Bertolucci (421 Cypress, 209 and 213 Lux) Project Information –Environmental Consistency Analysis

I. Purpose

On January 28, 2015, a programmatic Environmental Impact Report (EIR) was certified by the City Council (Final Environmental Impact Report for the South San Francisco Downtown Station Area Specific Plan (DSASP), State Clearinghouse #2013102001). The program EIR assessed the potential environmental impacts resulting from implementation of the DSASP, which established new land use, development, and urban design regulations for the area over a 20-year planning period. Since the certification of the program EIR, the City Council has certified an Addendum to the program EIR for the Downtown Transit Core (DTC) Zoning Amendments by Resolution No. 31-2018 on February 28, 2018, which are incorporated herein by reference.

The California Environmental Quality Act (CEQA) provides for limited environmental review of subsequent projects under a program EIR (CEQA Guidelines Sections 15162, 15168.) Components of a subsequent project must be examined in the light of the program EIR to determine whether any additional environmental analysis must be conducted. The CEQA Guidelines require lead agencies to use checklists or similar mechanisms to conduct this evaluation. This Environmental Consistency Analysis (ECA) has been prepared to evaluate the 99 apartment units and 1,500 square feet of restaurant (Project) that is a subsequent project within the DSASP (CEQA Guidelines Section 15168(c)(4)). This ECA also examines consistency of the Project with the Downtown Station Area Plan for the purposes of CEQA Guidelines 15183, which allows streamlined environmental review for projects consistent with existing zoning, community plan or general plan policies for which an EIR was certified, as well as CEQA Guidelines Section 15183.3, which allows streamlined environmental review for eligible infill projects.

The City concludes that, based on the substantial evidence discussed herein, that all the Project's environmental effects were previously analyzed in the DSASP program EIR and no event pursuant to Public Resources Code Section 21166 has occurred since preparation and certification of the DSASP program EIR. Therefore, no additional environmental review is required.

Other Available CEQA Exemptions

The City has chosen to analyze the Project under CEQA Guidelines 15168, 15183 and 15183.3, but based on the nature and location of the Project, and the analysis provided herein, the proposed Project also qualifies for several other CEQA exemptions.

- The Project is exempt under Government Code Section 65457, as a residential development project being undertaken pursuant to a Specific Plan for which an EIR was prepared and certified and no event specified in Public Resources Code Section 21166 has occurred.
- The Project is exempt pursuant to CEQA Guidelines Section 15332 as a qualified in-fill development project, as it meets the following conditions:
- As described in Section X (Land Use and Planning), below, the Project requires a general plan and zoning map amendment to rezone one of the three parcels from Downtown Residential Core (DRC) to Downtown Transit Core (DTC). Pursuant to such amendments, the Project would therefore be consistent with the applicable general plan designation, applicable general plan policies and applicable zoning designations and regulations,
    - As described in sub-section 9 (Description of the Project) and sub-section 10 (Existing Setting) of Section II (Project Description), the project occurs within the City limits on a site less than five acres, and is surrounded by urban uses,

- As described in Section IV (Biological Resources) below, the Project site has no value as habitat for endangered, rare, or threatened species,
- As described in Sections XVI (Traffic/Transportation), XII (Noise), III (Air Quality), and IX (Hydrology), approval of the project would not result in any significant effects relating to traffic, noise, air quality or water quality; and
- As described in Section XIV (Public Services), the site can be adequately served by all required utilities and public services.

- The Project is exempt under Public Resources Code Section 21155.4 (SB 743 (2013)), as a residential project, located in a transit priority area (Downtown Transit Core), consistent with the DSASP, for which an EIR was certified, and is located within/consistent with the Downtown (South San Francisco) Priority Development Area under Plan Bay Area 2040, the adopted Sustainable Communities Strategy for the Bay Area.

II. Project Description

1. Project Title

Bertolucci 421 Cypress Avenue, 209 and 213 Lux Avenue
South San Francisco, CA 94080

2. Lead Agency Name and Address

City of South San Francisco
315 Maple Avenue
South San Francisco, CA 94080

3. Contact Person and Phone Number

Peter and Victoria Sodini
(650) 749-4994
petersodini@gmail.com

4. Preparer and Phone Number

Margaret Netto, Netto Planning Services LLC
(650) 796-5828

5. Project Location

421 Cypress Avenue and 209 and 211 Lux Avenue
South San Francisco, CA 94080
APNs: 012-314-090, 012-314-080, and 012-314-070

