decision-makers, and other stakeholders.
- Address issues and concerns identified by South San Francisco residents, businesses, decision-makers, and other stakeholders.
- Provide affordable, safe, attractive, amenity-rich neighborhoods, balancing housing options with commercial and employment access.
- Ensure that high-quality and accessible services, facilities, and amenities are available for residents at all stages of their lives, such as internet connectivity, parks and open spaces, emergency response services, and educational and recreational opportunities.
- Provide a safe, convenient, and accessible transportation network that is well-connected to the region by ensuring that streets have accessible alternate transportation for all ages and abilities.
- Build a resilient community that is prepared for the future effects of climate change and natural disasters by prioritizing resources for the City’s most vulnerable residents and investing in climate pollution reduction, efficient energy and water use, and clean air.
- Foster a prosperous downtown and local economy by supporting local businesses and strengthening the City’s role as the worldwide hub of the biotech and life sciences.
- Make the downtown a destination for all by providing a diversity of uses as well as improving walkability, safety, and visual interest.
- Embrace the City’s legacy as “The Industrial City” and maintain a core of middle-wage jobs in the City.
- Identify strategies and measures to reduce GHG emissions generated by existing and future uses in the City.
- Update the Zoning Code to reflect the shared vision of the new General Plan and implement its new policies that reflect and preserve community character, respond to economic realities and trends, facilitate reinvestment in the community and development of housing for all segments, and encourage appropriate use of land.
- Address new requirements of State law.

1.3.3 - Required Approvals

While no Responsible Agencies or Trustee Agencies are responsible for approvals associated with adoption of the General Plan Update, Zoning Code Amendments, and Climate Action Plan, subsequent projects and other actions to support implementation of the proposed project would require actions, including permits and approvals by Trustee and Responsible Agencies that may include, but are not necessarily limited to:

- California Department of Fish and Wildlife (CDFW)
- California Department of Transportation (Caltrans)
- Regional Water Quality Control Board (RWQCB)

- San Mateo Local Agency Formation Commission (LAFCo)
- United States Army Corps of Engineers (USACE)
- United States Fish and Wildlife Service (USFWS)
- San Francisco Bay Conservation and Development Commission (BCDC)
- San Francisco Public Utilities Commission (SFPUC)
- City/County Associations of Governments of San Mateo County (C/CAG)

1.4 - Background

In accordance with CEQA Guidelines Section 15082, the City circulated the original Notice of Preparation (NOP) of a Program EIR for the General Plan Update for a 45-day review period from February 3, 2021, to March 22, 2021, to Trustee and Responsible Agencies, the State Clearinghouse (SCH), and the public. A scoping meeting was held on February 17, 2021, which was attended by three members of the public. A revised NOP was circulated from January 14, 2022 to February 28, 2022, to provide the public with an opportunity to comment on changes that were made to the Project Description related to net new housing units and net new employment opportunities anticipated under the General Plan Update. An additional Scoping Meeting was held on January 31, 2022, which was attended by one member of the public. Comments received on the NOP circulated from February 3, 2021 to March 22, 2021, as well as comments received on the revised NOP circulated from January 14, 2022 to February 28, 2022, will be considered part of the administrative record. The NOP and all comment letters received on the NOP are presented in Appendix A.

The Zoning Code was made available for public review and comments from June 8, 2022, through August 10, 2022. The Housing Element was available for public review and comments starting on July 5, 2022. The Draft Program EIR was circulated and made available for public review and comments from June 24, 2022, through August 9, 2022. During the public review period, the Draft Program EIR, including the technical appendices, was made available for review at the following City of South San Francisco offices:

- Planning Division at 315 Maple Avenue, South San Francisco, CA 94080
- Main Library at 840 West Orange Avenue, South San Francisco, CA 94080
- City Clerk at 400 Grand Avenue, South San Francisco, CA 94080
- Grand Avenue Library at 306 Walnut Avenue, South San Francisco, CA 94080

In addition, the Draft Program EIR, including technical appendices, Zoning Ordinance and Housing Element were posted on the City of South San Francisco website at <https://shapessf.com/plan-feedback> during the public review period. After the close of the public review period, the City of South San Francisco prepared a Final EIR, consisting of the comments received on significant environmental issues during the 46-day public review and comment period on the Draft Program EIR, written responses to those comments, revisions to the Draft Program EIR, and an errata making minor, non-substantive changes to the Final EIR. For these Findings, the “EIR” shall consist of the Draft Program EIR, all appendices attached to the Draft Program EIR, and the Final EIR (consisting of the Introduction, Errata, and Responses to Comments). The City of South San Francisco subsequently considered all oral and written comments regarding environmental issues in the Final EIR and

determined, based on all of the evidence presented, including but not limited to the Draft Program EIR, written and oral testimony given at public meetings and hearings in connection therewith, and the submission of comments from the public, organizations and regulatory agencies, as well as all other relevant information in the administrative record, the following environmental impacts associated with the proposed project are: (1) less than significant and do not require mitigation; or (2) potentially significant but will be avoided or reduced to a level of insignificance through the identified mitigation measures; or (3) significant and cannot be fully mitigated to a level of less than significant but will be substantially lessened to the extent feasible by the identified mitigation measures.

The City of South San Francisco concludes that implementation of the proposed project could result in potentially significant and significant adverse environmental impacts. Accordingly, as discussed above, the City of South San Francisco is required to make certain findings with respect to these impacts pursuant to CEQA Guidelines Section 15091. Accordingly, the City of South San Francisco hereby makes these required findings, as set forth in this document (“Findings”).

These Findings summarize the environmental determinations about the proposed project’s significant impacts before and after mitigation and summarize the proposed project’s individual and cumulative impacts. These Findings do not attempt to describe the full analysis of each environmental impact. Instead, they provide a summary description of each significant impact and the applicable mitigation measures identified in the Draft Program EIR and adopted by the City of South San Francisco and state the conclusions regarding the significance of each impact after incorporation of the identified mitigation measures. A comprehensive explanation of these environmental impact conclusions can be found in the Draft Program EIR, as supplemented and explained in staff reports and materials presented by the project applicant, the City of South San Francisco staff, and various project consultants, and other relevant materials in the administrative record.

The Draft Program EIR contains substantial evidence to support all the conclusions presented in these Findings.

The Draft Program EIR is incorporated into these Findings in its entirety. Without limitation, this incorporation is intended to elaborate on the scope and nature of mitigation measures, the basis for determining the significance of impacts, the comparative analysis of alternatives, and the reasons for approving the proposed project in spite of the potential for associated significant and unavoidable adverse impacts.

1.5 - Potential Environmental Effects Which are Not Significant or Less than Significant

The City of South San Francisco has heard, been presented with, reviewed, and considered all of the information and data in the administrative record, including the Draft Program EIR and Final EIR, and all oral and written evidence presented to it during all meetings and hearings. The Draft Program EIR reflects the independent judgment of the City of South San Francisco and is deemed adequate for purposes of making decisions on the merits of the proposed project.

Consistent with Public Resources Code Section 21002.1 and Section 15128 of the CEQA Guidelines, the Draft Program EIR focused its analysis on potentially significant impacts, and limited discussion of other impacts for which it can be seen with certainty there is no potential for significant adverse environmental impacts. CEQA Guidelines Section 15091 does not require specific findings to address environmental effects that an EIR identifies as “no impact” or a “less than significant” impact and for which no mitigation is necessary. Nevertheless, based on its independent judgment and the entire administrative record before it, the City of South San Francisco has determined that the following potential environmental effects would not be significant and no mitigation is necessary for the reasons stated below.

1.5.1 - Aesthetics

Potential Effect

Impact AES-1	The proposed project would not have a substantial adverse effect on a scenic vista. (Draft Program EIR, Page 3.1-12.)
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Findings: Less than significant impact (Draft Program EIR Page 3.1-14). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area which could alter existing scenic vistas and views. Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses. Development under the proposed project could alter existing views, including views of the South San Francisco Hillside Sign, Sign Hill, San Bruno Mountain, the Coast Range, and the San Francisco Bay. The proposed project promotes restoration of Colma Creek through General Plan Update Policy LU-8.7 and Action CS-3.1 of the Climate Action Plan, which would improve the visual character of the City. Views of these features could be affected by future development under the proposed project. Mandatory compliance with design review regulations and policies in the South San Francisco Municipal Code Section 13.28.110 (Construction areas) and Chapter 13.30 (Tree Preservation); Zoning Ordinance Chapter 20.480 (Design Review) and Section 20.480.006 (Design Review Criteria); and General Plan Updates, including Policy LU-8.8, Policy SA-32.5, Policy LU-9.2, Policy SA-6.1, Policy PR-3.2, Policy CR-4.3, and Action LU-9.1.4, would ensure that potential impacts related to scenic vistas and views from new development under the proposed project would be less than significant (Draft Program EIR Pages 3.1-12-14). The proposed project's impacts to aesthetics, light, and glare would be less than significant or no impact with the implementation of applicable regulations, including proposed project policies and implementing actions. No mitigation is necessary. (Draft Program EIR, page 4-7.)

Potential Effect

Impact AES-2	The proposed project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. (Draft Program EIR Page 3.1-14).
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Findings: Less than significant impact (Draft Program EIR Page 3.1-16). No mitigation required.

Facts in Support of Findings: Interstate 280 (I-280) is an officially designated State Scenic Highway from the South San Francisco and San Bruno border until it reaches Stanford University in Palo Alto and does not traverse the Planning Area. Distant views of the City of South San Francisco and San Bruno Mountain are intermittently visible from the officially designated portion of I-280; however, most of the views of the City and San Bruno Mountain are shielded by existing trees. The portion of State Route (SR) 35 (Junipero Serra Freeway) that borders the western side of the Planning Area is eligible for designation as a State Scenic Highway. Distant views of the City of South San Francisco and San Bruno Mountain are intermittently visible from SR-35; however, most of the views of the City and San Bruno Mountain are shielded by existing trees. Undeveloped grassland, shrubs, trees, and rock outcroppings can be seen in the immediate vicinity of I-280 and SR-35, and San Francisco Bay, San Bruno Mountain, and the Coast Range can be seen in the distance from I-280 and SR-35. As discussed under Impact AES-1, all development under the proposed project would be subject to development and design standards for each zoning district as well as any other sections of the South San Francisco Municipal Code and Zoning Ordinance that protect scenic resources, thereby minimizing potential impacts to existing views that can be seen from I-280 or SR-35. In addition, future development would be required to comply with the General Plan Update policies and actions that protect scenic resources. Historic buildings and other historic resources are discussed in in Section 3.4, Cultural Resources and Tribal Cultural Resources. While future development could occur in the vicinity of the I-280 and SR-35, those projects would be reviewed by the City to ensure that impacts related to scenic resources remain less than significant. Moreover, subsequent development, infrastructure, and planning projects would be subject to the General Plan Update policies and actions, as well as the South San Francisco Municipal Code and Zoning Ordinance, to reduce impacts related to scenic resources (Draft Program EIR, Pages 3.1-14 – 16). The proposed project's impacts to aesthetics, light, and glare would be less than significant or no impact with the implementation of applicable regulations, including proposed project policies and implementing actions. No mitigation is necessary. (Draft Program EIR, page 4-7.)

Potential Effect

Impact AES-3	The proposed project is in an urbanized area and would not conflict with applicable zoning and other regulations governing scenic quality. (Draft Program EIR, Pages 3.1-16.)
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Findings: Less than significant impact (Draft Program EIR, Page 3.1-17). No mitigation required.

Facts in Support of Findings: The City of South San Francisco is located in an urbanized area. As discussed under Impacts AES-1 and AES-2, as the City receives development applications for subsequent development under the proposed project, those applications will be reviewed by the City for compliance with the policies and actions of the General Plan Update related to scenic quality in urbanized areas, including scenic views and scenic resources. In addition, the South San Francisco Municipal Code and Zoning Ordinance, which implements the City's General Plan, would be reviewed when development applications are received. The General Plan Update includes policies and actions intended to reduce impacts to visual character in and around the Planning Area and promote cohesive and visually appealing development consistent with the character of the City. For example, Policy LU-2.2 requires development projects near transit centers to use architectural

transitions, such as setbacks, transitions in building height, and landscaping when adjacent to lower-density residential properties. Additional policies facilitate implementation of objective design standards, require new development to be compatible and integrated with existing residential neighborhoods, and provide for maintenance of high-quality design and development standards (Policies LU-4.1, LU-4.5, LU-4.6, and LU-5.2). The Sub-Areas Element includes policies and actions to provide for similar compatibility and high-quality architectural design specific to the identified sub-areas. The Parks and Recreation Element includes Policy PR-3.2, which limits the construction of facilities in open space areas and requires the design of necessary improvements, such as fire roads, access roads, and parking facilities, to minimize environmental impacts and maintain the visual qualities of the open space. Each of these policies aims to enhance the visual character of the City.

The South San Francisco Municipal Code also contains rules and regulations related to visual character, including Chapter 13.30 (Tree Preservation) and Section 13.28.110 (Construction areas). The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, contains architectural guidelines, design review criteria, lot and development standards, landscaping requirements, and other regulations for various land uses in order to promote aesthetic quality within the City and protect scenic views, including Chapter 20.480 (Design Review) and Section 20.480.006 (Design Review Criteria).

The Climate Action Plan includes actions that would improve the visual character of the City. Implementation of Action CS-3.1 would enhance Colma Creek as an ecological corridor, creating transitional habitat zones to build resilience and ecosystem services that would improve the visual character of the City. Implementation of Action CS-2.1 would expand the canopy cover to reach the goals of the Urban Forest Master Plan, which would also improve the visual character of the City. Compliance with General Plan Update and Climate Action Plan policies and actions, and adherence to development and design standards in the South San Francisco Municipal Code and Zoning Ordinance related to scenic views and scenic resources, would ensure that impacts remain less than significant (Draft Program EIR, Pages 3.1-16-17). The proposed project's impacts to aesthetics, light, and glare would be less than significant or no impact with the implementation of applicable regulations, including proposed project policies and implementing actions. No mitigation is necessary. (Draft Program EIR, page 4-7.)

Potential Effect

Impact AES-4	The proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. (Draft Program EIR, Page 3.1-17).
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Findings: Less than significant impact (Draft Program EIR, Page 3.1-19). No mitigation required.

Facts in Support of Findings: The proposed project would not create a new source of substantial light or glare that would adversely affect views. For example, the General Plan Update includes policies and actions requiring the use of low intensity lighting to reduce the amount of light reaching sensitive habitat, which would reduce light and glare impacts in and around the Planning Area. (See Draft Program EIR, Section 3.3, Biological Resources.) Additionally, Policy ES-2.2 requires the use of low intensity lighting for development within 150 feet of the San Francisco Bay. The South San

San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, contains architectural guidelines, design review criteria, lot and development standards, landscaping requirements, and other regulations for various land uses in order to reduce light and glare impacts within the City, including Section 20.300.008 (Lighting and Illumination), Section 20.300.008 (C), which establishes general standards for outdoor lighting; Section 20.300.008 (D), which prohibits the use of certain types of outdoor lighting; and Section 20.360.004 (General Standards for All Signs). Applications will be reviewed by the City of South San Francisco for compliance with the City's Municipal Code and Zoning Ordinance. Potential issues related to glare would be addressed by the Design Review Board pursuant to Chapter 20.480 (Design Review Procedures). Projects for which signs are proposed would be reviewed for compliance with Sections 20.300.008 (revised) and 20.360.004 (revised) of the Zoning Ordinance (Draft Program EIR, Page 3.1-17–19).

The proposed project's impacts to aesthetics, light, and glare would be less than significant or no impact with the implementation of applicable regulations, including proposed project policies and implementing actions. No mitigation is necessary. (Draft Program EIR, page 4-7.)

Potential Effect

Cumulative Impacts: Cumulative impacts related to aesthetics and visual quality would be less than significant. (Draft Program EIR, Page 3.1-19.)

Findings: Less than significant impact (Draft Program EIR, Page 3.1-20). No mitigation required.

Facts in Support of Findings: Future development would be subject to the design review processes of the individual jurisdiction, and the applicable land use plans contain policies and implementing actions to preserve visual character, land use compatibility, and views in those jurisdictions. As such, the proposed project and cumulative development would be consistent with the character of the surrounding area and would not obstruct current views. The proposed project and cumulative development would be subject to specific regulations and guidelines related to building heights, setbacks, undergrounding of utilities, landscaping, signage, and permitted land uses. These regulations would ensure that visual character and viewsheds are maintained and/or enhanced.

Local regulations related to light and glare would be applicable to all cumulative development, similar to the proposed project. Lighting and exterior building materials associated with the proposed project and cumulative development would be subject to administrative design review by the various jurisdictions. This process would ensure appropriate building materials are utilized, building windows are tinted with anti-reflective material, and exterior lighting is designed so that it is directed downward and away from adjacent properties. The proposed project and cumulative development would increase light and glare compared to existing conditions. However, adherence to the administrative design review process and standards of each applicable jurisdiction would minimize the light and glare impacts for the proposed project and cumulative development (Draft Program EIR, Pages 3.1-19-20).

The proposed project's impacts to aesthetics, light, and glare would be less than significant or no impact with the implementation of applicable regulations, including proposed project policies and implementing actions. No mitigation is necessary. (Draft Program EIR, page 4-7.)

1.5.2 - Air Quality

Potential Effect

Impact AIR-4	The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people. (Draft Program EIR, Page 3.2-57—58)
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Findings: Less than significant impact. (Draft Program EIR, Page 3.2-58) No mitigation required.

Facts in Support of Findings: While odors could be generated during construction activities, the proposed project consists of a General Plan Update, Climate Action Plan Update, and Zoning Code Amendment and would not directly result in construction of any development project. Identification of potential impacts to odor receptors resulting from construction-generated odors is not possible as project-specific information of future individual land use development projects is unknown. Consistent with the BAAQMD's CEQA Air Quality Guidelines, a plan-level analysis must acknowledge odor sources within the Planning Area and identify policies, goals, and objectives aimed at reducing potential odor impacts to ensure that potential impacts would be less than significant.

The BAAQMD's CEQA Air Quality Guidelines identify a screening distance of 1 and 2 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. The City of South San Francisco contains several of the land uses listed by the BAAQMD as potential odor sources, such as the Linden Stormwater Pump Station 6, South San Francisco—San Bruno Water Quality Control Plant, and various coffee shops that all have the potential to roast coffee beans on-site. The proposed project would facilitate future development of sensitive receptors within the identified screening distances of existing odor sources.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, contain several provisions with the goal to protect and promote the public health, safety, peace, comfort, convenience, prosperity, and general welfare. 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. Sections 20.410.004 (Indoor Commercial Cannabis Cultivation), 20.410.005 (Commercial Cannabis Manufacturing), and 20.410.006 (Cannabis Testing Operations) require that operators install and maintain, in good working-order, air treatment or other ventilation systems to prevent odors generated from the cultivation of cannabis from being detected within 10 feet of the structure in which commercial cannabis cultivation occurs. In addition, BAAQMD Regulation 7 limits emissions of odorous substances within the Air Basin and would apply to any odor source within the Planning Area (Draft Program EIR, Page 3.2-57-58).

1.5.3 - Biological

Potential Effect

Impact BIO-2	The proposed project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. (Draft Program EIR, Page 3.3-22-23.)
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Findings: Less than significant impact. (Draft Program EIR, Page 3.3-23.) No mitigation required.

Facts in Support of Findings:

Development under the proposed project, primarily adjacent to the San Francisco Bay, could result in direct or indirect effects on estuarine habitat and other sensitive marine communities. Subsequent development could also result in the direct or indirect effects on other sensitive habitats as defined by the CNDDDB or ecologically sensitive areas and habitat as described in the Environmental and Cultural Stewardship Element. Any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any lake or stream, must obtain a “Streambed Alteration Agreement” from the CDFW prior to any alteration of a lake bed, stream channel, or their banks. Through this agreement, the CDFW may impose conditions to limit and fully mitigate impacts on fish and wildlife resources.

The General Plan Update includes policies and actions designed to protect riparian habitat and other sensitive natural communities. For example, Policy ES-2.1 requires the City to protect and expand existing marsh and wetland habitat to improve water quality, adapt to climate change, and provide habitat for wildlife. Policy ES-2.2 requires the City to maintain standards and guidelines for new construction within 150 feet of San Francisco Bay that support the health of the Bay, such as maintaining (or increasing) building setbacks to support habitat areas and requiring the installation of bioswales to treat runoff before it enters the Bay. Policy ES-3.3 requires the City to maintain development standards and guidelines for new construction within 80 feet of Colma Creek, such as maintaining or increasing building setbacks to support habitat areas. Policy ES-6.3 requires that permit applications for projects located within ecologically sensitive habitat areas prepare site-specific biological assessments for review and approval by City Planning staff, and incorporation of the recommended measures during construction to protect ecologically sensitive habitat areas.

Additionally, the South San Francisco Zoning Ordinance contains rules and regulations regarding development in areas with sensitive habitats. Section 20.170.003 (Habitat and Biological Resource Conservation Areas) (existing) requires a site-specific assessment of biological resources for all development proposals in areas of the Special ES Overlay District that have been identified as ecologically sensitive habitat (such as Sign Hill Park, San Bruno Mountain State Park, and the saltmarshes along San Francisco Bay) as shown on a map or maps maintained by the City. Section 20.170.003 (existing) also requires that sensitive habitat areas be protected in the following order: (1) avoidance; (2) on-site mitigation; (3) off-site mitigation; and (4) purchase of mitigation credits. Lastly, Section 20.170.003 (existing) requires that approval of a development permit for a project on a site located within an area identified as ecologically sensitive habitat shall not occur unless the

applicable review body first finds that there will be no significant negative impact on the identified sensitive habitat and the proposed use will be consistent with the biological continuance of the habitat.

The CAP includes actions to enhance biological resources in the Planning Area. Implementation of Action CS-3.1 would enhance Colma Creek as an ecological corridor, restoring 5 miles of creek ecologies, and creating transitional habitat zones to build resilience and ecosystem services, which would assist in enhancing riparian habitat in the Planning Area. Implementation of Action CS-2.1 would expand the canopy cover to reach the goals of the Urban Forest Master Plan and increase environmental benefits, prioritizing connected wildlife corridors.

Future development under the proposed project would comply with adopted State, federal, and local regulations for the protection of riparian habitat and other sensitive natural communities. In addition, future projects would comply with requirements of the General Plan Update policies and actions and the South San Francisco Zoning Ordinance related to the protection of these biological resources (Draft Program EIR, Page 3.3-22—23). The proposed project's impacts related to biological resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact BIO-5	The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. (Draft Program EIR, Page 3.3-27).
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Findings: Less than significant impact (Draft Program EIR, Page 3.3-28). No mitigation required.

Facts in Support of Findings: Future discretionary projects facilitated by the proposed project would be subject to all applicable local policies and regulations related to the protection of important biological resources. Specifically, development would be required to comply with the City's Tree Ordinance, Chapter 13.28 of the South San Francisco Municipal Code. Section 13.28.110 (Construction areas) requires a tree removal permit for any construction activities on or adjacent to public property that requires removal of a tree planted on the property. As a condition of permit issuance, the applicant shall be required to replace the tree with one of the same size and species in a location designated by the director. Chapter 13.30 (Tree Preservation) provides standards and requirements for the protection of certain large trees and trees with unique characteristics; provides standards and requirements for planting and maintenance of trees for new development; and establishes recommended standards for planting and maintaining trees on property that is already developed. Section 20.170.003 (Habitat and Biological Resource Conservation Areas) (existing) of the South San Francisco Zoning Ordinance requires a site-specific assessment of biological resources for all development proposals in areas of the Special ES Overlay District that have been identified as ecologically sensitive habitat. Additionally, General Plan Update Policy ES-4.1 requires the City to expand the tree canopy cover to increase environmental benefits, prioritizing disadvantaged communities and connected wildlife corridors. Action ES-4.1.1 requires the City to implement the City's Urban Forest Plan. Policy ES-4.2 requires the avoidance of tree removal whenever possible, and when removals are warranted, that each removed tree be replaced with three new trees.

Future development under the proposed project would be subject to these mandatory tree preservation requirements (Draft Program EIR, Page 3.3-27-28).

The proposed project's impacts related to biological resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact BIO-6	The proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. (Draft Program EIR, Page 3.3-28).
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Findings: Less than significant impact (Draft Program EIR, Page 3.3-29). No mitigation required.

Facts in Support of Findings: South San Francisco contains two areas set aside as habitat for the conservation of threatened and endangered species, Sign Hill Park and San Bruno Mountain State Park, the latter of which is governed by the San Bruno Mountain HCP and the San Bruno Mountain HMP. Projects requiring a permit must comply with the requirements of the McAtter-Petris Act and the San Francisco Bay Plan. Subsequent development under the proposed project within or adjacent to Sign Hill Park, San Bruno Mountain State Park, or the San Francisco Bay could result in direct or indirect effects on sensitive habitats within the Planning Area. Subsequent development under the proposed project located within sensitive habitats or areas within the City must complete a site-specific assessment of biological resources as part of the development review process as described in Policy ES-6.3. The City's environmental review process would be utilized to impose appropriate mitigation measures on development to reduce impacts on sensitive habitats and special-status species (per Policy ES-6-3).

Policy ES-6.2 requires wildlife and plant assessments for new development in areas that could impact threatened or endangered species. Future projects that border San Francisco Bay and lie within BCDC jurisdiction may require a permit and must comply with the requirements of the McAtter-Petris Act and the San Francisco Bay Plan. Therefore, potential conflicts San Bruno Mountain HCP, San Bruno Mountain HMP, and the San Francisco Bay Plan would be reduced to less than significant levels and no mitigation is necessary. There are no other local, regional, or State HCPs that are applicable to the South San Francisco Planning Area.

The proposed project's impacts related to biological resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Impacts

The proposed project's cumulative impacts related to biological resources would be less than significant. (Draft Program EIR, Page 3.3-29-34).

Findings: Less than significant impact (Draft Program EIR, Page 3.3-34). No mitigation required.

Facts in Support of Findings: The geographical scope of the cumulative impact analysis for Biological Resources is the South San Francisco Planning Area as well as the surrounding cities of Brisbane, Daly City, Pacifica, San Bruno, and Millbrae.

Special-status Species: A majority of the City of South San Francisco and the surrounding region is highly urbanized and developed and contains little suitable habitat for special-status species aside from a few areas including Sign Hill Park, San Bruno Mountain State Park as well as the remaining pockets of saltmarsh habitat along San Francisco Bay. The cumulative geographic scope is largely built out. Development of future projects within the cumulative geographic context, would be required to comply with federal, State, and local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources. Because cumulative development would be required to comply with the above oversight and requirements, as well as the overall land use vision, design review regulations and policies in local and regional plans, cumulative biological impacts would be less than significant.

The proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update, including Policy ES-6.2 and Policy ES-6.3, in addition to MM BIO-1 analyzed above.

Other municipalities within the cumulative geographic context have adopted similar policies to ensure that development within the region will not adversely affect special-status species found in the region. Future development within the cumulative geographical context would also be required to comply with the various federal and State laws and regulations that protect special-status plant and animal species, including the Endangered Species Act and CESA. The General Plan Update contains policies and actions to protect special-status species, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies to protect biological resources.

Sensitive Natural Communities or Riparian Habitat: The geographic scope for analyzing potential impacts to sensitive natural communities and riparian habitat includes the following sensitive natural communities known to occur within 10 miles of the Planning Area: Northern Coastal Salt Marsh, Northern Maritime Chaparral, Serpentine Bunchgrass, and Valley Needlegrass Grassland. In addition, Colma Creek, San Bruno Creek, Navigable Slough of San Bruno Creek, Sign Hill Park, San Bruno Mountain State Park, and the tidal marsh mudflats, ponds, and open water in San Francisco Bay are considered ecologically sensitive areas. Development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources, as well as the overall land use vision, design review regulations and policies in local and regional plans.

The proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update. General Plan Update Policy ES-2.2 requires the City to establish standards and guidelines for new construction within 150 feet of San Francisco Bay and Policy ES-3.3 requires the City to maintain development standards and guidelines for new construction within 80 feet of Colma

Creek. Policy ES-6.3 requires that permit applications for projects located within ecologically sensitive habitat areas prepare site-specific biological assessments for review and approval by City Planning staff, and incorporation of the recommended measures during construction to protect ecologically sensitive habitat areas.

Other municipalities within the cumulative geographic context have adopted similar policies to ensure that development within the region will not adversely affect sensitive natural communities or riparian habitat found in the region. Future development within the cumulative geographic scope would also be required to obtain a “Streambed Alteration Agreement” from CDFW prior to any alteration of a lakebed, stream channel, or their banks. In addition, the General Plan Update contains policies and actions to protect habitat, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies to protect biological resources.

Waters of the United States: Development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies, as well as the overall land use vision, design review regulations and policies in local and regional plans. The proposed project’s incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update, as well as MM BIO-3. As analyzed above, to protect jurisdictional features, General Plan Update Policy ES-2.2 requires the City to maintain standards and guidelines for new construction within 150 feet of San Francisco Bay and Policy ES-3.3 requires the City to maintain development standards and guidelines for new construction within 80 feet of Colma Creek. Policy ES-7.1 requires the City to partner with regional and local agencies to develop a comprehensive watershed management strategy that identifies programs, partnerships, actions, and incentives that the City and partners can take to protect the City’s water resources and aquatic areas. MM BIO-3 requires that a qualified Biologist/wetland regulatory specialist conduct a site investigation and assessment for projects on sites where potential jurisdictional wetlands or waterways are present. MM BIO-3 further requires that if a feature is found to be jurisdictional or potentially jurisdictional, that the applicant shall comply with the appropriate permitting process with each agency claiming jurisdiction prior to disturbance of the feature.

Other municipalities within the cumulative geographic context have adopted similar policies to preserve existing jurisdictional features. Future development within the cumulative geographic scope would also be required to obtain permits from the USACE and RWQCB for any development that involves disturbance to a wetland or waters of the United States and/or State to ensure that there is “no net loss” of wetlands or jurisdictional waters, and to require that there be an equal amount of wetland created elsewhere to mitigate any loss of wetland. In addition, the General Plan Update contain policies and actions to protect habitat, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies to protect biological resources.

Fish and Wildlife Movement Corridors: Future development within the cumulative geographic scope would not substantially interfere with the movement of any fish or wildlife species because

development would be required to comply with federal, State, and local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on fish and wildlife movement corridors, as well as the overall land use vision, design review regulations and policies in local and regional plans.

Moreover, the proposed project's incremental contribution would not be significant with implementation of the policies and actions proposed in the General Plan Update as well as MMs BIO-1 and BIO-3. General Plan Update Policies ES-1.1, ES-1.2, ES-1.3, ES-1.4, ES-2.1, ES-3.1, and ES-6.3 would ensure that habitats important to migratory wildlife such as creeks, parks, open space, saltmarshes, and the San Francisco Bay would not be adversely impacted without adequate mitigation measures put in place to offset any potential impacts.

Other municipalities within the cumulative geographic scope have adopted similar policies to preserve habitats that are crucial for migratory wildlife. In addition, the General Plan Update contains policies and actions to protect fish and wildlife movement corridors, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies to protect biological resources.

Local Policies or Ordinances: Future development within the cumulative geographic context would be required to comply with local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential impacts on biological resources, and with the overall land use vision, design review regulations and policies in local and regional plans.

Moreover, the proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update, as well as Chapter 13.28 of the South San Francisco Municipal Code, which outlines City's Street Tree Preservation Policy, and Section 20.170.003 (Habitat and Biological Resource Conservation Areas) (existing) of the South San Francisco Zoning Ordinance. Additionally, General Plan Update Policy ES-4.1 requires the City to expand the tree canopy cover to increase environmental benefits, prioritizing disadvantaged communities and connected wildlife corridors and Action ES-4.1.1 requires the City to implement the City's Urban Forest Plan. Policy ES-4.2 requires the avoidance of tree removal whenever possible, and when removals are warranted, that each removed tree be replaced with three new trees. All development facilitated by the proposed project would be subject to these mandatory requirements.

Other municipalities within the cumulative geographic scope have adopted similar policies to encourage the preservation of trees and other sensitive habitat. In addition, the General Plan Update contains policies and actions to protect biological resources, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies.

Habitat and Natural Community Conservation Plan Consistency: South San Francisco contains two areas set aside as habitat for the conservation of threatened and endangered species, Sign Hill Park and San Bruno Mountain State Park, the latter of which is governed by the San Bruno Mountain HCP and the San Bruno Mountain HMP. The BCDC has jurisdiction over all areas of San Francisco Bay that

are subject to tidal action. Future development within the cumulative geographic scope would not substantially conflict with the San Bruno Mountain HCP, San Bruno Mountain HMP, and the San Francisco Bay Plan because development would be required to comply with federal, State, and local laws and policies and all applicable permitting requirements of the regulatory and oversight agencies intended to address potential conflicts with these plans, as well as the overall land use vision, design review regulations and policies in local and regional plans.

Moreover, the proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update, including Policy ES-6.3. Future projects within the cumulative geographic scope that lie within BCDC jurisdiction may require a permit and must comply with the requirements of the McAteer-Petris Act and the San Francisco Bay Plan. Other municipalities within the cumulative geographic context have adopted similar policies to encourage the preservation of sensitive habitat and special-status species, and would similarly be required to obtain permits for development within areas under the jurisdiction of the BCDC. In addition, the General Plan Update contains policies and actions to protect sensitive habitat, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies to protect biological resources (Draft Program EIR, Page 3.3-29-34).

The proposed project's impacts related to biological resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary

1.5.4 - Cultural and Tribal Cultural Resources

Potential Effect

Impact CUL-1	The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines Section 15064.5. (Draft Program EIR, Page 3.4-32—34).
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Findings: Less than significant impact (Draft Program EIR, Page 3.4-34). No mitigation required.

Facts in Support of Findings: Known historic buildings, districts and resource sites are located throughout the Planning Area. Additional undesignated sites, and potentially unidentified sites, exist within the Planning Area as well. Because South San Francisco is a fully built City, new development would primarily occur on parcels that contain existing homes or businesses, which could potentially be historic resources, with the majority of potential growth occurring within the East of 101, Lindenville, Downtown, and El Camino planning sub-areas. Additionally, the proposed project may result in other private and public improvements throughout the City that have the potential for environmental effects related to historic resources.

The General Plan Update includes policies and actions specifically designed to address the conservation and protection of historical resources. Policy SA-2.2 requires the City to protect historic buildings and the local building fabric in the Downtown through adaptive reuse and other strategies. Policy SA-6.1 requires that new buildings are developed at a scale and in a character compatible with

Downtown’s existing historical and physical context. Policy SA-33.3 requires the City to preserve the federally designated Sign Hill historic site. Policy ES-9.1 requires the City to maintain and update a Historic Resources Inventory to promote awareness of these community resources and as a tool to further their preservation. Action ES-9.1.1 requires the City to explore the feasibility of establishing a Downtown South San Francisco Historical Commercial District and Action ES-9.1.2 requires the City to prepare Downtown urban design guidelines and require design review of developments in the proposed Downtown South San Francisco Historical Commercial District to ensure that the height, massing, and design of buildings furthers Downtown’s character. Policy ES-9.3 requires the City to promote the adaptive use of historic resources, particularly as inns, vacation rentals, light commercial use, museums, educational facilities, or visitor-serving uses, when the original use can no longer be sustained. Policy ES-9.4 requires the City to protect and preserve historic sidewalk stamps, street signs, lampposts, street trees, and other hardscape and cultural landscape elements, in addition to designated historical buildings, structures, and sites that contribute to the historic character of a neighborhood, and the City. Finally, Policy ES-9.5 requires the preparation and submittal of historic reports and surveys as part of the environmental review process. There are no actions identified in the Climate Action Plan related to historic resources.

The South San Francisco Municipal Code contains rules and regulations that protect historical resources. Section 2.56.080 of the Municipal Code requires the identification, protection, enhancement, perpetuation and use of structures, sites and areas that are reminders of past eras, events and persons important to local, State or national history, or which provide significant examples of architectural styles of the past or are elements in the history of architecture. Section 2.56.110 grants the responsibility for designating historic resources to the Planning Commission and establishes criteria for historic designation. Section 2.56.130 requires a Certificate of Alteration prior to issuance of a building permit for any projects impacting a designated historic resource. In accordance with Section 2.56.130, all proposed work must be reviewed for conformance with the Secretary of Interior’s Guidelines for Rehabilitation.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations related to historic resources. Chapter 20.080 Downtown Residential Districts (existing) promotes and maintains the Downtown’s historic role as the City’s center by developing a variety of residential types and densities consistent with the policies of the General Plan and complementary to the goals and policies of the Downtown Station Area Specific Plan District. Chapter 20.090 Downtown Station Area Zoning Districts (existing) focuses new improvements on Grand Avenue to return this historic corridor to once again being the focus of the community and encourage the retention of existing and local businesses to the Downtown and protect existing historic building fabric. Section 20.360.008 (Nonconforming Signs) (revised) states that signs which reflect the unique historical characteristics of the development and heritage of South San Francisco may remain, subject to continued maintenance, until the use of the site on which the sign is located changes, subject to Planning Commission approval.

Development applications will be reviewed by the City of South San Francisco for compliance with the policies and actions of the General Plan Update related to the protection of historical resources.

The City's Municipal Code and Zoning Ordinance, which implement the City's General Plan would be reviewed when development applications are received.

Consistent with the South San Francisco Municipal Code Section 2.56.130, any projects impacting a designated historic resource requires a Certificate of Alteration prior to issuance of a building permit and all proposed work is to be reviewed for conformance with the Secretary of the Interior's Guidelines for Rehabilitation. Lastly, individual development projects which propose to alter a building or structure greater than 45 years of age at the time an application is deemed complete would be required to undergo project-specific environmental review in compliance with CEQA Guidelines Section 15064.5 (Draft Program EIR, Page 3.4-32-34). Accordingly, the proposed project's impacts related to cultural resources and tribal cultural resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact CUL-2	The proposed project would not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. (Draft Program EIR, Page 3.4-34-36).
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Findings: Less than significant impact (Draft Program EIR, Page 3.4-36). No mitigation required.

Facts in Support of Findings: Known archaeological resource sites are located within the Planning Area. Some of South San Francisco's known archaeological resources are located within areas undergoing development, such as Terrabay and El Camino Real. Additionally, undiscovered archaeological sites could exist in the Planning Area. Development under the proposed project could affect known archaeological resources or previously unidentified or undesignated archaeological resources.

The potential for additional archaeological sites to be present within the City exists but varies by location. Prehistoric habitation sites, such as those known to be present within the City, tend to be situated along creeks and other areas with a reliable water supply, whereas task-specific sites or resource procurement sites can be situated in almost any environment conducive to human activity. Buried prehistoric archaeological sites tend to be found on Holocene-age landforms, particularly alluvial fans, floodplains, and areas along rivers and streams. As such, within the Planning Area, the waterfront and the areas around Colma Creek and San Bruno Creek have the greatest potential for buried prehistoric archaeological resources to be present.

The General Plan Update includes policies and actions specifically designed to address potential impacts to archaeological resources. For example, Policy ES-10.1 requires the City to maintain formal procedures for minimizing and mitigating impacts to archaeological resources and Policy ES-10.2 requires the City to support educational efforts that increase community awareness, appreciation, and support for South San Francisco's archaeological resources. Policy ES-10.3 requires that development proposals be referred to the NWIC of the California Archaeological Inventory, NAHC, and local Native American tribes, for review and recommendations regarding supplemental field investigation. Policy ES-10.4 requires a records review for any development proposed in areas of

known archaeological resources. Lastly, as required by Policy ES-10.5, if construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts, then 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. As stipulated by Policy ES-10.5, work may only resume when appropriate protections are in place and the protections have been approved by the Economic and Community Development Department. There are no actions identified in the Climate Action Plan related to archaeological resources.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations related to archaeological resources. Section 20.110.004 (Supplemental Regulations) (existing) states that open space uses allowed within the Terrabay Preservation Parcel must be in conformance with the General Plan and the Mutual Release and Settlement Agreement executed in March 2000 between Terrabay Partners, L.L.C., Myers/Sunchase I, L.L.C., The Center for Biological Diversity, San Bruno Mountain Watch and the City of South San Francisco, including wetlands preservation and mitigation, habitat preservation, and preservation of archaeological resource site CA-SMa-40.

Proposed new development would be required to conduct a records search with the NWIC to determine the archaeological sensitivity of the site, as well as be referred to the NAHC and local Native American tribes. If required, an archaeological survey of the site would be conducted and/or accidental discovery procedures for archaeological resources would be required. In addition, proposed new development would be required to preserve archaeological resource site CA-SMa-40. Compliance with General Plan Update policies and actions and the regulations of the Zoning Ordinance would ensure that future development projects are appropriately reviewed and designed in terms of potential impacts to archaeological resources (Draft Program EIR, Page 3.4-34-36). Accordingly, the proposed project's impacts related to cultural resources and tribal cultural resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact CUL-3	The proposed project would not disturb human remains, including those interred outside of formal cemeteries (Draft Program EIR, 3.4-36).
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Findings: Less than significant impact (Draft Program EIR, Page 3.4-36). No mitigation required.