6. **Project Sponsor's Name and Address**

Owner: Peter and Victoria Sordini
421 Cypress Avenue
South San Francisco, CA 94080

7. **General Plan Designation**

Downtown Transit Core (DTC)
Downtown Residential Core (DRC)

8. Zoning

Downtown Station Area Specific Plan (DSASP) – Downtown Transit Core (DTC), Downtown Residential Core (DRC) Zoning District

9. Description of Project

The Project site consists of 0.584 acres, bounded by Lux Avenue to the north, Cypress Avenue to the east, and Tamarack Lane to the south. The Project site is an infill, redevelopment site that is currently developed with one-to-two story 10,000 square foot building with a surface parking lot surrounded by urban uses and located entirely in the DSASP DTC and DRC Zoning Districts.

The Project includes the full demolition of the existing building and surface parking lot located at 421 Cypress Avenue, 209 and 213 Lux Avenue. The site would be redeveloped into a seven-story; 99-unit apartment complex in one building over parking; project amenities include a courtyard, leasing offices, and 1,500 square feet allocated for a restaurant located at the corner of Cypress and Lux Avenues. The Project would have a residential density of 169 dwelling units per acre (du/acre), which is above the maximum base density of 100 du/acre but below the maximum density of 180 du/acre allowed under the City's DSASP Increased Density Incentive Program. The Project proposes to utilize both State Density Bonus Law (Gov. Code section 65915) and the DSASP Increased Density Incentive Program to achieve compliance with the applicable density standard. The Project would provide 10% low-income units and 5% very low-income units, for a total of 15% (15 units) Below Market Rate (BMR) units. The building would consist of five levels of "Type III A" wood construction over two levels of "Type I" concrete construction. The complex would be a maximum height of 84'-8' consistent with the DTC maximum height limit of 85-feet.

The five upper floors would consist of studios, and one- and two-bedroom apartments. These floors surround a 3,700 square foot landscaped courtyard on Level 2. The courtyard would be furnished with barbeques, dining areas, lounge furniture, and a recirculating fountain with access to a 1,480 square foot amenity space for the residents. The lower levels would contain mechanical lift parking for the residents, as well as guest parking for visitors, resident storage units, and long-term bicycle storage. The ground floor parking level would be lined with retail, lobbies, leasing area, trash, and utilities, so the parking is shielded from public view to those walking adjacent to the Project on Cypress and Lux Avenues. These uses provide interest and activation along Cypress and Lux Avenues. The Project provides an additional interior amenity area at the podium level that flows out to a shared, south- facing, landscaped podium with seating area and water feature. The proposed restaurant would be setback allowing for outdoor seating on the corner of Cypress and Lux Avenues. Level 7 provides another amenity space and terrace on the corner, creating a step-back defining the top of the corner elevation. This corner element keeps consistent architectural language that complements the ground floor corner restaurant.

Residents would have access to the units from the lobby and the entrance on Lux Avenue. The main lobby on Cypress Avenue provides easy access to the downtown shops and the Caltrain station. Garbage pick-up is proposed to be located on Cypress Avenue. The residential portion of the building would also be directly accessed from the internal parking spaces. The building would also be elevator served. Vehicular access to the parking garage would be provided via two right-in and right-out driveways from Tamarack Lane, which is a one-way street.


BERTOLUCCI'S
PIZZA
Sodini's


LUX AVE
UTILITY
470 SF
+29.85
ELECTRICAL
375 SF
+27.80
UTILITY
235 SF
+28.25
LOBBY / LOUNGE
720 SF
+27.80
LEASING
380 SF
+26.18
RETAIL
1500 SF
+26.00
DRIVEWAY
DRIVEWAY
99 STALLS
MAIL
PACKAGE
445 SF
+26.00
FLEXIBLE
750 SF
+24.40
LOBBY
515 SF
+24.40
TRASH
670 SF
+24.12
UTILITY / STORAGE
315 SF
+26.80
UTILITY
120 SF
+25.00
ROLL-UP GATES
ROLL-UP GATES
RIGHT TURN ONLY
TAMARACK LN
RIGHT TURN ONLY
CYPRESS AVE
LEGEND
UNIT
RETAIL SPACE
AMENITY AREA
VERTICAL CIRCULATION