Facts in Support of Findings: Excavation and construction activities allowed under the proposed project may uncover human remains that may not be marked in formal burial locations. Therefore, as future development and infrastructure projects are reviewed by the City, each project would be evaluated for conformance with the General Plan Update, South San Francisco Municipal Code, and other applicable State regulations.

Public Resources Code Section 5097 has specific stop-work and notification procedures to follow when Native American human remains are inadvertently discovered during excavation and construction activities. Section 7050.5 of the California Health and Safety Code sets forth provisions

related to the treatment of human remains, including the treatment of human remains found in locations other than a dedicated cemetery and the responsibilities of the Coroner. These requirements apply to all construction projects within the Planning Area.

The General Plan Update includes policies and actions intended to conserve and reduce impacts to archaeological resources, including human remains. 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 American tribe(s). Policy ES-11.1 further requires the appropriate treatment of Native American and other human remains discovered during project construction. (Draft Program EIR, 3.4-36).

Accordingly, the proposed project's impacts related to cultural resources and tribal cultural resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact CUL-4	The proposed project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource that is 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). (Draft Program EIR, Page 3.4-37-38).
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Findings: Less than significant impact (Draft Program EIR, Page 3.4-38). No mitigation required.

Facts in Support of Findings: On February 15, 2022, a letter was sent to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the Planning Area. A response was received on March 27, 2022, indicating the search returned negative results for TCRs in the Planning Area. A records search conducted at the NWIC identified 15 listed prehistoric sites that meet the definition of a TCR within the Planning Area.

Future development allowed under the proposed project could affect known or previously unidentified TCRs. In addition, the potential for additional undiscovered eligible TCRs to be present within the Planning Area exists but varies by location. As with prehistoric archaeological resources, the waterfront and the areas around Colma Creek and San Bruno Creek have the greatest potential for buried TCRs to be present.

The General Plan Update includes policies and actions intended to conserve and reduce impacts to TCRs. 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 American tribe(s). Policy ES-11.3 requires the City to Consult with local Native American tribes to identify, evaluate, and appropriately address TCRs and tribal sacred sites through the development review process. There are no regulations identified in the Zoning Code Amendments and no actions identified in the Climate Action Plan related to TCRs.

The General Plan Update also includes policies and actions intended to conserve and reduce impacts to archaeological resources, which can include TCRs. Policy ES-10.3 requires that development proposals be referred to the NWIC of the California Archaeological Inventory, NAHC, and local Native American tribes, for review and recommendations regarding supplemental field investigation. Policy ES-10.4 requires a records review for any development proposed in areas of known archaeological resources. As required by Policy ES-10.5, if construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts, then 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. As stipulated by Policy ES-10.5, work may only resume when appropriate protections are in place and the protections have been approved by the Economic and Community Development Department (Draft Program EIR, Page 3.4-37-38).

Accordingly, the proposed project's impacts related to cultural resources and tribal cultural resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact CUL-5	The proposed project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. (Draft Program EIR, Page 3.4-38).
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Findings: Less than significant impact (Draft Program EIR, 3.4-38). No mitigation required.

Facts in Support of Findings: On February 15, 2022, a letter was sent to the NAHC to determine whether any sacred sites are listed on its Sacred Lands File for the project area. A response was received on March 27, 2022, indicating the search returned negative results for TCRs in the Planning Area, and recommended contacting tribal representatives from six tribes for additional information. On January 14, 2022, in accordance with requirements promulgated by 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 proposed project and invited the tribes to participate in consultation. On April 6, 2022, in accordance with requirements promulgated by SB 18 and AB 52, the City notified the Wuksache Indian Tribe/Eshom Valley Band of the proposed project and invited the tribe to participate in consultation. As of June 6, 2022, no responses have been received.

At this time, the City, in its capacity as Lead Agency, has not identified TCRs throughout various sites in the Planning Area pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1 that would be adversely impacted by the proposed project. Nonetheless, as described under Impact CUL-4, future development allowed under the proposed project could affect previously unidentified TCRs. The General Plan Update includes policies and actions to conserve and reduce impacts to TCRs, such as Policy ES-11.1, Policy ES-11.3, Policy ES-10.3, and Policy ES-10.5. By adhering to the policies and actions in the General Plan Update, as well as the provisions under SB

18 and AB 52, potential impacts to existing or undiscovered eligible TCRs within the Planning Area would be reduced to less than significant and no mitigation is required

Cumulative Impact

The proposed project's cumulative impacts related to cultural resources would be less than significant (Draft Program EIR, Page 3.4-38-40).

Findings: Less than significant impact (Draft Program EIR, Page 3.4-40). No mitigation required.

Facts in Support of Findings: The geographic scope of the cumulative impact analysis for cultural and TCRs is the South San Francisco Planning Area as well as the surrounding cities of Brisbane, Daly City, Pacifica, San Bruno, and Millbrae.

Future development within the cumulative geographic scope could have significant cumulative impacts on known or previously unidentified cultural and TCRs. Development within the cumulative geographic context would be required to comply with federal, State, and local laws and policies that protect cultural and TCRs, including the provisions of SB 18 and AB 52, Section 15064.5 of the CEQA Guidelines, Section 7050.5 of the California Health and Safety Code, and Sections 5024.1 and 5097 of the Public Resources Code. Compliance with these policies may also require development projects to prepare site-specific, project-level analysis to fulfill CEQA requirements, which also would include additional consultation that could lead to the identification of potential site-specific cultural and TCRs.

Moreover, the proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update. General Plan Update Policy ES-9.5 requires the preparation and submittal of historic reports and surveys as part of the environmental review process. Policy ES10.3 requires that development proposals be referred to the NWIC of the California Archaeological Inventory, NAHC, and local Native American tribes, for review and recommendations regarding supplemental field investigation. Policy ES-10.4 requires a records review for any development proposed in areas of known archaeological resources. As required by Policy ES-10.5, if construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts, then all work within 100 feet of the discovery shall cease, the City's Economic and Community Development Department shall be notified, and the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures. Lastly, 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).

As discussed under Impacts CUL-1 through CUL-5, development applications will be reviewed by the City for compliance with the policies and actions of the General Plan Update, the provisions of SB 18 and AB 52, the South San Francisco Municipal Code, and other relevant federal, State, and local regulations that protect cultural and TCRs, including Section 15064.5 of the CEQA Guidelines and Sections 5024.1 and 5097 of the Public Resources Code. Other municipalities within the cumulative geographic context have adopted similar policies to preserve and protect known or previously

unidentified cultural and TCRs. Therefore, cumulative impacts from implementation of the proposed project would not result in a considerable incremental contribution to cumulative impacts to cultural and TCRs. In addition, the General Plan Update contains policies and actions to protect cultural and TCRs, and future development within the cumulative geographic context would be required to comply with regulations set forth by local, State, and federal agencies to protect cultural and TCRs. Therefore, the proposed project's contribution to cumulative impacts would be less than significant (Draft Program EIR, Page 3.4-38-40).

Accordingly, the proposed project's cumulative impacts related to cultural resources and tribal cultural resources would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.5.5 - Energy

Potential Effect

Impact ENER-1	The proposed project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation. (Draft Program EIR, Page 3.5-17-22)
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Findings: Less than significant impact (Draft Program EIR, Page 3.5-22). No mitigation required.

Facts in Support of Findings:

Construction

1. The proposed project does not expressly authorize any specific construction projects. Incremental potential growth in residential and nonresidential uses would be infill development occurring in already developed areas throughout the City, with the concentration of population, employment, and services allowing for more efficient use of energy during construction. Construction activities associated with individual development projects under the proposed project would consume energy in the form of petroleum fuel for heavy equipment, as well as from worker trips and material delivery trips to the construction sites. Because details regarding future construction activities are unknown, energy usage associated with construction activities cannot be calculated at this time. Subsequent environmental review of future development projects would be required to assess potential construction-related energy consumption impacts. Future development projects would be required to evaluate, measure, and mitigate air quality and GHG impacts generated from construction activities which would also assist in reducing energy consumption during construction. The Bay Area Air Quality Management District (BAAQMD) recommended Construction Measures would apply to future projects, including provisions which would assist in reducing energy consumption during construction and prevent the wasteful, inefficient, or unnecessary consumption of energy resources. The General Plan Update policies and actions related to air quality and GHG emissions, would also assist in reducing energy consumption during construction. For example, Policy CHEJ-3.1 requires the City to support regional efforts to improve air quality and protect human health. Action CHEJ-3.1.1

requires the City to work with the BAAQMD to establish and identify funding for air quality monitoring and reduction strategies. This action may include purchasing particulate matter (PM_{2.5}) monitors to track local air quality data in Lindenville, East of 101, and Downtown. Action CHEJ-3.2.2 requires the City to establish a local ordinance that exceeds the State vehicle idling restrictions where appropriate, including restrictions for bus layovers, delivery vehicles, trucks at warehouses and distribution facilities and taxis, particularly when these activities take place near sensitive land uses (schools, healthcare facilities, affordable housing, and elder and childcare centers). Action CHEJ3.2.2 also requires the City to manage truck idling in new residential neighborhoods in Lindenville and East of 101. Lastly, Policy CP-5.4 requires 75 percent waste diversion for municipal construction and demolition projects.

2. Additionally, The South San Francisco Municipal Code contains rules and regulations to reduce energy usage during construction. Chapter 15.60 promotes the redirection of recyclable materials generated during construction away from landfills. All project applicants are required to complete and submit a recycling management plan to estimate the volume of debris to be generated during construction and the estimated amount of debris that would be sent to the landfill. Section 15.62 (Deconstruction and Salvage and Recovery) requires the City to encourage contractors to make every structure planned for demolition available for deconstruction, salvage, and recovery prior to demolition; and to recover the maximum feasible amount of salvageable designated recyclable and reusable materials prior to demolition, by at least the rate set forth in Section 4.408 of Chapter 4 of the CALGreen, as may be amended from time to time.
3. Future development under the proposed project would be required to comply with requirements of the South San Francisco Municipal Code and the General Plan Update policies and actions that directly and indirectly reduce energy consumption during construction. Future development would also 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 ARB.

Operation

The electricity and natural gas consumption associated with the potential development calculated in CalEEMod found that the potential development would result in a net increase in consumption of 237,352,420 kWh of electricity per year and 392,651,730 kilo-British Thermal Units (kBtUs) of natural gas per year. These rates are based on CalEEMod default parameters which accounts for the 2019 California Code of Regulations Title 24 Part 6 standards. These standards require all homes built in California to have zero net energy use, which is achieved through energy efficiency measures as well as required rooftop solar photovoltaic systems. The 2019 California Code of Regulation Title 24 Part 6 standards also apply to nonresidential buildings and require a variety of energy efficiency measures to be implemented during construction of the structures that will reduce energy usage as well as air emissions. It is anticipated that the future development within the City will be designed and built to minimize electricity and natural gas usage.

The total VMT would increase from the existing 3,387,200 VMT (calculated based on 2019) to 6,585,400 VMT with buildout of the proposed project and the service population would increase

from the existing 123,500 service population to a service population of 245,700 with buildout of the proposed project. Because of the balanced growth of both residential and employment opportunities in the General Plan Update, as well as the extensive public transit options available in the City, the daily VMT per service population (employees + residents) is anticipated to be reduced from 27.42 VMT per service population for existing conditions to 26.80 VMT per service population under proposed project buildout conditions. The reduction in VMT per service population would result in improvements to energy efficiency for transportation-related energy usage.

The implementation of the proposed project would result in an estimated consumption of an additional 128,851 gallons of petroleum fuel per year. However, Executive Order N-79-20 requires sales of all new passenger vehicles to be zero-emission by 2035 and additional measures to eliminate harmful emissions from the transportation sector; thus, further reduction in vehicle emissions would be forthcoming.

The General Plan Update contains several policies and actions that assist in reducing energy consumption and petroleum fuel use. Policy CP-2.1 requires the City to maintain membership in Peninsula Clean Energy and continue to work to maintain a high level of private property owner participation in Peninsula Clean Energy. Policy CP-2.2 requires the City to partner with PG&E to develop options for reducing greenhouse gas emissions associated with the existing natural gas grid. Action CP-3.1.1 requires the City to provide incentives to encourage new construction to exceed California's Building Energy Efficiency Standards outlined in Title 24, Part 6. Policy LU-1.2 requires the City to improve walk, bike, and accessibility in complete neighborhoods. Policy LU-2.1 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. Lastly, Action CHEJ-3.3.1 requires the City to explore opportunities for production, distribution, and warehousing uses in Lindenville and East of 101 to reduce pollution, such as greener trucks, energy efficient buildings, and other strategies.

The South San Francisco Municipal Code contains rules and regulations related to energy resources. Section 15.22.010 adopts the CALGreen, 2019 Edition. Section 15.26.010 adopts the California Energy Code 2019 Edition. Chapter 15.62 of the Municipal Code aims to encourage the use of solar energy systems and comply with the Solar Rights Act by reducing local discretion in permitting for solar energy systems and creating an expedited, streamlined solar permitting process for small residential rooftop solar energy systems.

The South San Francisco Zoning Ordinance includes Section 20.300.008 which establishes regulations allowing outdoor lighting for uses and activities consistent with the need for utility, safety, and nighttime attractiveness while minimizing energy waste which increases impacts on the environment through energy production byproducts. Section 20.300.007 includes a number of requirements for new construction or rehabilitated landscapes to aid in energy conservation by providing shade from the sun and shelter from the wind and encourage the conservation of water resources through the use of native and drought-tolerant plants and water-conserving irrigation practices.

The Climate Action Plan includes a number of actions to minimize energy consumption. Implementation of Action CE-1.3 would establish a streamlined PV system permitting and approval

process to encourage the addition of solar PV systems. Implementation of Action CE-1.6 includes the exploration of opportunities to install community scale solar PV or other renewable energy systems including biogas to support local energy resiliency and provide renewable energy to disadvantaged communities. Implementation of Action BE-1.2 would update zoning and building codes to require alternations or additions at least 50 percent the size of the original building to comply with minimum CALGreen requirements.

Moreover, all new development in the City would be required to meet State energy efficiency regulations including Title 24 Part 6 building energy efficiency standards that require new residential uses to meet a net zero energy use standard, which is met through installation of rooftop solar PV systems, enhanced insulation, and energy efficient appliances. Additionally, the City of South San Francisco Municipal Code Section 15.26.020 requires new residential development to only include all-electric design features and prohibits the use of natural gas utilities.¹ The Title 24 Part 6 requirements also require nonresidential buildings to be designed for increased energy efficiency standards. Other State energy efficiency regulations include SB 100 which requires 100 percent of retail sales of electricity to be generated from zero-carbon emission sources by 2045 and Executive Order N-79-20 which requires 100 percent of new passenger vehicles sold in California to be zero-emission by 2035.

Furthermore, the proposed project minimizes petroleum fuel use for transportation by locating new housing and jobs in the East of 101, Lindenville, Downtown, and El Camino planning sub-areas, which are well served by Caltrain, BART, or SamTrans service and have good access to opportunity (such as jobs, neighborhood amenities, and health care facilities). Finally, the implementation of Mitigation Measure (MM) TRANS-1, which requires the City to implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements, would reduce VMT. Lastly, implementation of the proposed project would minimize petroleum fuel use for transportation. (Draft Program EIR, Page 3.5-17 – 22). The proposed project's impacts related to energy would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact ENER-2	The proposed project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency (Draft Program EIR, Page 3.5-22-23).
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Findings: Less than significant impact (Draft Program EIR, Page 3.5-23). No mitigation required.

Facts in Support of Findings: Development (including redevelopment of existing developed sites) consistent with the proposed project would be required to implement all applicable energy efficiency measures listed in the CAP. In addition, all future development would be required to adhere to the South San Francisco Municipal Code and Zoning Ordinance, which contains rules and regulations regarding energy efficiency. The policies and programs in the General Plan Update would not conflict with applicable State or regional plans for renewable energy or energy efficiency that

¹ City of South San Francisco. 2021. Ordinance Summary. Website:
<https://www.ssf.net/home/showpublisheddocument/23685/637582409224270000>. Accessed June 6, 2022.

include Plan Bay Area 2050, BAAQMD 2017 Clean Air Plan, Executive Order N-79-20 which requires 100 percent of new passenger vehicles sold in California to be zero-emissions by 2035, and SB 100 that requires 100 percent of retail sales of electricity to be generated from zero-carbon emission sources by 2045. On the contrary, the policies and actions in the General Plan Update support State and regional plans for renewable energy and energy efficiency, such as Policy CP-5.1 which requires all new municipal buildings and facilities to meet a minimum of Leadership in Energy and Environmental Design (LEEDTM) silver rating or equivalent green building rating system. Policy CP-5.5 requires new municipal buildings and facilities and major renovation projects to evaluate the feasibility of incorporating on-site batteries that store electricity from on-site renewable energy generation to supply the building and community with electricity in the event of a disaster. Policy CP-8.1 requires the City to continuously evaluate and, as appropriate, replace systems at the wastewater treatment plant to reduce energy use. (Draft Program EIR, Page 3.5-22) Accordingly, the proposed project's impacts related to energy would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Impact

The proposed project's cumulative impacts related to energy would be less than significant (Draft Program EIR, Page 3.5-23-24).

Findings: Less than significant impact (Draft Program EIR, Page 3.5-24). No mitigation required.

Facts in Support of Findings: The geographic scope of the cumulative impact analysis for energy resources is the South San Francisco Planning Area as well as the surrounding cities of Brisbane, Colma, Daly City, Pacifica, San Bruno, and Millbrae.

Cumulative projects would be required to comply with local ordinances and county and city General Plan policies that address energy conservation and energy efficiency, such as complying with the latest California Energy Code, Title 24 Building Energy Efficiency Standards, and CALGreen. Furthermore, PG&E, which supplies electricity to the cumulative project area, would be required by SB 100 to incrementally increase the proportion of renewable electricity generation supplying its in-state retail sales until it reaches 100 percent carbon-free electricity generation by 2045. Cumulative projects 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 ARB. Additionally, various federal and State regulations, including the Low Carbon Fuel Standard (LCFS), Pavley Clean Car Standards, and LEV Program, would serve to reduce the transportation fuel demand of cumulative projects.

As discussed above, development resulting from implementation of the proposed project would be subject to General Plan Update and CAP policies and actions and the South San Francisco Municipal Code and Zoning Ordinance to reduce energy consumption. As previously discussed, future development under the proposed project would be required to conform to State, regional, and local policies that would reduce impacts related to energy resources to less than significant levels. When applicable, any additional new development within the Planning Area would be subject, on a

project-by-project basis, to independent CEQA review as well as policies and actions in the General Plan Update and CAP, the South San Francisco Municipal Code and Zoning Ordinance, and other applicable City requirements that reduce impacts related to energy resources (Draft Program EIR, Page 3.5-23—24). The proposed project's cumulative impacts related to energy would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.5.6 - Geology, Soils, and Seismicity

Potential Effect

Impact GEO-1:	The proposed project could directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. ii) Strong seismic ground shaking. iii) Seismic-related ground failure, including liquefaction. iv) Landslides (Draft Program EIR, Page 3.6-17—23).
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Findings: Less than significant impact (Draft Program EIR, 3.6-23). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses. The City's proximity to the San Andreas Fault Zone and other active faults makes it likely that the Planning Area would experience periodic minor to strong earthquake motion and potentially expose additional residents and employees to the effects of surface fault rupture, seismic ground shaking, liquefaction, settlement, and landslides from local and regional earthquakes. Structures that would be built on steep slopes could be exposed to an existing risk of landslide or could exacerbate existing landslide conditions. New structures and other private and public improvements built under the proposed project could also experience substantial damage during seismic events. Estimating project-specific impacts is not possible at this time as the proposed project does not describe specific development projects.

Compliance with local codes, mandatory CBC requirements, and implementation of General Plan Update policies and actions, would ensure that future development projects are appropriately investigated in terms of potential seismic hazards and that any new buildings and structures are constructed to withstand the anticipated range of seismic events. At the programmatic level, seismic impacts would be reduced to a less than significant level. Consistent with General Plan Update policies and actions and the rules and regulations of the Municipal Code and Zoning Ordinance, individual development projects would be required to undergo project-specific environmental review, which may require additional site-specific or project-specific measures to reduce any potential for loss, injury, or death in the event of a seismic event.

i) Surface Fault Rupture

Within the Planning Area, the Alquist-Priolo Earthquake Fault Zone is up to 1,200 feet wide, passes through the westernmost corner of the City, and contains Holocene-active strands of the San Andreas Fault Zone.² As depicted on the San Francisco South Regulatory Map, surface fault rupture occurred within the westernmost corner of the City during the 1906 San Francisco Earthquake. The majority of potential growth under the proposed project would occur outside the Alquist-Priolo Earthquake Fault Zone. Land uses within the Alquist-Priolo Earthquake Fault Zone are currently developed with urban uses and could be exposed to the effects of surface fault rupture in the event of an earthquake.

The General Plan Update includes policies and actions to minimize structural damage and minimize the exposure of people to risk of injury or death from structural failure in the event of surface fault rupture during an earthquake. Action CR-1.3.3 requires the City to enact an ordinance to require real estate disclosures of all hazards identified in the Hazard Mitigation Plan, including hazards associated with geologic hazards, for commercial and residential properties including ownership and rental. Policy CR-1.4 requires the City to periodically adjust infrastructure design standards to address asset-specific vulnerabilities associated with the hazards. As part of the capital planning and budgeting process, Policy CR-1.5 requires all projects located within high hazard areas to adhere to risk assessment guidance and identify appropriate resilience strategies. Action CR-4.1.4 requires the City to incentivize retrofits of buildings and other mitigation measures in seismic and geologic hazards zones and explore developing a specific program to address seismic retrofit needs within South San Francisco's affordable housing stock. Action CR-4.4.1 requires that permit applications for projects located within areas susceptible to geologic hazards (Figure 43 of the General Plan Update) prepare site-specific soils and geologic reports for review and approval by the City Engineer, and incorporate recommended actions during construction. Lastly, Action CR-4.4.1 requires that future proposed projects located within the Alquist-Priolo Earthquake Fault Zone be subject to conducting an environmental analysis at the time a specific project is defined, including preparation of site-specific soils and geologic reports for review and approval by the City Engineer, and incorporation of the recommended actions during construction.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, contains rules and regulations regarding development within the Alquist-Priolo Earthquake Fault Zone. For example, new Section 20.310.002 identifies grading and drainage requirements for all projects throughout the City, including those located within the Alquist-Priolo Earthquake Fault Zone.

Potential structural damage and exposure of people to risk of injury or death from structural failure associated with surface fault rupture would be reduced by compliance with CBC engineering design and construction measures. Foundations and other structural support features would be designed to resist or absorb damaging forces from strong ground shaking and surface fault rupture. Chapter 15.08 of the South San Francisco Municipal Code incorporates the most recent CBC. The South San

² California Division of Mines and Geology (CDMG). Earthquake Planning Scenario for a Magnitude 8.3 Earthquake on the San Andreas Fault in the San Francisco Bay Area. Special Publication 61, 1982.

Francisco Building Division reviews plans and applications for site clearance, grading, and building permits to ensure compliance with Chapter 15.08 (California Building Standards Code) and imposes requirements for revisions where needed to ensure that new or significantly remodeled structures are constructed in compliance with the CBC, and reflect any additional measures deemed appropriate. Permit issuance would be based upon satisfactory completion of any identified applicable measures.

ii) Strong Seismic Ground Shaking

As mentioned previously, the entire Planning Area is within a seismically active region that could experience strong ground shaking during a seismic event. The southwestern corner and most of the City east of El Camino Real is located within Zone VIII (Very Strong) and is estimated to experience moderate structural damage. The remainder of the City, including the portions fronting the San Francisco Bay, are located within Zone IX (Violent) and are estimated to experience heavy structural damage. The intensity of ground shaking at a specific site would depend on the characteristics of the fault, distance from the fault, magnitude and duration of the earthquake, and site-specific geologic conditions.

The General Plan Update includes policies and actions to protect residents and employees of the City and surrounding areas from seismically induced hazards associated with strong seismic ground shaking. This includes Action CR-4.1.1, Policy CR-1.4, and Policy CR-1.5 discussed above. Action CR-4.1.2 requires the City to regularly update the City's Building Code to incorporate current earthquake standards. Action CR-1.3.1 requires the City to participate in the San Mateo County Hazard Mitigation Plan maintenance protocols and Countywide initiatives, adopt the Hazard Mitigation Plan by reference upon update, and update emergency operations plans and protocols to account for regularly updated hazard information. Action CR-1.6.2 calls for the addition of a second floor to the City's EOC and a warehouse to store supplies to support the City in the event of a disaster, as well as ensure the EOC has the necessary capabilities and can continue operations after all future hazards. Action CR-1.6.3 requires the City to establish a community resilience education program in collaboration with San Mateo County and local community partners and work with the Community Emergency Response Team and promotes programs to disseminate the information. Lastly, Action CR-1.6.4 requires the City to identify locations for emergency housing, siting locations in areas with lower hazard risk, and Action CR-1.8.1 requires the City to create a post-disaster recovery framework that establishes post-disaster policies and programs designating when, where, and how rebuilding will occur.

Compliance with local codes, mandatory CBC requirements, and implementation of General Plan Update policies and actions, would ensure that future development projects are appropriately investigated in terms of potential seismic hazards and that any new buildings and structures are constructed to withstand the anticipated range of seismic events. Individual development projects would be required to undergo project-specific environmental review, which may require additional site-specific or project-specific measures to reduce any potential for loss, injury, or death in the event of a seismic event.

iii) Seismic-related Ground Failure

Secondary effects of earthquake shaking may include landslides, slope instability, liquefaction, subsidence, and lateral spreading. The majority of the Planning Area is located within a low or moderate risk category for landslides. Portions of the City are hilly and underlain with weak bedrock with slopes greater than 15 percent and have the greatest susceptibility to landslides. In the Paradise Valley/Terrabay area, slopes still pose elevated rockfall risks. Areas near the San Francisco Bay have high ground failure potential, including liquefaction and settlement during earthquake shaking. Most of the lowland areas of the City have the potential for liquefaction hazards, with very high liquefaction potential in the East of 101 and Lindenville sub-areas, high potential along Colma Creek, and moderate potential in the alluvial fan of Colma Creek and in a narrow strip of land south of Sister Cities Boulevard. Liquefaction-induced lateral spreading could occur in the low-lying coastal areas and along Colma Creek.³ Additional residents, employees, buildings, and infrastructure, could be exposed to the secondary effects of local and regional earthquakes.

The South San Francisco Municipal Code and Zoning Ordinance and policies and actions of the General Plan Update would protect against the secondary effects of earthquake shaking. This includes previously discussed Chapter 15.08 of the South San Francisco Municipal Code, Section 20.310.002 the South San Francisco Zoning Ordinance, and Section 20.170.004 of the South San Francisco Zoning Ordinance. Future proposed projects located within areas susceptible to seismic-related ground failure would be required to conduct an environmental analysis at the time a specific project is defined, including preparation of site-specific soils and geologic reports for review and approval by the City Engineer, and incorporation of the recommended actions during construction.

iv) Landslides

As discussed above the majority of the Planning Area is located within a low or moderate risk category for landslides, with some portions of the City at greater risk for landslides and rockfalls. Additional residents and employees, as well as buildings and infrastructure, could potentially be exposed to landslides.

The General Plan Update includes policies and actions specifically designed to protect individuals from injuries and minimize property damage resulting from land instability by limiting development in certain areas and requiring increased review and mitigation where appropriate. These include Action CR-1.3.3, Policy CR-1.4, Policy CR-1.5 as discussed previously. Policy CR-4.3 discourages development on steep hillside areas more than 30 percent grade and requires that development of hillside sites follow existing contours to the greatest extent possible and that grading is kept to a minimum.

³ California Department of Conservation, California Geological Survey (CGS). 2021. Seismic Hazard Zone Report for the San Francisco South 7.5-Minute Quadrangle. Website: https://www.conservation.ca.gov/cgs/Documents/Publications/SHZR/SHZR_133_San_Francisco_South_a11y.pdf. Accessed February 27, 2022

The South San Francisco Municipal Code also contains rules and regulations to address development on lands susceptible to landslides. This includes Section 20.310.002 of the South San Francisco Zoning Ordinance and Chapter 15.08 of the South San Francisco Municipal Code, discussed above.

The South San Francisco Building Division reviews plans and applications for site clearance, grading, and building permits to ensure compliance with Section 20.310.002 and Chapter 15.08 and imposes requirements for revisions where needed to ensure that new or significantly remodeled structures are constructed in compliance with these requirements, and reflect any additional measures deemed appropriate. Permit issuance would be based upon satisfactory completion of any identified applicable measures. Future projects would be required to conduct an environmental analysis at the time a specific project is defined. In reviewing individual project applications, the City would determine which policies and actions apply, and which sections of the Municipal Code and Zoning Ordinance apply, depending on the specific characteristics of the project type and/or project site during the development review process (Draft Program EIR, Page 3.6-17-23). The proposed project's impacts related to geology, soils, and seismicity would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions.

No mitigation is necessary.

Potential Effect

Impact GEO-2	The proposed project would not result in substantial soil erosion or the loss of topsoil (Draft Program EIR, Page 3.6-23-24).
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Findings: Less than significant impact (Draft Program EIR, Page 3.6-24). No mitigation required.

Facts in Support of Findings: Development under the proposed project would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. As such, soil erosion is dependent on individual site locations and conditions on-site during construction.

Construction activities that disturb one or more acre of land surface are subject to the NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2012-0006-DWQ). Permit conditions require development of a Storm Water Pollution Prevention Plan and inspection of construction sites before and after a storm to identify stormwater discharge from construction activity and to identify and implement erosion controls, where necessary.

The General Plan Update includes policies and actions that would reduce soil erosion and loss of topsoil, including Policy CR-4.3. Policy ES-7.1 requires the City to partner with regional and local agencies to develop a comprehensive watershed management strategy that identifies programs, partnerships, actions, and incentives that the City and partners can take to protect the City's water resources and aquatic areas. Policy ES-7.3 requires that new development and redevelopment projects meet federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, stormwater infiltration, peak flow reduction, and trash capture.

The South San Francisco Municipal Code and Zoning Ordinance also contains rules and regulations to minimize soil erosion and the loss of topsoil. Chapter 15.08 of the Municipal Code regulates grading activities, including drainage and erosion control. Section 20.300.007 (Landscaping) (revised) of the Zoning Ordinance includes a number of requirements for new construction or rehabilitated landscapes, including the preparation of a soil management report and grading design plan to reduce runoff. Section 14.04.132 (Site design measures for non-regulated projects) of the Municipal Code states that all new development and redevelopment projects are encouraged to include adequate site design measures that include minimizing land disturbance and impervious surfaces. Section 14.04.180 (Reduction of pollutants in stormwater) of the Municipal Code 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. Implementation of General Plan Update policies and actions would further reduce potential soil erosion and loss of topsoil from construction-related soil disturbance (Draft Program EIR, Page 3.6-23-24). The proposed project's impacts related to geology, soils, and seismicity would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact GEO-3	The proposed project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the proposed project, and potentially result in a settlement, an on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. (Draft Program EIR, Page 3.6-24-26)
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Findings: Less than significant impact (Draft Program EIR, 3.6-26). No mitigation required.

Facts in Support of Findings: Certain geologic units present in the Planning Area could have the potential for landslides, slope instability, rock falls, liquefaction, settlement, and liquefaction-induced lateral spreading. Other geologic hazards, such as subsidence or collapse, are also present in the Planning Area. Development allowed under the proposed project could occur within areas containing unstable geologic units or be located on soils that are unstable or could become unstable from such development. Any development under the proposed project would be required to comply with Chapter 15.08 of the South San Francisco Municipal and Sections 20.170.004 and 20.310.002 of the South San Francisco Zoning Ordinance, discussed above.

The General Plan Update includes policies and actions specifically designed to protect individuals from injuries and minimize property damage resulting from development on unstable geologic units or unstable soils by limiting development in certain areas and requiring increased review and mitigation where appropriate. These include Policy CR-4.3, Action CR-1.3.3, and Action CR-4.1.4. 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. Policy CR-4.4 requires the City to protect existing and new buildings, infrastructure, and other assets from other geologic hazards, including landslides, slope instability, liquefaction, settlement, subsidence, unstable geologic units, unstable soils, and expansive soils.

The proposed project does not include specific plans for individual development; thus, analyzing the future effects of individual development is not possible. Future proposed projects located within areas containing unstable geologic units or unstable soils would be required to conduct an environmental analysis at the time a specific project is defined, including preparation of site-specific soils and geologic reports for review and approval by the City Engineer, and incorporation of the recommended actions during construction (Draft Program EIR, Page 3.6-24-26). The proposed project's impacts related to geology, soils, and seismicity would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact GEO-4	The proposed project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property (Draft Program EIR, Page 3.6-26-27).
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Findings: Less than significant impact (Draft Program EIR, Page 3.6-27). No mitigation required.

Facts in Support of Findings: New development constructed on expansive soils could be subject to damage or become unstable when underlying soil shrinks or swells. Expansive soils in the City are generally located within the Colma Formation which runs horizontally through the central portion of the City.⁴ Along the eastern perimeter of the City near San Francisco Bay is primarily artificial fill which is susceptible to damage from expansive soils.⁵ Development under the proposed project would be required to comply with Chapter 15.08 of the South San Francisco Municipal Code and Sections 20.310.002 and 20.170.004 of the South San Francisco Zoning Ordinance, as previously discussed. The General Plan Update also includes policies and actions specifically designed to protect residents from injuries and minimize property damage resulting from geologic hazards, such as Action CR-1.3.3, Policy CR-4.1, Policy CR-1.4, Policy CR-1.5, Policy CR-4.4, and Action CR-4.4.1 (Draft Program EIR, Page 3.6-26—27). The proposed project's impacts related to geology, soils, and seismicity would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact GEO-5	The proposed project would not 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 (Draft Program EIR, Page 3.6-27-28).
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Findings: Less than significant impact (Draft Program EIR, Page 3.6-28). No mitigation required.

Facts in Support of Findings: The proposed project encourages growth management and development within the Planning Area. Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses, as previously discussed. Development facilitated by the proposed project would be

⁴ United States Geological Survey (USGS). 1998. Preliminary Geologic Map of the San Francisco South 7.5' Quadrangle and Part of the Hunters Point 7.5' Quadrangle, San Francisco Bay Area, California.

⁵ Ibid.

served by the existing sewer system, and most new development would connect to existing sewer lines. Should any new development require the installation of septic tanks or alternative wastewater disposal systems, the General Plan Update includes policies and actions to ensure that any new development can be feasibly constructed according to soil conditions, including Policy CR-4.3, Policy CR-4.1, Policy CR-4.4, and Action CR-4.4.1.

Chapter 14.14 (Sewer Lateral Construction, Maintenance, and Inspection) of the South San Francisco Municipal Code includes provisions to protect the public health and safety by establishing and providing a mechanism for enforcing performance standards for private sewer laterals that connect or are connected to a public sewer main, and to maintain all parts of the sewer system and reduce and prevent sanitary sewer overflows. Section 14.14.050 (Permits—General) requires that a permit be obtained for the installation of individual waste disposal systems including septic systems and that all work comply with the provisions of Chapter 14.14, including design standards and construction standards. Chapter 15.12 (California Plumbing Code) of the South San Francisco Municipal Code implements the California Plumbing Code on a local level, and includes construction requirements for the installation of septic tanks or alternative wastewater disposal systems. Implementation of policies and actions in the General Plan Update, 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 (Draft Program EIR, Page 3.6-27—28). The proposed project's impacts related to geology, soils, and seismicity would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Impact

The proposed project's impacts related to geology, soils, seismicity, or paleontological resources would be less than significant (Draft Program EIR, Page 3.6-29-31).

Findings: Less than significant impact (Draft Program EIR, Page 3.6-31). No mitigation required.

Facts in Support of Findings: The geographic context for analysis of cumulative impacts related to geology, soils, and seismicity includes the South San Francisco Planning Area. The geographic context for paleontological resources includes San Mateo County.

Potentially adverse environmental effects associated with seismic hazards, as well as those associated with expansive soils, unstable geologic units, unstable soils, landslides, and erosion, usually are site-specific and generally do not result in cumulative effects. Cumulative projects would be exposed to similar ground shaking during seismic events, but development of individual projects would not increase the potential for impacts to occur. Individual development proposals would be reviewed separately by the appropriate public agency depending on location and undergo environmental review if appropriate. In the event that future cumulative development would result in impacts related to geologic or seismic impacts, those potential project or site-specific impacts would be addressed in accordance with the requirements of CEQA. New buildings would be constructed utilizing current design and construction methodologies for earthquake-resistant design as required by relevant regulations, including the San Mateo County Code of Ordinances.

Compliance with the CBC, NPDES permits, laws and regulations mentioned above would ensure that cumulative development would have less than significant impacts associated with geology, soils, or seismicity.

As previously discussed, development facilitated by the proposed project would be required to comply with provisions of the CBC, excavation and grading requirements of the South San Francisco Municipal Code and Zoning Ordinance, including enhanced policies and actions developed as part of the General Plan Update, and mandatory NPDES permit requirements to ensure that potential impacts related to site-specific geotechnical conditions remain at less than significant levels.

As cumulative development occurs, all future projects must comply with the federal, State, and pertinent local regulations regarding structural stability, resulting in less than significant cumulative impacts related to subsidence or collapse. The proposed project would not contribute to a cumulative impact on liquefaction, lateral spreading, or landslides. As discussed above, impacts related to subsidence or collapse are less than significant with implementation of the General Plan Update's policies and actions, and compliance with the South San Francisco Municipal Code and Zoning Ordinance.

Cumulative development within the Planning Area could propose to install septic tanks or alternative wastewater disposal systems, particularly within areas under the jurisdiction of San Mateo County. Cumulative development would not contribute to potential impacts on the soils related to septic tanks or alternative wastewater disposal systems since new development would be required to demonstrate that soils are capable of supporting septic tanks or alternative wastewater disposal systems. As discussed above, impacts related to soils supporting septic tanks or alternative wastewater disposal systems are less than significant with implementation of the General Plan Update's policies and actions, as well as compliance with the rules and regulations of the South San Francisco Municipal Code and Zoning Ordinance. Moreover, the proposed project's incremental contribution to these less than significant cumulative impacts would not be significant. The City will review development applications for subsequent development under the proposed project for compliance with the policies and actions of the General Plan Update and would be required to demonstrate that soils are capable of supporting septic tanks or alternative wastewater disposal systems.

Future development in San Mateo County has potential to cumulatively impact paleontological resources. However, all cumulative projects would be required to comply with federal and State policies related to protection of paleontological resources which reduces potential cumulative impacts to paleontological resources to less than significant. Moreover, the proposed project's incremental contribution to less than significant cumulative impacts would not be significant. The City would review development applications for subsequent development under the proposed project for compliance with MM GEO-6, which requires paleontological monitoring for all proposed excavations in the Colma Formation and Merced Formation, including those buried in the shallow subsurface below Quaternary deposits. Future development under the proposed project would also be required to conform to federal and State policies that protect paleontological resources, including Section 5097 of the California Public Resources Code (Draft Program EIR, Page 3.6-29-31).

The proposed project's cumulative impacts related to geology, soils, and seismicity would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.5.7 - Greenhouse Gas Emissions

Potential Effect

Impact GHG-1	The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment (Draft Program EIR, Page 3.7-53-66).
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Findings: Less than significant impact (Draft Program EIR, 3.7-66). No mitigation required.

Facts in Support of Findings:

Construction

Construction activities associated with future development under the proposed project would generate temporary short-term GHG emissions from heavy-duty construction equipment, worker commute trips, and material delivery trips (i.e., vendor trips), and hauling trips. On-site activities would consist of the operation of off-road construction equipment, as well as on-site truck travel (e.g., haul trucks, dump trucks, and concrete trucks). Off-site sources would include emissions from construction vehicles used for hauling materials and worker vehicle trips. The City would consider construction emissions to be potentially significant if a project would not incorporate Best Management Practices (BMPs) to reduce GHG emissions during construction. New development facilitated by the proposed project would include BMPs for reducing construction emissions of PM₁₀ and PM_{2.5} through Mitigation Measure (MM) AIR-1a, which would help reduce construction-related GHG emissions.

The General Plan Update includes policies and actions specifically designed to address GHG emissions during project construction activities. Policy CHEJ-3.1 requires the City to support regional efforts to improve air quality and protect human health. Action CHEJ-3.1.1 requires the City to work with the BAAQMD to establish and identify funding for air quality monitoring and reduction strategies. This action may include purchasing particulate matter (PM_{2.5}) monitors to track local air quality data in Lindenville, East of 101, and Downtown. Action CHEJ-3.2.2 requires the City to establish a local ordinance that exceeds the State vehicle idling restrictions where appropriate, including restrictions for bus layovers, delivery vehicles, trucks at warehouses and distribution facilities and taxis, particularly when these activities take place near sensitive land uses (schools, healthcare facilities, affordable housing, and elder and childcare centers). Action CHEJ-3.2.2 also requires the City to manage truck idling in new residential neighborhoods in Lindenville and East of 101. Lastly, Policy CP-5.4 requires 75 percent waste diversion for municipal construction and demolition projects.