Parking and Circulation. The parking garage would contain 99 parking spaces as well as 26 long-term bicycle parking spaces shown on the site plan. Table 1 below shows the number of units, vehicle parking stalls, and bicycle parking that would be included in the Project. Mechanical stacker vehicular parking would be provided on Level 1 and a mezzanine floor. Access to the floor would be provided by two elevators and several staircases. The site plan shows two access gates from Tamarack Lane. The east gate would provide access to 30 mechanical stacker vehicular parking spaces and seven standard parking spaces, including five accessible parking spaces. The west gate would provide access to 60 mechanical stacker vehicular parking spaces and two standard spaces. The parking aisles within the garage would not be connected. The following requirements apply to the Project:

Multi-family Residential

- **Studio and less than 500 sq. ft.- 1 space per bedroom**
- **One-bedroom or 500 to 800 sf. ft.- 1 space minimum, 1.5 spaces per maximum unit**
- **Two bedroom or 801-1,100 sq. ft.- 1.5 spaces minimum, 1.8 spaces maximum per unit**
- **Three or more bedrooms and 1,101 sf. ft. or larger- 1.5 spaces minimum, 2 spaces maximum per unit**

Restaurants

- **No parking required for the first 1,500 sq. ft. of customer seating area or floor area and 1 space per 100 sq. ft. of customer seating area in excess of 1,500 sf. ft.**

Based on these requirements, the Project would be required to provide 112 parking spaces for the residential use and zero parking spaces for the restaurant use. The Project proposes 13 spaces fewer than what is required by the code. However, the Project is entitled to certain parking reductions pursuant to State Density Bonus Law, and practically given the Project's proximity to the Caltrain station, it is expected that many residents would use public transportation and would not need a car. Also, the Project would implement a comprehensive Transportation Demand Management (TDM) plan, in accordance with South San Francisco requirements to reduce the Project's parking demand and off-set the reduced parking on- site.

Table 1. Bertolucci Project Summary

Number of Units	**99**
Lot Area	**0.58 ac**
Building Gross Floor Area	**119,257 sf**
Parking Spaces	**99**
Amenities	**6,760 sf**

As a new high-density development within a one-half mile radius of the Caltrain Station, the Project will promote ridership and reduce emissions, provide high-quality residential opportunities for younger employees and older retirees who desire a convenient downtown location, and increase the population close to Grand Avenue to support nearby businesses, per the DSASP goals. In addition, the Project would include a robust TDM plan for the purpose of reducing the reliance on single-occupancy vehicles, thus reducing vehicle trips as well as the need for on-site parking. The TDM Program is proposed to include the following (or similar/equivalent) features:

Site Location and Design-Related Measures

- ✓ The site is located within walking distance of the current South San Francisco Caltrain station (approximately 0.25 miles). With the South San Francisco Caltrain station reconstruction, the newly completed Caltrain plaza is located to the south of the Project on the southeast quadrant of Airport

Boulevard/Grand Avenue intersection, which would be less than a 5-minute walk from the Project via the new Grand Avenue bicycle/pedestrian underpass.

- ✓ Access to building amenities, such as outdoor courtyard, terrace, fitness center and community space, co-work center and free Wi-Fi in community areas for telecommuting will be included to allow residents to stay on-site and reduce commute trips.
- ✓ Ample bicycle support facilities will be provided including secure and protected bicycle parking for residents, bike racks for visitors, and on-site bicycle repair stations to encourage bicycling as a travel mode and private bike share program.
- ✓ Package room would be provided for on-site storage units that could be used to store personal items such as car seats, strollers, cargo bicycles, or other large bicycles.

Programmatic Measures

- ✓ Transportation Coordinator: Identify a Transportation Coordinator (could be an existing on-site staff person) for the community who will be responsible for developing, marketing, implementing, and evaluating TDM programs. Providing dedicated personnel to help make the TDM program more robust, consistent, and reliable. Include internal communication tools such as the "on-line kiosk" with all the specific information about the transportation resources available to the residents.
- ✓ Subsidized Transit Passes: The developer will provide a total of 99 transit passes, one per dwelling unit, for the first year following building occupancy.
- ✓ New Resident Orientation Packet: Provide a move-in packet to all new residents explaining public transportation options and the TDM program creates an awareness and culture of drive-alone alternatives.
- ✓ Ridesharing Programs: Ridesharing programs help carpool forming by matching drivers and passengers, such as internal bulletins/message boards, 511.org carpool matching / Lyft partnership technology, or peer-to-peer matching apps.
- ✓ Car Share: Work with car sharing companies to assess the feasibility of providing car share on-site. The decision to install a car share is ultimately up to the car sharing service providers. A car share provider located on-site would allow residents to use a car share vehicle for errands which helps to reduce concerns and inconveniences of not owning a vehicle.