The South San Francisco Municipal Code contains rules and regulations to reduce GHG emissions during construction. Chapter 15.60 promotes the redirection of recyclable materials generated during construction away from landfills. All project applicants are required to complete and submit a recycling management plan to estimate the volume of debris to be generated during construction

and the estimated amount of debris that would be sent to the landfill. Section 15.62 (Deconstruction and Salvage and Recovery) requires the City to encourage contractors to make every structure planned for demolition available for deconstruction, salvage, and recovery prior to demolition; and to recover the maximum feasible amount of salvageable designated recyclable and reusable materials prior to demolition, by at least at the rate set forth in Section 4.408 of Chapter 4 of the CALGreen, as may be amended from time to time.

Future development under the proposed project would be required to comply with the requirements of the South San Francisco Municipal Code, the General Plan Update policies and actions, and MM AIR-1a, to reduce GHG emissions during construction. In addition, 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 ARB. Construction of future development under the proposed project would not result in potentially significant impacts related to GHG emissions after inclusion of identified mitigation and compliance with local policies and regulations.

Operation

Long-term operational sources of GHG emissions associated with the proposed project would include mobile sources (e.g., vehicle exhaust), energy consumption (e.g., electricity and natural gas), solid waste, wastewater treatment, and water consumption (e.g., electricity used to deliver and treat water consumed by customers in the City). The operational GHG emissions from buildout of the proposed project have been calculated through use of the CalEEMod model for area sources, energy usage, solid waste, and water and wastewater and EMFAC 2021 for mobile sources (see Appendix B of Draft Program EIR). The operational GHG emissions are based on proposed project buildout conditions within the Planning Area in 2040, including up to 38,959 dwelling units and up to 50,052,914 square feet of nonresidential space. The GHG emissions forecast assumes that several State and local GHG reduction measures listed on page 3.7-54 of the Draft Program EIR, would be implemented by 2040.

General Plan Update policies and updated 2022 CAP actions, listed on Pages 3.7-55-63 of the Draft Program EIR, would help reduce GHG emissions generation from existing and future development. It should be noted that these policies and actions are not specifically incorporated into the emissions estimates provided in this analysis due to the uncertainty of their widespread utility. The City adopted Ordinance 21-416 to amend Title 15, Buildings and Construction, to require all new single-family and low-rise multifamily residential development to be designed all-electric and new additions or major alterations constituting 50 percent of the building be designed all-electric, consistent with the updated 2022 CAP Action BNC-2.1. This ordinance will help reduce GHG emission generation in the City from new development, but it does not currently preclude mid-rise or high-rise residential development from utilizing natural gas infrastructure, nor does it currently preclude the use of natural gas infrastructure in nonresidential development or nonresidential occupancies in mixed use development. Moreover, Ordinance 21-416 contains exceptions that future eligible residential development may seek depending on the conditions, for instance, if there is no approved calculation method contained in the California Energy Code or if there is no commercially available technology for that specific building.

Table 3.7-3 of the Draft Program EIR shows the estimated GHG emissions generated from the entire City for the year 2040. Table 3.7-3 is based on year 2022 emission rates from area sources, energy usage, solid waste, water, and wastewater sources while the VMT data used to support this analysis utilizes a baseline year of 2019. Compliance with future State regulations would reduce related GHG emissions through the year 2040, such as SB 100 which requires 100 percent of in-state sales of electricity to be generated from zero-carbon emissions sources by 2045, which would result in reducing energy source emissions to near zero levels. In addition, the transportation sources only incorporate previously adopted State regulations and do not account for recent State regulations and goals, including the anticipated reductions from Executive Order N-79-20 that established a goal of 100 percent of new passenger vehicles sold in California to be zero-emission by 2035. The proposed GHG emission reduction policies and actions included in the proposed project would further reduce the GHG emissions.

The City is estimated to generate approximately 872,000 MT CO₂e per year in 2040 with a service population (residents and employees) of an estimated 245,700 people. 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 proposed project. The GHG emissions per service population for the proposed project buildout conditions would not exceed the 4.0 MT CO₂e per service population threshold. The proposed project would result in annual per service population GHG emissions of 3.55 MT CO₂e, which is below the established significance threshold of 4.0 MT CO₂e per service population.

The proposed project's impacts related to GHG emissions would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update and CAP policies and implementing actions. No mitigation is necessary

Potential Effect

Impact GHG-2	The proposed project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases (Draft Program EIR, Page 3.7-66-83).
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Findings: Less than significant impact (Draft Program EIR, Page 3.7-83). No mitigation required.

Facts in Support of Findings:

Development facilitated by the proposed project would be required to comply with requirements of the General Plan Update, updated 2022 CAP, and South San Francisco Municipal Code and Zoning Ordinance to reduce GHG emissions. In addition, the City will be required to comply with existing and new federal, State, and local statutes and regulations related to GHG emissions. As demonstrated below, development facilitated by the proposed project would not conflict with the applicable plans for reducing GHG emissions.

ARB Climate Change Scoping Plan

In the 2017 Climate Change Scoping Plan, the ARB recommends local plan-level targets of no more than 6.0 MT CO₂e per capita by 2030 and no more than 2.0 MT CO₂e per capita by 2050. Based on a linear interpolation of these two GHG reduction goals, the proposed target for the proposed project

would be no more than 4.0 MT CO₂e per service population by 2040. As identified in Table 3.7-3 of the Draft Program EIR, the City is projected to emit 3.55 MT CO₂e per service population in 2040.

Future projects would be required to comply with State standards for new construction as well as policies and actions of the General Plan Update and updated 2022 CAP that aim to reduce GHG emissions, which include GHG reduction actions similar to those recommended in the 2017 Climate Change Scoping Plan. Policy CP-4.2 directs the City to prepare a Building Electrification Plan to retrofit existing homes and businesses to all electric. Policy CP-5.1 requires new buildings to meet a minimum LEEDTM Silver rating or equivalent and requires feasibility studies for net zero energy use, on-site renewable energy generation, and on-site batteries. In addition, the 2019 California Code of Regulations Title 24 Part 6 standards also now require that all homes built in California shall have zero-net-energy use, which is achieved through energy efficiency measures as well as required rooftop solar photovoltaic systems. The 2019 California Code of Regulations Title 24 Part 6 standards also apply to nonresidential developments and require a variety of energy efficiency measures to be implemented during construction of the structures to reduce energy usage as well as air emissions.

Plan Bay Area 2050: Strategy for a Sustainable Region

To achieve the ABAG and MTC sustainable vision for the San Francisco Bay Area, the Plan Bay Area 2050 land use concept plan concentrates most new population and employment growth in and around Priority Development Areas (PDAs). The City of South San Francisco is located within the North San Mateo County Super District that is forecasted to have an increase of 69,000 households between the baseline year of 2015 and the proposed plan year of 2050. Buildout of the proposed 2040 General Plan could yield up to 17,153 new residential units (based on 2019 baseline data from Fehr & Peers). As such, the proposed project would promote implementation of the Plan Bay Area 2050. In addition, the policies and actions of the General Plan Update encourage the use of alternative modes of travel and reduce dependence on auto use, consistent with Plan Bay Area's vision. As shown in Table 3.7-4 of the Draft Program EIR, the proposed project would be consistent with the GHG-related policy strategies contained in Plan Bay Area 2050.

The General Plan Update and updated 2022 CAP include GHG reduction actions which are consistent with the Plan Bay Area 2050 GHG-related policy strategies. Future projects would be required to comply with State standards for new construction as well as policies and actions of the General Plan Update and updated 2022 CAP that aim to reduce GHG emissions.

Bay Area Air Quality Management District 2017 Clean Air Plan

The BAAQMD 2017 Clean Air Plan contains control measures that focus primarily on reducing GHG emissions across the following sectors: stationary sources, transportation, energy, buildings, agriculture, natural and working lands, waste management, water, and super-GHG pollutants. Table 3.7-5 of the Draft Program EIR identifies the control measures from the 2017 Clean Air Plan that are relevant to the City and the proposed project's consistency with those measures. Future projects would be required to comply with requirements of the General Plan Update, updated 2022 CAP, and the City's Municipal Code and Zoning Ordinance that aim to reduce GHG emissions in the Planning Area (Draft Program EIR, Page 3.7-66—83). The proposed project's impacts related to GHG emissions

would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update and CAP policies and implementing actions. No mitigation is necessary.

Cumulative Impact

The proposed project's cumulative impacts related to GHG emissions would be less than significant (Draft Program EIR, Page 3.7-83—84).

Findings: Less than significant impact (Draft Program EIR, 3.7-84). No mitigation required.

Facts in Support of Findings: The analysis under Impacts GHG-1 and GHG-2 also addresses cumulative impacts, as GHG emissions related to implementation of the proposed project are not confined to a particular air basin but are dispersed worldwide.

As discussed under Impacts GHG-1 and GHG-2, the proposed project does not propose the construction of new housing or other development; rather, it provides a framework for future growth and development in South San Francisco. Development in the City is required to be analyzed for consistency with the General Plan Update, updated 2022 CAP, South San Francisco Municipal Code and Zoning Ordinance, and other applicable local and State requirements; comply with the requirements of CEQA; and obtain all necessary clearances and permits. Furthermore, existing federal, State, and local regulations and policies described throughout this section that serve to reduce communitywide GHG emissions would apply to future projects. This would reduce the proposed project's cumulative contribution to this impact.

As discussed under Impact GHG-1 and shown on Table 3.7-3 of the Draft Program EIR, the GHG emissions per service population for the General Plan buildout conditions would be within the 4.0 MT CO₂e per service population threshold necessary for the City to achieve its fair share of Statewide GHG reductions in accordance with the State's long-term GHG reduction targets.

Cumulative projects will also be required to comply with existing federal, State, and local regulations and policies to reduce communitywide GHG emissions. Lastly, cumulative projects will be required to comply with the requirements of CEQA and obtain all necessary clearances and permits (Draft Program EIR, Page 3.7-83-84). Accordingly, the proposed project's cumulative impacts related to GHG emissions would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update and CAP policies and implementing actions. No mitigation is necessary.

1.5.8 - Hazards and Hazardous Materials

Potential Effect

Impact HAZ-1	The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials (Draft Program EIR, Page 3.8-24-26).
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Findings: Less than significant impact (Draft Program EIR, 3.8-26). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development, as well as other private and public improvements throughout the Planning Area, which could result in an increase in the routine transportation, use, and disposal of hazardous materials. Exhibit 2-4 of the Draft Program EIR identifies the following land use designations that have the potential to generate hazardous materials: Business Technology Park, Business Technology Park High, Mixed Industrial, Mixed Industrial High, and Industrial Transition Zone. Construction and demolition activities may generate small amounts of hazardous waste or the release of hazardous building materials. All new development (construction and operations) would be required to comply with mandatory regulations for hazardous materials adopted by the EPA, OSHA, USDOT, DTSC, Caltrans, CHP, local CUPA, and BAAQMD.

Hazardous Material Transportation

Multiple agencies enforce federal and State regulations regarding transportation of hazardous materials on local roadways and railways and respond to hazardous material spills and releases that occur on roadways, railway lines, and at railroad crossings. Further, businesses handling or storing hazardous materials over threshold quantities are required to submit an HMBP to the local CUPA. Should an accident occur during transport of hazardous materials, the CUPA, South San Francisco Fire Department (SSFFD), and South San Francisco Police Department (SSFPD) would respond. The CHP conducts regular inspections of licensed transporters to assure regulatory compliance and responds to hazardous materials emergencies on roadways.

The General Plan Update contains policies and actions that would further minimize risk to the public or environment resulting from the transportation of hazardous materials and waste. Policy CHEJ-4.4 requires the City to maintain an up-to-date truck routes map that minimizes exposures to sensitive land uses from vehicles carrying hazardous materials and toxic waste. Action CR-1.3.1 requires the City to participate in the San Mateo County Hazard Mitigation Plan maintenance protocols and Countywide initiatives, adopt the Hazard Mitigation Plan by reference upon update, and update emergency operations plans and protocols to account for regularly updated hazard information. Policy CR-1.6 requires the City to continually strengthen emergency management capacity and coordination with the San Mateo County Emergency Operations Center. Policy CR-7.2 requires the City to cooperate with federal, State, and County agencies to effectively regulate the management of hazardous materials and hazardous waste. Lastly, Policy CR-7.3 requires the City to assess the use of hazardous materials as part of a development's environmental review and/or include the development of a hazardous management and disposal plan as a condition of project approval, subject to review by the San Mateo County Health Department.

Hazardous Material Use

The SSFFD and South San Francisco Building Division 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. Any businesses that generate or use hazardous materials within the Planning Area would also be subject to existing hazardous materials regulations such as those implemented by the local CUPA. The CUPA and SSFFD also conduct inspections for fire safety and hazardous materials management of businesses and residential dwellings. Businesses storing or handling hazardous

materials over threshold quantities are required to submit HMBPs pursuant to federal, State, and local regulations. These HMBPs must include measures for safe storage, use, and handling of hazardous materials, along with a contingency plan that describes the facility's response procedures in the event of a hazardous materials release.

The General Plan Update contains policies and actions that would further minimize risk to the public or environment resulting from the use of hazardous materials, including Policy CR-7.3 discussed above. Policy CHEJ-4.5 prohibits new nonresidential uses that are known to release or emit toxic waste at levels that are harmful to human health while continuing to allow life science, research and development, medical, and other necessary services such as dry cleaners. Policy LU-6.6 encourages the development of non-polluting industries that are not major sources of air, water, or noise pollution. Policy CR-7.1 requires the City to integrate updated remediation strategies related to hazardous materials in coordination with regulating agencies and continue annual emergency training related to hazardous materials. Lastly, Policy CR-7.4 requires the City to develop an awareness program to expand public engagement in the handling and disposal of hazardous waste in the community, especially at home.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, includes rules and regulations to minimize risk to the public or environment resulting from the use of hazardous materials. Section 20.300.009 (Performance Standards) (revised) states that the use, handling, storage, and transportation of hazardous and extremely hazardous materials shall comply with the provisions of the California Hazardous Materials Regulations and the California Fire and Building Code as well as the laws and regulations of the California Department of Toxic Substances Control and the County Environmental Health Agency. Further, activities, processes, and uses shall not generate or emit any fissionable or radioactive materials into the atmosphere, a sewage system or onto the ground. Lastly, all activities, processes, and uses involving the use of, or storage of, flammable and explosive materials shall be provided with adequate safety devices against the hazard of fire and explosion.

Hazardous Material Disposal

The disposal of hazardous materials is regulated and monitored by the City of South San Francisco (Chapter 8.20 of the Municipal Code), local CUPA, SSFFD, Cal/OSHA, and the DTSC consistent with the requirements of federal, State, and local regulations and policies.

The General Plan Update contains policies and actions that would further minimize risk to the public or environment resulting from the disposal of hazardous materials. These include Policy CR-7.2, Policy CR-7.3, and Policy CR-7.4, as discussed above. Action CR-7.4.1 requires the City to offer educational programming on the harmful effects and proper disposal of hazardous materials and pesticides and recommend alternatives that can be used at home and in businesses.

Estimating project-specific impacts is not possible as the proposed project does not describe specific development projects. Future projects would be subject to conducting an environmental analysis at the time a specific project is defined. 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 of individual projects (Draft Program EIR, Page 3.8-24-26).

The proposed project's impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact HAZ-2	The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment (Draft Program EIR, Page 3.8-26—28).
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Findings: Less than significant impact (Draft Program EIR, Page 3.8-28). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain existing land uses. Additionally, the proposed project may result in other private and public improvements throughout the City with the potential for environmental effects related to hazardous materials. Construction and demolition activities have the potential to release potentially hazardous materials into the environment. As noted above in Impact HAZ-1, compliance with mandatory regulations would reduce all potential construction-related impacts to a less than significant level, and General Plan Update policies and actions and the Zoning Ordinance would further reduce potential impacts and ensure that they are less than significant.

The General Plan Update contains several policies and actions that would minimize risk to the public or environment resulting from reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, including previously discussed Policy CR-7.3. Policy CHEJ-4.1 requires the City to support Brownfield remediation through cleanup and reuse of contaminated sites in Lindenville and East of 101 to protect human health. Action CHEJ-4.1.1 requires the City to maintain a map and database of contaminated, hazardous waste and substance sites (e.g., Cortese List). Action CHEJ-4.1.2 requires the City to implement any future City-prepared sea level rise adaptation plan for the Oyster Point Marina and landfill to prevent the release of toxins into the Bay. Lastly, Policy CHEJ-4.2 requires that contaminated sites are adequately remediated before allowing new development.

To prevent and minimize hazardous conditions to below a level of significance, existing local, State, and federal law will be enforced at all construction sites. Compliance with existing regulations would ensure that the public and environment are not exposed to any risks related to hazardous materials during demolition and construction. Future projects would comply with Cal/OSHA regulations concerning the use of hazardous materials, including requirements for safety training, exposure warnings, availability of safety equipment, and preparation of emergency action/prevention plans. All contaminated waste must be collected and disposed of at an appropriately licensed disposal or treatment facility.

Future development, including redevelopment, must comply with the California Code of Regulations. Title 8 of the California Code of Regulations establishes Cal/OSHA requirements related to public and worker protection. Topics addressed include materials exposure limits, equipment requirements, protective clothing, hazardous materials, and accident prevention. Construction safety and exposure standards for lead and asbestos are set forth in Title 8. Title 17 of the California Code of Regulations establishes regulations relating to use and disturbance of materials containing naturally occurring asbestos. Soil excavated during construction is regulated under Title 22 of the California Code of Regulations.

As previously discussed, development that disturbs one acre or more of soil must obtain permit coverage under the Construction General Permit by filing a NOI and SWPPP with the RWQCB prior to commencement of construction. The Best Management Practices in the SWPPP include measures to prevent spills and require on-site materials for cleanup.

At the time a specific future project is defined, it would be subject to conducting an environmental analysis. The City would review individual project applications to 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. (Draft Program EIR, Page 3.8-26-28).

The proposed project's impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact HAZ-3	The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school. (Draft Program EIR, Page 3.8-28-29).
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Findings: Less than significant impact (Draft Program EIR, Page 3.8-29). No mitigation required.

Facts in Support of Findings: The City is served by public and private schools, including 15 schools within the South San Francisco Unified School District (SSFUSD), one private elementary school, 10 preschools, and 10 daycare centers. Given the distribution of schools in the City, it is possible that future development and redevelopment associated with the proposed project, which may involve hazardous emissions or handling of hazardous materials and wastes, may occur within 0.25 mile of an existing or future school.

Development facilitated by the proposed project would be required to comply with existing federal, State, and local regulations related to hazardous materials, including those codified in General Plan Update Policies CR-7.3, CR-7.4, CHEJ-4.5, and LU-6.6 and Section 20.300.009 (Performance Standards) (revised) of the Zoning Ordinance.

In particular, the SSFFD and South San Francisco Building Division 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 proposed project would be required by the local CUPA to store, manage, and dispose of the materials in accordance with the Unified Program. Therefore, impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact HAZ-4	The proposed project would not be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment (Draft Program EIR, Page 3.8-29 – 30).
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Findings: Less than significant impact (Draft Program EIR, 3.8-30). No mitigation required.

Facts in Support of Findings: According to an EnviroStor search performed on February 2, 2022, a total of 29 sites are located within the Planning Area, including four active sites. According to a GeoTracker search performed on March 3, 2022, a total of 46 open sites are located within the Planning Area. Of the 46 open sites, seven are LUST Cleanup Sites: Arco #6073 (2300 Westborough Boulevard), California Golf Club of San Francisco (844 West Orange Avenue), Grand Avenue Gas (1086 Grand Avenue), Monfredini Property (477 Forbes), Tony's Services (209 El Camino Real), Union Carbide Corporation (7 South Linden Avenue), and Unocal #6980 (192 El Camino Real). Of the 46 open sites, two are land disposal sites: O'Brien-Haskins Former San Bruno Channel (500 East Jamie Court) and Oyster Point Landfill (Oyster Point Boulevard). As such, development facilitated by the proposed project could occur on a contaminated site. Future discretionary projects under the proposed project will be evaluated for project-specific impacts related to hazardous materials at the time they are proposed.

As discussed in Impact HAZ-1, HAZ-2, HAZ-3, and the Regulatory Framework of the Draft Program EIR, any development on a contaminated site would be required to comply with mandatory regulations, ensuring it does not create a significant hazard to the public or the environment. This includes Cal/EPA-enforced federal hazardous materials laws and regulations. The DTSC, a department of the Cal/EPA, requires programs such as HMBPs that include dealing with aftermath clean-ups of improper hazardous waste management, evaluation of samples taken from sites, enforcement of regulations regarding use, storage, and disposal of hazardous materials, and encouragement of pollution prevention.

The General Plan Update contains several policies and actions that would minimize risk to the public or environment resulting from the inadvertent discovery of hazardous materials on a project site. These include previously discussed Policy CR-7.3, Policy CHEJ-4.1, Policy CHEJ-4.2, and Action CHEJ-4.1.1. Action LU-6.6.1 requires the City to seek funding to finance cleanup and redevelopment of contaminated sites.

If hazardous materials are encountered during construction activities from development facilitated by the proposed project, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations set forth by the City of South San Francisco, EPA, OSHA, USDOT, DTSC, Caltrans, CHP, local CUPA, and BAAQMD. The City would review individual project applications to determine which General Plan Update policies and actions and Zoning Ordinance chapters apply (Draft Program EIR, Page 3.8-29—30). The proposed project's impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact HAZ-5	The proposed project would not result in a safety hazard or excessive noise for people residing or working in the project area (Draft Program EIR, Page 3.8-30—32).
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Findings: Less than significant impact (Draft Program EIR, Page 3.8-32). No mitigation required.

Facts in Support of Findings: Development envisioned by the proposed project is generally focused in already developed areas of the City; however, development could result in an incremental increase in the exposure of people residing or working in the Planning Area to a safety hazard or excessive noise because of proximity to SFO. The Planning Area is located within the Federal Aviation Regulation Part 77 SOI and within the boundaries of Airport Influence Areas A and B of the SFO ALUCP. Future projects would be required to comply with the policies and actions within the General Plan Update and the South San Francisco Municipal Code and Zoning Ordinance regarding interior noise standards and maximum building heights permitted under Federal Aviation regulations. Further, continued consultation with the C/CAG and Federal Aviation Administration for projects located in the vicinity of SFO will minimize the exposure of people residing or working in the City to a safety hazard or excessive noise because of proximity to SFO.

The General Plan Update contains policies and actions that minimize the exposure of people residing or working in the Planning Area to a safety hazard or excessive noise because of proximity to SFO. Policy SA-12.6 requires the City to encourage residential development in the South Spruce area that is within the 65 decibel (db) CNEL contour, provided the interior of a structure meets the standard indoor 45 db CNEL noise requirement. Action SA-12.6.1 requires the City to review the SFO ALUCP and, as needed, to update the City of South San Francisco's General Plan to be in conformance with land use compatibility standards in the ALUCP. Action SA-12.6.1 further states that in the event that updates to the ALUCP allow residential land uses on suitable sites on the El Camino Real corridor where residential is not currently permitted, the City will update the General Plan to allow Urban odd Residential uses. Lastly, Policy SA-21.3 requires the City to allow building heights in the East of 101 area to the maximum limits permitted under Federal Aviation regulations. Section 3.11, Noise, identifies additional policies and actions, as well as Mitigation Measure MM NOI-3, Airport Noise Impact Reduction Plan, to address potential exposure to people residing or working in the vicinity of SFO to excessive noise levels.

The City of South San Francisco will review future development applications for compliance with the policies and actions of the General Plan Update to reduce the exposure of people residing or working in the City to a safety hazard or excessive noise because of proximity to SFO. In addition, Chapter 15.08, CBC, and Chapter 8.32, Noise Regulations, of the City's Municipal Code would be reviewed when development applications are received. Further, Section 20.320.002 (Establishment of Lawful Nonconforming Uses, Structures and Lots) (revised) ensures that no permit shall be granted that would allow the establishment or creation of an airport hazard or permit a nonconforming structure or nonconforming use to be made or become higher or become a greater hazard to air navigation. In accordance with the SFO ALUCP, the City would consult with the C/CAG and Federal Aviation Administration when development applications for subsequent development under the proposed project in the vicinity of SFO are received, including submitting applications to the C/CAG for a determination of consistency with the SFO ALUCP (Draft Program EIR, Page 3.8-30-32; Errata, p. 3-3). The proposed project's impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact HAZ-6	The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan (Draft Program EIR, Page 3.8-32-34).
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Findings: Less than significant impact (Draft Program EIR, 3.8-34). No mitigation required.

Facts in Support of Findings: San Mateo County has developed an EOP that establishes policies and procedures and assigns responsibilities to ensure the effective management of emergency operations within the San Mateo County Operational Area. New development under the proposed project would be considered in the context of the San Mateo County EOP. As development occurs under the proposed project, the San Mateo County EOP can be modified to reflect new growth within the Planning Area. Most of the development facilitated by the proposed project would be served by existing emergency evacuation routes, which have sufficient capacity to accommodate projected growth.

The General Plan Update contains policies and actions that aim to continually strengthen emergency response and emergency evacuation. These include previously discussed Action CR-1.3.1 and Policy CR-1.6. Action CR-1.6.5 requires the City to maintain and communicate evacuation route plans for businesses and residents. Lastly, Policy CR-1.7 requires the City to expand the reach of the CERT program to strengthen community cohesion and emergency preparedness through community engagement efforts (Draft Program EIR, Page 3.8-32-34). The proposed project's impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Effect

The proposed project's cumulative impacts related to hazards and hazardous materials would be less than significant (Draft Program EIR, Page 3.8-34-36).

Findings: Less than significant impact (Draft Program EIR, 3.8-36). No mitigation required.

Facts in Support of Findings: The geographic scope of the cumulative impact analysis for hazards and hazardous materials is the South San Francisco Planning Area as well as the surrounding cities of Brisbane, Daly City, Pacifica, San Bruno, and Millbrae.

Hazards and Hazardous Materials: Cumulative projects would be subject to the requirements and regulations set forth by the EPA, OSHA, USDOT, DTSC, Caltrans, CHP, local CUPA, and BAAQMD related to transport, use, and disposal of hazardous materials. Cumulative projects will also be required to implement a SWPPP and comply with the California Code of Regulations during construction, site grading, excavation operations, and building demolition.

The proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update. The City of South San Francisco would review applications for development for compliance with General Plan Update policies and actions including, but not limited to, Policies CR-7.3, CHEJ-4.1, and CHEJ-4.2. Additionally, as previously stated, development under the proposed project would be required to comply with all requirements and regulations set forth by the City of South San Francisco, EPA, OSHA, USDOT, DTSC, Caltrans, CHP, local CUPA, and BAAQMD related to transport, use, and disposal of hazardous materials. Accordingly, development under the proposed project would not result in physical changes that would incrementally contribute to a significant environmental effect.

Airport Safety Hazards: Cumulative projects would be subject to the requirements and regulations set forth by the SFO ALUCP and Federal Aviation Administration related to the exposure of people residing or working in the area to a safety hazard or excessive noise. Cumulative projects would also be required to comply with General Plan policies and Municipal Code regulations related to interior noise standards and maximum building heights.

Moreover, the proposed project's incremental contribution to cumulative impacts would not be significant. As previously discussed, development under the proposed project could result in an increase in the exposure of people residing or working in the area to a safety hazard or excessive noise. Potential impacts would be reduced to below a level of significance, as discussed above, with compliance with the policies and actions within the General Plan Update including Policies SA-12.6 and SA-21.3 and Action SA-12.6.1, as well as Chapters 8.32 and 15.08 of the Municipal Code and Section 20.320.002 (revised) of the Zoning Ordinance to further reduce potential impacts related to the exposure of people residing or working in the area to a safety hazard or excessive noise. Further, continued consultation with the C/CAG and Federal Aviation Administration for projects located in the vicinity of SFO will minimize the exposure of people residing or working in the City to a safety hazard or excessive noise because of proximity to SFO. To ensure a less than significant contribution

to cumulative impacts, development consistent with the General Plan Update and Municipal Code will be required to implement all applicable policies during the design review process.

Emergency Response and Evacuation Plans: Cumulative impacts related to emergency response and evacuation plans would be less than significant. The SSFFD manages and maintains emergency plans and training of City staff and community members and focuses on activities that will prepare the community to take care of itself in the period immediately following a local disaster. For example, the CERT program educates volunteers about disaster preparedness for the hazards that may impact their area and trains them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations. In addition, San Mateo County has an EOP that is regularly updated. Adjacent jurisdictions also have emergency response plans and emergency evacuation plans. Furthermore, larger regional and statewide resource areas are regulated by State agencies to address larger-scale statewide issues.

Moreover, the proposed project's incremental contribution to these less than significant cumulative impacts would not be significant with the implementation of all applicable General Plan Update policies and actions. The City will review development applications for subsequent development under the proposed project for compliance with the policies and actions of the General Plan Update related to emergency response plans and emergency evacuation plans. Additionally, new development under the proposed project would be considered in the context of the San Mateo County EOP and is not expected to impair implementation of or physically interfere with the San Mateo County EOP (Draft Program EIR, Page 3.8-34 – 36).

The proposed project's cumulative impacts related to hazards and hazardous materials would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.5.9 - Hydrology and Water Quality

Potential Effect

Impact HYD-1	The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality (Draft Program EIR, Page 3.9-27-31).
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Findings: Less than significant impact (Draft Program EIR, Page 3.9-31). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses, with the majority of potential growth occurring within the East of 101, Lindenville, Downtown, and El Camino planning sub-areas. Additionally, the proposed project may result in other private and public improvements throughout the City with the potential for environmental effects related to hydrology and water quality. Future development under the proposed project would also be required to comply with the CWA and regulations enforced by the

RWQCB, the requirements of the South San Francisco Municipal Code and Zoning Ordinance, the General Plan Update, and Climate Action Plan policies and actions related to water quality.

Construction

Development under the proposed project could degrade surface and groundwater quality, if not properly controlled. Future development (including redevelopment of existing developed sites) that disturbs one acre or more of soil, or that is part of a common plan of development that disturbs one acre or more of soil, must obtain permit coverage under the Construction General Permit by filing an NOI and SWPPP with the RWQCB prior to commencement of construction. The SWPPP must describe the site, the 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. Inspection of construction sites before and after storms is required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

The General Plan Update includes policies and actions to protect water quality in and around the Planning Area during project construction. Policy ES-7.3 requires 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. Policy ES-2.1 requires the City to protect and expand existing marsh and wetland habitat to improve water quality. Policies ES-2.2 and ES-3.3 require the City to maintain standards for new construction adjacent to the San Francisco Bay and Colma Creek, such as maintaining (or increasing) building setbacks to support habitat areas, which will also assist in protecting water quality during construction. Lastly, Policy ES-3.4 requires the City to continue to implement stormwater management practices across the Colma Creek Watershed, such as the Orange Memorial Park Stormwater Capture Project to improve water quality and increase trash capture.

The South San Francisco Municipal Code contains rules and regulations to protect water quality during construction. Section 14.04.180 (Reduction of pollutants in stormwater) identifies construction-related BMPs to reduce pollutants entering the City storm sewer system. Section 14.04.132 (Site design measures for non-regulated projects) and Section 14.04.133 (Site design and stormwater treatment requirements for regulated projects) requires all new development and redevelopment projects to minimize disturbance of natural water bodies and drainage systems, protect slopes and channels, and conserve natural areas, including existing trees, other vegetation, and soils.

The Climate Action Plan includes actions that would protect water quality during construction. Implementation of Action CS-3.1 would enhance Colma Creek as an ecological corridor, creating transitional habitat zones to build resilience and ecosystem services, which would assist in protecting water quality during construction. Implementation of Action CS-2.1 would expand the canopy cover to reach the goals of the Urban Forest Master Plan, which would also assist in protecting water quality during construction.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations to protect water quality during construction.

Section 20.180.005 (Development Standards) (new) includes standards for the Flood Plain/SLR Overlay District which will also assist in protecting water quality during construction. For example, by installing fencing along riparian areas, pollution associated with construction such as fuel, grease, oil and other fluids, concrete material, sediment, and litter, would be managed and controlled on-site and not degrade off-site water quality. Section 20.310.002 (General Site and Building Design) (new) includes grading and drainage requirements for all projects throughout the City, including submittal of a grading plan for any grading on a site with a natural slope of 15 percent or greater, and slope stabilization to control against erosion, which will also assist in protecting water quality during construction.

Dewatering

Future development may encounter shallow groundwater, in which case dewatering of the excavation or trenching site may be required. If improperly managed, these dewatering activities could result in discharge of contaminated groundwater. In accordance with the General Waste Discharge Requirements for Extracted Groundwater from Structural Dewatering Requiring Treatment in the San Francisco Bay Region (Order No. R2-2018-0026; General NPDES Permit No. CAG912004), any contaminated groundwater would be treated prior to discharge or disposed of at an appropriate disposal facility or wastewater treatment plant. Also, discharges of dewatered groundwater to a storm drain must be conducted in a manner that complies with the San Francisco Bay RWQCB Order No. R2-2015-0049, MRP.

Section 14.08.290 (Harmful discharges) of the South San Francisco Municipal Code regulates excessive, accidental, and harmful discharges and directs the superintendent to suspend the wastewater treatment service or a wastewater discharge permit in order to stop an actual or threatened discharge in certain circumstances to protect the health or welfare of people or the environment. In addition, Chapter 14.08 of the South San Francisco Municipal Code provides for the regulation of direct and indirect dischargers to the to the publicly owned treatment works through the issuance of permits for certain nondomestic users and through enforcement of general requirements for all users, thereby further ensuring that dewatering activities do not degrade water quality in the Planning Area. Section 14.08.250 (Excessive discharge) directs the superintendent to impose mass limitations on users which are using dilution to meet applicable pretreatment standards or requirements, or in other cases where the imposition of mass limitations is appropriate. Section 14.08.260 (Accidental discharges) requires the submittal of detailed plans showing facilities and operating procedures to provide protection from accidental discharge of prohibited materials or other regulated substances to the City for review. The detailed plans shall be approved by the City before construction of the facility.

Operation

New development under the proposed project could add additional areas of impervious surfaces within the Planning Area and therefore, the volume and type of pollutants that are typically associated with urban runoff into the stormwater. These pollutants could result in water quality impacts to on-site and off-site drainage flows to area waterways.

The General Plan Update includes policies and actions intended to protect water quality in and around the Planning Area. These include Policies ES-7.3, ES-2.2, and ES-3.3 discussed previously

under “Construction”. Policy ES-7.1 requires the City to collaborate with regional agencies and neighboring jurisdictions to manage stormwater, reduce impervious surfaces, and improve water quality in the Colma Creek Watershed. Lastly, Policy ES-7.2 requires the City to integrate green infrastructure in City projects.

The South San Francisco Municipal Code also contains rules and regulations to protect water quality at operation, including Section 14.04.180, Section 14.04.132, and Section 14.04.133 as described above under “Construction.” Section 14.04.134 (LID requirements) requires that all regulated projects implement LID requirements as specified in NPDES Permit No. CAS612008 to reduce runoff and mimic a site’s predevelopment hydrology. Implementation of Action CS-3.1 and CS-2.1 of the Climate Action Plan, as described above under “Construction”, would protect water quality during operation.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations to protect water quality in the Planning Area such as Section 20.180.005 and Section 20.310.002, as described above under “Construction”. Section 20.300.007 (Landscaping) (revised) includes a number of requirements for new construction or rehabilitated landscapes, including the preparation of a soil management report and grading design plan to reduce runoff (Draft Program EIR, Page 3.9-27—31).

The proposed project's impacts related to hydrology and water quality would be less than significant or no impact with the implementation of applicable regulations, including General Plan policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-12.)

Potential Effect

Impact HYD-2	The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin (Draft Program EIR, 3.9-31—33).
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Findings: Less than significant impact (Draft Program EIR, Page 3.9-33). No mitigation required.

Facts in Support of Findings: Development under the proposed project could lead to an increased demand for water, which could lead to an increase in groundwater pumping. California Water Service (Cal Water) South San Francisco District, one of two water providers for the City, has historically pumped groundwater from the Westside Basin to supplement the supply from the San Francisco Public Utilities Commission (SFPUC). Groundwater has historically supplied 10 to 15 percent of the Cal Water South San Francisco District’s water demand. The Cal Water South San Francisco Water District groundwater supply is expected to be 100 percent reliable in all year types through 2045.⁶ Subsequent development under the proposed project could result in an increase in impervious surfaces, which could reduce stormwater and rainwater infiltration and transmitting of groundwater. Future development under the proposed project would be required to comply with

⁶ California Water Service (Cal Water). 2021. 2020 Urban Water Management Plan. South San Francisco District. Website: https://www.calwater.com/docs/uwmp2020/SSF_2020_UWMP_FINAL.pdf. Accessed April 20, 2022.

requirements of the South San Francisco Municipal Code and Zoning Ordinance, and the General Plan Update and Climate Action Plan policies and actions related to maximizing infiltration and rainwater retention.

The General Plan Update includes policies and actions to maximize infiltration and rainwater retention and minimize impacts to groundwater recharge, including Policies ES-2.2, ES-3.3, and ES-7.3 as described above in Impact HYD-1. Policy ES-7.4 requires the City to encourage pervious surfaces in new developments. Lastly, Policy ES-8.1 requires the City to optimize groundwater recharge from new and redevelopment projects by infiltrating stormwater in accordance with State, regional, and local requirements.

The South San Francisco Municipal Code also contains rules and regulations to maximize stormwater infiltration and rainwater retention and minimize impacts to groundwater recharge. These include Section 14.04.134, Section 14.04.132, and Section 14.04.133 as described above in Impact HYD-1. The Climate Action Plan includes actions to maximize stormwater infiltration and rainwater retention and minimize impacts to groundwater recharge. These include Actions CS 3.1 and CS 2.1, as discussed above in Impact HYD-1.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations to maximize stormwater infiltration and rainwater retention and minimize impacts to groundwater recharge. Section 20.180.005, described above in impact HYD-1, will assist in maximizing infiltration and rainwater retention. Section 20.300.007 would maximize stormwater infiltration and rainwater retention and minimize impacts to groundwater recharge (Draft Program EIR, 3.9-31 – 33).

The proposed project's impacts related to hydrology and water quality would be less than significant or no impact with the implementation of applicable regulations, including General Plan policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-12.)

Potential Effect

Impact HYD-3:	The project would not 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: i) result in substantial erosion or siltation on- or off-site; ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) impede or redirect flood flows (Draft Program EIR, Page 3.9-33—37).
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Findings: Less than significant impact (Draft Program EIR, Page 3.9-37). No mitigation required.

Facts in Support of Findings:

i) Erosion and Siltation

Future development would involve construction activities such as stockpiling, grading, excavation, paving, and other earth-disturbing activities. Loose and disturbed soils are more prone to erosion and loss of topsoil by wind and water. This could result in an increase in stormwater runoff and the potential to cause erosion or sedimentation in drainage swales and creeks. As discussed in Impact HYD-1, construction activities that disturb one or more acres of land surface are subject to the Construction General Permit adopted by the State Water Board, which requires development of a SWPPP and inspection of construction sites before and after storms to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

The South San Francisco Municipal Code and Zoning Ordinance set forth rules and regulations to manage stormwater, which would also reduce erosion and siltation on- or off-site caused by stormwater runoff. This includes Section 14.04.134 and Section 20.300.007 of the Municipal Code as discussed above in Impact HYD-1. Section 20.310.002 of the Zoning Ordinance, also described above in Impact HYD-1, would also reduce erosion and siltation on- or off-site caused by stormwater runoff. General Plan Update policies and actions would further reduce the potential for erosion and off-site siltation from construction-related soil disturbance. This includes Policies ES-2.2 and ES-3.3 described in Impact HYD-1 and Policy ES-7.4 described in Impact HYD-2. Policy CR-4.3 requires the City to discourage development on steep hillside areas greater than a 30 percent grade and limit grading to a minimum in such areas.

ii) Surface Runoff

Development under the proposed project encourages infill development and discourages development on hillsides. New development or redevelopment that would be allowed by the proposed project could increase the total impervious area within the Planning Area and increase stormwater runoff, which could result in flooding. However, as described previously, compliance with existing regulations and the General Plan Update and Climate Action Plan policies and actions, as well as adherence to the South San Francisco Municipal Code and Zoning Ordinance, would maximize stormwater infiltration and rainwater retention, which would in turn reduce stormwater runoff.