The Project is located in two zoning districts, DTC and DRC. The applicant is requesting to rezone one of the three parcels from DRC to DTC. The applicant is requesting an increase of density from the maximum base of 100 du/acre (58 units) to 169 du/acre (99 units) with community benefits as allowed by the DSASP Increased Density Incentive Program. In addition to seeking an increase in dwelling units per acre under the City's DSASP Increased Density Incentive Program, the Project will also invoke State Density Bonus Law to seek incentives and/or waivers to the City's development standards.

The California State Density Bonus Law allows for waivers from development standards. Per Govt. Code 65915 (e)(1), waiver or reduction of development standards that would have the effect of physically precluding the construction of a development meeting the criteria of section 65915(b) at the densities or with the concessions or incentives permitted under State Density Bonus Law. The applicant is requesting four waivers:

1. Build-to-line: A build-to-line of 8" from the property line on Lux and Cypress Avenues in lieu of a minimum of at least 65% of the linear street frontage.
2. Corner build area: The plaza corner setback is 14'-10" from Cypress Avenue in lieu of 30' from the corner.
3. Useable open space: 95 square feet of open space per unit in lieu of 100 square feet per unit.

4. Private storage space: 105 cubic feet per unit in lieu of 200 cubic feet per unit.

The Project is consistent with the City's goal of increasing the quantity and density of residential units in the Downtown area, to promote increased Caltrain ridership and to promote a healthy ecosystem that supports downtown businesses. In the public realm around the site, the Project will include public art and historic recognition and streetscape improvements such as undergrounding overhead utility lines along all frontages of the property, widening and installing new sidewalks along the Project frontage on Cypress and Lux Avenues, and providing street furnishings and landscaping such as benches and street trees along the Project frontage of Cypress and Lux Avenues. Improved public utilities such as storm drains and new sanitary sewer cleanouts would be completed within Cypress Avenue. The Project would be equivalent to LEED Silver status. The Project would include the provision of electric charging stations, a mechanical stacking parking system to achieve maximin efficiency, and would be wired for future solar. The Project would also be in compliance with the City's Reach Codes.

10. Existing Setting

The Project site is located two blocks north of Grand Avenue on the east side of downtown South San Francisco. The Project site is an infill, redevelopment site that is currently developed with a one-to-two story 10,000 square foot building with a surface parking lot.

11. Surrounding Land Uses and Setting

The subject site is located at the northwest corner of Cypress and Lux Avenues. The area connects the downtown to the Old Town neighborhood. To the north across Lux Avenue are single-family homes, two-story apartments, and a single-story commercial building containing an auto-body shop. To the east across Cypress Avenue is a seven-story apartment building containing 260 units. To the south across Tamarack Lane are apartments currently under construction, and to the west are two story-apartments.

12. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement):

Development will be subject to:

- Entitlements from the City of South San Francisco.

III. Determination

The Project is within the scope of the DSASP program EIR and no new environmental document is required (CEQA Guidelines Section 15168(c)). All of the following statements are found to be true:

1. This subsequent Project is within the scope of the project covered by the Final EIR for the City's DSASP.

2. This subsequent Project will have no additional significant environmental effects not discussed or identified in the DSASP program EIR;

3. No substantial changes to the DSASP are proposed as part of this Project. Further, no substantial changes have occurred with respect to the circumstances under which the DSASP program EIR was certified, and no new information, which was not known and could not have been known at

the time that the DSASP program EIR was certified as complete has become available.

4. No new or additional mitigation measures or alternatives are required.

5. All applicable policies, regulations, and mitigation measures identified in the DSASP program EIR will be applied to this subsequent Project or otherwise made conditions of approval of this subsequent Project.

Thresholds of Significance: The Thresholds of Significance are based on CEQA Guidelines Appendix G with additional thresholds for consistency with the DSASP EIR.

Issue Areas/Documentation:

I. AESTHETICS -- *Would the project:*
a) Have a substantial adverse effect on a scenic vista?
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a *state scenic highway*?
c) Substantially degrade the existing visual character or quality of the site and its surroundings?
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? ("Glare" is defined in the DSASP program EIR as the reflection of harsh bright light sufficient to cause physical discomfort or loss in visual performance and visibility.)

Documentation:

a. The DSASP program EIR (p. 4.1-9) concluded that no scenic vistas or view corridors existed within the DSASP area but that there are prominent visual landmarks in South San Francisco outside of the DSASP area, including San Bruno Mountain, Sign Hill Park, the "Wind Harp Tower" at San Bruno Point Hill and the San Francisco Bay. There are no designated scenic outlooks within the DSASP area and no designated places where people would gather in order to gain a view of San Bruno Mountain or Sign Hill Park. Additionally, all new development under the DSASP would have building heights consistent with the land use designations of the development sites, except for those granted a Waiver and Modification. The Project is requesting a general plan and rezoning amendment, therefore would be consistent with the DTC zoning district. The height of the Project would be 85 feet to the top of the parapet which is allowable under the DSASP and DTC Zoning District development standards. Since the land use designations are approved by the General Plan, views from new development would be consistent with the City's regulations. Therefore, the Project would not have a substantial adverse effect on a scenic vista, consistent with the DSASP program EIR.

b. While the DSASP area is not located within a state scenic highway, it does contain historic buildings that could be considered scenic resources. The integrity of such resources would be maintained, however, with adherence to DSASP policies and objectives as described in (c) below. A main objective of the DSASP is to revitalize the Downtown to be a vibrant and successful community resource, while protecting the historic building fabric of the area. Grand Avenue is the historic heart of the City, with City Hall at one end of the street and a diverse array of one-, two-, and three-story buildings with examples of interesting architectural periods, dispersed along the street. While Grand Avenue would experience new development and improvements, the scale and character of the street would be maintained under the DSASP. The Project site is located two-blocks north of Grand Avenue and would respect the historic

fabric of the Downtown area while providing an updated, refreshed feel to attract more pedestrian and commercial activity within the DSASP area.

Brewster Historic Preservation prepared a historic resource evaluation, dated May 2021, of the building to be demolished and determined that the building is not historic (Attachment 1). However, as part of the project, the applicant would install a plaque on the wall along Cypress Avenue recognizing the Bertolucci's site, its founders, and its significance to the downtown. Also, a "Bertolucci's" neon sign will be included in the new building façade. As a result, the Project is consistent with the aesthetic considerations of the DSASP program EIR. Therefore, implementation of the Project would not substantially damage scenic resources, as it would be in conformance with these policies and subject to conditions of approval proposed with the entitlements request.

c. The existing Downtown area is currently comprised of inconsistent building heights and aesthetic quality and lacks a cohesive grid street network. There is little to no streetscaping, and the area is deteriorated in certain locations and generally not designed for optimal pedestrian and commercial activity. Implementation of the DSASP has established design guidelines and standards to improve the overall aesthetic quality of the DSASP area as a whole. The existing low- and medium-rise buildings within the study area presently create limited shade and shadow patterns that are contained within proximity to each building. Additionally, the few taller buildings within the study area create more extensive shade and shadow patterns on other buildings in their immediate vicinity and not on open space.

Design Standard 20 of the DSASP requires projects in the specific plan area to "consider the impacts of shade and wind on open spaces, pedestrian corridors and retail streets in the massing and articulation of building facades; locate outdoor spaces where there will be good protection from wind." A solar shadow analysis was prepared by Studio T-Square, dated April 12, 2022 (Attachment 10), to analyze whether the Project would create substantial shade impacts on open spaces, pedestrian corridors, and retail streets and whether the Project would create shadows that "substantially degrade" the quality of the site and its surroundings.

On the north side of Lux Avenue across from the Project site are multifamily and single-family residential buildings. There are no schools, parks, or other public open spaces in the immediate vicinity of the Project site. There are also no shade-sensitive commercial uses, which would include pedestrian-oriented outdoor spaces or dining areas, nurseries, and solar collectors, in the vicinity of the Project site.

The study indicates that the Project would cast new shadows across Lux Avenue and portions of the residential properties in the vicinity of the Project site. No new shadows would be cast upon open public spaces, pedestrian corridors, and retail streets; therefore, the Project would not have an impact on these categories of shade-sensitive uses.

The study also indicates that the Project would also cast some new shadows on commercial properties west of the Project site during portions of the morning; however, these shadows would be transitory in nature and leave the western properties unshaded by noon. To the north and east, the Project would result in incrementally new shadows on the non-shade-sensitive portions of residential and commercial properties, such as parking areas, roofs, and driveways.

Overall, the proposed project's shadows are most impactful during the winter months and for brief periods during the fall and spring seasons. The Project provides approximately 15% new shadows onto the adjacent properties. However, the degree and length of shadowing do not appear to cause negative affects to character-defining features or indirectly cause any material impairment to historic resources such that there would be a CEQA impact according to the CEQA Guidelines Section 15064.5 for Impacts to Historical Resources.