Chapter 14.04 of the South San Francisco Municipal Code contains regulations that seek to minimize impervious surfaces, minimize impacts from stormwater runoff, and follow LID requirements. Section 20.310.002 (new) of the South San Francisco Zoning Ordinance requires City Engineer approval of all drainage plans that alter the slope of contour of a site's existing drainage pattern. General Plan Update policies and actions would further reduce impacts from surface runoff, including Policies ES-7.3, ES-2.2, ES-3.3, and ES-7.4 as previously described in Impacts HYD-1 and HYD-2. Lastly, implementation of Climate Action Plan Actions CS 3.1 and CS 2.1, described in Impact HYD-1, would assist in maximizing infiltration and rainwater retention throughout the Planning Area, thereby reducing impacts from surface runoff.

iii) Exceedance of Storm Drain Capacity

New development or redevelopment that would be allowed by the proposed project could increase the total impervious area within Planning Area and increase stormwater runoff, which could exceed stormwater drainage facility capacity or create additional sources of polluted runoff. As described previously, implementation of General Plan Update Policies ES-2.2, ES-3.3, and ES-7.4 as well as Climate Action Plan policies and actions and adherence to the requirements of the South San Francisco Municipal Code and Zoning Ordinance would maximize the on-site infiltration capacity for new development and redevelopment projects and would minimize off-site water runoff. This includes previously described Chapter 14.04 and Section 20.310.002 of the South San Francisco Zoning Ordinance.

iv) Impacts to Flood Flows

Some areas of the Planning Area are located within the 100-year flood zone, and some areas are within the 0.2 percent annual chance flood hazard, which is referred to as the “500- year flood zone”. As such, development facilitated by the proposed project would occur within FEMA-designated 100-year flood zones with a 1 percent chance of being flooded in any given year. To a smaller extent, development facilitated by the proposed project would occur within 500- year flood zones. Subsequent development, infrastructure, and planning projects would be subject to the General Plan Update policies and actions, as well as the South San Francisco Municipal Code and Zoning Ordinance, to reduce the risks of flooding to City residents and properties. Furthermore, as described in the Regulatory Framework section, federal and State agencies are responsible for maintaining flood protection features in the City, including the USACE and BCDC.

The General Plan Update includes policies and actions specifically designated to address flood hazards, including previously described Policy ES-2.1. Policy CR-2.3 requires the City to prioritize green infrastructure in the Colma Creek Watershed to reduce flooding in developed areas through continually updated site-specific design guidelines, LID, and design standards for public infrastructure projects. Policy CR-2.5 requires new development to account for SLR in all project applications, including the identification of areas of a parcel subject to flooding, the potential depth of flooding, and raising base floor elevation above the FEMA Base Flood Elevation to include SLR projections expected for the lifetime of the project. Policy CR-3.1 requires the City to continue to work with San Mateo County Flood and SLR Resiliency District on developing and implementing adaptation options for Colma Creek, restore creek ecologies, and create transitional habitat zones to build resilience against flooding.

The South San Francisco Municipal Code also contains rules and regulations to address flood hazards. Section 15.56.140 (Development permit) requires that a development permit be obtained before any construction or other development occurs within an area of special flood hazard. Section 15.56.160 (Standards of construction) includes construction standards for all projects within special flood hazard zones, including anchoring, construction materials and methods, elevation and floodproofing. Section 15.56.170 (Standards for utilities) requires that all new and replacement water supply and sanitary sewage systems be designed to minimize or eliminate infiltration of floodwaters into the systems and discharge from the systems into floodwaters. Section 15.56.170

also requires that all on-site waste disposal systems be located to avoid impairment to them, or contamination from them during flooding. Lastly, Section 15.56.220 (Coastal high hazard areas) includes standards for construction in coastal high hazard areas. For example, all new construction or other development shall be located on the landward side of the reach of mean high tide. In addition, all new residential and nonresidential construction, including substantial improvements, shall be elevated on adequately anchored pilings or columns and securely anchored to such pilings or columns so that the bottom of the lowest horizontal structural member of the lowest floor (excluding the pilings or columns) is elevated to or above the base flood level. Implementation of Action CS-3.1 and Action CS-2.1 of the Climate Action Plan, as described above in Impact HYD-1, would increase stormwater infiltration and rainwater retention and assist in minimizing flood hazards.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations to maximize stormwater infiltration and rainwater retention, which would assist in minimizing flood hazards. This includes previously discussed Section 20.180.005 (Development Standards) (new) which includes standards for the Flood Plain/SLR Overlay District (Draft Program EIR, Page 3.9-33-37).

The proposed project's impacts related to hydrology and water quality would be less than significant or no impact with the implementation of applicable regulations, including General Plan policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-12.)

Potential Effect

Impact HYD-4	The proposed project could be located in a flood hazard zone, tsunami, or seiche zone, and could risk release of pollutants due to project inundation (Draft Program EIR, 3.9-38-40).
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Findings: Less than significant impact (Draft Program EIR, 3.9-40). No mitigation required.

Facts in Support of Findings:

Inundation by Seiche

Seiches are changes or oscillations of water levels within a confined body of water. There are no large, confined water bodies within the City of South San Francisco.

Inundation By Flooding (Including Sea Level Rise)

As described under Impact HYD-3, some areas of the Planning Area are located within the 100-year flood zone, and some areas of the Planning Area are located within the 0.2 percent annual chance flood hazard, which is referred to as the “500-year flood zone”.

The appellate court has specifically held that an EIR need not contain an extensive analysis of sea level rise (SLR) or evaluate the potential impacts of SLR on a project. (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473-74 [Ballona]). Therefore, this discussion related to project site inundation from SLR is included for informational purposes. Exhibit 3.9-3 of the Draft Program EIR shows the projected SLR and coastal flooding by 2100 along the coast of South San

Francisco. A significant number of public facilities and infrastructure, buildings, and other structures are likely to be affected based on a vulnerability assessment conducted by San Mateo County. Portions of US-101, Fire Stations 61 and 62, the former Oyster Point Landfill, Bay Trail, South San Francisco-San Bruno Water Quality Control Plant, and SFO are among the large public assets exposed to future SLR.⁷

In addition to the policies and actions identified under Impact HYD-3 that address flood hazards, the General Plan Update contains policies and actions to address SLR. Policy CR-2.2 requires the City to pursue a comprehensive shoreline management plan that uses a variety of adaptation solutions to protect the shoreline and enhance ecosystem resilience. Action CR-2.2.1 requires the City to continue ongoing collaboration with the USACE to protect existing and future development by raising levees or seawalls in accordance with the Continuing Authorities Program Study. Action CR-2.2.1 also requires the implementation of any future City-prepared SLR adaptation plan for the Oyster Point Marina and landfill. Action CR-2.2.2 requires the City to explore nature-based solutions appropriate for the South San Francisco shoreline, particularly at the mouth of Colma Creek, to provide protection for the built environment and ecosystems.

The South San Francisco Municipal Code and Zoning Ordinance contain rules and regulations related to flood hazards and SLR. This includes previously discussed Section 15.56.140, Section 15.56.160, and Section 15.56 of the Municipal Code and Section 20.180.005 of the Zoning Ordinance. Chapter 15.56 (Flood Damage Prevention) of the Municipal Code aims to promote the public health, safety, and general welfare, and minimize public and private losses due to flood conditions in specific areas by legally enforceable regulations applied uniformly throughout the community to all publicly and privately owned land within flood prone, mudslide [i.e., mudflow] or flood-related erosion areas.

Mandatory federal, State, and local regulations govern the storage and use of hazardous materials to ensure appropriate containment to prevent spills. In addition, General Plan Action LU-6.6.1 requires the City to seek funding to finance cleanup and redevelopment of contaminated sites. Lastly, Action CHEJ-4.1.2 requires the City to implement any future City-prepared SLR adaptation plan for the Oyster Point Marina and landfill to prevent the release of toxins into the Bay.

Inundation by Tsunami

Portions of the City that are low-lying and located in the eastern side and adjacent to San Francisco Bay, are susceptible to inundation from a tsunami as shown in Exhibit 3.9 of the Draft Program EIR. As such, development facilitated by the proposed project could be located within a tsunami inundation area, exposing structures, infrastructure, and people to inundation in the event of a tsunami. As detailed above, the policies and actions of the General Plan Update and regulations in the South San Francisco Municipal Code and Zoning Ordinance that address flood hazards and SLR would also protect structures, infrastructure, and people in the event of inundation by tsunami.

Moreover, the General Plan Update contains policies and actions to prepare the City to respond to natural disasters and minimize damage and injury caused by these events, including tsunamis. Action

⁷ Sea Change San Mateo County. 2018. Sea Level Rise Vulnerability Assessment. Website: <https://seachangesmc.org/vulnerabilityassessment/>. Accessed April 16, 2022

CR-1.3.1 requires the City to actively participate in the San Mateo County Hazard Mitigation Plan maintenance protocols and Countywide initiatives, adopt the Hazard Mitigation Plan by reference upon update, and update emergency operations plans and protocols to account for regularly updated hazard information. Policy CR-1.6 requires the City to continually strengthen emergency management capacity and coordination with the San Mateo County Emergency Operations Center. Action CR-1.6.1 requires the City to develop a resiliency hub program to help community members with disaster planning assistance and supplies. Lastly, Action CR-1.6.2 requires the City to add a second floor to the City's Emergency Operations Center (EOC), add a warehouse to store supplies to support the City in the event of a disaster, and ensure the EOC has the necessary capabilities and can continue operations after all future hazards.

Additionally, Section 3.8, Hazards and Hazardous Materials, provides more detail on mandatory federal, State, and local regulations that govern the storage and use of hazardous materials to ensure appropriate containment to prevent spills. In addition, General Plan Action LU-6.6.1 and CHEJ-4.1.2, described above, relate to the cleanup and redevelopment of contaminated sites and the prevention of the release of toxins into the Bay (Draft Program EIR, 3.9-38-40). The proposed project's impacts related to hydrology and water quality would be less than significant or no impact with the implementation of applicable regulations, including General Plan policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-12.)

Potential Effect

Impact HYD-5	The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan (Draft Program EIR, Page 3.9-40-41).
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Findings: Less than significant impact (Draft Program EIR, 3.9-41). No mitigation required.

Facts in Support of Findings: The City is within the jurisdiction of the San Francisco Bay RWQCB. The RWQCB has established regulatory standards and objectives for water quality in San Francisco Bay in its Water Quality Control Plan for the San Francisco Bay Basin, commonly referred to as the Basin Plan.

As discussed under Impact HYD-1, construction and operation of development facilitated by the proposed project would be required to comply with CWA, the General Plan Update policies and actions, the South San Francisco Municipal Code and Zoning Ordinance, and the mandatory NPDES permit requirements. Future development under the proposed project at construction and operation would not violate any water quality standards or WDRs or otherwise substantially degrade surface or groundwater quality, in compliance with the San Francisco Bay Basin Plan.

As discussed under Impact HYD-2, groundwater supply is expected to be 100 percent reliable in all year types through 2045.⁸ Additionally, the General Plan Update contains several policies and actions that would facilitate groundwater recharge by encouraging pervious surfaces in new developments

⁸ California Water Service (Cal Water). 2021. 2020 Urban Water Management Plan. South San Francisco District. Website: https://www.calwater.com/docs/uwmp2020/SSF_2020_UWMP_FINAL.pdf. Accessed April 20, 2022.

and requiring projects to meet federal, State, regional, and local stormwater requirements, including stormwater infiltration (Draft Program EIR, Page 3.9-40-41).

The proposed project's impacts related to hydrology and water quality would be less than significant or no impact with the implementation of applicable regulations, including General Plan policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-12.)

Cumulative Effect

The proposed project's cumulative impacts related to hydrology would be less than significant (Draft Program EIR, Page 3.9-41—42).

Findings: Less than significant impact (Draft Program EIR, Page 3.9-41). No mitigation required.

Facts in Support of Findings: The geographic context for an analysis of cumulative impacts is the Colma Creek Watershed, which includes Colma, Daly City, South San Francisco, and portions of unincorporated San Mateo County.⁹

Cumulative development in the watershed contributes to an incremental increase in impervious surfaces that could introduce pollutants that are typically associated with urban runoff into the stormwater and/or contribute to cumulative flood conditions in the watershed. Cumulative development could also contribute to water quality impacts in the watershed from construction activities. Cumulative impacts would be less than significant because future cumulative development, infrastructure, and planning projects would be subject to local, State and federal permit requirements and would be required to comply with City (Colma, Daly City, South San Francisco) and San Mateo County ordinances and San Mateo County General Plan policies, as well as other water quality regulations that control construction-related and operational discharge of pollutants in stormwater. The water quality regulations implemented by the RWQCB take a basin-wide approach and consider water quality impairment in a regional context that addresses the entire geographic context of the Colma Creek Watershed. For example, the Construction General Permit ties receiving water limitations and basin plan objectives to terms and conditions of the permit, and the MS4 Permit works with all municipalities within the Colma Creek Watershed (Colma, Daly City, South San Francisco, and unincorporated San Mateo County) to manage stormwater systems to be collectively protective of water quality. If a CWA Section 404 permit is required, the USACE would have approval authority.

Moreover, the proposed project's incremental contribution to less than significant cumulative impacts would not be significant with implementation of the policies and actions proposed in the General Plan Update and the South San Francisco Municipal Code and Zoning Ordinance. As previously discussed, future development under the proposed project would be required to conform to federal, State, and local policies that would reduce hydrology and water quality impacts to less than significant levels. When applicable, any additional new development within the Planning Area

⁹ County of San Mateo. 2022. Colma Creek Watershed. Website: <https://www.smcgov.org/publicworks/colma-creek-watershed>. Accessed April 24, 2022.

would be subject, on a project-by-project basis, to independent CEQA review as well as policies and actions in the General Plan Update, the South San Francisco Municipal Code and Zoning Ordinance, and other applicable City requirements that reduce impacts related to hydrology and water quality. More specifically, potential changes related to stormwater quality, stormwater flows, drainage, impervious surfaces, and flooding would be minimized by the implementation of stormwater control measures, bioswales, infiltration, and LID measures, and review by the City Engineer to integrate measures to reduce potential flooding impacts. Therefore, development under the proposed project would not have a cumulatively considerable contribution to a cumulative hydrology impact (Draft Program EIR, Page 3.9-41—42).

The proposed project's cumulative impacts related to hydrology and water quality would be less than significant or no impact with the implementation of applicable regulations, including General Plan policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-12.)

1.5.10 - Land Use and Planning

Potential Effect

Impact LAND-1	The proposed project would not physically divide an established community (Draft Program EIR, Page 3.10-15—17).
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Findings: Less than significant impact (Draft Program EIR, 3.10-17). No mitigation required.

Facts in Support of Findings: The physical division of an established community typically refers to the construction of a physical feature or the removal of a means of access that would impair mobility within an existing community, or between a community and outlying areas. The proposed project does not contemplate or authorize any such physical changes to the community. With implementation of the General Plan Update and CAP policies and actions, the proposed project would support community connectivity. New development that occurs within South San Francisco is anticipated to consist of infill development and redevelopment of existing developed properties. Infill development and redevelopment generally do not divide established communities, as they typically occur within individual parcels or adjoining parcels. Future development occurring under the proposed project would be required to demonstrate consistency with the applicable regulations requiring connectivity (See generally, Section 3.10, Land Use and Planning, of the Draft Program EIR).

The General Plan Update contains a multitude of policies and actions to require and ensure community connectivity as buildout occurs. Policy LU-1.2 requires connectivity in complete neighborhoods. Policy LU-1.4 requires the maintenance and expansion of public facilities and services including co-locating new public projects near compatible civic uses, thereby encouraging community connectivity. Policy LU-1.7 facilitates the construction of new neighborhoods in Lindenville and East of 101 that are well connected. Policies LU-2.1 and LU-2.3 prioritize development near transit centers and transit-oriented communities with strong pedestrian, shuttle, and bicycle connections. Policy LU-6.1 prohibits the introduction of new residential, commercial, and other nonresidential uses in areas designated as Mixed Industrial High to preserve land for industrial uses. Policy LU-6.2 prohibits additional encroachment of incompatible uses into industrial areas in

Lindenville and East of 101, except where residential growth is planned. Policy LU-7.1 promotes complete neighborhoods that provide convenient access to a range of goods and services. Policy LU7.5 fosters pedestrian and bicycle access. Policy LU-8.3 requires the improvement of pedestrian connections and sidewalk infrastructure. Policy MOB-2-1 requires the incorporation of complete streets improvements into all roadway and development projects. Action MOB-2.1.1 ensures that all roadway and development projects are designed and evaluated to meet the needs of all street users, and that development projects contribute to multimodal improvements in proportion to their potential impacts on vehicle miles traveled. Action MOB-2.1.3 implements the Active South City Pedestrian and Bicycle Plan. Action MOB-2.2.1 requires collaboration with the SSFUSD to implement Safe Routes to Schools programs and improvements, with an emphasis on schools serving equity priority communities. Action MOB-3.2.2 incorporates new street connections to better distribute vehicle trips across South San Francisco’s street network, especially in the East of 101 area.

The Climate Action Plan (CAP) includes a number of actions to ensure community connectivity as buildout occurs. Implementation of Action TL-2.3 would evaluate the current and best use of curb space in the City’s activity centers and repurpose space to maximize people served (i.e., for loading, bikeways, bike parking, bus lanes, EV charging, or parklets). Implementation of Action TL-2.5 would ensure that all new land use and transportation projects adhere to the City’s Vehicle Miles Traveled (VMT) Analysis Guidelines and qualitatively assess the proposed project’s effect on multimodal access. Implementation of Action TL-2.5 would allow for the use of the development review process to identify opportunities to enhance bicycle, pedestrian, and transit connectivity. Implementation of Action TL-2.6 would ensure that all roadway and development projects are designed and evaluated to meet the needs of all street users and that development projects contribute to multimodal improvements in proportion to their potential impacts on VMT. Implementation of Action TL-2.8 would improve transit station access by leveraging public-private partnerships to increase transit ridership and improve transit station access by incorporating first/last mile bus, shuttle, and active transportation connections between employment hubs and regional transit stations.

The South San Francisco Zoning Ordinance, including the new or revised chapters of the Zoning Ordinance that are part of the proposed project, define allowable land uses and development standards for each Base Zoning District, Overlay District, and Specific and Area Plan Districts. Some of the development standards include building heights, building setbacks, and standards for fences and walls to ensure that community connectivity is maintained as future development occurs within the Planning Area. In addition, Section 20.300.014 (Underground Utilities) requires that all exterior utilities, including but not limited to drainage systems, sewers, natural gas lines, water, electrical, telephone, cable television, and similar distribution lines providing direct service to a development site shall be installed and maintained underground within a project site. Further, all on-site underground utilities shall be designed and installed to minimize the disruption of off-site utilities, paving and landscaping during construction and maintenance.

The South San Francisco Municipal Code contains rules and regulations to ensure community connectivity as buildout occurs. Chapter 13.16 (Underground Utility Installations) contains regulations for the installation, maintenance, use, and removal of underground utilities as well as responsibilities of property owners and utility companies. Chapter 14.14 (Sewer Lateral

Construction, Maintenance, and Inspection) contains regulations regarding the operation and maintenance of the City’s sewer system. Section 19.16.030 (Utility Easements) states that easements not less than 10 feet wide shall be required within or across lots where necessary for underground utilities, cables, wires, street trees, drainage, conduit and water mains or other utilities (Draft Program EIR, Page 3.10-15-17).

The proposed project’s impacts related to land use would be less than significant or no impact with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-13.)

Potential Effect

Impact LUP-2	The proposed project 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 (Draft Program EIR, Page 3.10-18-21).
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Findings: Less than significant impact (Draft Program EIR, Page 3.10-21). No mitigation required.

Facts in Support of Findings:

The General Plan Update is consistent with Government Code Section 65300 and includes the seven mandatory elements. Some elements have been combined and additional relevant elements have been added. Consistent with General Plan Update requirements under State Planning and Zoning law, added elements will be submitted for review and approval by applicable State agencies. Also consistent with Government Code Section 65300, the General Plan Update is internally consistent, plans for the long term (horizon year of 2040), includes all land within the city limits and SOI (Planning Area) and is readily available to the public.

The proposed project would draft new and revise existing elements of the City’s current general plan. As such, the adoption of the General Plan Update would serve as a self-mitigating aspect of the proposed project and inconsistency with the existing general plan prior to the update would not be considered a potential significant impact.

Likewise, the City’s Zoning Code Amendments would be revised to implement the proposed project, consistent with State Law (Government Code § 65860(a)). The Zoning Code Amendments would translate the General Plan Update policies into specific requirements, development standards and performance criteria to guide the review and consideration of individual development projects.

The General Plan Update, Zoning Code Amendments, and CAP all include various regulations with the intention of avoiding or mitigating environmental effects. The Zoning Code Amendments are necessary to implement the General Plan Update and are therefore internally consistent. The City’s CAP was designed in concert with the General Plan Update to provide clear policy guidance to City staff and decision-makers on how to reduce GHG emissions and therefore, inherently mitigates environmental effects. Furthermore, the CAP aligns with new State regulations and targets related to climate change. The potential environmental impacts related to the implementation of these

regulatory documents is considered throughout the Draft Program EIR. Lastly, the proposed project would be consistent with the City's various Specific Plans, Master Plans, and Area Plans as evidenced by the General Plan Update's Action LU-2.1.3, which requires the review and update of existing plans to ensure consistency.

Future development under the proposed project would be required by the City to demonstrate consistency with applicable federal, State, and local policies including those mitigating or avoiding environmental impacts through the mechanisms of project permitting and approvals.

Senate Bill 375 and Plan Bay Area 2050

Plan Bay Area 2050 is a 30-year, long-range strategic plan focused on the interrelated elements of housing, the economy, transportation, and the environment. As a regional land use plan, Plan Bay Area 2050 aims to reduce per capita GHG emissions by promoting more compact, mixed-use residential and commercial neighborhoods located near transit, and therefore aims to reduce and/or mitigate environmental impacts. Plan Bay Area 2050 implements Senate Bill (SB) 375; however, SB 375 does not directly require local land use policies, regulations, or general plans to be consistent with Plan Bay Area 2050. Instead, it requires consistency between regional transportation planning processes and local housing planning processes. Because both Plan Bay Area 2050 and the General Plan Update use similar growth projections and were developed in consideration of each other, the General Plan Update would not be expected to conflict with Plan Bay Area 2050.

Airport Land Use Compatibility Plan

The proposed project would intensify land uses within the East of 101, Lindenville, Downtown, and El Camino planning subareas to create more housing units and employment opportunities. Portions of proposed mixed-use residential land use designations are located within SFO's runway safety zone boundaries and 65 decibel (dB) CNEL noise contour. Some of the Planning Area is located within the 70 dB CNEL noise contour. Residential developments in this area would be required to undergo federal, State, and local regulatory review processes specific to airport noise, airspace safety, and other land use compatibility standards, including 14 Code of Federal Regulations Part 77 regulations for the safety, efficient use, and preservation of navigable airspaces. The SFO ALUCP requires grant of an aviation easement as a condition of allowing residential development within the 65 dB contour. Disclosure regarding airport noise is also required under South San Francisco Municipal Code Chapter 15.58. Residential uses are designated as incompatible with the 70 dB counter and higher. Residential uses East of 101 would experience significant noise disturbances from aircraft departures.

As discussed under Impact HAZ-5, portions of the Mixed Industrial High, Business Technology Park High, East of 101 Mixed Use, High Density Mixed Use, Urban Residential, and El Camino Mixed Use High land use designations are located within various Safety Compatibility Zones. Future projects within the Mixed Industrial High land use designations have the potential to conflict with Zone 2 restrictions. Future projects within the Business Technology Park, East of 101 Mixed Use, and High-Density Mixed-Use land use designations have the potential to conflict with Zone 3 restrictions. Furthermore, future projects within the El Camino Mixed Use High land use designation have the potential to conflict with Zone 4 restrictions.

The ALUCP for the Environs of SFO specifies how land near airports is to be used, based on safety and noise compatibility considerations, develops height restrictions for new development to protect airspace in the vicinity of the airport, and establishes construction standards for new buildings near airports, including sound insulation requirements. Local plans, policy actions, or development activities that affect areas within that boundary must receive ALUC approval or have a finding of overriding considerations prior to local permit issuance. The SFO ALUCP requires all residential development within Area A, which is the entirety of San Mateo County, to provide real estate disclosures (see SFO ALUCP Appendix G-7). Additionally, within Area B, the ALUC (C/CAG of San Mateo County) is responsible for reviewing proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezoning, and land development proposals. As such, the City is required to submit the General Plan Update to the ALUC for review and approval and future development within the SFO ALUCP areas must also be referred to the ALUC for a determination of consistency with the 2011 California Airport Land Use Planning Handbook and the SFO ALUCP. In reviewing individual project applications, the City would determine which policies and actions apply and whether project modifications would be required to ensure compatibility with the ALUCP, depending on the specific characteristics of the project type and/or project site during the development review process. Buildings within the ALUCP area would be required to comply with FAA regulations for height.

Furthermore, the General Plan Update includes policies and actions related to land use compatibility. Action SA-12.5.1 requires the General Plan to be in conformance with land use compatibility standards in the ALUCP. Policy SA-21.3 allows building heights within maximum limits permitted under FAA regulations. These actions, along with the requirements of the ALUCP and South San Francisco Municipal Code ensure that future development would be consistent with the ALUCP. Therefore, the proposed project would not cause a significant environmental impact due to a conflict with ALUCP for the purpose of avoiding or mitigating an environmental effect.

San Francisco Public Utilities Commission

The SFPUC has several water transmission pipelines that traverse the City, generally in a north–south direction within right-of-way lands that are typically 80 feet wide. Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area, some of which may occur along SFPUC right-of-way lands. The SFPUC may permit a secondary use on the right-of-way. It also maintains a Right-of-Way Encroachment Removal Policy and a Right-of-Way Vegetation Management Plan that addresses existing and future encroachments, maintenance and security. Future buildout of the proposed project located within SFPUC right-of-way would be required to apply for and have approved any secondary use through the SFPUC’s formal process, ensuring that the future development would not conflict with SFPUC right-of-way regulations adopted for the purpose of avoiding or mitigating an environmental effect (Draft Program EIR, Page 3.10-15-17).

Accordingly, the City finds that the proposed project’s impacts related to land use would be less than significant or no impact with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-13.)

Cumulative Effects

The proposed project's cumulative impacts related to land use and planning would be less than significant (Draft Program EIR, Page 3.10-21—22).

Findings: Less than significant impact (Draft Program EIR, Page 3.10-22). No mitigation required.

Facts in Support of Findings: The geographic context for analysis of cumulative impacts related to land use and planning generally includes the Planning Area and San Mateo County.

Cumulative development is likely to continue occurring in the surrounding incorporated and unincorporated areas of San Mateo County, most of which would take place in urbanized areas as infill development and would not require significant land use changes that would create land use conflicts, nor would they divide existing communities. Development would be subject to the land use plans, policies, and regulations of the applicable jurisdiction. As such, development within incorporated and unincorporated areas of San Mateo County is not likely to create significant land use conflicts or divide existing communities.

The proposed project's incremental contribution to cumulative land use impacts would also not be significant. The land uses allowed under the proposed project provide opportunities for cohesive new growth and redevelopment on existing parcels within developed areas. As discussed under Impacts LUP-1 and LUP-2, the proposed project would promote strategic development alongside existing land uses. The proposed General Plan Update contains policies and actions that support a connected community and promotes a network of pedestrian and bicycle trails that enhance neighborhoods. Implementation of the proposed project would not include approval of linear infrastructure projects that may create a barrier or physically divide an established community. The proposed project does not conflict with any applicable land use plan, policy, or regulation, adopted for the purpose of avoiding or mitigating an environmental effect, including the SFO ALUCP or SFPUC regulations. As such, development anticipated under the proposed project would not create substantial land use impacts or result in the physical division of existing communities. New development and redevelopment consistent with the proposed project would be designed to complement the character of existing neighborhoods and provide connectivity between existing development and new development within the cumulative analysis area. Further, the proposed project does not approve the construction or development of any new roadways, walls, bridges, major infrastructure, or other features that would divide existing neighborhoods within the cumulative analysis areas. Accordingly, the proposed project's contribution to cumulative impacts would also be less than significant (Draft Program EIR, Page 3.10-21-22). The City finds that the proposed project's cumulative impacts related to land use would be less than significant or no impact with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-13.)

1.5.11 - Noise

Potential Effect

Impact NOI-2	The proposed project would not result in generation of excessive groundborne vibration or groundborne noise levels (Draft Program EIR, Page 3.11-32-34).
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Findings: Less than significant impact (Draft Program EIR, Page 3.11-34). No mitigation required.

Facts in Support of Findings: New development under the proposed project would result in additional residential and nonresidential development, as well as other private and public improvements, throughout the Planning Area. The short-term and long-term groundborne vibration impacts associated with construction and operations are discussed separately below.

Construction-Related Vibration

Construction activity can result in varying degrees of ground vibration, depending on the equipment used on the site. Table 3.11-3 of the Draft Program EIR provides approximate vibration levels for specific types of construction equipment and activities. Construction vibration levels from future development projects under the proposed project, including other private and public improvements, could exceed the FTA damage threshold criteria of 0.12 in/sec PPV. Construction vibration sources can be mitigated to acceptable levels either at the source or on the adjacent property using alternate equipment, adequate setbacks, or by digging temporary trenches between the source and the receptor.

Mandatory requirements in the General Plan Update will ensure that construction vibration impacts associated with future development projects under the proposed project remain less than significant. 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. 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 Section 20.300.009 (Performance Standards) (revised) of the Zoning Ordinance. These required site-specific analyses would identify measures such as setback requirements, 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 is monitored by City grading and building department personnel.

Operation-Related Vibration

The primary source of groundborne vibration generated within the boundaries of South San Francisco is rail activity from BART and the Southern Pacific Railroad line. Based on the FTA Guidelines, the screening distance for conventional railroad activity is 200 feet for residences and other buildings where people sleep. Groundborne vibration from rail activity could result in levels of annoyance or disturbance for residential-type land uses located within 200 feet of existing rail lines within the City. However, BART remains underground throughout the City and compliance with mandatory requirements of the General Plan Update will ensure that railroad groundborne vibration impacts are minimized to acceptable levels. Policy NOI-2.2 requires that a vibration impact analysis

be prepared for new land use developments located within 200 feet of an existing rail line (Draft Program EIR, Page 3.11-32-34).

The proposed project's impacts related to vibration would be less than significant with the implementation applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Effects

The proposed project's cumulative impacts related to noise would be less than significant (Draft Program EIR, Page 3.11-36-37).

Findings: Less than significant impact (Draft Program EIR, Page 3.11-37). No mitigation required.

Facts in Support of Findings: The geographic scope of the cumulative impact analysis for Noise is the South San Francisco Planning Area as well as the surrounding cities of Brisbane, Daly City, Pacifica, San Bruno, and Millbrae; however, it is important to note that noise is by definition a localized phenomenon and reduces in magnitude as the distance from the noise source increases.

Cumulative traffic noise levels would have the highest increase of 1.7 dBA compared to existing traffic noise levels, along the segment of Grand Avenue from Linden Avenue to Airport Boulevard. The noise levels resulting from future development under the proposed project would be 61.9 dBA CNEL along this segment of Grand Avenue. These traffic noise levels are considered normally acceptable for all types of land uses. Therefore, this increase is not considered a cumulative impact. As shown in Table 3.11-8 of the Draft Program EIR, for every modeled roadway segment that would result in traffic noise levels that would exceed normally acceptable standards for some land uses, the contribution of future development under the proposed project to those impacted roadway segments is less than a 1 dBA increase or even results in a decrease in noise levels, compared to noise levels that would exist without the proposed project. Therefore, development under the proposed project would not have an incremental contribution to the less than significant cumulative impact, and traffic-related noise levels from the proposed project would not result in a cumulatively considerable contribution to the noise environment in the vicinity of the proposed project.

With regard to stationary source noise impacts, cumulative development would be required to comply with existing planning regulations regarding noise. In addition, the implementation of MM NOI-1, Operational Noise Reduction Plan, would reduce stationary source noise impacts from future development under the proposed project to less than significant and would not result in any substantial permanent increase in ambient noise levels. Therefore, stationary source noise levels from implementation of the proposed project would not result in a cumulatively considerable contribution to the environment in the vicinity of the proposed project.

The major sources of groundborne vibration within the Planning Area are temporary construction and ongoing railroad activity. These sources do not constitute an existing cumulative impact. Furthermore, construction and operational groundborne vibration impacts associated with future development under the proposed project would remain less than significant with compliance with mandatory requirements of the General Plan Update. Therefore, there is no cumulative

groundborne vibration impact, and groundborne vibration levels from implementation of the proposed project would not result in a cumulatively considerable contribution to this less than significant cumulative impact

With regard to airport activity noise impacts, the combined effects of cumulative projects (other cities) surrounding South San Francisco would not result in any additional special events or sources of single-event noise in the form of aircraft flyover noise, and therefore, would not result in changes in the 65 dBA CNEL airport noise contours and would not increase airport noise impacts. However, future buildout cumulative conditions related to airport activity related noise would be the same as that identified in Impact NOI-3 discussion above. The proposed project could still result in the introduction of land use development that could be potentially incompatible with the noise environment in the vicinity of SFO. However, as discussed in Impact NOI-3, implementation of MM NOI-3, Airport Noise Impact Reduction Plan, would reduce airport activity noise impacts from implementation of the proposed project to less than significant. No additional mitigation is required with respect to cumulative impacts. Therefore, airport activity noise levels from implementation of the proposed project would not result in a cumulatively considerable contribution to this less than significant cumulative impact (Draft Program EIR, Page 3.11-36-37). The proposed project's cumulative impacts related to noise would be less than significant with the implementation of mitigation measures and applicable regulations, including new and revised General Plan Update policies and implementing actions.

1.5.12 - Population, Housing, and Employment

Potential Effect

Impact POP-1	The proposed project would not 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) (Draft Program EIR, Page 3.12-19-21).
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Findings: Less than significant impact (Draft Program EIR, Page 3.12-21). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. The majority of potential growth would occur within the East of 101, Lindenville, Downtown, and El Camino planning subareas. The proposed project anticipates approximately 14,312 net new housing units, with a projected total of 38,959 housing units by 2040. The proposed project anticipates approximately 42,297 net new employment opportunities, with a projected total of 137,557 employment opportunities by 2040. This new growth would increase the City's population by approximately 40,068 to 107,203 by 2040. The population growth under the proposed project would not be unplanned.

As noted above, the additional population growth is less than the anticipated net new employment opportunities. By 2040, with buildout of the proposed project, the jobs-to-housing ratio is anticipated to be approximately 3.53, exceeding a balanced jobs-to-housing ratio of 1.0 to 1.5 jobs for every housing unit. By 2040, with buildout of the proposed project, the jobs-to-employed

residents' ratio is estimated to be 2.95, exceeding the balanced jobs-to-employed residents' ratio of 1.0. Therefore, under current and future conditions, the City provides more jobs than it has employable residents, and more jobs than can be filled by existing and projected households. Thus, the City is likely to experience increased traffic associated with employees traveling from outside South San Francisco to jobs located within the City, as well as intensified pressure for additional residential development to house the labor force in the City.

The General Plan Update contains goals, policies and actions that plan for and guide growth within the City through 2040 and support the objectives of the City. Areas identified for future residential and commercial development would be required to abide by policies and actions to ensure that new development or redevelopment does not induce substantial direct or indirect population growth. The General Plan Update accounts for the 2015-2023 Regional Housing Need Allocation as outlined by the ABAG. Policy LU-3.7 requires no net loss in housing, meaning that the number of residential units for a particular site would not be reduced by reconstruction or renovation projects to result in a loss of units. Policy LU-3.4 facilitates multi-generational housing. Policy LU-3.5 facilitates live/work housing. Goal LU-4 identifies high-quality residential neighborhoods. The General Plan Update's Subareas Element augments citywide goals and policies from the Land Use and Community Design Element and provides policies and implementation actions specific to subareas related to housing and employment. The General Plan Update also plans for future expansion of City service to accommodate expected growth. The South San Francisco Municipal Code also contains regulations regarding housing and land use types that affect population and employment. Title 20, Zoning, of the Municipal Code implements the City's General Plan and provides a precise guide for the physical development of the City, consistent with the goals and policies of the General Plan. Future development would be reviewed by the City for compliance with the policies and actions of the General Plan Update, the City's Municipal Code, and the mitigation measures referenced in other sections of the Draft Program EIR and project-specific environmental documentation, thus additional population growth would be considered planned growth (Draft Program EIR, Page 3.12-19-21).

The proposed project's impacts related to population, housing, and employment would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact POP-2	The proposed project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere (Draft Program EIR, Page 3.12-21-22).
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Findings: Less than significant impact (Draft Program EIR, Page 3.12-22). No mitigation required.

Facts in Support of Findings: As discussed above, the proposed project anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040, increasing the City's population by approximately 40,068. The City of South San Francisco will review applications for future development under the proposed project for compliance with the policies and actions of the General Plan Update and the South San Francisco Municipal Code and Zoning Ordinance to ensure the displacement of housing or significant need for new housing does

not occur. The proposed project includes land use and Zoning Code Amendments but does not propose or approve any specific development that would result in the displacement of existing housing units or people, necessitating the construction of replacement housing elsewhere.

The General Plan Update includes policies and actions to ensure that existing housing is appropriately protected, and additional housing is added to support future growth within the City by 2040, including Policy LU-3.7 and Policy LU-3.5, as discussed above. Goal LU-3 and Policy LU-3.3 encourage a diverse range of housing types and options. Policy LU-3.1 requires the active facilitation of adding affordable workforce housing. The Housing Element is being updated and once certified, the Housing Element's goals and policies would also be applicable to future development within the City. The 2023-2031 RHNA is expected to be appropriately incorporated into the Housing Element to guide the City in meeting the housing provision goals.

The City of South San Francisco Municipal Code and Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, contain several existing provisions to address the location and design of new and renovated housing units. Chapter 20.480 outlines design review, Section 20.350.035 regulates ADUs, Chapter 19.36 regulates condominiums and community housing projects, Chapter 20.380 regulates inclusionary housing, Chapter 20.390 implements State density bonus law, Chapter 20.070 regulates residential zoning districts, and Chapter 20.080 regulates downtown residential districts. Chapter 8.96 outlines the commercial linkage fee, the revenue of which can be used to fund new housing, preserve existing units, or acquire new land for nonprofit developers (Draft Program EIR, Page 3.12-21-22). The proposed project's impacts related to population, housing, and employment would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Effects

The proposed project's cumulative impacts related to population, housing, and employment would be less than significant (Draft Program EIR, Page 3.12-23).

Findings: Less than significant impact (Draft Program EIR, Page 3.12-23). No mitigation required.

Facts in Support of Findings: The geographic context for analysis of cumulative impacts related to population, housing, and employment includes the nine Bay Area counties (San Mateo, San Francisco, Santa Clara, Marin, Sonoma, Napa, Solano, Alameda, and Contra Costa).

ABAG projects that from 2025 to 2040 the population of San Mateo County will increase from approximately 816,460 to 916,590, an increase of approximately 100,130 people, or, on average, approximately 0.8 percent increase per year. For the City of South San Francisco, ABAG projects that from 2025 to 2040, population is projected to increase from 71,080 to 80,015, or, on average, approximately 0.8 percent increase per year. As such, the City and County growth rates are expected to be approximately similar.

The general plans and other planning documents prepared by the jurisdictions within the nine Bay Area counties (San Mateo, San Francisco, Santa Clara, Marin, Sonoma, Napa, Solano, Alameda, and

Contra Costa) would be required to develop land use plans that comply with State law and that would accommodate the existing and forecasted population, similar to the long-range planning guidance included in the proposed project. Consistent with State law, these planning documents would be required to provide adequate housing to accommodate forecasted numbers of people within the jurisdiction, and displaced development, if any, would be replaced primarily within the jurisdiction. Further, new development would be required to address potential environmental impacts as part of individual project review. As such, cumulative development would not induce substantial unplanned population growth, either directly or indirectly. Because cumulative projects would comply with all applicable land use plans to provide adequate development within a jurisdiction, cumulative impacts would be less than significant.

Moreover, the proposed project would not have a cumulatively considerable contribution to the less than significant cumulative impact. As the City's projected population growth is within projected growth estimates, and the growth would be occurring primarily through infill development within the City, the proposed project's contribution to this less than significant cumulative impact would not be cumulatively considerable. The proposed project would not result in any policies or physical improvements that would result in direct or indirect unplanned regional growth or result in substantial displacement of people or the need to construct additional housing and therefore would not contribute to a cumulative impact (Draft Program EIR, Page 3.12-23). The proposed project's cumulative impacts related to population, housing, and employment would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.5.13 - Public Services

Potential Effect

Impact PUB-1	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection (Draft Program EIR, Page 3.13-22-24).
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Findings: Less than significant impact (Draft Program EIR, Page 3.13-24). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area as well as other private and public improvements throughout the City, with the potential for environmental effects related to fire protection facilities. Development and growth in the City would increase demand for fire protection services. There may be a need to increase staffing and equipment or expand or construct new fire stations to maintain acceptable service ratios, response times, and other performance standards which could cause environmental impacts.

The General Plan Update includes policies and actions to ensure that fire protection services keep pace with new development. Policy SA-16.4 requires the City to coordinate with the SSFFD to ensure public services can accommodate growth impacts of new development in the East of 101 area. Policy

SA-22.7 requires the City to coordinate with the SSFFD to ensure public services can accommodate growth impacts of new development in Lindenville. Action ECS-6.1.1 requires the City to maintain an equitable distribution of Fire Stations so that each neighborhood is equally and adequately served.

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 South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, includes rules and regulations related to fire protection services. Section 20.300.009 (Performance Standards) (revised) requires that land or buildings shall not be used or occupied in a manner creating any dangerous, injurious, or noxious fire, explosive, or other hazard which would adversely affect the surrounding area. All activities, processes, and uses involving the use of, or storage of, flammable and explosive materials shall be provided with adequate safety devices against the hazard of fire and explosion. Firefighting and fire suppression equipment and devices standard in industry shall be approved by the Fire Department. All incineration is prohibited with the exception of those substances, including chemicals, insecticides, hospital materials, and waste products, required by law to be disposed of by burning and those instances wherein the Fire Department deems it a practical necessity. Chapter 20.350 Standards and Requirements for Specific Uses and Activities (revised) requires setbacks from fire hydrants, fire lanes, and fire access ways, the use of fire-treated umbrellas, canopies, or other shade elements for outdoor dining areas, and provision of fire walls to separate every 3,000 square feet within any personal storage structure. For large recycling facilities, storage containers for flammable material shall be constructed of nonflammable material and approved by the Fire Department and oil storage must be in containers approved by the Fire Department and Health Official. Section 20.360.004 (General Standards for All Signs) (revised) prohibits the placement of any sign on a fire hydrant or in a manner that would prevent or inhibit free ingress to or egress from any door, window, vent, or any exit way required by the Building Code or by Fire Department regulations (currently in effect). Section 20.490.005 (Conditions of Approval) (revised) allows the Chief Planner to impose conditions related to fire protection in approving a temporary use permit.

The project-specific environmental impacts of constructing new or expanded fire protection facilities cannot be determined at this time because the site-specific locations and designs are not known. Buildout under the proposed project could result in approximately 68,367 square feet of nonresidential uses under the “Public” land use designation, which could include fire protection facilities. It can be expected 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.

New or expanded fire protection facilities will be reviewed by the City for compliance with the policies and actions of the General Plan Update, the City’s Municipal Code, and the mitigation measures referenced in other sections of the Draft Program EIR. In addition, the City will review development applications for development under the proposed project for compliance with the policies and actions of the General Plan Update to ensure that fire protection services keep pace with new development. Chapter 8.75, Public Safety Impact Fee, and Chapter 15.24, California Fire Code of the City’s Municipal Code would be reviewed when development applications are received (Draft Program EIR, Page 3.13-22-24). The proposed project's impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact PUB-2	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities, need for new or physically altered police protection facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection (Draft Program EIR, Page 3.13-24-26).
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Findings: Less than significant impact (Draft Program EIR, 3.13-26). No mitigation required.

Facts in Support of Findings: As described above, development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. The proposed project may result in other private and public improvements throughout the City with the potential for environmental effects related to police protection facilities. The proposed project anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040. This new growth would increase the City’s population by approximately 40,068. Development and growth in the City would increase demand for police protection services. Thus, there may be a need to increase staffing and equipment, or expand or construct new police stations, to maintain acceptable service ratios, response times, and other performance standards which could cause environmental impacts.

The General Plan Update includes policies and actions to ensure that police protection services keep pace with new development, including Policy SA-16.4 and Policy SA-22.7 as discussed above. Action ECS-6.1.2 requires the City to establish a Community Safety and Equity Advisory Board to review data, provide recommendations, build trust, and make recommendations related to public safety or to any equity issue throughout City departments and programs. Action ECS-6.1.3 requires the City to strengthen community cohesion through community engagement efforts to build cross-cultural trust between the Police and Fire Departments and residents of color and low-income residents.

The South San Francisco Municipal Code contains rules and regulations related to police protection services, including previously discussed Chapter 8.75. The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations related to police protection services. Section 20.350.029 (Other Financial Services) (new)

requires that a security plan be provided for review and approval by the Chief Planner and the City of South San Francisco Police Department for other financial services, which includes alternative loan businesses and pawnbrokers. The plan shall provide for adequate security, including a central station alarm system to the Police Department. Bars on the windows, exterior phones, and roll-up doors are prohibited. Section 20.490.005 allows the Chief Planner to impose conditions related to police protection in approving a temporary use permit.

The project-specific environmental impacts of constructing new or expanded police protection facilities cannot be determined at this time because the site-specific locations and designs are not known. Buildout under the proposed project, as described in Impact PUB-1, could include fire protection facilities. It can be expected 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.

New or expanded police protection facilities will be reviewed by the City for compliance with the policies and actions of the General Plan Update, the City's Municipal Code, and the mitigation measures referenced in other sections of the Draft Program EIR. In addition, the City will review development applications for development under the proposed project for compliance with the policies and actions of the General Plan Update to ensure that fire protection services keep pace with new development, as well as Chapter 8.75 Public Safety Impact Fee of the City's Municipal Code (Draft Program EIR, Page 3.13-24—26). The proposed project's impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact PUB-3	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for schools. (Draft Program EIR, Page 3.13-26—27)
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Findings: Less than significant impact (Draft Program EIR, Page 3.13-27). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. The majority of potential growth would occur in areas located within the SSFUSD. The proposed project anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040, increasing the City's population by approximately 40,068 and increasing demand for school facilities. According to telephone communication with Jessen Langley of SSFUSD Student Services on March 7th, 2022, schools within the SSFUSD are operating at approximately 65.7 percent of capacity and existing school facilities would be able to accommodate the additional

students in existing facilities.¹⁰ The incremental increase in staffing and equipment required to maintain acceptable service ratios and other service objectives for schools as enrollment increases would not result in significant environmental impacts.

The General Plan Update includes policies and actions to ensure that school facilities keep pace with new development. These include Policy SA-16.4 and Policy SA-22.7, as described above in Impact PUB-1. Policy LU-1.4 requires the City to maintain and expand public facilities to better support the community, including schools, particularly in neighborhoods lacking these resources. Policy LU-1.6 requires the City to promote childcare and pre-K facilities in South San Francisco. Policy ECS-5.3 requires the City to maintain a continuous exchange of information with the SSFUSD on projected growth of the City. The City will review development applications for subsequent development under the proposed project for compliance with the policies and actions of the General Plan Update to ensure that school facilities keep pace with new development. Finally, the City's Municipal Code, which implements the City's General Plan, would be reviewed when development applications are received, including payment of school impact fees per SB 50.

The proposed project's impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact PUB-4	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library facilities (Draft Program EIR, Page 3.13-27—29).
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Findings: Less than significant impact (Draft Program EIR, Page 3.13-29). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area with the majority of residential uses located within 1 mile of an existing or new library (Community Civic Campus). The proposed project anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040. This new growth would increase the City's population by approximately 40,068. Development and growth in the City would increase demand for library facilities. The new library at the Community Civic Campus can accommodate some of the increase in demand for library services from buildout of the proposed project, but increased staffing and equipment to maintain acceptable service ratios and other performance objectives for library facilities may be needed. If an existing library is at capacity for staffing, this could require an expansion of an existing library or construction of a new library, the construction of which could cause environmental impacts.

¹⁰ Langley, Jessen. Student Services, South San Francisco Unified School District (SSFUSD). Personal communication: telephone. March 7, 2022.

The General Plan Update includes policies and actions to ensure that library facilities keep pace with new development, including Policy LU-1.4 as described in Impact PUB-3. Policy ECS-7.1 requires the City to ensure adequate library services, staffing, and facilities are maintained for all residents. Policy ECS-7.7 requires the City to develop customer service surveys to use to evaluate library programs and events. The South San Francisco Municipal Code contains rules and regulations related to library facilities including Chapter 8.74 of the Municipal Code, which establishes a library impact fee to finance library facilities and collections which benefit development, and for each new development to pay its fair and proportional share of these improvements.

The proposed project does not include specific plans for the construction of a new or expanded library, thus project-specific environmental impacts cannot be determined at this time. However, library facilities are allowed within the “Public” land use designation and are contemplated as part of the proposed project. Buildout under the proposed project, as discussed in Impact PUB-1, could include library facilities. It can be expected that construction and operation of future new or expanded library facilities would have similar impacts as would construction and operation of other types of new development under the proposed project. The City will review construction plans of new or expanded library facilities for compliance with the policies and actions of the General Plan Update, the City’s Municipal Code, and the mitigation measures referenced in other sections of the Draft Program EIR. Furthermore, applications for subsequent development under the proposed project will be reviewed by the City for compliance with the policies and actions of the General Plan Update to ensure that library facilities keep pace with new development. In addition, development facilitated by the proposed project would be required to pay library impact fees in accordance with Chapter 8.74 of the Municipal Code (Draft Program EIR, Page 3.13-27—29). The proposed project’s impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact PUB-5	The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered other public facilities, need for new or physically altered other public facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for other public facilities (Draft Program EIR, Page 3.13-29).
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Findings: Less than significant impact (Draft Program EIR, Page 3.13-29). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area, increasing the City’s population by approximately 40,068. Development and growth in the City would increase demand for other public facilities. As such, there may be an additional need to increase staffing and equipment to maintain acceptable service ratios and other performance objectives for these other public facilities. If an existing public facility is at capacity for staffing, an expansion of an existing public facility or construction of a new public facility may be required, which could cause environmental impacts.

The proposed project does not include specific plans for the construction of new or expanded other public facilities, thus project-specific environmental impacts cannot be determined at this time. However, public facilities are allowed within the “Public” land use designation and are contemplated as part of the proposed project (Exhibit 2-4 of Draft Program EIR). Buildout under the proposed project, as discussed in Impact PUB-1, could include other public facilities. It can be expected that construction and operation of future new or expanded public facilities would have similar impacts as would construction and operation of other types of new development under the proposed project. The City will review plans for the construction of new or expanded public facilities for compliance with the policies and actions of the General Plan Update, the City’s Municipal Code, and the mitigation measures referenced in other sections of the Draft Program EIR (Draft Program EIR, Page 3.13-29).

The proposed project's impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact REC-1	The proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated (Draft Program EIR, Page 3.13-30-31).
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Findings: Less than significant impact (Draft Program EIR, Page 3.13-31). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area, with the majority of residential uses located within 0.75 mile of an existing or proposed new park or recreational facility. The proposed project anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040, increasing the City’s population by approximately 40,068 (Chapter 2, Draft Program EIR). Development and growth in the City would increase demand for parks and recreational facilities. There may be a need to increase staffing and other resources, or expand or construct new parks and recreational facilities, to maintain existing parks and recreational facilities at acceptable service ratios. The environmental impacts from the construction of new parks and recreational facilities are discussed above under Impact REC-2.

Based on the City’s projected population of 107,203 by 2040, an additional 274 acres of park and open space would be needed by 2040 to achieve the City’s service standard of 5.5 acres of parkland per 1,000 residents. The proposed project includes new parks and recreational facilities to assist the City in meeting the park service standards. Additionally, the General Plan Update includes policies and actions to ensure that parks and recreational facilities keep pace with new development. Policy SA-16.3 requires the City to create new parks and open spaces in East of 101, including a public park within a ten-minute walk to any new residential development East of 101, a Colma Creek linear park featuring walking and cycling paths, and a recreational greenway between South Airport Boulevard and Littlefield Avenue. Action SA-31.1.1 requires the City to coordinate with Cal Water to purchase or lease land along Chestnut Avenue and Colma Creek to expand Orange Park. Policy PR-1.5 requires

the City to seek opportunities to use vacant and underutilized commercial and industrial buildings for recreational services, especially in disadvantaged communities. Policy PR-1.4 requires the City to ensure accessible public facilities and services are equitably distributed throughout the City and are provided in a timely manner to keep pace with new development. Policy PR-3.3 requires the City to create new public access points to Sign Hill, San Bruno Mountain State and County Park, and the San Francisco Bay Trail and parks. Policy PR-4.6 requires the City to work with other agencies, including PG&E, California Water Service, and SFPUC to convert public easements, such as utility corridors or unused rights of way, into parks and trails. Lastly, Policy PR-5.2 requires the City to seek opportunities to acquire property, including former Redevelopment Agency sites, utility right-of-way, and other vacant and underutilized properties to convert into parkland in the Downtown sub-area.

The South San Francisco Municipal Code contains rules and regulations related to parks and recreational facilities. Chapter 8.67 of the Municipal Code establishes a parks and recreation impact fee to acquire property in the City and provide three acres of parkland per 1,000 residents and one-half acre of parkland per 1,000 new employees, mitigating the impact of development projects on park facilities. The City will review applications for development under the proposed project for compliance with the policies and actions of the General Plan Update to ensure that parks and recreational facilities keep pace with new development. In addition, development facilitated by the proposed project would be required to pay parks and recreation impact fees in accordance with Chapter 8.67 of the Municipal Code (Draft Program EIR, Page 3.13-30-31).

The proposed project's impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact REC-2	The proposed project could include parks or recreational facilities or require the construction or expansion of parks or recreational facilities, which may have an adverse physical effect on the environment (Draft Program EIR, Page 3.13-31-32).
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Findings: Less than significant impact (Draft Program EIR, Page 3.13-31). No mitigation required.

Facts in Support of Findings: The proposed project could yield new parks, improved open space adjacent to State Route 35, and pedestrian and bicycle connections primarily east of US-101 and along the transit corridors. The proposed project also identifies planned and proposed parks and open spaces throughout the City, primarily within the Westborough, Orange Park, Lindenville, and East of 101 planning sub-areas. There could be environmental impacts associated with the construction of new or expanded parks and recreational facilities. However, project-specific environmental impacts cannot be assessed as the proposed project does not include specific plans for new or expanded park and recreation facilities. However, it can be expected that construction and operation of future new or expanded parks and recreational facilities would have similar impacts as would construction and operation of other types of new development under the proposed project. The City will review construction plans of new or expanded parks and recreational facilities for compliance with the policies and actions of the General Plan Update and the City's Municipal Code (Draft Program EIR, Page 3.13-31-32). The proposed project's impacts related to public services

and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Effects

The proposed project's cumulative impacts related to public services and recreation would be less than significant (Draft Program EIR, Page 3.13-32-35).

Findings: Less than significant impact (Draft Program EIR, Page 3.13-35). No mitigation required.

Facts in Support of Findings: The geographic context for analysis of cumulative impacts related to public services generally includes the South San Francisco Planning Area and is delineated by the local service areas within the City, as described below in each service area discussion.

Fire Protection Services

The geographic context for the analysis of cumulative impacts related to fire protection facilities includes the SSFFD service area, which comprises the City of South San Francisco. A significant cumulative environmental impact would result if cumulative growth exceeded the ability of SSFFD to adequately serve its service area, thereby requiring construction of new facilities or modification of existing facilities. Development activity in the City provides revenue through impact fees, and license and permit fees. Additionally, SSFFD conducts a regular budgeting process where future facility and staffing needs are identified. All cumulative projects within the SSFFD service area would be required to comply with City ordinances and General Plan Update policies and actions that address fire protection services, including payment of 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. Because past and present development will comply with all ordinances and policies, and there are mechanisms in place to ensure provision of adequate service, there would be no significant cumulative condition with respect to fire protection services.

Moreover, the proposed project's incremental contribution to the less than significant cumulative impacts would not be significant. As discussed under Impact PUB-1, implementation of the proposed project would not create a need for new or physically altered facilities for the SSFFD to provide fire protection services to its service area.

As previously discussed, development facilitated by the proposed project would be required to comply with the policies and actions in the General Plan Update as well as the South San Francisco Municipal Code, to ensure that fire protection services are adequate as future development is proposed. Therefore, impacts of the proposed project on fire protection services are not cumulatively considerable.

Police Protection Facilities

The geographic context for the analysis of cumulative impacts related to police protection facilities includes the SSFPD service area, which comprises the City of South San Francisco. A significant cumulative environmental impact would result if this cumulative growth exceeded the ability of the SSFPD to adequately serve its service area, thereby requiring construction of new facilities or

modification of existing facilities. Development activity in the City provides revenue through impact fees and license and permit fees. Additionally, SSFPD conducts a regular budgeting process where future facility and staffing needs are identified. All cumulative projects within the SSFPD service area would be required to comply with City ordinances and General Plan Update policies and actions that address police protection services, including payment of public safety impact fees to provide funding for adequate police equipment, vehicles, and facilities to meet the broad range of needs of South San Francisco residents and employees. Because past and present development will comply with all ordinances and policies, and there are mechanisms in place to ensure provision of adequate service, there would be no significant cumulative condition with respect to police protection services.

Moreover, the proposed project's incremental contribution to the less than significant cumulative impacts would not be significant. As discussed under Impact PUB-2, implementation of the proposed project would not create a need for new or physically altered facilities for the SSFPD to provide police protection services to its service area.

As previously discussed, development facilitated by the proposed project would be required to comply with the policies and actions in the General Plan Update as well as the South San Francisco Municipal Code, to ensure that police protection services are adequate as future development is proposed. Therefore, impacts of the proposed project on police protection services are not cumulatively considerable.

School Facilities

The geographic context for the analysis of cumulative impacts related to school facilities includes the SSFUSD and private schools that serve South San Francisco and surrounding cities. Regional growth resulting from past, present, and reasonably foreseeable projects would result in increased demand for additional school facilities within the SSFUSD. Schools are expected to receive development impact fees from cumulative development within other jurisdictions. The payment of school impact fees, per SB 50, would ensure that school facilities can accommodate future students.

Moreover, the proposed project's incremental contribution to the less than significant cumulative impacts would not be significant. As discussed under Impact PUB-3, development facilitated by the proposed project would be required to pay the school impact fees adopted by each school district, per SB 50, and this requirement is considered to fully address the impacts of the proposed project on school facilities. Therefore, impacts of the proposed project on school facilities are not cumulatively considerable.

Library Facilities

The geographic context for analysis of cumulative impacts to library facilities includes the South San Francisco Public Library. A significant cumulative environmental impact would result if cumulative growth exceeded the ability of the South San Francisco Library to adequately serve people within its service area, thereby requiring construction of new facilities or modification of existing facilities. All cumulative projects would be required to comply with City ordinances and other policies that address library facilities and services, including library impact fees.

Moreover, the proposed project's incremental contribution to the less than significant cumulative impacts would not be significant. As discussed under Impact PUB-4, development facilitated by the proposed project would be required to pay library impact fees. Therefore, impacts of the proposed project on library facilities are not cumulatively considerable.

Other Public Facilities

The geographic context for analysis of cumulative impacts to other public facilities includes the Planning Area. Development and growth in the City would increase demand for other public facilities. A significant cumulative environmental impact would result if cumulative growth exceeded the ability of the City to adequately serve people within its service area, thereby requiring construction of new facilities or modification of existing facilities. All cumulative projects would be required to comply with City ordinances and other policies that address other public facilities.

Moreover, the proposed project's incremental contribution to the less than significant cumulative impacts would not be significant. As discussed under Impact PUB-5, implementation of the proposed project would not create a need for other new or physically altered public facilities to maintain acceptable service ratios or other performance objectives. Therefore, impacts of the proposed on other public facilities are not cumulatively considerable.

Parks and Recreational Facilities

The geographic context for the analysis of cumulative impacts of parks and recreational facilities includes the Planning Area. A significant cumulative environmental impact would result if this cumulative growth resulted in an increase in the use of existing parks and recreational facilities, such that substantial physical deterioration of the parks or recreational facilities would occur or be accelerated, to require the construction of new parks and recreational facilities or modification of existing parks and recreational facilities. All cumulative projects would be required to comply with City ordinances and General Plan Update policies that address parks and recreational facilities, such as paying park in-lieu fees and maintaining adequate parkland ratios.

Moreover, the proposed project's incremental contribution to less than significant cumulative impacts would not be significant. As discussed under Impact REC-1, implementation of the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. As discussed under Impact REC-2, the construction or expansion of parks and other recreational facilities are not expected to result in an adverse physical effect on the environment. As such, development anticipated under the proposed project would not create substantial impacts related to parks and other recreational facilities.

Further, potential future impacts to South San Francisco parks and recreational facilities would be further reduced through the contribution of a parks and recreation impact fee to ensure facilities at these locations are adequately maintained and sufficient to accommodate growth associated with cumulative development. Therefore, impacts of the proposed project on parks and other recreational facilities are not cumulatively considerable (Draft Program EIR, Page 3.13-32-35).

Accordingly, the proposed project's cumulative impacts related to public services and recreation would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.5.14 - Transportation

Potential Effect

Impact TRANS-2	Implementation of the proposed project would not conflict with a program, plan, ordinance, or policy of the circulation system regarding bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities, that may have a significant impact on the environment (Draft Program EIR, Page 3.14-41-44).
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Findings: Less than significant impact (Draft Program EIR, Page 3.14-44). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area and may result in other private and public improvements throughout the City that have the potential for environmental effects related to bicycle and pedestrian facilities. Future potential development under the proposed project would contribute to and increase use of bicycle and pedestrian facilities in South San Francisco. The General Plan Update does not conflict with the Active South City Plan, which seeks to improve bicycle and pedestrian safety and improve mobility options in South San Francisco. The proposed circulation network enhances bicycle and pedestrian facilities citywide, improves connectivity, and shortens walking and biking distances.

While growth within South San Francisco would cumulatively contribute to and increase use of bicycle and pedestrian facilities, the General Plan Update includes policies and actions, listed on Pages 3.14-41-43 of the Draft Program EIR, that directly and indirectly result in improving the bicycle and pedestrian network and supporting programs to increase bicycle and pedestrian travel. Implementation of these General Plan Update policies and actions of the proposed project would improve the bicycle and pedestrian network and support programs to increase bicycle and pedestrian travel and ensure that the proposed project would not conflict with a program, plan, ordinance, or policy of the circulation system regarding bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

Furthermore, actions identified in the Climate Action Plan, including Actions TL-2.5 (Development along Transit Corridors) and TL-2.6 (Complete Streets Policy), would enhance the bicycle and pedestrian network. Implementation of Action TL-2.5 would ensure that 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. Action TL-2.5 includes use of the development review process to identify opportunities to enhance bicycle, pedestrian, and transit connectivity. Implementation of Action TL-2.6 would ensure that all roadway and development projects are designed and evaluated to meet the needs of all street users and that development projects contribute to multimodal improvements in proportion to their potential impacts on VMT. Further, Action TL-2.6 includes the development of a Capital Improvement Program (CIP) prioritization criteria, including equity

considerations for SB 1000 neighborhoods, to strategically advance multimodal complete streets projects. Lastly, Action TL-2.6 would ensure that all capital improvements and development projects 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.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations that assist in reducing impacts related to bicycle and pedestrian facilities. Chapter 20.400 (Transportation Demand Management) (revised) promotes more efficient utilization of existing transportation facilities and ensures that new developments maximize transit, active transportation, carpooling, and vanpooling usage. Section 20.400.005 (Submittal Requirements and Approvals) (revised) requires that a project subject to the TDM Ordinance submit TDM documentation with the development application, which includes a completed TDM checklist of the trip reduction measures chosen by the applicant and a description of how the applicable performance requirements would be achieved and maintained over the life of the project. The trip reduction measures identified in Section 20.400.003 (Trip Reduction Measures and Requirements) (revised) related to bicycle and pedestrian facilities include the provision of bicycle storage, showers, and lockers, providing bicycle and pedestrian-oriented site access, providing on-site pedestrian-oriented amenities, providing active transportation subsidies, providing cash reward incentives for commuting via walking or biking, and providing a bicycle repair station. Further, Section 20.330.007 (Bicycle Parking) (revised) 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 alterations to existing dwelling units, and alterations that increase the number of dwelling units (Draft Program EIR, Page 3.14-41-44). Therefore, related transportation impacts would be less than significant and no mitigation is necessary.

Potential Effect

Impact TRANS-3	Implementation of the proposed project would not conflict with a program, plan, ordinance, or policy of the circulation system regarding transit facilities, or otherwise decrease the performance or safety of such facilities, that may have a significant impact on the environment (Draft Program EIR, Page 3.14-44-47).
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Findings: Less than significant impact (Draft Program EIR, Page 3.14-47). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area and may result in other private and public improvements throughout the City that have the potential for environmental effects related to transit facilities. Future potential development under the proposed project would increase use of transit service and transit facilities in South San Francisco.

The General Plan Update includes policies and actions that directly and indirectly result in improving the transit network and supporting an increase in transit use. Implementation of these General Plan Update policies and actions would improve the transit network and support programs to increase travel by transit and 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.

Actions identified in the Climate Action Plan, including Actions TL 2.5 and TL 2.6 as discussed above in Impact TRANS-2, as well as TL 2.8 (Improve Transit Station Access) would enhance the transit network. Implementation of Action TL 2.8 would include leveraging public-private partnerships to increase transit ridership and improve transit station access by incorporating first/last mile bus, shuttle, and active transportation connections between employment hubs and regional transit stations.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, includes rules and regulations that would enhance transit facilities. These include Chapter 20.400, Section 20.400.005, and Section 20.400.003 as described above in Impact TRANS-2 (Draft Program EIR, Page 3.14-44-47). Accordingly, impacts would be less than significant and no mitigation is required.

Potential Effect

Impact TRANS-5	Implementation of the proposed project would not result in inadequate emergency access (Draft Program EIR, Page 3.14-50-52).
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Findings: Less than significant impact (Draft Program EIR, Page 3.14-52). No mitigation required.

Facts in Support of Findings: Future potential development under the proposed project would alter land use patterns and increase travel demand on the transportation network that may influence emergency access. To accommodate the additional population and jobs, the proposed project includes 25 circulation improvements listed in Table 3.14-5 of the Draft Program EIR. The proposed improvements would increase connectivity in the network, which would promote improved emergency access. Additionally, new development that occurs pursuant to the proposed project would be subject to the provisions of the California Fire Code including those that pertain to emergency access. Multiple policies and actions in the Mobility Element and in other sections of the proposed project, listed on Pages 3.14-51-52 of the Draft Program EIR, support the maintenance of adequate emergency access.

Furthermore, actions identified in the Climate Action Plan would support the maintenance of adequate emergency access. Implementation of Action TL 2.3 would improve curb management by evaluating the current and best use of curb space in the City's activity centers and repurposing space to maximize people served (i.e., for loading, bikeways, bike parking, bus lanes, EV charging, or parklets). Implementation of Action TL 2.6 would ensure that all roadway and development projects are designed and evaluated to meet the needs of all street users and that development projects contribute to multimodal improvements in proportion to their potential impacts on vehicle miles traveled.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include rules and regulations to reduce impacts related to emergency access including Chapter 20.400, Section 20.400.005, and Section 20.400.003, as discussed in Impact TRANS-2. Section 20.400.003 identifies trip reduction measures that promote carpooling and the use of transit, pedestrian and bicycle facilities, which would assist in reducing the number of vehicles on the road, thereby reducing traffic congestion throughout the City that could impede emergency

access (Draft Program EIR, Page 3.14-50-52). Accordingly, impacts would be less than significant and no mitigation is required.

1.5.15 - Utilities and Service Systems

Potential Effect

Impact UTIL-1	The proposed project would not 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 would cause significant environmental effects (Draft Program EIR, Page 3.15-28-30).
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Findings: Less than significant impact (Draft Program EIR, Page 3.15-30). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area. The proposed project is expected to accommodate 40,068 new residents, 14,312 new housing units, 42,297 new jobs, and 14,100,523 new square feet of nonresidential building space at buildout. These increases would require additional water, wastewater treatment, storm drainage, electric power, natural gas, and telecommunication services which may require the construction or relocation of facilities which could cause significant environmental impacts. Each service is discussed separately below.

Water

As noted in Impact UTIL-2 of the Draft Program EIR, the General Plan Update includes policies and actions that would reduce water demand of future buildout. The CAP also includes actions that would reduce water demand of future buildout under the proposed project. Also described under Impact UTIL-2, both the Cal Water South San Francisco District and WWD project sufficient water supply availability under normal water years and require conservation measures under dry year conditions per the Cal Water Shortage Contingency Plan and WWD Water Shortage Contingency Plan. In addition, most new development accommodated under the proposed project is expected to be infill and would rely on the existing distribution network that has sufficient capacity to convey available water supplies. As such, implementation of the proposed project would not result in the need to construct or expand water supply and treatment facilities that have not already been described and accounted for in the 2020 UWMPs.

Furthermore, each individual project would be required to demonstrate the availability of water to service the development, as required and applicable, in the form of will-serve letters or, for larger projects, preparation of a WSA per SB 610. If additional facilities were to be constructed, separate environmental analysis would be required. The City currently complies with the statutory requirements listed in the regulatory section, and the General Plan Update ensures that the City will continue to comply with the State and federal regulatory requirements. The General Plan Update encourages water conservation through Policies ES-5.3, ES-5.8, and ES-5.9. Policy ES-7.1 provides for ongoing partnerships with regional and local agencies to develop a comprehensive watershed management strategy that identifies programs, partnerships, actions, and incentives that the City and partners can take to protect the City's water resources and Policy ES-7.2 calls for integration of

green irrigation infrastructure into City-owned landscapes. Additional policies focus on integrating green infrastructure for energy efficiency.

Cal Water’s 2020 UWMP and WWD’s 2020 UWMP state that there are currently no planned future water supply projects or programs that are expected to provide a quantifiable increase to the water supply. However, Cal Water is currently in the process of developing a regional water supply reliability study to create a long-term supply reliability strategy through 2050 for Cal Water districts in the Bay Area. It is anticipated this study will identify feasible water supply projects that may benefit the South San Francisco District. Individual infrastructure improvements that may occur under the applicable UWMPs would be subject to individual CEQA review and clearance to determine whether any would have significant environmental impacts. Therefore, the proposed project would not result in insufficient water supplies from Cal Water and WWD, and no new or expanded water treatment facilities would be needed under the proposed project.

Wastewater

As described under Impact UTIL-3, the General Plan Update includes policies and actions that would reduce the need for wastewater treatment. The CAP also includes actions that would reduce the need for wastewater treatment. In accordance with City requirements, new development that occurs pursuant to the proposed project would be subject to 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. Further, as discussed under Impact UTIL-3, there is sufficient capacity at the South San Francisco/San Bruno WQCP and Daly City’s North San Mateo WQCP to accommodate wastewater collection and treatment generated by the proposed project.

Future development under the proposed project would be located within the urban framework of the City and near existing wastewater infrastructure. As such, implementation and buildout of the proposed project would not result in the need to construct or expand wastewater collection and treatment facilities that have not already been described and accounted for in the applicable Sewer System Master Plans. The City currently complies with the statutory requirements listed in the regulatory section, and the General Plan Update policies and actions ensure that the City will continue to comply with State and federal regulatory requirements related to wastewater. Therefore, the proposed project would not result in insufficient wastewater collection and treatment and no new or expanded wastewater treatment facilities would be needed.

Storm Drainage Capacity

In accordance with City requirements, new development that occurs pursuant to the proposed project would be required to install on-site storm drainage infrastructure that would detain stormwater and release runoff at a rate no greater than the pre-development condition of the project site. General Plan Policy ES-7.3 requires stormwater management practices for new and redevelopment projects. Policies ES-7.4 and ES-8.1 allow for groundwater recharge. Policy ES-8.2 implements potable water demand reduction measures. Additional policies require further water efficiency upgrades and measures. City requirements and policies would ensure that runoff would not inundate downstream storm drainage facilities such that new or expanded facilities would be required.

Electric Power, Natural Gas, and Telecommunications

Electricity, natural gas, and telecommunications utilities respond to increased demands and prepare long-range plans to accommodate projected growth in their service areas. These planning efforts consider growth projections, including the growth under the proposed project. Because the proposed project 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 proposed project would not be expected to require or result in new or expanded electricity, natural gas, or telecommunications facilities beyond those already planned (Draft Program EIR, Page 3.15-28-30). The proposed project's impacts related to utilities and service systems would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact UTIL-2	Sufficient water supplies would be available to serve the proposed project and reasonably foreseeable future development during normal, dry, and multiple dry years (Draft Program EIR, Page 3.15-30-35).
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Findings: Less than significant impact (Draft Program EIR, 3.5-35). No mitigation required.

Facts in Support of Findings: The proposed project is expected to accommodate 40,068 new residents, 14,312 new housing units, 42,297 new jobs, and 14,100,523 new square feet of nonresidential building space at buildout. This increase in development would result in an increased demand for potable water. The City of South San Francisco receives most of its water supply from Cal Water, with a small area (the Westborough neighborhood) serviced by the WWD. A significant impact would occur if water demand for development facilitated by the proposed project could not be met by the providers' existing entitlements and water supply resources.

The Westborough planning sub-area, which receives water from the WWD, is projected to see an increase of 524 residential units and 105 jobs as a result of the proposed project. Based on residential water demand factors provided by Cal Water in the absence of available data from WWD, the additional residences are expected to result in an increase of water demand within the Westborough planning sub-area of approximately to 23.8 MG per year. This increase in water demand represents 4.9 percent of total projected available supply (482 MG per year) within the WWD service area by 2040. WWD purchased only between 56 and 68 percent of its 482 MG per year, thus sufficient water is available. Because the proposed project is planned growth and because the WWDs UWMP and Water Shortage Contingency Plan consider future planned growth, sufficient water supplies are expected to be available in single and multiple dry years with the implementation of the Water Shortage Contingency Plan.

It is assumed that the remainder of the proposed project (13,788 residential units, 42,192 jobs) would receive water supplies from the Cal Water South San Francisco District. This growth would result in an increase of approximately 4,768 AFY water demand, which represents approximately 59 percent of total projected demand within the Cal Water South San Francisco District service area by 2040. Since Cal Water's UWMP's projected demand is based on general growth in its service area, the projected water demand from the proposed project, under normal water years, is accounted for

in the overall demand forecast. Because the project is planned growth and because Cal Water's UWMP and Water Shortage Contingency Plan consider future planned growth, sufficient water supplies are expected to be available in single and multiple dry years with the implementation of the Water Shortage Contingency Plan.

In addition, with SB X7-7 and the State and County water conservation ordinances in place, each jurisdiction within the water service area is required to conserve its water use through establishing water efficiency measures. As required by the General Plan Update, the City of South San Francisco will continue to coordinate with regional water districts regarding water conservation efforts, demand management measures promoted by the water districts, compliance with current CALGreen measures and South San Francisco CAP measures promoting efficient indoor and outdoor water use. These measures would serve to reduce water use and demand overall and especially during drought years.

Larger development projects within the Planning Area would be subject to SB 610 and SB 221, which require preparation of a WSA to confirm whether current and projected water supplies could accommodate the development as proposed. Other development projects would be required to obtain a will-serve letter from the water district.

Cal Water intends to adopt a Water Neutral Development Policy in the near future, requiring any new residential, commercial, or industrial development within the South San Francisco District that is expected to use 50 AFY or more in net new demand to offset its net increase in water demand. Once adopted, future development consistent with the proposed project would be required to comply with the proposed Development Offset Program, which would help ensure that overall customer demand for water does not exceed available current or future supply under a range of hydrologic conditions. However, until the Development Offset Program is finalized it is too speculative to analyze.

Further, the General Plan Update includes policies and actions that would reduce water demand of future buildout. Policies ES-5.3, ES-5.8, ES-5.9, and ES-7.2 require and encourage water usage reduction strategies in landscaping design, including waterwise planting pallets, conservative irrigation systems, alternative irrigation water sources, and green infrastructure. Policy ES-7.4 and ES-8.1 encourage pervious surfaces and groundwater recharge. Policy ES-8.2 requires the implementation of potable water demand reduction measures. Policy CP-3.2 requires regular updates to the City's building codes to improve the water efficiency of new construction and major renovation. Policy CP-4.1 aims to establish an energy and water efficiency upgrade program for existing buildings. Policy CP-8.3 requires the exploration of recycled water supply.

The CAP also includes actions that would reduce water demand from future buildout under the proposed project. Implementation of Action BE-1.2 would update zoning and building codes to require alterations or additions at least 50 percent the size of the original building to comply with minimum CALGreen requirements. Actions WW-1.1 through WW-1.4 would reduce outdoor water use through landscaping water requirements, alternative water sources, greywater systems, and landscaping plant lists. Actions WW-2.1 and WW-2.2 would reduce indoor water use through indoor water efficiency standards and the promotion of water conservation rebates. Action CL-1.1 and CL-

1.2 would improve environmental efficiencies and performance of municipal buildings, facilities, landscaping and parks through minimum LEED™ certification or equivalent for new buildings and benchmarking the environmental performance of municipal buildings and facilities, including water use (Draft Program EIR, Page 3.15-30—35). The proposed project's impacts related to utilities and service systems would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary

Potential Effect

Impact UTIL-3	The wastewater treatment provider would have adequate capacity to serve the proposed project in addition to the provider's existing commitments (Draft Program EIR, Page 3.15-35—38).
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Findings: Less than significant impact (Draft Program EIR, Page 3.15-38). No mitigation required.

Facts in Support of Findings: The proposed project is expected to accommodate 40,068 new residents, 14,312 new housing units, 42,297 new jobs, and 14,100,523 new square feet of nonresidential building space at buildout. Additionally, the proposed project may result in other private and public improvements throughout the City with the potential for environmental effects related to wastewater treatment capacity. Development and growth in the City would increase demand for wastewater treatment capacity. As the demand for wastewater treatment capacity increases, there may be a need to increase wastewater conveyance and treatment facilities, the construction of which could cause environmental impacts.

The General Plan Update includes policies and actions to ensure that wastewater treatment capacity keeps pace with new development. Policies ES-8.3 and CP-3.2 encourage water consumption reduction measures which would, in turn, reduce wastewater generation. Policy CP-4.3 encourages greywater permitting to use for irrigation. Policy LU-8.10 ensures adequate infrastructure and utilities for all future development. Policy CP-8.1 requires the continuous evaluation and, as appropriate, system replacement at the wastewater treatment plant to reduce energy use. The CAP includes Action 1.2, which explores options at the South San Francisco/San Bruno WQCP for delivering non-potable, recycled water for reuse.

Based on the proposed project's increase in population of 38,444 (outside the Westborough neighborhood) and the South San Francisco/San Bruno WQCP average per capita flow rate over the last 10 years of 79 gallons per day (gpd), an additional 3,037,076 gpd or 3.03 MGD of wastewater would be produced. Based on the proposed project's increase in population of 1,624 within the Westborough neighborhood and using the average per capita flow rate of the South San Francisco/San Bruno WQCP as a proxy for the North San Mateo County Sanitation District, an additional 130,666 gpd or 0.13 MGD of wastewater would be produced.

In accordance with City requirements, new development that occurs pursuant to the proposed project would be required to connect to the municipal sewer system. New development would be subject to 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 two wastewater treatment plants serving the City of South San Francisco have a combined capacity to treat up to 23.3 MGD and currently have additional dry weather capacity of approximately 14.6 MGD. The 3.13 MGD of wastewater generated by new development under the proposed project would represent 23.3 percent of total treatment capacity of the wastewater treatment plants. As shown in Table 3.15-11 of the Draft Program EIR, both wastewater treatment plants have capacity to handle the proposed project's increase in wastewater.

Both the City of South San Francisco and the WWD maintain SSMPs as required under the Statewide General Waste Discharge Requirements for Sanitary Sewer Systems. The management plans are audited bi-annually and updated every 5 years. These updates allow for the consideration of development and redevelopment such as would occur under the proposed project. As such, the potential for increased wastewater generation and its need for transmission has been and will continue to be planned for by both the City of South San Francisco and the WWD. The City's Sewer Capacity Charge reduces impacts caused by future development and redevelopment in the City by financing the replacement and renewal of existing sanitary sewer facilities and the upgrade and construction of new sanitary sewer facilities. Furthermore, the Storm Water Management Plans (SWMPs) include consideration of future growth in the City such as that of the proposed project. Finally, the City's Capital Improvement Plan includes projects covering both the wastewater system and the WQCP (Draft Program EIR, Page 3.15-35-38).

The proposed project's impacts related to utilities and service systems would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact UTIL-4	The proposed project would not 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. In addition, the proposed project would comply with federal, State, and local statutes and regulations related to solid waste (Draft Program EIR, 3.15-38-40).
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Findings: Less than significant impact (Draft Program EIR, Page 3.15-40). No mitigation required.

Facts in Support of Findings: Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area with the potential for environmental effects related to the generation of solid waste. Development and growth in the City would increase the generation of solid waste (both temporary construction and permanent operation waste) which could exceed State or local standards, exceed local infrastructure capacity, or otherwise impair the attainment of solid waste reduction goals.

The General Plan Update includes policies and actions to reduce and divert solid waste. Policy CP-5.4 requires 75 percent waste diversion for municipal construction and demolition projects. Policy CP-

6.1 requires maintenance and regular updates of the City’s waste reduction plans and programs to ensure consistency with California’s waste reduction goals. Policy CP-6.2 develops education and technical assistance programs to help all residents and businesses to compost and recycle.

The CAP also includes actions to reduce and divert solid waste. Implementation of Action SW-1.1 would adopt an AB 1383 compliant zero-waste plan for municipal operations and the community. Implementation of Action SW-1.2 entails the City continuing to work with SSF Scavenger to ensure implementation of waste reduction targets. Implementation of Action SW-1.3 establishes compliance pathways and enforcement mechanisms for mandatory organics and food waste diversion. Action SW-1.4 would develop educational and technical assistance programs to help all residents and businesses to compost and recycle. Implementation of Action CL 1.4 requires municipal construction projects to achieve 75 percent waste diversion from the landfill.

Development that occurs pursuant to the proposed project would be required by the City to be served with solid waste, recycling, and green waste services provided by the City’s franchise hauler (Municipal Code Chapter 8.16). Additionally, construction and demolition debris from new development would be required to be recycled (Municipal Code Chapter 15.60). Statewide ordinances, including AB 341, AB 939, SB 1016, and SB 1383 require waste reduction, recycling, and diversion and would also be applicable to development occurring pursuant to the proposed project.¹¹

Construction waste would be temporary and would be required to be diverted from landfills in accordance with Municipal Code Chapter 15.60. Operationally, development under the proposed project would be estimated to generate approximately 59,014.2 tons or 42,153.0 cubic yards of solid waste at full buildout. For the solid waste that would be landfilled, the four landfills shown in Table 3.15-11 have a combined remaining capacity of 43.43 million cubic yards. The solid waste generated by the proposed project would represent approximately 0.09 percent of the remaining capacity of the servicing landfills. This capacity would be more than sufficient to accommodate the solid waste generated by implementation of the General Plan Update. Furthermore, as previously discussed, all future development projects proposed in the City would be consistent with federal, State, and local statutes and regulations related to solid waste, including the California Health and Safety Code, California Code of Regulations, California Public Resources Code, and City of South San Francisco General Plan and Municipal Code (Draft Program EIR, 3.15-38—40). The proposed project’s impacts related to utilities and service systems would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Effects

The proposed project’s cumulative impacts related to utilities and service systems would be less than significant (Draft Program EIR, Page 3.15-40-42).

¹¹ City of South San Francisco. 2022. Ordinances and Laws. Website: <https://www.ssf.net/departments/public-works/solid-wasterecycling/ordinances-laws>. Accessed April 12, 2022

Findings: Less than significant impact (Draft Program EIR, Page 3.15-42). No mitigation required.

Facts in Support of Findings:

Water Supply

The geographic context for the analysis of cumulative impacts related to water supply includes the Cal Water South San Francisco District and WWD service areas. Overall, as described in detail above, cumulative water demands would neither exceed planned levels of supply nor require building new water treatment facilities or expanding existing facilities beyond what is currently planned under normal hydrologic years. Under single dry and multiple dry years, water supply availability is uncertain. However, each individual project would be required to demonstrate the availability of water to service the development. Cumulative projects would be required to demonstrate compliance with the statutory requirements listed in the regulatory section, and the General Plan Update would ensure that cumulative development in the City will continue to comply with the State and federal regulatory requirements. As discussed under Impact UTIL-2, if the water service providers should experience a shortage of supply during a drought, water use reduction plans and Water Shortage Contingency Plans are in place to reduce water consumption. These measures would be implemented in conjunction with other State, County, and local water conservation requirements and water efficiency measures. All cumulative projects would be subject to local, State, and federal permit requirements and would be required to comply with City/County ordinances and General Plan policies, as well as other regulations that address water supply. For these reasons, cumulative impacts are less than significant. The proposed project's contribution to less than significant cumulative impacts would not be cumulatively considerable. Development facilitated by the General Plan would contribute to an increased cumulative demand for water supply, however, the growth within the water purveyor's service areas has been considered in their UWMPs. Additionally, development consistent with the proposed project would be required to follow multiple water reduction policies outlined in the General Plan Update, CAP, and Municipal Code.

Required compliance with federal, State, and local policies that would reduce water supply impacts of development facilitated by the proposed project to less than significant levels. When applicable, any additional new development within the Planning Area would be subject, on a project-by-project basis, to independent CEQA review as well as policies in the General Plan, the Municipal Code, and compliance with current regulations, including and SB 610 and SB 221, which require WSAs for large development projects prior to approval. Accordingly, development consistent with the proposed project would have a less than significant contribution to cumulative impacts.

For these reasons, development consistent with the proposed project in conjunction with other cumulative projects would not be cumulatively considerable and the proposed project's incremental contribution would be less than significant. Additionally, compliance with Cal Water's anticipated future Water Neutral Development Policy, where new developers would pay a Development Offset Fee to offset their water demand with efficiency improvements elsewhere in the system, would further ensure that the proposed project's incremental contribution to less than significant cumulative impacts would not be cumulatively considerable.

Wastewater

The geographic context for the analysis of cumulative impacts related to wastewater conveyance and treatment includes the Cal Water South San Francisco District and WWD service wastewater services areas. All cumulative projects would be required to comply with City/County ordinances and General Plan policies, as well as other regulations related to wastewater collection and treatment. As described under Impact UTIL-3, sufficient wastewater conveyance and treatment capacity is available to serve the proposed project.

Additionally, the proposed project's contribution to less than significant cumulative impacts would not be cumulatively considerable. While development facilitated by the proposed project would result in an increased demand for wastewater collection and treatment, such wastewater collection and treatment can be accommodated (see Impact UTIL-3). In addition, future projects within the Planning Area would be required to comply with requirements of the General Plan and Municipal Code that aim to reduce wastewater generation flows. Thus, impacts of the proposed project related to wastewater conveyance and treatment in conjunction with other cumulative development is not cumulatively considerable.

Solid Waste

The geographic context for the analysis of cumulative impacts related to solid waste includes the jurisdictions that are served by the Corinda Los Trancos and Newby Island Landfills. Cumulative development within other jurisdictions would contribute to an incremental increase in solid waste delivered to these landfills and other landfills in the region. Other future projects within the cumulative geographic context, would be required to comply with federal, State, and local laws and policies to address potential impacts related to solid waste.

Additionally, the proposed project's contribution to less than significant cumulative impacts would not be cumulatively considerable. While development and growth in the City under the proposed project would result in an increased generation of solid waste, the affected landfills and other regional landfills have enough capacity to serve the City (see Impact UTIL-4). In addition, development facilitated by the proposed project would be required to comply with policies and programs of the General Plan and the regulations of the Municipal Code that aim to divert solid waste from the local landfill. The City would also be required to comply with existing and new federal, State, and local statutes and regulations related to solid waste (See UTIL-4). Therefore, as discussed, development consistent with the General Plan would have a less than significant contribution to cumulative impacts.

Storm Drainage

The geographic context for analysis of cumulative impacts to storm drain facilities includes the lands surrounding the Planning Area. Cumulative development contributes to an incremental increase in impervious surfaces that could increase stormwater runoff and impact existing storm drain facilities requiring relocated or new facilities. All cumulative projects would be required to comply with City/County ordinances and General Plan policies, as well as other regulations that minimize stormwater runoff, such as the CWA.

As discussed under Impact UTIL-1, the proposed project’s contribution to less than significant cumulative impacts would not be cumulatively considerable. The General Plan Update contains policies and programs to reduce stormwater runoff. Likewise, the sections of the Municipal Code that protect water quality also minimize stormwater runoff, such as Chapter 11.17 and 11.18. All future development under the proposed project would also be required to comply with the CWA and regulations enforced by the RWQCB, which reduce stormwater runoff. Therefore, as discussed, development consistent with the General Plan would have a less than significant contribution to cumulative impacts (Draft Program EIR, Page 3.15-40-42). The proposed project's cumulative impacts related to utilities and service systems would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary

1.5.16 - Wildfire

Potential Effect

Impact WILD-1	The proposed project would not expose people or structures, either directly or indirectly to a significant risk of loss, injury or death involving wildland fires (Draft Program EIR, Page 3.16-11-15).
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Findings: Less than significant impact (Draft Program EIR, Page 3.16-15). No mitigation required.

Facts in Support of Findings: The Planning Area is not located in an FHSZ in an SRA or a VHFHSZ in a local, State, or federal responsibility area and the proposed project does not approve, propose, or authorize development in an SRA or FHSZ. Sign Hill Park is susceptible to wildfires and the Planning Area is adjacent to land identified as Moderate FHSZ within an SRA and High FHSZ within an SRA (San Bruno Mountain State Park). For properties that adjoin hillsides, and/or other non-developed open space fire-prone areas, new construction or rehabilitated landscapes require the submittal of a Standard Landscape Plan in accordance with Section 20.300.007 (Landscaping) (revised) of the South San Francisco Zoning Ordinance. The Standard Landscape Plan is required to include a landscape design plan in accordance with Section 492.6 of the Model Water Efficient Landscape Ordinance (MWEL0). In particular, a landscape design plan for projects in fire-prone areas shall address fire safety and prevention, include a defensible space or zone around a building or structure per Public Resources Code Section 4291(a) and (b), and avoid fire-prone plant materials and highly flammable mulches.

New development or improvements under the proposed project in areas adjacent to San Bruno Mountain State Park or Sign Hill Park could expose people or structures to wildfire spread. However, land use designations in the vicinity of San Bruno Mountain State Park and Sign Hill Park are not being modified under the proposed project. As a result, the degree of exposure of people or structures, either directly or indirectly, to a risk of loss, injury, or death involving wildland fires would not substantially change with adoption of the proposed project, and current hazards would not be significantly increased.

The City of South San Francisco, San Mateo County, and SSFFD have plans, policies, actions, and ordinances in place to reduce the risks associated with wildland fires and future discretionary

projects facilitated by the proposed project will be evaluated for project-specific impacts at the time they are proposed.

The San Mateo–Santa Cruz County CWPP identifies recommendations aimed at preventing and reducing both infrastructure and ecosystem damage associated with wildland fires. The City of South San Francisco is located within the San Mateo Bayside Planning Area and adjacent to the San Mateo Interior Planning Area of the CWPP. General recommendations, listed on page 3.16-13 of the Draft Program EIR, have been identified for the San Mateo Bayside Planning Area, which would assist in reducing wildfire risk within the City of South San Francisco. Additionally, the San Mateo County LHMP provides recommendations, listed on page 3.16-13, to assist the County in reducing wildfire risk, which in turn can assist in reducing wildfire risk within the City of South San Francisco.

The San Mateo County EOP establishes policies and procedures and assigns responsibilities to ensure the effective management of emergency operations within the San Mateo County Operational Area, which includes the Planning Area. During an emergency or disaster, such as a wildfire, the San Mateo County EOP will accomplish actions listed on page 3.16-12 of the Draft Program EIR.

The SSFFD, Division of Fire Prevention, reviews architectural and development plans for compliance with Chapter 15.24 of the Municipal Code’s fire protection and emergency access requirements. SSFFD will also review plans to ensure that fire sprinklers, fire alarms, and fire extinguishers are up to current code and appropriately located within proposed buildings or structures. Buildings and structures located adjacent to fire hazard areas (San Bruno Mountain State Park and Sign Hill Park), would be required to maintain the required hazardous vegetation and fuel management as well as defensible space as outlined in Government Code Sections 51175-51189 and local standards of the City of South San Francisco. The City enforces these standards through code enforcement.¹²

The General Plan Update contains policies and actions that reduce risks from wildland fires before development occurs. Specifically, Policy SA-32.8 requires the City to limit the amount of development allowed on the north side of Sign Hill (discretionary at one unit per acre maximum) and not permit excessive grading of this portion of the hill or clustering of development in the future. Policy CR-5.1 requires the City to continue to implement Sign Hill wildfire mitigation measures (i.e., restoration and maintenance of native grass and scrubland habitat, removal of non-native trees and trees killed in October 2020 fire, removal of dead trees due to drought and disease and maintenance of existing trails to function as fire breaks). Policy CR-5.2 requires the City to maintain a comprehensive fire hazard management program to reduce fire hazards on other public lands. Policy CR-1.2 requires the City to participate in regional hazard planning initiatives. Action CR-1.3.3 requires the City to enact an ordinance to require real estate disclosures of all hazards identified in the Hazard Mitigation Plan, including hazards associated with wildfire for commercial and residential properties, including ownership and rental. Policy CR-1.4 requires the City to periodically adjust infrastructure design standards to address asset-specific vulnerabilities associated with the hazards, such as wildfire. Policy CR-1.5 requires that capital projects in high hazard areas adhere to risk assessment guidance and identify appropriate resilience strategies.

¹² City of South San Francisco. 2022. Submit a Request. Website: <https://www.ssf.net/departments/public-works/submit-a-request>. Accessed May 26, 2022.

Implementation of the Climate Action Plan would also indirectly reduce wildfire risks. In particular, implementation of Action CS-3.1 which would enhance Colma Creek as an ecological corridor and expand existing marsh and wetland habitat, would assist in providing a fuel break in the event of a wildland fire. Implementation of Action WW-1.4, which would develop a landscaping plant list for efficiency and habitat/wildlife for new development and landscape retrofits, could include plants that are more resistant to wildland fires.

As the City would review development applications for subsequent development under the proposed project for compliance with the policies and actions of the General Plan Update to reduce the exposure of people or structures, either directly or indirectly, to a risk of loss, injury, or death involving wildland fires. In addition, the City's Municipal Code, which implements the City's General Plan, would be reviewed when development applications are received, including Chapter 15.08, California Building Code; Chapter 15.18, Dangerous Buildings Code; and Chapter 15.24, California Fire Code.

The proposed project's impacts related to wildfire would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact WILD-2	The proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan (Draft Program EIR, Page 3.16-16-17).
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Findings: Less than significant impact (Draft Program EIR, Page 3.16-17). No mitigation required.

Facts in Support of Findings: As described in HYD-1, the Planning Area is not located in an FHSZ in an SRA or a VHFHSZ in a local, State, or federal responsibility area and does not include plans for development in these areas. The Planning Area is adjacent to land identified as Moderate FHSZ within an SRA and High FHSZ within an SRA (San Bruno Mountain State Park), and Sign Hill Park is susceptible to wildfires as evidenced by a fire that occurred in 2020. Development under the proposed project would result in additional residential and nonresidential development throughout the Planning Area, some of which could occur in areas adjacent to San Bruno Mountain State Park or Sign Hill Park. Additionally, the proposed project may result in other private and public improvements throughout the City that have the potential for environmental effects related to wildfire should they be constructed near Sign Hill Park or San Bruno Mountain State Park. Therefore, subsequent development under the proposed project could affect adopted emergency response plans or emergency evacuation plans.

However, because South San Francisco is a fully built city, most of the development under the proposed project would occur as redevelopment within the urbanized areas of the City, outside of an SRA, thus proposed project would not materially overburden any designated evacuation routes nor substantially impair any emergency response plans or emergency evacuation plans.

Development proposed within the northern portions of the Sunshine Gardens, Sign Hill, Paradise Valley/Terrabay, and East of 101 sub-areas could be within 100 feet of land designated as Moderate

FHSZ within an SRA or High FHSZ within an SRA. Development authorized by the proposed project, including potential development closest to the SRA (within 100 feet) would not impair an adopted emergency response plan or emergency evacuation plan because policies and actions contained within the General Plan Update establish requirements for preventive measures and practices to minimize wildland fire hazards and maintain adequate evacuation and access routes for vehicles in the event of an emergency, including wildland fires. Policy CR-1.6 requires the City to strengthen emergency management capacity and coordination with the San Mateo County EOC. Action CR-1.6.5 requires the City to maintain and communicate evacuation route plans for businesses and residents. Policy CR-1.7 requires the City to expand the reach of the CERT program to strengthen community cohesion and emergency preparedness through community engagement efforts. Policy CR-5.1 requires the City to implement Sign Hill wildfire mitigation measures and Policy CR-5.2 requires the City to maintain a comprehensive fire hazard management program to reduce fire hazards on other public lands. Lastly, Policy CR-5.3 requires the City to increase community participation and understanding of evacuation and early warning software programs to minimize threat to life and be better prepared in case of a wildfire event.

Evacuation routes in the City are designed to accommodate development at buildout of the proposed project. In addition, the policies and actions in the General Plan Update are designed to facilitate and support the City's emergency response and do not have any direct or indirect impact on the environment.

All development in the City will be required to demonstrate compliance with applicable codes and regulations. Development under the proposed project would require continued implementation of the San Mateo County LHMP and San Mateo County EOP. Further, the California Fire Code establishes requirements for emergency access for fire apparatus. Chapter 15.24 of the Municipal Code requires development to demonstrate compliance with applicable fire safety measures prior to the issuance of building permits. Ongoing compliance with safety measures are enforceable through the City's code enforcement. As such, new development projects that occur pursuant to the proposed project would be assessed for compliance with applicable Fire Code requirements that pertain to emergency access as well as compliance with proposed policies and actions of the General Plan Update which would further enhance emergency response. By involving the Police and Fire Departments in the development review process, the City ensures adequate emergency vehicle access and ensures that development is designed and operated in a manner that minimizes fire hazards and maximizes the potential for responsive emergency services (Draft Program EIR, Page 3.16-16 – 17). The proposed project's impacts related to wildfire would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact WILD-3	The proposed project would not, 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 (Draft Program EIR, Page 3.16-18-19).
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Findings: Less than significant impact (Draft Program EIR, 3.16-19). No mitigation required.

Facts in Support of Findings: There are no SRAs or Fire Hazard Severity Zones within the Planning Area (Exhibit 3.16-1). However, Sign Hill Park is susceptible to wildfires and the Planning Area is adjacent to land identified as Moderate FHSZ within an SRA and High FHSZ within an SRA (San Bruno Mountain State Park).

As described under Impact WILD-1, new development or improvements under the proposed project in areas adjacent to San Bruno Mountain State Park or Sign Hill Park could expose people or structures to wildfire spread. However, land use designations in the vicinity of San Bruno Mountain State Park and Sign Hill Park are not being modified under the proposed project (Exhibit 2-5). Therefore, the degree of wildland fire hazard would not substantially change with adoption of the proposed project, and current hazards would not significantly increase.

New development would primarily occur on parcels that already contain some existing homes or businesses, the majority which would occur over 0.25 mile from San Bruno Mountain State Park or Sign Hill Park and within the low-lying portions of the Planning Area adjacent to San Francisco Bay, which are less susceptible to wildland fires. If a fire were to occur in the more flat and urbanized areas of the City, the risk of the fire spreading rapidly would be less than in areas with steeper slopes. Nevertheless, smoke from wildfires occurring in remote parts of the State have at times resulted in poor air quality throughout the bay area.

Development under the proposed project would be consistent with the City of South San Francisco, San Mateo County, and SSFFD plans, policies, actions, and ordinances in place to reduce the risks associated with wildland fires. As described under Impacts WILD-1 and WILD-2, these existing plans, policies, actions, and ordinances reduce the potential for exposure to wildland fires. Reducing potential for fires to start and mitigating wildfire spread once started reduces exposure to smoke and air pollution. Safely evacuating people affected by wildfires also reduces exposure. Policy CR-6.4, which requires the City to maintain adequate cooling and warming centers that can be used as refuge during excessive heat and cold days, would also provide relief from the potential effects of wildfires on air quality, thus reducing the exposure of residents to pollutants (Draft Program EIR, Page 3.16-18-19). The proposed project's impacts related to wildfire would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact WILD-4	The proposed project would not 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 (Draft Program EIR, Page 3.16-19-20).
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Findings: Less than significant impact (Draft Program EIR, Page 3.16-20). No mitigation required.

Facts in Support of Findings: There are no SRAs or Fire Hazard Severity Zones within the Planning Area, thus no development under the proposed project would be located within an FHSZ. The majority of development under the proposed project, including other private and public

improvements throughout the City (see Chapter 2, Project Description, Section 2.5.2), would occur in urban and developed areas that contain required defensible space, existing roadways, fuel breaks, water sources, power lines, and other utilities. The Fire Department will review the installation and maintenance of fire department access roadways, access walkways to and around buildings, and hydrant quantity and placement as required by the CFC and CBC. As discussed under Impacts WILD-1 and WILD-2, compliance with the CBC and General Plan Update policies and actions, as well as review of all new structures as well as private and public improvements by the Police and Fire Departments, would ensure that fire risks are not exacerbated.

As discussed in Impact UTIL-1, development consistent with the proposed project would not require or result in the relocation or construction of new or expanded utilities and service systems, the construction or relocation of which could cause significant environmental effects. Most development under the proposed project is expected to occur in urbanized and developed areas where existing infrastructure are already in place. The proposed project would retain the existing roadway patterns and does not propose any new roadways. The City will review development applications for development, and private and public improvements, for compliance with the fire protection measures identified in the General Plan Update, California Fire Code, and the California Public Resources Code (Draft Program EIR, Page 3.16-19-20). The proposed project's impacts related to wildfire would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Potential Effect

Impact WILD-5	The proposed project would not 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 (Draft Program EIR, Page 3.16-20-21).
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Findings: Less than significant impact (Draft Program EIR, Page 3.16-21). No mitigation required.

Facts in Support of Findings: As discussed above, there are no SRAs or FHSZs within the Planning Area. Sign Hill Park and San Bruno Mountain State Park contain sloping hillsides that are susceptible to landslides and flooding after fire has removed protective vegetative cover. These secondary hazards associated with wildfires are described in the San Mateo County LHMP.

As described under Impact WILD-1, new development or improvements under the proposed project in areas adjacent to San Bruno Mountain State Park or Sign Hill Park could expose people or structures to wildfire spread. However, land use designations in the vicinity of San Bruno Mountain State Park and Sign Hill Park are not being modified under the proposed project. Therefore, the degree of wildland fire hazard, including secondary hazards associated with wildfires, would not substantially change with adoption of the proposed project, and current hazards would not significantly increase.

As described in WILD-3 the majority of development under the proposed project would occur on parcels that already contain some existing homes or businesses over 0.25 mile from San Bruno Mountain State Park or Sign Hill Park and within the low-lying portions of the Planning Area (5 to 20

feet above sea level) adjacent to San Francisco Bay. If a fire were to occur in the flatter areas of the City, the risk of flooding or landslides afterward would be negligible because of the nearly flat topography and because little soil would be exposed due to the developed conditions. Development under the proposed project would be subject to the rules and regulations of the South San Francisco Municipal Code and the policies and actions in the General Plan Update regarding development on unstable geologic soils and controlling stormwater runoff during and after construction. Specific policies related to the prevention of flooding, landslides, and drainage changes include Policy CR-4.3, which discourages development on steep hillside areas more than 30 percent grade; Policy ES-3.3, which requires no net new impervious surfaces in the areas surrounding Colma Creek; Policy ES-7.3, which requires stormwater management practices for new and redevelopment projects; and Policy ES-7.4, which encourages pervious surfaces in new developments. The San Mateo–Santa Cruz County CWPP and San Mateo County LHMP would continue to be implemented and architectural and development plans would be reviewed by the SSFFD (Draft Program EIR, Page 3.16-20-21).

The proposed project's impacts related to wildfire would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

Cumulative Impacts

The proposed project's cumulative impacts related to wildfire would be less than significant (Draft Program EIR, Page 3.16-21-22).

Findings: Less than significant impact (Draft Program EIR, Page 3.16-22). No mitigation required.

Facts in Support of Findings: The geographic scope of the cumulative impact analysis for wildfire is the South San Francisco Planning Area as well as the surrounding cities of Brisbane, Daly City, Pacifica, San Bruno, and Millbrae.

The cities surrounding the Planning Area are largely urbanized, generally outside the SRA and VHFHSZs, and include roads and other fuel breaks, emergency water sources, emergency utilities and maintenance of other infrastructure that would reduce impacts from wildfires. All cumulative projects, including the installation and/or maintenance of associated infrastructure, would be subject to similar fire protection development standards and be required to comply with San Mateo County ordinances, General Plan policies, and plan review by the local fire department to assist in protecting life and property in the event of a wildfire. Development projects, including the installation and maintenance of associated infrastructure, within a hazardous fire area must be reviewed by the County Fire Warden to ensure that building materials, access, vegetative clearance from structures, fire flows and water supplies are adequate for fire protection purposes and in conformance to the fire policies of the San Mateo County General Plan. Additionally, development projects, including the installation and maintenance of associated infrastructure, would be required to comply with all policies in the California Fire Code, including the requirements for WUI fire areas. All cumulative projects, including the installation and maintenance of associated infrastructure, would be covered under existing emergency response plans by San Mateo County. Lastly, implementation of the San Mateo–Santa Cruz County CWPP and the San Mateo County LHMP throughout the Planning Area and adjacent areas would reduce cumulative impacts related to wildfire.

The proposed project's incremental contribution to the less than significant cumulative wildfire hazard impacts would not be significant. As previously discussed, because South San Francisco is a fully built City, new development would primarily occur on parcels that already contain some development, with the majority of potential growth occurring over 0.25 mile from San Bruno Mountain State Park or Sign Hill Park and within the low-lying portions of the Planning Area (5 to 20 feet above sea level) adjacent to San Francisco Bay, which are less susceptible to wildland fires. Development could result in an incremental increase in exposure of people and structures to wildland fires and associated hazards, such as development near Sign Hill Park or San Bruno Mountain State Park. However, land use designations in the vicinity of San Bruno Mountain State Park and Sign Hill Park are not being modified under the proposed project. The adoption of the proposed project would not exacerbate any existing wildfire hazards because the degree of wildland fire hazard, including secondary hazards, would not substantially change.

Additionally, new development within the Planning Area would be required to comply with the fire protection measures identified in the General Plan Update, California Fire Code, and the California Public Resources Code. Action CR-1.3.1 directs the City to actively participate in the San Mateo County Hazard Mitigation Plan maintenance protocols and Countywide initiatives. Policy CR-1.6 requires the City to strengthen emergency management capacity and coordination with the San Mateo County EOP. The proposed project's contribution to cumulative impacts would not be cumulatively considerable (Draft Program EIR, Page 3.16-21-22).

The proposed project's cumulative impacts related to wildfire would be less than significant with the implementation of applicable regulations, including new and revised General Plan Update policies and implementing actions. No mitigation is necessary.

1.6 - Potential Environmental Effects Which Can Be Mitigated Below a Level of Significance

The City of South San Francisco hereby finds that feasible mitigation measures have been identified in the Draft Program EIR that will avoid or substantially lessen the following potentially significant environmental impacts to a less than significant level. The potentially significant impacts, and the mitigation measures that will reduce them to a less than significant level, are as follows:

1.6.1 - Air Quality

Potential Effect

Impact AIR-3	The proposed project would not expose sensitive receptors to substantial pollutant concentrations (Draft Program EIR, Page 3.2-54-56).
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Findings: Less than significant impact with mitigation incorporated. (Draft Program EIR, Page 3.2-56.) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)).

Mitigation Measures

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. Screening area distances may be increased on a case-by-case basis if an unusually large source or sources of hazardous emissions are proposed or currently exist. Based on the results of the HRA, identify and implement measures (such as air filtration systems) to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards. Measures identified in HRAs shall be included into the site development plan as a component of a proposed project.

Facts in Support of Findings: Within the SFBAAB, localized risks are primarily associated with exposure to TAC emissions. Common sources of TAC emissions are stationary sources, subject to BAAQMD permit requirements, on-road motor vehicles on high-volume roads, and off-road sources such as construction equipment and diesel-powered trains traveling on the Caltrain corridor. Although the proposed project does not include specific plans for any new, large stationary sources of emissions, it could result in new sensitive receptors (primarily residential receptors) near existing sources of emissions.

Community Risk and Hazards—Plan Land Use Diagram Special Overlay Zones

The proposed project consists of a General Plan Update, Climate Action Plan Update, and Zoning Code Amendment and would not directly result in construction of any development project. Project-specific information for future individual land use development projects is unknown, thus potential impacts to sensitive receptors resulting from construction-generated TACs cannot be determined. If the proposed project's land use diagram identifies special overlay zones around existing and planned sources of TACs, including special overlay zones of at least 500 feet on each side of all freeways and high-volume roadways (or another BAAQMD-approved modeled distance), and the plan identifies goals, policies, and objectives to minimize potentially adverse impacts, then the community risk and hazard impact would not be significant. This is consistent with BAAQMD's CEQA Air Quality Guidelines for analyzing plan-level impacts to sensitive receptors. Page 3.2-55 of the Draft Program EIR lists sites for which the ARB Air Quality and Land Use Handbook recommends avoiding the siting of new sensitive land uses.

The proposed project does not contain a land use diagram which identifies special overlay zones around existing and planned sources of TACs. MM AIR-1b, detailed above, would be required to ensure that future development facilitated by the proposed project would result in less than significant impacts to sensitive receptors related to operational TACs.

Community Risk and Hazards—Goals, Policies, and Objectives for Reducing Impacts

A proposed plan must also identify goals, policies, and objectives to minimize potential impacts and create overlay zones around sources of TACs, PM_{2.5}, and hazards to be considered to result in less than significant impacts related to exposing sensitive receptors to substantial pollutant concentrations. The General Plan Update contains several policies and actions that aim to reduce the potential growth of vehicle use through encouraging the use of alternative modes of transportation, monitoring and improving existing sources of TACs throughout the City and reducing overall health impacts related to air quality in general.

General Plan Update policies and actions that target the use of alternative modes of transportation, such as bicycling, walking, or using public transit, include Action LU-1.1.3, Policy LU-2.1, Action LU-2.1.2, Policy LU-4.4, and Policy CR-6.5. General Plan Update policies and actions that require the City to monitor and improve existing source of TACs include Policy PE-2.1, Action CHEJ-3.1.1, Action CHEJ-3.2, Action CHEJ-3.2.1, Policy CHEJ-3.2.2, Policy CHEJ-3.3, and Action CHEJ-3.3.1. Lastly, General Plan Update policies and actions that generally aim to reduce health impacts to residents in the City include Policy SA-17.4, Policy SA-32.5, Policy CHEJ-3.1, Action CHEJ-3.3.2, Policy CHEJ-3.5, and Policy CHEJ-3.6.

The South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, include Section 20.300.010 (Performance Standards), which establishes regulations related to air contaminants. Section 20.300.010 requires that sources of air pollution comply with rules identified by the EPA (Code of Federal Regulations, Title 40), the ARB, and the BAAQMD. The section further requires that operators of activities, processes, or uses that require “approval to operate” from the BAAQMD, shall file a copy of the permit with the Planning Division within 30 days of permit approval (Draft Program EIR, Page 3.2-54—56).

The City finds that MM AIR-1b is feasible, is adopted, and will further reduce impacts related to operational TACs. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with air quality would be less than significant with mitigation incorporated.

1.6.2 - Biological Resources

Potential Effect

Impact BIO-1	The proposed project could have a substantial adverse effect, either directly or through habitat modifications, on a species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service (Draft Program EIR, Page 3.3-18-22).
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Findings: Less than significant impact with mitigation incorporated. (Draft Program EIR, Page 3.3-22.) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)).

Mitigation Measures

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.

Facts in Support of Findings: Forty-eight special-status plant species and 51 special-status animal species were recorded to occur within 5 miles or less of the South San Francisco Planning Area. The sensitive plant species are most likely to be found in the estuary habitats around San Francisco Bay. San Bruno Mountain State Park contains critical habitat for Choris' popcornflower. The special-status wildlife species are most likely to be found in parks within the City or in the surrounding hillsides. Shorebirds and aquatic species can be found along the eastern edge of the City, in the estuaries surrounding San Francisco Bay. A few of these wildlife species, such as birds and bats, may find suitable nesting habitat within buildings and other human-made structures. The species most adapted to man-made habitats include the Alameda song sparrow, American peregrine falcon, and Townsend's big-eared bat. San Bruno Mountain State Park contains critical habitat for the Bay checkerspot butterfly. Subsequent development under the proposed project could result in the direct/indirect loss or indirect disturbance of special-status plant or animal species or their habitats that are known to occur, or have potential to occur, in the region.

Significant impacts on special-status plant species associated with individual subsequent projects could include the direct loss of individual plants and of habitat areas associated with these special-status plant species. Indirect impacts to special-status plant species could include habitat degradation as a result of impacts to water quantity and quality. Significant impacts could include, but are not limited to, increased mortality caused by higher numbers of automobiles in new areas of development; direct mortality from the collapse of underground burrows, resulting from soil compaction; direct mortality resulting from the movement of equipment and vehicles through construction areas; direct mortality resulting from removal of trees with active nests; direct mortality or loss of suitable habitat resulting from the trimming or removal of obligate host plants;

direct mortality resulting from the filling of wetlands features; loss of breeding and foraging habitat resulting from the filling of seasonal or perennial wetlands; loss of breeding, foraging, and refuge habitat resulting from the permanent removal of riparian vegetation; loss of suitable habitat for vernal pool invertebrates resulting from the destruction or degradation of vernal pools or seasonal wetlands; abandonment of eggs or young and subsequent nest failure for special-status nesting birds, including raptors, and other non-special-status migratory birds resulting from construction-related noises; loss or disturbance of rookeries and other colonial nests; loss of suitable foraging habitat for special-status raptor species; loss of migration corridors resulting from the construction of permanent structures or features; and impacts to fisheries/species associated with waterways.

The Endangered Species Act and CESA generally prohibit the taking of protected plant and animal species or direct impacts to foraging or breeding habitat without a special permit. The General Plan Update Policy ES-2.1 requires the City to protect and expand existing marsh and wetland habitat to improve water quality, adapt to climate change, and provide habitat for wildlife. Policy ES-2.2 requires the City to maintain standards and guidelines for new construction within 150 feet of San Francisco Bay that support the health of the Bay, such as the installation of bioswales to treat runoff before it enters the Bay, use of low intensity lighting to reduce the amount of light reaching sensitive habitat, and requiring an assessment as part of the CEQA process to consider wildlife impacts before project approval to continue to protect special-status of species. Action ES-2.2.1 requires the City to develop a bird-safe design ordinance to minimize the adverse effects on native and migratory birds and require new development East of 101 to incorporate design measures. Policy ES-3.3 requires the City to maintain development standards and guidelines for new construction within 80 feet of Colma Creek, such as maintaining or increasing building setbacks to support habitat areas. Policy ES-6.1 requires the City to continue to catalog and update information on threatened and endangered wildlife and plant species in the review of project proposals. Policy ES-6.2 requires wildlife and plant assessments for new development in areas that could impact threatened or endangered species. Policy ES-6.3 requires that permit applications for projects located within ecologically sensitive habitat areas prepare site-specific biological assessments for review and approval by City Planning staff, and incorporation of the recommended measures during construction to protect ecologically sensitive habitat areas.

The South San Francisco Zoning Ordinance Chapter 20.170 (existing) creates a Special ES Overlay District to protect areas of high biological value. Section 20.170.003 (Habitat and Biological Resource Conservation Areas) (existing) requires a site-specific assessment of biological resources for all development proposals in areas of the Special ES Overlay District that have been identified as ecologically sensitive habitat (such as Sign Hill Park, San Bruno Mountain State Park, and the saltmarshes along San Francisco Bay) as shown on a map or maps maintained by the City. Section 20.170.003 also requires that sensitive habitat areas be protected in the following order: (1) avoidance; (2) on-site mitigation; (3) off-site mitigation; and (4) purchase of mitigation credits.

Future development under the proposed project would be required to comply with the various federal and State laws and regulations and with requirements of the South San Francisco Zoning Ordinance and the General Plan Update policies and actions related to biological resources. To further enhance and ensure protection of threatened and endangered species, as well as nesting

and migratory birds, MM BIO-1 requires that focused surveys be conducted. Implementation of these requirements, policies, and actions will have both direct and indirect beneficial effects for species by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, requiring surveys, and by emphasizing avoidance, minimization, and mitigation of impacts to habitats (Draft Program EIR, Page 3.3-18-22).

The City finds that MM BIO-1 is feasible, is adopted, and will further reduce impacts related to species and habitat. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with biology would be less than significant with mitigation incorporated.

Potential Effect

Impact BIO-3	The proposed project could 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 (Draft Program EIR, Page 3.3-23-25).
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Findings: Less than significant impact with mitigation incorporated. (Draft Program EIR, Page 3.3-25.) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR. (State CEQA Guideline§ 15091(a)(1).)

Mitigation Measures

MM BIO-3 Assess Potential Wetland Impacts

Applicants or sponsors of projects on sites where potential jurisdictional wetlands or waterways are present shall 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). This investigation shall include assessing potential impacts to wetlands and other waters of the United States and/or State. If a feature is found to be jurisdictional or potentially jurisdictional, the project applicant or sponsor shall comply with the appropriate permitting process with each agency claiming jurisdiction prior to disturbance of the feature, and a qualified Biologist/wetland regulatory specialist shall conduct a detailed wetland delineation if necessary.

Facts in Support of Findings: Estuarine and marine wetlands line the City's coastline and parts of Colma Creek and San Bruno Creek. A navigable slough is located south of Colma Creek in the southeastern portion of the City. Subsequent development under the proposed project, primarily adjacent to the San Francisco Bay, could result in direct or indirect effects on estuarine habitat and other sensitive marine communities. Federally protected wetlands and other waters of the United States and/or State could be affected through direct removal, filling, hydrological interruption

(including dewatering), alteration of bed and bank, and other construction-related activities, which could result in significant environmental impacts.

The General Plan Update Policy ES-2.1 requires the City to protect and expand existing marsh and wetland habitat to improve water quality, adapt to climate change, and provide habitat for wildlife. Policy ES-2.2 requires the City to maintain standards and guidelines for new construction within 150 feet of San Francisco Bay that support the health of the Bay, such as requiring no net new impervious areas, maintaining (or increasing) building setbacks to support habitat areas, and requiring the installation of bioswales to treat runoff before it enters the Bay. Policy ES-3.3 requires the City to maintain development standards and guidelines for new construction within 80 feet of Colma Creek, such as requiring no net new impervious areas, maintaining, or increasing building setbacks to support habitat areas, and encouraging new construction to construct bioswales or similar features to treat runoff before it enters the creek. Policy ES-7.1 requires the City to partner with regional and local agencies to develop a comprehensive watershed management strategy that identifies programs, partnerships, actions, and incentives that the City and partners can take to protect the City's water resources and aquatic areas.

The South San Francisco Zoning Ordinance Section 20.170.003 (Habitat and Biological Resource Conservation Areas) (existing) requires a site-specific assessment of biological resources for all development proposals in areas of the Special ES Overlay District that have been identified as ecologically sensitive habitat, such as the saltmarshes along San Francisco Bay. Section 20.170.003 (existing) requires that approval of a development permit for a project on a site located within an area identified as ecologically sensitive habitat shall not occur unless the applicable review body first finds that there has been "no net loss" of wetlands and that disturbed wetlands have been replaced with the same type of wetlands.

MM BIO-3 requires that a qualified Biologist/wetland regulatory specialist conduct a site investigation and assessment. Future development under the proposed project would comply with adopted State, federal, and local regulations for the protection of wetlands and waters of the United States and/or State, including Section 404 and 401 of the Clean Water Act (CWA). In addition, future projects would comply with requirements of the South San Francisco Zoning Ordinance and the General Plan Update policies and actions related to the protection of these biological resources. Lastly, future development would be required to implement MM BIO-3 (Draft Program EIR, Page 3.3-23-26).

The City finds that MM BIO-3 is feasible, is adopted, and will further reduce impacts related to wetlands and biological resources. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with biology would be less than significant with mitigation incorporated.

Potential Effect

Impact BIO-4	The proposed project could interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of wildlife nursery sites. (Draft Program EIR, Page 3.3-26—27).
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Findings: Less than significant impact with mitigation incorporated.

Mitigation Measures

Implement MM BIO-1 and MM BIO-3.

Facts in Support of Findings: The San Francisco Bay provides essential natural resources for migratory birds on the Pacific Flyway. Pockets of parks and open space within the City provide space for wildlife and Colma Creek, San Bruno Creek, and Navigable Slough of San Bruno Creek provide connections between these open areas. The City’s urban forest canopy can support the movement of a variety of migratory bird species, while creeks and drainages typically serve as movement corridors for wildlife.

Future development under the proposed project would comply with adopted State, federal, and local regulations for the protection of biological resources. Future projects would also comply with requirements of the South San Francisco Municipal Code and Zoning Ordinance and the General Plan Update policies and actions related to biological resources. MM BIO-1, which requires that focused surveys be conducted 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, would also protect wildlife movement corridors. MM BIO-3, which requires that a site investigation and assessment be conducted for projects on sites where potential jurisdictional wetlands or waterways are present, and compliance with the appropriate permitting process with each agency claiming jurisdiction prior to disturbance of the feature, would also protect wildlife movement corridors.

Many of the policies and actions already discussed above have both direct and indirect benefits of protecting movement habitat for wildlife, including Policy ES-1.1, Policy ES-1.2, Policy ES-1.3, Policy ES-1.4, Policy ES-2.1, Policy ES-3.1, and Action ES-2.2.1. Implementation of these policies and actions, as well as MMs BIO-1 and BIO-3, therefore, would have both direct and indirect beneficial effects for protecting regional wildlife linkages and facilitating wildlife movement.

The City finds that MM BIO-1 and MM BIO-3 are feasible, are adopted, and will further reduce impacts related to wildlife linkages and movement. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with biology would be less than significant with mitigation incorporated.

1.6.3 - Geology, Soils, and Seismicity

Potential Effect

Impact GEO-6	The proposed project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. (Draft Program EIR, Page 3.6-28-29.)
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Findings: Less than significant impact with mitigation incorporated. (Draft Program EIR, Page 3.6-29.) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)).

Mitigation Measures

MM GEO-6 Applicants, owners, and/or sponsors of all future development or construction projects shall be required to perform or provide paleontological monitoring for all proposed excavations in the Colma Formation and Merced Formation, including those buried in the shallow subsurface below Quaternary deposits, due to the high paleontological sensitivity for significant resources in these areas. Should significant paleontological resources (e.g., bones, teeth, well-preserved plant elements) be unearthed by the future project construction crew, the project activities shall be diverted at least 15 feet from the discovered paleontological resources until a professional vertebrate Paleontologist has assessed such discovered resources and, if deemed significant, such resources shall be salvaged in a timely manner. The applicant/owner/sponsor of said project shall be responsible for diverting project work and providing the assessment including retaining a professional vertebrate Paleontologist for such purpose. Collected fossils shall be deposited by the applicant/owner/sponsor in an appropriate repository (e.g., University of California Museum of Paleontology (UCMP), California Academy of Sciences) where the collection shall be properly curated and made available for future research.

Facts in Support of Findings: Any project involving earthmoving activity could potentially result in inadvertent discovery and disturbance of paleontological resources during grading and excavation work. The paleontological records search conducted for the proposed project indicates that the potentially fossiliferous areas in the Planning Area are the Merced Formation and the Colma Formation. As such, construction-related and earth-disturbing actions from development facilitated by the proposed project within the Merced Formation and Colma Foundation have the potential to damage or destroy fossils resulting in significant impacts on paleontological resources. With implementation of Mitigation Measure (MM) GEO-6, detailed above, potential impacts to paleontological resources would be reduced to less than significant.

The remaining portions of the Planning Area have a low paleontological sensitivity and low paleontological potential. Nonetheless, in the unlikely event that any earth-disturbing construction-related activities uncover significant paleontological resources, potential impacts to paleontological resources would be minimized through compliance with federal and State laws that protect paleontological resources. Section 5097 of the Public Resources Code specifies procedures to be followed in the event of unexpected discovery of paleontological resources. Compliance with Section

5097 of the Public Resources Code would minimize the potential to impact paleontological resources directly and indirectly within the portions of the Planning Area that have a low paleontological sensitivity and low paleontological potential, and impacts would be less than significant (Draft Program EIR, Page 3.6-28-29).

The City finds that MM GEO-6 is feasible, is adopted, and will further reduce impacts related to paleontological resources. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with paleontological resources would be less than significant with mitigation incorporated.

1.6.4 - Noise

Potential Effect

Impact NOI-1	The proposed project could generate 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. (Draft Program EIR, Pages 3.11-24-32.)
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Findings: Less than significant impact with mitigation incorporated. (Draft Program EIR, Page 3.11-32.) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)).

Mitigation Measures

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.

Facts in Support of Findings: The proposed project could result in new residential and nonresidential uses within the Planning Area. Additionally, the proposed project may result in other private and public improvements throughout the City that have the potential for environmental effects related to noise. The General Plan Update includes policies that require preparation of acoustical studies for residential development where the existing noise levels exceed an exterior noise level of 65 dBA CNEL. Additionally, General Plan Update policies require that new office and commercial development be designed to reduce interior noise levels. Individual development projects would be required to demonstrate compliance with these standards during the design review process. The applicable chapters of the Municipal Code and Zoning Ordinance, including the revised chapters of the Zoning Ordinance that are part of the proposed project, reiterate compliance with the noise performance thresholds identified in the Municipal Code.

Construction activity can temporarily increase noise, while traffic and stationary noise sources related to future development projects can result in permanent noise increase. Potential temporary and permanent noise increase impacts from construction and operation of the proposed project are analyzed below.

Temporary Construction Noise Increases

A significant impact would occur if noise producing construction activities from the proposed project exceed noise performance standards during certain hours depending on land use as permissible by the City's Municipal Code listed on page 3.11-25 of the Draft Program EIR. An exception to these standards may only be granted if an application for construction-related exception is submitted and considered by the City Manager or the manager's designee in accordance with Section 8.32.060 of the Municipal Code.

The proposed project does not include specific development proposals, thus exact noise levels, locations, or time periods for construction of such projects cannot be determined. However, sites adjacent to areas where future development/redevelopment is anticipated to occur could expose people to construction noise throughout the construction period. Because construction is performed in discrete steps with unique noise characteristics, noise levels vary as construction progresses. However, similarities in the dominant noise sources and patterns of operation allow construction noise ranges to be categorized by work phase. The site preparation phase, which includes excavation and grading activities, generate the highest noise levels. Typical noise levels of construction equipment as measured at a distance of 50 feet from the operating equipment are shown in Table 3.11-2 of the Draft Program EIR.

The City has not adopted numeric thresholds of significance for construction noise. However, the City has adopted mandatory requirements in the South San Francisco Municipal Code and General Plan Update that will ensure that construction noise associated with General Plan implementation remains less than significant. Municipal Code Section 8.32.050, as previously mentioned, regulates the time when construction activities may occur, and an exception may be granted to these hours

only if an application for construction-related exception is made to and considered by the City Manager or the City Manager’s designee. Section 8.32.050 of the Municipal Code is applied to all construction permits and compliance is mandatory and is monitored by City grading and building department personnel and is also monitored and addressed through reporting by members of the public when construction hours are not being observed. Furthermore, Policy NOI-1.2 of the Noise Element requires enforcement of the City’s Noise Ordinance noise performance standards. In addition, the Actions of Policy NOI-1.2 include the requirement to restrict construction activities to acceptable time periods and to consider constructing temporary sound walls surrounding construction sites during construction. This ensures that construction noise will not occur to a level beyond what is stipulated in the Municipal Code when residents are most vulnerable to noise disturbance.

This analysis identifies the worst-case, loudest phase of construction and identifies the compliance requirements that would reduce this worst-case impact to less than significant. Therefore, other phases of construction that would produce lower noise levels would similarly be reduced to less than significant with the same compliance requirements. Compliance with mandatory requirements of the Municipal Code and General Plan Update will ensure that construction noise occurs only at appropriate times of day and is minimized to acceptable levels.

Permanent Traffic Noise Increases

A significant impact would occur if traffic generated by the proposed project would result in a substantial increase in ambient noise levels compared with existing conditions. The County does not define “substantial increase.” For purpose of this analysis, a substantial increase is based on the following criteria. A characteristic of noise is that audible increases in noise levels generally refer to a change of 3 dBA or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. Therefore, for purposes of this analysis, a significant impact would occur if the proposed project would cause the CNEL to increase by any of the amounts listed on page 3.11-27 of the Draft Program EIR.

As identified in Table 3.11-7 of the Draft Program EIR, noise environments with noise levels of up to 65 dBA CNEL are considered normally acceptable for residential land use developments, industrial and commercial land use development, and for open land use areas and schools.

The FHWA highway traffic noise prediction model (FHWA-RD-77-108) was used to evaluate existing and future traffic noise conditions with implementation of the proposed project along modeled roadway segments in the vicinity of the Planning Area. Traffic modeling was performed using the data provided by Fehr & Peers. The traffic noise modeling input and output files included in Appendix G of the Draft Program EIR. Table 3.11-8 of the Draft Program EIR shows a summary of the traffic noise levels for year 2040 projected traffic conditions without and with the proposed project, as measured at 50 feet from the centerline of the outermost travel lane. Several of the modeled roadway segments would experience a reduction in traffic noise levels with implementation of the proposed project, compared to conditions that would exist without the proposed project, due to lower anticipated average daily trips generated by the proposed land uses compared to the total development that could occur under the existing General Plan. The highest increase that would

occur along these modeled roadway segments would be a 1.7 dBA increase above conditions without the proposed project and would occur along Grand Avenue from Linden Avenue to Airport Boulevard. According to the significance impact criteria identified above, a 5 dBA increase would be considered significant for these conditions.

Although this analysis evaluates buildout of the proposed project against baseline conditions, it is important to note that the development contemplated by the proposed project is consistent with development already allowed under the existing General Plan. Accordingly, it is reasonable to assume that development consistent with the existing General Plan would potentially occur absent the adoption of the General Plan Update. While development envisioned by the proposed project would result in an incremental increase in development in the Planning Area, future development would be required to comply with requirements of the General Plan Update and City of South San Francisco Municipal Code protecting against noise impacts. Specifically, Policy 1-1 requires that all new development within the City complies with the Land Use/Noise Compatibility guidelines, along with associated Actions which require that projects must be assessed through the subdivision, site plan, conditional use permit, and other development review processes, and that such projects must incorporate conditions of approval and mitigation measures that ensure noise compatibility where appropriate. In addition, Section 20.300.009 (Performance Standards) (revised) of the Zoning Ordinance also establishes land use development requirements and limitations, as well as acoustic design requirements for development in noise impacted areas.

Permanent Stationary Source Noise Increases

A significant impact would occur if operational noise levels generated by stationary noise sources at development projects under the proposed project exceed noise performance standards listed on page 3.11-30 of the Draft Program EIR. Future development projects under the proposed project would include new stationary noise sources such as parking lot activities, and mechanical ventilation system equipment. These would be potential point sources of noise that could affect noise-sensitive receptors in the vicinity of the proposed project.

Parking Lot and Truck Loading/Unloading Activities

Typical parking lot activities generate noise levels ranging from approximately 60 dBA to 70 dBA L_{max} at 50 feet. Noise levels from typical rooftop unit mechanical ventilation equipment range from 50 dBA to 60 dBA L_{eq} at a distance of 25 feet. Typical maximum noise levels from truck loading and unloading activity are 70 dBA to 80 dBA L_{max} as measured at 50 feet. These stationary source operational noise levels could exceed the City's noise performance thresholds if they were to occur in areas adjacent to sensitive receptor land uses. With implementation of Mitigation Measure (MM) NOI-1, detailed above, impacts generated by future development projects under the proposed project would be reduced to less than significant.

Mechanical Equipment Operations

Noise levels from commercially available mechanical ventilation equipment range from 50 dBA to 60 dBA L_{eq} at a distance of 25 feet. These stationary source operational noise levels could exceed the City's thresholds if they were to occur in areas adjacent to sensitive receptor land uses. With implementation of MM NOI-1, detailed above, impacts generated by future development projects under the proposed project would be reduced to less than significant (Draft Program EIR, Pages 3.11-24-3.11-32).

The City finds that MM NOI-1 is feasible, is adopted, and will further reduce impacts related to noise impacts on sensitive receptors. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with noise would be less than significant with mitigation incorporated.

Potential Effect

Impact NOI-3 **The proposed project could expose people residing or working in the plan area to excessive noise levels 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 (Draft Program EIR, Pages 3.11-34-35).**

Findings: Less than significant impact with mitigation incorporated. (Draft Program EIR, Page 3.11-35.) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)).

Mitigation Measures

MM NOI-3 Airport Noise Impact Reduction Plan

Prior to issuance of building permits, the project applicant or sponsor of proposed development projects shall implement the following measures to limit airport activity noise source impacts:

- Any proposed residential development project or any hotel, motel, or transient lodging land use development project, that would be located within the San Francisco International Airport (SFO) 65 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) noise contours, 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 airport activity noise levels to meet the interior noise level standards shown in Table 11 of the Noise Element. Outdoor active use space must also comply with the exterior noise standards of Table 11 of the Noise Element or must be excluded from such projects. The report must be approved by the Planning Division prior to issuance of building permits.
- Any proposed commercial development project that would be located within the SFO 70 dBA CNEL noise contours 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 airport activity noise levels to meet the interior noise level standards shown in Table 11 of the Noise Element. The report must be approved by the Planning Division prior to issuance of building permits.

- Any proposed institutional or public facility development project that would be located within the SFO 65 dBA CNEL noise contours 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 airport activity noise levels to meet the interior noise level standards shown in Table 11 of the Noise Element. Outdoor active use space must also comply with the exterior noise standards of Table 11 of the Noise Element or must be excluded from such projects. The report must be approved by the Planning Division prior to issuance of building permits.

Facts in Support of Findings: The City of South San Francisco experiences air traffic noise impacts due to its proximity to SFO. Aircraft noise in the City results from aircraft departing from Runway 28 and from Runway 1. Flights departing from Runway 28 climb directly over noise-sensitive land uses resulting in high pass-by noise levels in residential areas, including areas outside the contours that define noise-impacted areas. The proposed project does not propose additional special events or sources of single-event noise in the form of aircraft flyover noise. Therefore, the proposed project would not result in changes in the 65 dBA CNEL airport noise contours and would not increase airport noise impacts.

However, future development could introduce noise-sensitive land uses to excessive aircraft noise levels if they would occur within the 65 dBA CNEL contours of the airport. Any local plans, policy actions or development activities that affect areas within the 65 dBA CNEL contour established in the SFO ALUCP must receive San Mateo County ALUC approval or have a finding of overriding consideration prior to local permit issuance. The proposed project envisions future development that could occur within the 65 dBA CNEL noise contours which could expose persons residing or working at these areas to noise levels from airport activity that would be in excess of normally acceptable land use compatibility standards. For example, the proposed project includes planned mixed-use residential areas east of US-101 which would lie within the airport's runway safety zone boundaries and the SFO 65 dBA CNEL noise contours shown on Exhibit 3.11-2 of the Draft Program EIR.

These airport activity noise levels could exceed the City's noise/land use compatibility standards for certain land uses. Therefore, mitigation would be required to reduce this potential impact. With implementation of MM NOI-3, detailed above, impacts generated by future development projects under the proposed project would be reduced to less than significant (Draft Program EIR, Pages 3.11-34-35).

The City finds that MM NOI-3 is feasible, is adopted, and will further reduce noise impacts. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the proposed project that mitigate or avoid the potentially significant impacts as identified in the EIR. Therefore, impacts associated with noise would be less than significant with mitigation incorporated.

1.7 - Impacts Identified in the Draft Program EIR as Being Significant and Unavoidable Even After the Incorporation of All Feasible Mitigation Measures

The City of South San Francisco hereby finds that, despite the incorporation of mitigation measures outlined in the Draft Program EIR and the attached MMRP, the following impacts from the proposed project and related approvals cannot be fully mitigated to a less than significant level and a Statement of Overriding Considerations is therefore included herein.

1.7.1 - Air Quality

Impact AIR-1	The proposed project would conflict with or obstruct implementation of an applicable air quality plan (Draft Program EIR, Page 3.2-35-50).
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Findings: Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)). However, impacts would still remain significant and unavoidable even with mitigation incorporated. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly-trained workers, make infeasible the mitigation measure or project alternatives identified in the EIR (State CEQA Guidelines § 15091(a)(3)). (Draft Program EIR, Page 3.2-50).

Mitigation Measures

MM AIR-1a Individual development projects facilitated by the proposed project 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 mph.
- 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.

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 Assessments (HRA) for residential development and other sensitive receptors.

Screening area distances may be increased on a case-by-case basis if an unusually large source or sources of hazardous emissions are proposed or currently exist. Based on the results of the HRA, identify and implement measures (such as air filtration systems) to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards. Measures identified in HRAs shall be included into the site development plan as a component of a proposed project.

MM TRANS-1 Transportation Demand Management

To reduce Vehicle Miles Traveled (VMT), the City shall implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements. The City shall also update its TDM Ordinance and parking requirements every five to ten years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. The City shall achieve the performance standards outlined in the TDM Ordinance.

The City shall update its TDM Ordinance every 5 to 10 years to limit Total VMT and Work-Based VMT by incentivizing use of transit and active transportation and disincentivizing auto use. The TDM Ordinance shall cover all development projects generating greater than 100 daily trips, with the most stringent requirements for office/Research and Development (R&D) land uses that disproportionately account for the highest rates of VMT in the City. Development projects shall implement a combination of TDM programs, services, and infrastructure improvements, including but not limited to: establishing trip reduction programs; subsidizing transit and active transportation use; coordinating carpooling and vanpooling; encouraging telecommuting and flexible work schedules; designing site plans to prioritize pedestrian, bicycle, and transit travel; funding first/last mile shuttle services; establishing site-specific trip caps; managing parking supply; and constructing transit and active transportation capital improvements. Developments shall be subject to annual monitoring. The City shall establish an administrative fine structure for developments found to be out of compliance and apply any revenues from fines to infrastructure and services aimed at reducing VMT.

The City shall establish an East of 101 Area Trip Cap to support the monitoring of vehicle trip activity and focus efforts to reduce VMT. The area-wide trip cap shall apply to the high-density employment uses in the East of 101 Area. The City shall conduct annual traffic counts along the cordon area perimeter. Should the trip cap be reached, the City shall consider corrective actions such as: revising mode share targets for projects subject to the TDM Ordinance, identifying new funding measures for TDM services, implementing new vehicle user charges, creating new street connections, or slowing the pace of development approvals within the cordon zone.

The City shall update its parking requirements every 5 to 10 years to align with its TDM Ordinance and East of 101 Area Trip Cap. The City shall establish parking maximums for office/R&D uses to ensure that VMT reduction goals are incorporated into the design of development projects.

Facts in Support of Findings: According to the BAAQMD’s guidance, a proposed land use plan would be consistent with the AQP if it would: (1) support the primary goals of the AQP, (2) include applicable control measures from the AQP, (3) not disrupt or hinder implementation of any AQP control measures, and (4) the plan’s projected VMT increase must be less than or equal to its projected population growth.

- (1) *The proposed project supports the primary goals of the AQP:* The primary goals of the 2017 Bay Area Clean Air Plan are to attain air quality standards, reduce population exposure and protect public health, and reduce GHG emissions and protect the climate.

The proposed project would be consistent with the 2017 Bay Area Clean Air Plan’s primary goal of achieving and maintaining attainment status for AAQS as the land use patterns in the proposed project would not be substantially different from existing land use patterns. In addition to existing regulations in the Municipal Code, the proposed project includes several policies and actions related to improving air quality, including Policy CHEJ-3.1, Action CHEJ-3.1.1, Action CHEJ-3.2, Action CHEJ-3.2.2, Action CHEJ-3.3.2, Policy CEHJ-3.5, Policy CR-6.1, and Policy CR-6.5. The CAP includes several actions that assist in reducing or avoiding impacts related to air quality. Several of the CAP measures focus on reducing VMT and consequently mobile source emissions, as well as promoting green building design which reduces indirect air quality associated with the building envelope. These include Action CE-1.1, CE-1.3, CE-1.6, TL-1.1, TL-2.2, and TL-2.6, as well as the South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, including Section 20.300.008 (Lighting and Illumination), Section 20.480 (Design Review), and Section 20.300.010 (Performance Standards). Furthermore, as discussed in Impact AIR-2, individual development projects would be required to undergo their own respective CEQA environmental review, including an analysis of potentially significant impacts on local and regional air quality and consideration of an individual development project’s contribution to an existing or forecasted air quality violation. MM AIR-1a would be required to ensure that individual development projects would result in less than significant construction fugitive dust impacts. MM AIR-1a contains BAAQMD’s “Basic Construction Mitigation Measures Recommended for All Proposed Projects.”

The daily VMT per service population (employees + residents) is anticipated to be reduced from 27.42 VMT per service population for existing conditions to 26.80 VMT per service population for proposed project buildout conditions (see Draft Program EIR, Section 3,14, Transportation.) The reduction in VMT per service population would reduce the population’s exposure to TACs from transportation-related sources. As identified in the discussion of community risk and hazards (see Impact AIR-3), new sensitive land uses could be proximate to sources of TACs, and new commercial land uses could generate an increase in TACs. As discussed in Impact AIR-3, mandatory compliance with BAAQMD regulations would ensure that new sources of TACs do not expose populations to significant health risk. Consistent with BAAQMD’s CEQA Air Quality Guidelines, the proposed project

would not result in a potentially significant community risk and hazard impact if the land use diagram identifies special overlay zones around existing and planned sources of TACs, including special overlay zones of at least 500 feet on each side of all freeways and high-volume roadways (or another BAAQMD-approved modeled distance), and the plan identifies goals, policies, and objectives to minimize potentially adverse impacts. Because the proposed project does not currently contain a land use diagram which identifies special overlay zones around existing and planned sources of TACs, MM AIR-1b would be required to ensure that future development facilitated by the proposed project would result in less than significant impacts related to exposing sensitive receptors to substantial pollutant concentrations. Measures identified in HRAs shall be included into the site development plan as a component of the project. MM AIR-1b would ensure that future development facilitated by the proposed project would result in less than significant impacts to sensitive receptors related to operational TACs. Implementation of new and revised General Plan Update and CAP policies and programs would reduce community risk and hazards. Lastly, future development would be required to comply with Section 20.300.010 (Performance Standards) of the Zoning Ordinance.

As discussed in Section 3.7, Greenhouse Gas Emissions, implementation of the proposed project would substantially contribute to the region's achievement of the 2030 Statewide GHG reduction goal and is forecasted to advance toward the 2050 Statewide goal. In addition, the proposed project is consistent with regional strategies for infill development identified by the MTC/ABAG in the Plan Bay Area. Consequently, the proposed project is consistent with the goals of the 2017 Bay Area Clean Air Plan to reduce GHG emissions.

- (2) *The Proposed Project Includes Applicable Control Measures From the AQP:* The proposed project includes the applicable control measures from the AQP. Table 3.2-5 from the Draft Program EIR identifies the applicable control measures included in the 2017 Clean Air Plan and the General Plan Update and CAP policies and actions, as well as regulations in the South San Francisco Municipal Code and Zoning Ordinance related to the control measures. Measures not included in Table 3.2-5 were determined by the City to not be applicable to the proposed project. As shown in Table 3.2-5, the General Plan Update, South San Francisco Zoning Ordinance, CAP, and South San Francisco Municipal Code include policies, actions, and requirements that incorporate and implement the control measures included in the 2017 Clean Air Plan. As such, the proposed project would be consistent with the 2017 Clean Air Plan under this criterion.
- (3) *The Proposed Project Would Not Disrupt or Hinder Implementation of Any AQP Control Measures:* As shown in Table 3.2-5, the General Plan Update and South San Francisco Municipal Code incorporate and are consistent with the control measures included in the 2017 Clean Air Plan. The proposed project does not include any components that would disrupt or hinder implementation of any control measures, such as precluding an extension of a planned transit line or bike bath or proposing excessive parking. As previously discussed, control measures not included above would not pertain to the proposed project as a long-range land use planning document, such as Control Measure SS7, Sulfuric Acid Plants, which calls for the consideration of amending District Rule 9-1 to limit SO₂ emissions from acid plants associated with petroleum refining or Control Measure TR1, Clean Air Teleworking Initiative, that calls for the development of teleworking best practices for

employers. Measures not included in Table 3.2-5 were determined by the City to not be applicable to the proposed project. Please refer to the BAAQMD's 2017 Clean Air Plan for more information on all 55 control measures. As such, the proposed project would not hinder the BAAQMD from implementing the control measures in the 2017 Clean Air Plan.

- (4) *The Proposed Project Would Not Reduce VMT Per Capita:* The increase in daily VMT from implementation of the proposed project has been analyzed in Section 3.14, Transportation, which found that the total daily VMT would increase from the existing (year 2019) 3,387,200 VMT to 6,585,400 VMT in 2040 with buildout of the proposed project, resulting in a net increase of 3,198,200 daily VMT. As discussed in Section 3.14, Transportation, the City's population would grow from an estimated 67,200 people under existing conditions to an estimated 108,100 people in 2040 with buildout of the proposed project. As such, the proposed project would facilitate an estimated population growth of 40,900 people by 2040. The VMT growth facilitated by the proposed project would constitute an approximately 94 percent growth through 2040 while population growth facilitated by the proposed project would constitute an approximately 61 percent growth through 2040. The forecasted VMT growth would outpace the forecasted population growth facilitated by the proposed project. Therefore, the proposed project would be considered inconsistent with the 2017 Clean Air Plan. The proposed project would implement MM TRANS-1, which would require the City to implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements to reduce project-generated VMT. MM TRANS-1 also requires the City to update its TDM Ordinance and parking requirements every 5 to 10 years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. However, even with the implementation of the General Plan Update policies and actions and implementation of MM TRANS-1, because the effectiveness of VMT reduction strategies cannot be quantified in this programmatic analysis, the City of South San Francisco may not achieve the overall VMT threshold reduction level. As such, this impact would be significant and unavoidable.

In conclusion, overall development facilitated by the proposed project would be inconsistent with the 2017 Clean Air Plan, since it would facilitate VMT growth which outpaces the forecasted population growth. Nonetheless, the proposed project would support the primary goals of the AQP, include applicable control measures from the AQP, and neither disrupt nor hinder implementation of any AQP control measures. Because the proposed project would facilitate VMT growth which outpaces forecasted population growth through 2040, the proposed project would conflict with the 2017 Clean Air Plan and impacts would be significant and unavoidable after mitigation. (Draft Program EIR, Page 3.2-34-50).

The City finds that MM AIR-1a, MM AIR-1b and MM TRANS-1 are feasible, are adopted, and will reduce VMT impacts to the extent feasible. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or reduce the potentially significant impacts as identified in the EIR to the extent feasible. However, impacts associated with VMT growth would remain significant and unavoidable even with mitigation incorporated.

Impact AIR-2	The proposed project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard (Draft Program EIR, Page 3.2-50-54).
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Findings: Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)). However, impacts would still remain significant and unavoidable even with mitigation incorporated. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the EIR (State CEQA Guidelines § 15091(a)(3)). (Draft Program EIR, Page 3.2-54).

Mitigation Measures

Implement MM AIR- 1a and MM TRANS-1.

Facts in Support of Findings: *Construction:* Future development supported by the proposed project would result in short-term construction-related criteria pollutant emissions that have the potential to have an adverse effect on air quality. Short-term criteria pollutant emissions would occur during demolition, site preparation, grading, building construction, paving, and architectural coating activities associated with individual development projects. ROG and NOX emissions are primarily associated with gasoline and diesel equipment exhaust and the application of architectural coatings. Fugitive dust emissions (PM₁₀ and PM_{2.5}) are primarily associated with site preparation and vary as a function of such parameters as soil silt content, soil moisture, wind speed, acreage of disturbance area, and VMT by construction vehicles on- and off-site. Typical construction equipment associated with development and redevelopment projects includes dozers, graders, excavators, loaders, and trucks.

Although the exact coverage, location, or duration of future construction projects is unknown at the time of preparation of the Draft Program EIR, future development activities would generally entail demolition, site preparation, grading, building construction, paving, and painting. Since South San Francisco is generally a built-out city, many new projects in the City will likely require the demolition of existing structures to make room for newer ones. In addition, the proposed project may result in other private and public improvements throughout the City. Fugitive dust emissions would typically be greatest during building demolition, site preparation, and grading due to the disturbance of soils and transport of material. NO_x emissions would also result from the combustion of diesel fuels used to power off-road heavy-duty vehicles and equipment (e.g., backhoes, bulldozers, excavators). The types and quantity of equipment, as well as duration of construction activities, would be dependent on project-specific conditions. Larger projects would require more equipment over a longer time frame than that required for redevelopment of a single, residential home or small residential or mixed-use project.

The BAAQMD maintains and recommend project-level thresholds would apply to potential future development projects. In addition, the BAAQMD's CEQA Air Quality Guidelines identify and recommend a series of "Basic" measures to control and reduce construction-related emissions. For

all projects, the BAAQMD recommends implementation of eight Basic Construction Measures to reduce construction fugitive dust emissions. The BAAQMD determines a less than significant impact with respect to construction fugitive dust emissions when following Basic Construction Measures highlighted in the Draft Page EIR at page 3.2-51. MM AIR-1a would be required to ensure that individual development projects facilitated by the proposed project would result in less than significant impacts. MM AIR-1a contains BAAQMD’s “Basic Construction Mitigation Measures Recommended for All Proposed Projects” in the bullet points listed above and contained in the BAAQMD’s 2017 CEQA Air Quality Guidelines, which are recommended by the BAAQMD to ensure construction fugitive dust emissions are less than significant.

Operation: The proposed project would accommodate new residential and nonresidential development that will operate through the General Plan Update horizon year 2040. Long-term criteria pollutant emissions would result from the operation of residential, retail, light industrial, commercial, and institutional uses supported by the proposed project. Operational air quality emissions are principally generated from area, energy, and mobile sources. Area source emissions are the combination of many small emission sources that include use of outdoor landscape maintenance equipment, use of consumer products such as cleaning products, use of fireplaces and hearths, and periodic reapplication of architectural coatings. Criteria pollutants generated from energy sources are principally from the on-site use of natural gas; electricity consumption is not included in energy source emissions as those potential emissions would be generated as the result of the operation of an electricity generation facility which may or may not be within the same air basin and under the same attainment status as the end-use. Mobile source emissions result from the vehicle activity associated with the operation of a given land use development project, including resident, worker, and patron vehicle trips.

Implementation of the proposed project may result in development of up to 17,153 net new residential units (based on 2019 baseline data from Fehr & Peers), and up to 14,100,523 square feet of net new nonresidential space. Future development projects would be subject to the City’s standard CEQA review process and would be required to assess project-specific emissions in relation to the BAAQMD significance thresholds.

The estimated net criteria air pollutants resulting from the proposed project are shown in the Draft Program EIR, Table 3.2-7. Overall area and energy source emissions would increase from baseline conditions as a result of the projected increase in residential units and nonresidential space. Overall mobile source emissions would decrease from baseline emissions as a result of improved fuel efficiency standards, the accelerated adoption of EVs, and fleet turnover requirements implemented at the State level through 2040 as compared to existing conditions.

As discussed in Impact AIR-1, the proposed project would be consistent with the applicable 2017 Clean Air Plan control measures. As discussed in Impact AIR-1, the VMT growth facilitated by the proposed project would constitute an approximately 94 percent growth rate through 2040, while population growth facilitated by the proposed project would constitute an approximately 61 percent growth rate through 2040. Therefore, the forecasted VMT growth would outpace the forecasted population growth facilitated by the proposed project. As such, this impact would be potentially significant. As described in Impact AIR-1, there is no reasonable mitigation that could be

implemented to increase population projections while keeping VMT growth to a minimum in an area that is already fully urbanized and built out, such as the City of South San Francisco; therefore, this impact would remain significant and unavoidable after mitigation (Draft Program EIR, Page 3.2-50—54).

The City finds that MM AIR-1a and MM TRANS-1 are feasible, are adopted, and will reduce VMT impacts to the extent feasible. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or reduce the potentially significant impacts as identified in the EIR to the extent feasible. However, impacts associated with VMT growth would remain significant and unavoidable even with mitigation incorporated.

Cumulative Impacts

The proposed project's cumulative impacts related to air quality would be significant and unavoidable, even with mitigation incorporated. (Draft Program EIR, Page 3.2-58-63).

Findings: Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)). However, impacts would still remain significant and unavoidable even with mitigation incorporated. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the EIR (State CEQA Guidelines § 15091(a)(3)). (Draft Program EIR, Page 3.2-63).

Mitigation Measures

Implement MM AIR-1a, MM AIR-1b, and MM TRANS-1.

Facts in Support of Findings: The geographic scope of the cumulative impact analysis for air quality is the Air Basin.

As discussed in Impact AIR-4, the proposed project would not result in cumulatively considerable impacts related to odor impacts or cumulatively considerable impacts exposing sensitive receptors to substantial pollutant concentrations. Nonetheless, as discussed in Impact AIR-1, the proposed project would result in an inconsistency with the 2017 Clean Air Plan and a cumulatively considerable net increase in criteria pollutants as a result of VMT growth facilitated by the proposed project. As such, the proposed project would have a cumulatively considerable contribution to a cumulative impact, even with implementation of the policies in the proposed project and all feasible mitigation.

2017 Clean Air Plan Consistency

The BAAQMD CEQA Guidelines provide that land use plans should incorporate policies and requirements that ensure they do not inhibit attainment of air quality standards and that actually assist in improving local and regional air quality. BAAQMD further recommends that air quality-related goals, policies, performance measures and standards should be incorporated within the context of the plan itself, rather than introduced as corrective actions within the plan's EIR. As shown

in Table 3.2-5 of the Draft Program EIR, the General Plan Update, South San Francisco Zoning Ordinance, CAP, and South San Francisco Municipal Code include policies, actions, and requirements that incorporate and implement the control measures included in the 2017 Clean Air Plan. As discussed in Impact AIR-1, the proposed project would support the overall goals of the 2017 Clean Air Plan with implementation of MMs AIR-1a and AIR-1b.

BAAQMD evaluates criteria pollutants resulting from long-range plans such as the proposed project, by evaluating consistency with the AQP, as well as a comparison of project VMT to projected population increase. The proposed project would support the primary goals of the AQP, include applicable control measures from the AQP, and neither disrupt nor hinder implementation of any AQP control measures. However, as noted in Impact AIR-1, the development envisioned by the proposed project would be inconsistent with the 2017 Bay Area Clean Air Plan, since it would facilitate VMT growth which outpaces the forecasted population growth.

The SFBAAB is currently designated as a nonattainment area for PM. The BAAQMD's recommended significance threshold for construction fugitive dust is binary—meaning a project's construction fugitive dust emissions would be less than significant with the inclusion of dust control BMPs, and potentially significant without dust control BMPs. Implementation of MM AIR-1a, detailed above in Impact AIR-1, would ensure that individual development projects facilitated by the proposed project would result in less than significant construction fugitive dust impacts.

Consistent with BAAQMD's CEQA Air Quality Guidelines, the proposed project would not result in a potentially significant community risk and hazard impact if the land use diagram identifies special overlay zones around existing and planned sources of TACs, including special overlay zones of at least 500 feet on each side of all freeways and high-volume roadways (or another BAAQMD-approved modeled distance), and the plan identifies goals, policies, and objectives to minimize potentially adverse impacts. The proposed project does not currently contain a land use diagram which identifies special overlay zones around existing and planned sources of TACs. Implementation of MM AIR-1b, detailed in Impact AIR-1 would ensure that future development facilitated by the proposed project would result in less than significant impacts related to exposing sensitive receptors to substantial pollutant concentrations.

Criteria Air Pollutant and Ozone Precursor Emissions

BAAQMD's plan-level guidelines do not require an emissions inventory of criteria air pollutants for plan-level projects. Impact AIR-2 provides an inventory of criteria pollutants for informational purposes only. A plan-level analysis must demonstrate project consistency with AQP control measures and a projected VMT increase that is less than or equal to its projected population growth for this impact to be less than significant.

As explained previously, the development envisioned by the proposed project would be inconsistent with the 2017 Bay Area Clean Air Plan, since it would facilitate VMT growth which outpaces the forecasted population growth. Nonetheless, the proposed project would support the primary goals of the AQP, include applicable control measures from the AQP, and neither disrupt nor hinder implementation of any AQP control measures. The General Plan Update and CAP contain new policies and actions to reduce criteria air pollutants to the maximum extent practicable.

All new development and redevelopment within the City would be required to meet the BAAQMD rules and regulations, including Regulation 6-3-306 which restricts the installation of wood burning fireplaces into a new building and Regulation 8-3-301, which limits the allowed VOC levels in the architectural coatings applied onto buildings within the City. The 2019 California Code of Regulations, Title 24, Part 6, standards also now require all homes built in California to have zero-net-energy use, which is achieved through energy efficiency measures as well required rooftop solar photovoltaic systems. The 2019 California Code of Regulations, Title 24, Part 6, standards also apply to nonresidential buildings and require a variety of energy efficiency measures to be implemented that will reduce energy usage as well as air emissions.

Therefore, compliance with the applicable policies and actions in the General Plan Update and CAP, as well applicable State and BAAQMD rules and regulations, would minimize the potential air quality impacts resulting from implementation of the proposed project, which would encourage or require the use of fuel-efficient equipment, vehicles, and BMPs. Mandatory compliance with design review regulations and policies in the South San Francisco Municipal Code and General Plan would ensure that operation-related air quality impacts from new development under the General Plan would be less than significant on an individual project basis, and the City will review those future projects under its standard design review procedures in the Municipal Code.

As previously discussed, the SFBAAB is currently designated as a nonattainment area for PM. The BAAQMD's recommended significance threshold for construction fugitive dust is binary—meaning a project's construction fugitive dust emissions would be less than significant with the inclusion of dust control BMPs, and potentially significant without dust control BMPs. Implementation of MM AIR-1a, detailed above in Impact AIR-1, would ensure that individual development projects facilitated by the proposed project would result in less than significant construction fugitive dust impacts.

Nonetheless, as the proposed project would facilitate VMT growth which outpaces projected population growth through the planning horizon of 2040, the proposed project would be inconsistent with the 2017 Clean Air Plan and would therefore result in a cumulatively considerable net increase in criteria air pollutants and ozone precursors, resulting in a conflict with the applicable air quality plan, even after implementation of MMs AIR-1a and AIR-1b.

Sensitive Receptor Exposure to Substantial Pollutant Concentrations

As discussed under Impact AIR-3, localized risks are primarily associated with exposure to TAC emissions. Common sources of TAC emissions are stationary sources (e.g., dry cleaners, diesel backup generators, and gasoline stations), which are subject to BAAQMD permit requirements. Another common and often more significant source type is on-road motor vehicles on high-volume roads, such as US-101, I-280, SR-82, SR-35, and off-road sources such as construction equipment and diesel-powered trains traveling on the Caltrain corridor. Although the proposed project does not include specific plans for any new, large stationary sources of emissions, it could result in new sensitive receptors (primarily residential receptors) near existing sources of emissions.

As discussed above, the proposed project would not result in a potentially significant community risk and hazard impact if the land use diagram identifies special overlay zones around existing and

planned sources of TACs, including special overlay zones of at least 500 feet on each side of all freeways and high-volume roadways (or another BAAQMD-approved modeled distance), and the plan identifies goals, policies, and objectives to minimize potentially adverse impacts. The proposed project does not currently contain a land use diagram which identifies special overlay zones around existing and planned sources of TACs. Implementation of MM AIR-1b, detailed in Impact AIR-1 would ensure that future development facilitated by the proposed project would result in less than significant impacts related to exposing sensitive receptors to substantial pollutant concentrations.

The General Plan Update contains several policies and actions that aim to reduce the potential growth of vehicle use through encouraging the use of alternative modes of transportation, monitoring and improving existing sources of TACs throughout the City and reducing overall health impacts related to air quality in general.

Odor Impacts

While odors could be generated during construction activities, the proposed project consists of a General Plan Update, Climate Action Plan Update, and Zoning Code Amendment and would not directly result in construction of any development project. Project-specific information for future individual land use development projects is unknown, thus identification of potential impacts related to construction-generated odors from future projects is not possible. As discussed in Impact AIR-4, the City contains several of the land uses listed by the BAAQMD as potential odor sources. As the City of South San Francisco is a fully urbanized and built-out city, it currently has, and the proposed project would facilitate future development of, sensitive receptors within the identified screening distances of existing odor sources. Consistent with the BAAQMD's CEQA Air Quality Guidelines, a plan-level analysis must acknowledge odor sources within the Planning Area and identify policies, goals, and objectives aimed at reducing potential odor impacts to ensure that potential impacts would be less than significant.

Furthermore, the South San Francisco Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed project, contain Section 20.300.010 (Performance Standards), which 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. Sections 20.410.004 (Indoor Commercial Cannabis Cultivation), 20.410.005 (Commercial Cannabis Manufacturing), and 20.410.006 (Cannabis Testing Operations) require that operators install and maintain, in good working-order, air treatment or other ventilation systems to prevent odors generated from the cultivation of cannabis from being detected within 10 feet of the structure in which commercial cannabis cultivation occurs. In addition, BAAQMD Regulation 7 limits emissions of odorous substances within the Air Basin and would apply to any future odor source within the Planning Area (Draft Program EIR, Page 3.2-58—63).

The City finds that MM AIR-1a, MM AIR-1b, and MM TRANS-1 are feasible, are adopted, and will reduce air quality impacts to the extent feasible. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or reduce the potentially significant impacts as identified in the EIR to the extent feasible. However, air quality impacts would remain significant and unavoidable even with mitigation incorporated.

1.7.2 - Transportation and Traffic

Impact TRANS-1 Implementation of the proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) (Draft Program EIR, Page 3.14-35-40).

Findings: Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)). However, impacts would still remain significant and unavoidable even with mitigation incorporated. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measure or project alternatives identified in the EIR (State CEQA Guidelines § 15091(a)(3)). (Draft Program EIR, Page 3.14-40).

Mitigation Measures

Implement MM TRANS-1.

Facts in Support of Findings: While impacts would be less than significant for citywide Home-Based VMT Per Resident for residential use without mitigation, impacts with mitigation (MM TRANS-1) for citywide Total VMT Per Service Population and for Work-Based VMT Per Employee would remain significant and unavoidable. Even with the General Plan Update policies and mitigation measures related to the TDM Ordinance, East of 101 Area Trip Cap, and parking requirements, the City may not achieve the overall VMT threshold reduction level due to uncertainty in the cumulative effectiveness of these measures as well as unknowns related to transit service levels, transportation technology, and travel behavior. Moreover, these policies and mitigation measures primarily apply to new developments; existing land uses, and land uses that have already been approved and are under construction are generally not affected. Because of the programmatic nature of the proposed project, no additional mitigation measures are available, and the impact is considered significant and unavoidable. (Draft Program EIR, Page 3.14-35-40).

The City finds that MM TRANS-1 is feasible, is adopted, and will reduce VMT impacts to the extent feasible. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or reduce the potentially significant impacts as identified in the EIR to the extent feasible. However, impacts associated with VMT growth would still have traffic impacts that remain significant and unavoidable even with mitigation incorporated.

Impact TRANS-4 Implementation of the proposed project could substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Draft Program EIR, Pages 3.14-48-50).

Findings: Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effects as identified in the EIR (State CEQA Guidelines § 15091(a)(1)). However, impacts would still remain significant and unavoidable even with mitigation incorporated. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the

mitigation measure or project alternatives identified in the EIR (State CEQA Guidelines § 15091(a)(3)). (Draft Program EIR, Page 3.14-50).

Mitigation Measures

Implement MM TRANS-1 and MM TRANS-4.

MM TRANS-4 Freeway Offramp Queue Improvements

To minimize queueing hazards, the City shall work 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 as identified in Table 3.14-5. 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.

Facts in Support of Findings: Even with the implementation of General Plan Update policies and actions and implementation of MMs TRANS-4 and TRANS-1, given the uncertainty around specific operational conditions and ability to mitigate such conditions in a constrained right-of-way, this impact remains significant and unavoidable. However, due to the programmatic nature of the proposed project, no additional mitigation measures are available, and the impact is considered significant and unavoidable.

The City finds that MM TRANS-1 and MM TRANS-4 are feasible, are adopted, and will reduce traffic impacts to the extent feasible. Accordingly, the City finds that, pursuant to Public Resources Code Section 21081(a)(1) and State CEQA Guidelines Section 15091(a)(1), changes or alterations have been required in, or incorporated into, the project that mitigate or reduce the potentially significant impacts as identified in the EIR to the extent feasible. However, impacts associated with traffic hazards would still remain significant and unavoidable even with mitigation incorporated. (Draft Program EIR, Pages 3.14-48—50).

1.8 - Findings Regarding Alternatives

1.8.1 - Introduction

This section presents findings regarding alternatives to the proposed project. The section provides a summary and discussion of the feasibility of the following alternatives evaluated in the Draft Program EIR:

- Alternative 1: No Project Alternative/1999 General Plan.
- Alternative 2: Decreased Employment Alternative.
- Alternative 3: Increased Residential Alternative

In accordance with CEQA Guidelines Section 15126.6, the Draft Program EIR contained a comparative impact assessment of alternatives to the proposed project. The primary purpose of this

analysis is to provide decision makers and interested agencies, organizations and individuals with information about a reasonable range of potentially feasible project alternatives, which could avoid or reduce any of the proposed project's significant adverse environmental effects. Important considerations for the alternatives analysis are noted below:

- An EIR need not consider every conceivable alternative to a project;
- An EIR should identify alternatives that were considered by the lead agency, but rejected as infeasible during the scoping process;
- Reasons for rejecting an alternative include:
 - Failure to meet most of the basic project objectives identified in Section 4.2, Project Objectives;
 - Infeasibility; and
 - Inability to avoid significant environmental effects.

CEQA does not require that an analysis of alternate sites always be included in an EIR. Pursuant to CEQA Guidelines Section 15126.6(f)(2), in making the decision to include or exclude analysis of an alternate site, the "key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR."

In this case, an alternative location does not constitute a feasible alternative because the project in question consists of a comprehensive update to the City of South San Francisco General Plan, Zoning Code Amendments, and Climate Action Plan. A General Plan serves as the comprehensive land use planning document for the jurisdiction that adopts it; as such, the geographical area encompassed by the plan is an immutable, fundamental characteristic. Similarly, the Zoning Code and Climate Action Plan address the entire City. Thus, it is not possible to evaluate an alternative location for programmatic planning documents such as the City's General Plan, Zoning Code, or Climate Action Plan.

Alternative 1: No Project Alternative/1999 General Plan.

Under the No Project Alternative/1999 General Plan, the General Plan would not be updated with new policies and no zoning or land use designation changes would occur. Future development would be in accordance with the current land use and zoning maps identified in the 1999 General Plan. The 1999 General Plan provided for development of then-approved projects plus future development of a total of 2,780 housing units and 9 million square feet of nonresidential space to the City's current inventory of an estimated 19,400 housing units and 18.1 million square feet of nonresidential development. The 1999 General Plan estimated a population of 67,400 at projected buildout in 2020. Existing land uses in 2019 include 24,647 residential units and 31,906,205 square feet of commercial/industrial/civic space. Exhibit 4-1 illustrates the existing land use map from the 1999 General Plan. Additionally, under this alternative the Zoning Code would not be updated, and the City would not consider updating the existing Climate Action Plan. Under this alternative, the current goals, policies, and zoning would remain in place through the horizon year.

The No Project Alternative/1999 General Plan would have similar impacts to the proposed project's less than significant or no impacts associated with biological resources, cultural resources, and tribal cultural resources. Because the No Project Alternative/1999 General Plan would not offer the policy enhancements and benefits that the proposed project would, overall impacts would not be reduced to the same degree as the proposed project, resulting in greater impacts associated with aesthetics, light, and glare, air quality, energy, geology, soils, and seismicity, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population, housing, and employment, public services and recreation, utilities and service systems, and wildfire. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-18.) The significant and unavoidable impacts related to exceedance of the VMT threshold and freeway offramp queueing impacts would remain significant and unavoidable under this alternative, and somewhat greater for VMT impacts than the proposed project. The significant and unavoidable impacts related to a conflict with the 2017 Clean Air Plan and a cumulatively considerable net increase in criteria pollutants would remain significant and unavoidable under the No Project Alternative/1999 General Plan.

Additionally, the No Project Alternative/1999 General Plan would not meet the majority of project objectives. As the new policies and programs in the proposed project reflect the current goals and vision expressed by City residents, businesses, decision-makers, and other stakeholders, continuing development under the 1999 vision of the No Project Alternative/1999 General Plan would not achieve the first objective of the proposed project. Additionally, the No Project Alternative/1999 General Plan would not update the General Plan or update the CAP to address issues and concerns related to energy, sustainability and climate resiliency, sea level rise, hydrology and water quality, or any other issue raised by City residents and therefore would not meet the second objective of the proposed project. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-19) The No Project Alternative/1999 General Plan would not provide additional mitigation for biological resources or cultural and tribal cultural resources or reduce VMT and noise impacts to the same extent as the proposed project. The No Project Alternative/1999 General Plan would also fail to achieve objectives because this alternative would not meet the City's housing needs, nor would it include new policies and programs that provide direction for cohesive development to meet the projected population and employment growth. Neither would the No Project Alternative/1999 General Plan meet the last two objectives because it would not update the Zoning Code and would not provide needed updates to address new requirements of State law. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-19.)

Finding: Based on the discussion in the Draft Program EIR and all other evidence before it, the City finds that the No Project Alternative fails to meet the majority of the project objectives. The City rejects this alternative as infeasible.

Alternative 2: Decreased Employment Alternative.

Under the Decreased Employment Alternative, there would be a 25 percent decrease in nonresidential uses in the East of 101, Lindenville, and El Camino subareas to decrease the number of employment opportunities and improve the jobs/housing balance in the City. It is assumed that these decreases would not occur within 0.333 mile of existing transit. This alternative was selected

because it would decrease VMT associated with employment and would therefore result in reduced traffic-related impacts compared to the proposed project.

The Decreased Employment Alternative would have similar less than significant impacts compared to the proposed project with respect to biological resources, cultural and tribal cultural resources, geology, soils and seismicity, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, population, housing and employment, and wildfire. This alternative would incrementally decrease the proposed project's less than significant impacts related to aesthetics, light and glare, air quality, energy, noise, public services, recreation, and utilities. This alternative would slightly decrease the significant and unavoidable impacts associated with exceedance of the VMT threshold, freeway offramp queuing, a conflict with the 2017 Clean Air Plan, and a cumulatively considerable net increase in criteria pollutants, although not to less than significant. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-25.)

The Decreased Employment Alternative would partially achieve the project objectives related to developing a resilient community that is prepared for climate change by updating the CAP as part of the alternative. Additionally, this alternative would meet objectives to develop a well-connected transportation system by encouraging development near transit, increasing transit ridership, improving circulation for all modes, and improving the pedestrian environment. Because of decreased capacity for jobs, this alternative is less likely to meet project objectives relating to economic development and job growth because this alternative would prioritize increased residential development over nonresidential development, which does not reflect the goals and vision expressed by City stakeholders to the same extent as the proposed project. Similar to the proposed project, this alternative would incorporate updates to the Zoning Code and provide updates to address existing new laws. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-26.)

Finding: Based on the discussion in the Draft Program EIR and all other evidence before it, the City finds that the Reduced Residential Alternative only partially meets the project objectives. The City rejects this alternative as infeasible.

Alternative 3: Increased Residential Alternative.

This alternative would propose an increase in residential development along the El Camino Real transit corridor through increased density zoning (see Exhibit 4-2). This alternative would result in an increase in approximately 500 dwelling units compared to the proposed project. An additional 3,017 residential units would be added to this area (compared to the 2,524 units under the proposed project). Approximately 95 acres of what is now proposed as Medium-Density Mixed Use along El Camino Real and around the Bay Area Rapid Transit (BART) station would be designated as High-Density Mixed Use, resulting in a change in maximum allowable density from 120 dwelling units per acre to 180 dwelling units per acre. Maximum building heights for these parcels would increase from 85 feet to 120 feet. This alternative was selected because it would reduce the jobs to housing imbalance; thereby reducing VMT impacts associated with commuting compared to the proposed project.

The Increased Residential Alternative would have similar less than significant impacts compared to the proposed project with respect to air quality, biological resources, cultural resources and tribal cultural resources, geology, soils, and seismicity, hazards and hazardous materials, hydrology and water quality, population, housing, and employment, and wildfire (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-33). This alternative would result in greater impacts associated with aesthetics, light, and glare, energy, GHG emissions, land use and planning, noise, public services and recreation, and utilities and service systems. The Increased Residential Alternative would further decrease VMT compared to the proposed project, but not to below the significance threshold and the significant and unavoidable impacts associated with exceedance of the VMT threshold, freeway offramp queuing, a conflict with the 2017 Clean Air Plan, and a cumulatively considerable net increase in criteria pollutants would remain. Similar to the proposed project, the Increased Employment Alternative would be required to comply with identified mitigation along with applicable regulations including internally consistent General Plan Update and Zoning Code policies and implementing actions. The Increased Residential Alternative would achieve the project objectives related to developing a resilient community that is prepared for climate change by updating the CAP to reduce greenhouse gas emissions as part of the alternative. Additionally, this alternative would meet objectives to provide affordable, safe, attractive, amenity-rich neighborhoods, develop a well-connected transportation system by encouraging development near transit, increasing transit ridership, improving circulation for all modes, and improving the pedestrian environment. Similar to the proposed project, this alternative would incorporate updates to the Zoning Code and provide updates to address existing new laws. However, because this alternative would also result in incrementally greater impacts on aesthetics, air quality, energy, greenhouse gas emissions, land use and planning, noise, public services and recreation, and utilities it would not meet the City's fundamental objective to address issues and concerns identified by South San Francisco residents, businesses, decision-makers, and other stakeholders to the same degree as the proposed project. Nor would it address the City's goal of providing attractive, balanced housing to the same degree due to the increased aesthetic impacts of locating increased height buildings adjacent to single family residential neighborhoods. (Draft Program EIR, Chapter 4, Alternatives to the Proposed Project, Page 4-33.)

Finding: Based on the discussion in the Draft Program EIR and all other evidence before it, the City finds that the Increased Residential Alternative only partially meets the project objectives. The City rejects this alternative as infeasible.

Environmentally Superior Alternative

Section 15126.6(e)(2) of the State CEQA Guidelines indicates that an analysis of alternatives to a proposed project shall identify an environmentally superior alternative among the alternatives evaluated in an EIR.

Each of the three project alternatives would lessen the environmental impacts relative to the proposed project to a certain degree (as described above and further in the EIR). Overall, based on these Findings, the Decreased Employment Alternative would be considered the environmentally superior alternative, even though, as discussed above, the City finds that it fails to fully implement proposed project objectives and is therefore infeasible.

1.9 - Findings Regarding Cumulative Impacts

Consistent with CEQA's requirements, the Draft Program EIR for the proposed project includes an analysis of cumulative impacts in every topical discussion. As discussed above, except as to cumulative air quality impacts, all other cumulative impacts associated with the proposed project are less than significant with the implementation of applicable regulations including new and revised General Plan Update policies and implementing actions. Cumulative air quality impacts remain significant and unavoidable even with incorporation of all available feasible mitigation.

1.10 - Findings Regarding Growth Inducement

State CEQA Guidelines Section 15126.2(e) requires a discussion of the ways in which a proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Typical growth-inducing factors might be the extension of urban services or transportation infrastructure to a previously unserved or underserved area, or the removal of major barriers to development.

Direct growth-inducing impacts occur when the development of a project imposes new burdens on a community by directly inducing population growth, or by leading to the construction of additional developments in the same area. Also included in this category are projects that remove physical obstacles to population growth. Projects that physically remove obstacles to growth, or projects that indirectly induce growth may provide a catalyst for future unrelated development in an area such as a new residential community that requires additional commercial uses to support residents. Consistent with the State CEQA Guidelines Section 15126.2(e), it "must not be assumed that growth in any one area is necessarily beneficial, detrimental or of little significance to the environment."

The General Plan Update does not propose or entitle any specific development that would directly increase growth. Additionally, the General Plan Update cannot predict when any particular development would occur; however, the General Plan Update anticipates approximately 14,312 net new housing units, for a total of 38,959 housing units by 2040. A total of 40,068 new persons could be accommodated under the General Plan Update at full buildout, for a total projected population of approximately 107,203. The General Plan Update anticipates approximately 42,297 net new employment opportunities, for a total of 137,557 employment opportunities from full buildout of the General Plan Update by 2040. The population estimate is 34 percent greater than the Association of Bay Area Government (ABAG) 2040 estimates, while the employment opportunities estimate is 154 percent greater.¹³ However, full buildout may not be achieved by 2040. To provide a reasonable forecast, the City's population and employment projections are based on projects that are entitled, under review, or under construction, and approved plans.

The City's jobs-to-employed residents' ratio was approximately 1.46 in 2010 and 1.70 in 2019. By 2040, with buildout of the proposed project, the jobs-to-employed residents' ratio is estimated to be 2.95, meaning there are more jobs than employable residents under current and future conditions. Therefore, under current and future conditions, it is reasonably anticipated that nonresidents would

¹³ Association of Bay Area Governments (ABAG). 2017. Projections 2040 by Jurisdiction. Website: <https://abag.ca.gov/our-work/landuse/forecasts-projections>. Accessed May 18, 2022.

continue to fill employment positions in the City. As there is not enough housing in the City for the projected labor force, employees may need to commute to the City for employment.

It is too speculative at this time to identify the particular sectors for future job growth or to anticipate whether any of these positions would be virtual employment opportunities that could be filled by individuals residing in higher unemployment areas that would not have associated growth-inducing impacts. Additionally, while an increase in permanent employment demand in the City could result in an increase in population growth that may necessitate the construction of housing or other infrastructure to support the population increase in adjacent communities, and while this construction could cause physical environmental effects; it is too speculative to identify where or when this increase would occur. Because of these uncertainties, it would be too speculative for the City to identify and discuss any potential related environmental impacts as part of the Draft Program EIR pursuant to CEQA Guidelines Section 15145. Specific projects under the proposed project would comply with local and State regulations and undergo project-level environmental review to assess environmental effects. Therefore, because the new employment opportunities in the City of South San Francisco exceed growth projections and would likely be filled by employees residing outside the City, the new employment opportunities could have growth-inducing impacts outside of the Planning Area; however, those potential impacts are too speculative to address in further detail.

Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses, with the majority of potential growth occurring within the East of 101, Lindenville, Downtown, and El Camino planning subareas. The City is already well served by existing services and infrastructure. As such, implementation of the proposed project would not likely require extensions of electrical, natural gas, or water utility infrastructure beyond that which currently exists within the Planning Area. However, for undeveloped sites, future projects may require connections to existing infrastructure on or adjacent to those sites. The proposed project would not extend urban infrastructure other than to future projects within the Planning Area, and thus would not induce growth in other areas outside the City's Sphere of Influence. As such, the proposed project would not result in indirect population growth through providing an extension of infrastructure or services, or through the removal of a barrier to growth.

As discussed above, possible growth-inducing impacts outside of the Planning Area as a result of new employment facilitated by the proposed project are too speculative to address in further detail. The reasonably foreseeable environmental impacts resulting from the growth envisioned by the General Plan Update would be avoided or lessened with the implementation of proposed General Plan Update policies, including policies related to growth management, and by implementation of mitigation measures. Therefore, by design, the proposed project reduces most of the impacts of the growth it could otherwise have induced (Draft Program EIR, Chapter 5, Other CEQA Considerations, Page 5-3-6).

1.11 - Findings Regarding Significant Irreversible Environmental Changes

According to Sections 15126(c) and 15126.2(d) of the State CEQA Guidelines, the City of South San Francisco must address any significant irreversible environmental changes that would occur should

the project be implemented. Generally, a project would result in significant irreversible environmental changes if any of the following would occur:

- The proposed project would involve a large commitment of non-renewable resources;
- The primary and secondary impacts of the project would generally commit future generations to similar uses;
- The proposed project involves uses in which irreversible damage could result from any potential environmental accidents; or
- The proposed consumption of resources is not justified.
- Development under the proposed project could result in approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities within the Planning Area. Because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses. Additionally, the proposed project may result in other private and public improvements throughout the City.

Construction facilitated by the proposed project would include the consumption of resources that are not replenishable or which may renew so slowly to be considered nonrenewable. These resources would include the following: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead; petrochemical construction materials such as plastics; and water. Fossil fuels such as gasoline and oil would also be consumed in the use of construction vehicles and equipment. Development would not be expected to involve an unusual commitment of nonrenewable resources, nor be expected to consume any resources in a wasteful manner. Construction-related impacts related to electricity and fuel consumption would be less than significant.

At operation, the proposed project would include the consumption of energy as part of building operations and transportation activities (vehicle trips associated with the proposed project). Fossil fuels, a nonrenewable resource, would be the primary energy source during operation of the proposed project. All new development in the City would be required to meet State energy efficiency regulations that include Title 24 Part 6 building energy efficiency standards that require new residential uses to meet a net zero energy use standard and nonresidential buildings to be designed for increased energy efficiency standards (Section 3.5, Draft Program EIR). Other State energy efficiency regulations include Senate Bill (SB) 100 that requires 100 percent of retail sales of electricity to be generated from zero-carbon emission sources by 2045 and Executive Order N-79-20 that requires 100 percent of new passenger vehicles sold in California to be zero-emissions by 2035. In addition, compliance with the General Plan Update and Climate Action Plan policies and actions, adherence to the development standards in the South San Francisco Municipal Code and Zoning Ordinance, and compliance with State regulations, would ensure that implementation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy, thus minimizing demands for energy resources and ensuring their efficient use. Furthermore, the proposed project minimizes petroleum fuel use for transportation by locating new housing and jobs in areas well-served by transit services and that have good access to opportunity (such as jobs,

neighborhood amenities, and health care facilities). Finally, the implementation of MM TRANS-1, which requires the City to implement its TDM Ordinance as part of the Zoning Code Amendments and parking requirements, would reduce VMT. Thus, although the proposed project would result in an irretrievable commitment of nonrenewable resources at operation, the resources would not be consumed inefficiently, unnecessarily, or wastefully.

Implementation of the proposed project could result in an irreversible commitment of land uses from existing land uses to land uses proposed under the General Plan Update. Therefore, future generations would be committed to similar land uses and the irreversible long-term environmental changes discussed below.

The irreversible long-term environmental changes associated with the proposed project would include an increase in local and regional vehicular traffic, and the resultant increase in air pollutants, greenhouse gas emissions, and noise generated by this traffic. The proposed project would also irreversibly increase the commitment of energy resources, potable water supply, wastewater treatment, solid waste disposal, and public services, such as providing police and fire services, to support the proposed project through its lifetime. However, features incorporated into the proposed project and proposed mitigation measures would minimize the significant effects of the environmental changes associated with the proposed project to the maximum degree feasible.

The proposed project may have the potential to cause significant environmental accidents through hazardous material releases into the environment by new commercial or industrial land uses. Compliance with State law and implementation of a Storm Water Pollution Prevention Plan (SWPPP) during construction activities would ensure that future development would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving release of hazardous materials. According to California Department of Forestry and Fire Protection (CAL FIRE), the Planning Area is not located in a Fire Hazard Severity Zone (FHSZ) but is adjacent to land identified as Moderate FHSZ within a State Responsibility Area (SRA) and High FHSZ within an SRA (San Bruno Mountain State Park). Sign Hill Park is susceptible to wildfires as evidenced by a fire that occurred in 2020. Land use designations in the City in the vicinity of San Bruno Mountain State Park and Sign Hill Park are not being modified under the General Plan Update. As a result, the degree of wildland fire hazard, including secondary hazards, would not substantially change with adoption of the General Plan Update, and current hazards would not significantly increase. In addition, existing fire protection facilities would be adequate to serve the Planning Area under the proposed project, and the proposed project would not result in a significant and unavoidable impact related to need for new or altered fire protection facilities. Thus, implementation of the proposed project would not have the potential to result in significant environmental accidents related to wildfire hazards and would not result in significant irreversible environmental changes (Draft Program EIR, Chapter 5, Other CEQA Considerations, Pages 5-6-8).

1.12 - Findings Regarding Recirculation

During the public review period after the Draft Program EIR was published, the City of South San Francisco received certain additional information. City of South San Francisco staff and consultants involved in preparing the various studies, reports and analyses included in the Project EIR have also

presented additional information since the publication of the Draft Program EIR. Some of this information was contained in comments submitted on the Draft Program EIR, and in responses to those comments contained in the Final EIR. Other information was presented at or before public meetings/hearings on the Draft Program EIR. The Draft Program EIR incorporates additions, clarifications, modifications, and other changes, in response to comments and as determined appropriate by City of South San Francisco staff and required under CEQA Guidelines.

The City of South San Francisco has considered all relevant information including the opinions and comments of interested agencies, organizations and individuals. The City of South San Francisco finds that the additional information does not show that any of the following situations requiring recirculation identified in CEQA Guidelines Section 15088.5 have occurred:

- A new significant environmental impact that would result from the project (or any alternative) or from a new mitigation measure proposed to be implemented.
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project (or an alternative), but the project's proponents decline to adopt it.
- The Draft Program EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

Based on the foregoing and as explained in more detail in the Final EIR, and having reviewed all the information in the record of proceedings, the lead agency hereby finds that this additional information does not constitute significant new information, nor does it require recirculation of the Draft Program EIR. The additional information merely clarifies or amplifies an adequate EIR.

1.13 - Statement of Overriding Considerations

CEQA requires that a Lead Agency balance the benefits of a project against its unavoidable environmental risk in determining whether to approve the project. If the benefits outweigh the unavoidable adverse effects, those effects may be considered "acceptable" pursuant to CEQA Guidelines Section 15093(a). CEQA requires that a Lead Agency support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Those reasons must be based on substantial evidence in the EIR or elsewhere in the administrative record pursuant to CEQA Guidelines Section 15093(b). The Lead Agency's written reasons are referred to as a Statement of Overriding Considerations.

As explained in the above Findings of Fact, most of the proposed project's impacts on the environment would either be insignificant or, through the incorporation of mitigation measures as conditions of approval of the proposed project, can be reduced to less than significant. However, as set forth in Section 1.6 above, even with implementation of all available mitigation, the proposed project would result in significant unavoidable impacts related to project-level vehicle miles traveled, project-level roadway safety, cumulative vehicle miles traveled, cumulative roadway safety, project-

level conflict with 2017 Bay Area Clean Air Plan and cumulative criteria air pollutants. Further, as set forth in Section 1.7 above, there are no feasible alternatives to the proposed project, which would mitigate or avoid those environmental impacts, and which would meet project objectives.

Accordingly, as set forth below, the City of South San Francisco hereby declares that the following benefits provided to the public through the approval and implementation of the proposed project outweigh the identified significant adverse environmental impacts of the proposed project that cannot be mitigated. The Planning Commission finds that each of the proposed project benefits separately and individually outweigh all of the unavoidable adverse environmental effects identified in the Draft Program EIR and therefore finds those impacts to be acceptable.

The City of South San Francisco hereby declares that pursuant to the State CEQA Guidelines Section 15093, the City of South San Francisco has balanced the benefits of the proposed project against any unavoidable environmental impacts in determining whether to approve the proposed project. Pursuant to the State CEQA Guidelines, if the benefits of the proposed project outweigh the proposed project's unavoidable adverse environmental impacts, those impacts may be considered "acceptable."

Having reduced the adverse significant environmental effect of the proposed project to the extent feasible by adopting the mitigation measures contained in the Draft Program EIR, the MMRP, and this Resolution, having considered the entire administrative record on the proposed project, and having weighed the benefits of the proposed project against its unavoidable adverse impact after mitigation, the Planning Commission has determined that each of the following social, economic and environmental benefits of the proposed project separately and individually outweigh the potential unavoidable adverse impact and render those potential adverse environmental impacts acceptable based upon the following overriding considerations:

- The proposed project would provide consistent direction for development of vacant and underutilized sites in the City and the ensure cohesive development of attractive buildings that meet or exceed current building standards and complement existing and planned uses, in accordance with the General Plan.
- The proposed project would promote the effective use of City resources by establishing a framework to promote business diversification, create cohesive innovative areas, and retain local businesses.
- The proposed project would implement policies of importance to the City, as reflected in the General Plan Update.
- The proposed project would promote more efficient land use interaction by encouraging residential and nonresidential development within already developed urban areas; the concentration of population, employment, and services allows for more mixed-use and would consequently reduce air quality impacts.
- The proposed project would protect unique views in the City and promote restoration of Colma Creek through General Plan Update Policy LU-8.7 and Action CS-3.1 of the Climate Action Plan. Additionally, the Zoning Code Amendments that are part of the proposed project contain architectural guidelines, design review criteria, lot and development standards,

landscaping requirements, and other regulations for various land uses in order to promote aesthetic quality within the City and protect scenic views.

- The proposed project, especially the update to the General Plan, includes policies that encourage civic engagement in the public decision-making process as well as goals and policies to promote safe and sanitary homes throughout the City.
- The proposed project contains policies and actions that support a connected community. The proposed project will contribute to the community through the provision of pedestrian and bicycle facilities that may reduce greenhouse gas emissions.
- The proposed project would assist the City in competing economically on a domestic and international scale by developing commercial and industrial uses that are positioned to be economically competitive.

The proposed project proposes modern state-of-the-art infrastructure improvements that would benefit the entire community and would be designed to comply with the California MUTCD and the City's design guidelines. Additionally, the proposed project would designate official truck routes. The official designation of truck routes would direct heavy vehicles to roadways that are suited for such travel. Likewise, it would promote avoidance of neighborhood streets that are poorly suited for heavy vehicle traffic, thereby reducing incompatible uses in neighborhoods.

Custodian of Record; Scope and Content of Record

The documents and materials that constitute the record of proceedings on which these Findings are based are located at Planning Division at 315 Maple Avenue South San Francisco, CA 94080. This information is provided in compliance with Public Resources Code Section 21081.6.

Various documents, information, testimony, reports, studies, analyses and other materials (both oral and written) constitute the record upon which the Commission bases these Findings and the basis for the Commission's approval and/or adoption contained herein. These Findings cite specific pieces of evidence, but none of the Commission's findings are based solely on those cited pieces of evidence. Rather, these Findings are based upon the entire record, and the City of South San Francisco intends to rely upon all supporting evidence in the record for each of its conclusions contained herein.

The documents in the record include all items referenced in Public Resources Code Section 21167.6(e):

- (i) All project application materials;
- (ii) The Project EIR (including the Draft Program, the Final EIR, and all appendices attached thereto);
- (iii) All staff reports, and related documents prepared by the lead agency and/or consultants with respect to the lead agency's compliance with the substantive and procedural requirements of this division and with respect to the action on the project;

- (iv) All staff reports, and related documents prepared by the lead agency and written testimony, or documents submitted by any person relevant to any findings or statement of overriding considerations adopted by the lead agency pursuant to this division;
- (v) All documentary and oral evidence received and reviewed at public hearings, public meetings, study sessions, and workshops on the Project EIR, and any transcript or minutes of the proceedings at which any advisory body or decision-making body heard testimony on, or considered the Project EIR;
- (vi) All notices issued by the lead agency to comply with this division or with any other law governing the processing and approval of the project;
- (vii) All written comments received in response to, or in connection with, the Project EIR, including comments on the Draft Program EIR;
- (viii) All written evidence or correspondence submitted to, or transferred from, the lead agency with respect to compliance with this division or with respect to the project;
- (ix) Any proposed decisions or findings submitted to the decision makers by lead agency staff, or the project proponent, project opponents, or other interested agencies, organizations and/or individuals;
- (x) The documentation of the final decision, including the Project EIR and all documents, in addition to those referenced in paragraph (c), cited or relied on in the findings or in a statement of overriding considerations adopted pursuant to this division;
- (xi) For documentary and informational purposes, all locally-adopted land use plans and ordinances, including, without limitation, general plans, specific plans and ordinances, master plans together with environmental review documents, findings, mitigation monitoring programs, and other documentation relevant to planned growth in the area;
- (xii) Any other written materials relevant to the lead agency's compliance with this division or to its decision on the merits of the project, including any drafts of any environmental document or portions thereof, which have been released for public review, and copies of studies or other documents relied upon in any environmental document prepared for the project and either made available to the public during the public review period or included in the lead agency's files on the project, and all internal agency communications, including staff notes and memoranda related to the project or to compliance with this division;
- (xiii) The full written record before any inferior administrative decision-making body whose decision was appealed to a superior administrative decision-making body prior to the filing of litigation; and
- (xiv) Any additional items not included above if otherwise required by law.

Attachment A:
Mitigation Monitoring and Reporting Program

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**Mitigation Monitoring and Reporting Program
for the
General Plan Update, Zoning Code Amendments, and Climate
Action Plan
City of South San Francisco, San Mateo County, California**

Prepared for:
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Report Date: September 6, 2022

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PREFACE

Section 21081.6 of the California Environmental Quality Act (CEQA) and CEQA Guidelines Section 15097 require a Lead Agency to adopt a Mitigation Monitoring and Reporting Program (MMRP) whenever it adopts an Environmental Impact Report (EIR) in conjunction with a project approval. The purpose of the MMRP is to ensure compliance with the mitigation measures occurs during project implementation.

The Draft Program EIR prepared for the General Plan Update, Zoning Code Amendments, and Climate Action Plan concluded that project implementation could result in potentially significant effects on the environment and mitigation measures were incorporated into the proposed project or are required as a condition of project approval that reduce these potential impacts to a less than significant level. This MMRP documents how and when the mitigation measures adopted by the lead agency will be implemented and confirms that potential environmental impacts are reduced to less than significant levels as identified in the Draft Program EIR.

This document does not discuss those subjects that the environmental analysis demonstrates would result in less than significant impacts and for which no mitigation was proposed or necessary.

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Table 1: General Plan Update, Zoning Code Amendments, and Climate Action Plan Project Mitigation Monitoring and Reporting Program

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
3.2 Air Quality					
MM AIR-1a: Individual development projects facilitated by the proposed project 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 mph. • 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 13, 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	Incorporation into project construction documents; the City of South San Francisco Planning Division shall inspect the worksite regularly to ensure the mitigation measures are implemented	Prior to issuance of building permits for individual projects and ongoing throughout construction	City of South San Francisco Planning Division,		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
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.					
MM AIR-1b: Projects that may result in additional toxic air contaminants (TACs) that are located within 1,000 feet of a sensitive receptors(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 Assessments (HRA) for residential development and other sensitive receptors. Screening area distances may be increased on a case-by-case basis if an unusually large source or sources of hazardous emissions are proposed or currently exist. Based on the results of the HRA, identify and implement measures (such as air filtration systems) to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards. Measures identified in HRAs shall be included into the site development plan as a component of a proposed project.	Qualified air quality specialist conducts an HRA and identifies mitigation measures; incorporation of mitigation measures into the site development plan; on-site inspection	Prior to plan check review; during construction	City of South San Francisco Planning Division		
MM TRANS-1: Transportation Demand Management To reduce Vehicle Miles Traveled (VMT), the City shall implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements. The City shall also update its TDM	Implementation of TDM Ordinances; review and update of TDM Ordinances and parking requirements;	Review and update of TDM Ordinances and parking requirements: every 5 to 10 years	City of South San Francisco		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
Ordinance and parking requirements every five to ten years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. The City shall achieve the performance standards outlined in the TDM Ordinance. The City shall update its TDM Ordinance every 5 to 10 years to limit Total VMT and Work-Based VMT by incentivizing use of transit and active transportation and disincentivizing auto use. The TDM Ordinance shall cover all development projects generating greater than 100 daily trips, with the most stringent requirements for office/Research and Development (R&D) land uses that disproportionately account for the highest rates of VMT in the City. Development projects shall implement a combination of TDM programs, services, and infrastructure improvements, including but not limited to: establishing trip reduction programs; subsidizing transit and active transportation use; coordinating carpooling and vanpooling; encouraging telecommuting and flexible work schedules; designing site plans to prioritize pedestrian, bicycle, and transit travel; funding first/last mile shuttle services; establishing site-specific trip caps; managing parking supply; and constructing transit and active transportation capital improvements. Developments shall be subject to annual monitoring. The City shall establish an administrative fine structure for developments found to be out of compliance and apply any revenues from fines to infrastructure and services aimed at reducing VMT. The City shall establish an East of 101 Area Trip Cap to support the monitoring of vehicle trip activity and focus efforts to reduce VMT. The area-wide trip cap shall apply to the high density employment uses in the East of 101 Area. The City shall conduct annual traffic counts along the cordon area perimeter. Should the trip cap be reached, the City shall	establishment of an East of 101 Area Trip Cap; achievement of performance standards outlined in the TDM Ordinance				

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
consider corrective actions such as: revising mode share targets for projects subject to the TDM Ordinance, identifying new funding measures for TDM services, implementing new vehicle user charges, creating new street connections, or slowing the pace of development approvals within the cordon zone. The City shall update its parking requirements every 5 to 10 years to align with its TDM Ordinance and East of 101 Area Trip Cap. The City shall establish parking maximums for office/R&D uses to ensure that VMT reduction goals are incorporated into the design of development projects.					
3.3 Biological Resources					
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	Pre-construction survey by a qualified Biologist; mitigation and monitoring program (if required) by a qualified Biologist; submittal and review of survey and monitoring documents	Prior to commencement of grading and construction activities for individual projects; ongoing during construction	City of South San Francisco Planning Division;		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
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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.					
MM BIO-3: Assess Potential Wetland Impacts Applicants or sponsors of projects on sites where potential jurisdictional wetlands or waterways are present shall 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). This investigation shall include assessing potential impacts to wetlands and other waters of the United States and/or State. If a feature is found to be jurisdictional or potentially jurisdictional, the project applicant or sponsor shall comply with the appropriate permitting process with each agency claiming jurisdiction prior to disturbance of the feature, and a qualified Biologist/wetland regulatory specialist shall conduct a detailed wetland delineation if necessary.	Site investigation and assessment by a qualified Biologist; submittal of investigation and assessment documents	Prior to issuance of grading permit and construction activities for individual projects	City of South San Francisco Planning Division		
3.6 Geology, Soils, and Seismicity					
MM GEO-6: Applicants, owners, and/or sponsors of all future development or construction projects shall be required to perform or provide paleontological monitoring for all proposed excavations in the Colma Formation and Merced Formation, including those buried in the shallow subsurface below Quaternary deposits, due to the high paleontological sensitivity for significant resources in these areas. Should significant paleontological resources (e.g., bones, teeth, well-preserved plant elements) be unearthed by the future project	Retention of a professional paleontologist; ongoing monitoring	Prior to issuance of grading permit for individual projects. Ongoing during construction activities	City of South San Francisco Planning Division		

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construction crew, the project activities shall be diverted at least 15 feet from the discovered paleontological resources until a professional vertebrate Paleontologist has assessed such discovered resources and, if deemed significant, such resources shall be salvaged in a timely manner. The applicant/owner/sponsor of said project shall be responsible for diverting project work and providing the assessment including retaining a professional vertebrate Paleontologist for such purpose. Collected fossils shall be deposited by the applicant/owner/sponsor in an appropriate repository (e.g., University of California Museum of Paleontology (UCMP), California Academy of Sciences) where the collection shall be properly curated and made available for future research.					
3.11 Noise and Vibration					
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	Implementation of measures and submittal and approval of final acoustical report, when applicable	Prior to issuance of building permits for individual projects	City of San Francisco Planning Division		

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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.					
MM NOI-3: Airport Noise Impact Reduction Plan Prior to issuance of building permits, the project applicant or sponsor of proposed development projects shall implement the following measures to limit airport activity noise source impacts: - Any proposed residential development project or any hotel, motel, or transient lodging land use development project, that would be located within the San Francisco International Airport (SFO) 65 A-weighted decibel (dBA) Community Noise Equivalent Level (CNEL) noise contours, 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 airport activity noise levels to meet the interior noise level standards shown in Table 11 of the Noise Element. Outdoor active use space must also comply with the exterior noise standards of Table 11 of the Noise Element or must be excluded from such projects. The report must be approved by the Planning Division prior to issuance of building permits. - Any proposed commercial development project that would be located within the SFO 70 dBA CNEL noise contours shall demonstrate compliance with Policies NOI-1.1 and NOI-1.2 of the City's Noise Element by submitting a final acoustical	Implementation of measures and submittal and approval of a final acoustical report, when applicable	Prior to the issuance of building permits for individual projects	City of South San Francisco Planning Division		

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
				Date	Initial
report prepared to the satisfaction of the Planning Division that identifies design measures to adequately minimize airport activity noise levels to meet the interior noise level standards shown in Table 11 of the Noise Element. The report must be approved by the Planning Division prior to issuance of building permits. Any proposed institutional or public facility development project that would be located within the SFO 65 dBA CNEL noise contours 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 airport activity noise levels to meet the interior noise level standards shown in Table 11 of the Noise Element. Outdoor active use space must also comply with the exterior noise standards of Table 11 of the Noise Element or must be excluded from such projects. The report must be approved by the Planning Division prior to issuance of building permits.					
3.14 Transportation					
MM TRANS-1: Transportation Demand Management To reduce VMT, the City shall implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements. The City shall also update its TDM Ordinance and parking requirements every five to ten years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. The City shall achieve the performance standards outlined in the TDM Ordinance pursuant to Section 20.400.004 of the Zoning Ordinance. The City shall review and update its TDM Ordinance every five to ten years to limit Total VMT and Work-Based VMT by incentivizing use of transit and active transportation and	Implementation of TDM Ordinances; review and update of TDM Ordinances and parking requirements; establishment of an East of 101 Area Trip Cap; achievement of performance standards outlined in the TDM Ordinance	Review and update of TDM Ordinances and parking requirements: every 5 to 10 years	City of South San Francisco		

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disincentivizing auto use. The TDM Ordinance shall cover all development projects generating greater than 100 daily trips, with the most stringent requirements for office/R&D land uses that disproportionately account for the highest rates of VMT in the City. Development projects shall implement a combination of TDM programs (pursuant to Sections 20.400.003 and 20.400.004 of the Zoning Ordinance), services, and infrastructure improvements, including but not limited to: establishing trip reduction programs; subsidizing transit and active transportation use; coordinating carpooling and vanpooling; encouraging telecommuting and flexible work schedules; designing site plans to prioritize pedestrian, bicycle, and transit travel; funding first/last mile shuttle services; establishing site-specific trip caps; managing parking supply; and constructing transit and active transportation capital improvements. Developments shall be subject to annual reporting and monitoring. The City shall establish a fine structure for developments found to be out of compliance and apply any revenues from fines to infrastructure and services aimed at reducing VMT. The City shall establish an East of 101 Area Trip Cap to support the monitoring of vehicle trip activity and focus efforts to reduce VMT. The area-wide trip cap shall apply to the high intensity employment uses in the East of 101 Area. The City shall conduct annual traffic counts along the cordon area perimeter. Should the trip cap be reached, the City shall consider corrective actions such as: revising mode share targets for projects subject to the TDM Ordinance, identifying new funding measures for TDM services, implementing new vehicle user charges, creating new street connections, or slowing the pace of development approvals within the cordon zone.					

Mitigation Measures	Method of Verification	Timing of Verification	Responsible for Verification	Verification of Completion	
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The City shall review and update its parking requirements every five to ten years to align with its TDM Ordinance and East of 101 Area Trip Cap. The City shall establish parking maximums for office/R&D uses to ensure that VMT reduction goals are incorporated into the design of development projects.					
MM TRANS-4: Freeway Offramp Queue Improvements To minimize queueing hazards, the City shall work 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 as identified in Table 3.14-5. 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.	Development of improvement measures. Documentation in the General Plan progress report.	Ongoing. Consultation with Caltrans to initiate within a year of adoption of General Plan Update.	City of South San Francisco Planning Division, Caltrans		