Implementation of the Project would be beneficial to the DSASP area, as it would eliminate an existing commercial building and parking lot and replace with 99 new residential units within a seven story, high-quality, modern building. In the public realm around the site, the Project will include public art and historic recognition and streetscape improvements such as undergrounding overhead utility lines along all frontages of the property, widening and installing new sidewalks along the Project frontage on Cypress and Lux Avenues, and providing street furnishings and landscaping such as benches and street trees along the project frontage of Cypress and Lux Avenues.

Because the Project does not have the potential to increase shadows on public open spaces, pedestrian corridors, and retail streets, it would not substantially degrade the quality of the Project site and its surroundings, and the Project would result in less than significant impacts. The overall Project would enhance the visual quality of the site and its surroundings, consistent with the DSASP program EIR. Therefore, the Project would not result in a negative aesthetic impact to the surrounding area.

d. The land uses accommodated under the DSASP have the potential to include sources of light and glare, such as security lighting or new glass panel buildings. However, the DSASP area is currently developed with similar land uses. Redevelopment would not result in a substantial net increase in nighttime lighting or daytime glare sources. The South San Francisco Municipal Code (SSFMC) includes multiple building and construction regulations and zoning requirements that are intended to minimize localized light and glare impacts. Additionally, the DSASP Performance Standards and adopted zoning regulations state that all new pedestrian light fixtures shall be designed to focus light onto sidewalks and to minimize light spillover into adjacent upper-level building windows or into the night sky. The Project has been designed to adhere to these requirements as all lighting will be shielded and downlight (see Project design plan sheet L18), and, therefore, no new sources of substantial light or glare not evaluated by the DSASP program EIR would result from implementation of the Project.

No new impacts have been identified and no new mitigations are required for the Project.

II. AGRICULTURE RESOURCES -- *Would the project:*
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?
c) Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned Timberland Production?
d) Result in the loss of forest land or conversion of forest land to non-forest use?
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

Documentation:

a, c, d, e. No agricultural uses are located in the DSASP area, and the area does not contain any Prime Farmland, Unique Farmland, Farmland of Statewide Importance, forest land, timberland, or timberland production. The Project is located in a built-out, urban environment, and, therefore, would not convert farmland to a non-agricultural use. Consistent with the DSASP program EIR, no impact would occur as a result of the Project.

b. The Project would not conflict with any agricultural zoning use or a Williamson Act contract. There are no such zoned land uses or Williamson Act contracts in the Project vicinity. Consistent with the DSASP program EIR, no impact would occur as a result of the Project.

III. AIR QUALITY -- *Would the project:*
a) Conflict with or obstruct implementation of the applicable air quality plan?
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, including releasing emissions that exceed quantitative threshold for ozone precursors?

d) Expose sensitive receptors to substantial pollutant concentrations, including, but not limited to, substantial levels of toxic air contaminants?
e) Create objectionable odors affecting a substantial number of people?

Documentation:

a-c. The DSASP program EIR (pp. 4.2-10 through 4.2-28) identified significant and unavoidable impacts related to air quality for construction and operational activities of new development if mitigation measures were not implemented for all future projects. Mitigations were included in the EIR, but the City Council determined that such impacts could not be avoided even with the incorporation of these measures and that no other feasible mitigations or alternatives would avoid or lessen the impacts. Consequently, the City Council adopted a Statement of Overriding Considerations for the DSASP program EIR on January 28, 2015, that determined that the new development benefits outweigh the potential air quality impacts.

An Air Quality Assessment prepared by Illingworth & Rodkin, Inc., dated February 3, 2022 (Attachment 9) determined the Project is consistent with the development planned to occur under the DSASP EIR. Construction period emissions were modeled using the California Emissions Estimator Model, Version 2020.4.0 (CalEEMod). These emissions include both on-site construction activity and off-site truck and worker travel. Construction activity is anticipated to include demolition, grading and site preparation, trenching, and building construction. The proposed project land uses, and construction information inputted into the CalEEMod were as follows:

- 99 "Dwelling Unit Apartments Mid Rise" Acreage = .58 acres
- Grading = 9,400-cy soil export and 2,000-cy soil import
- Demolition = 13,000 sf
- Paving = 32,670-sf asphalt

The Project is subject to the air quality mitigation measures in the DSASP EIR, specifically:

- Mitigation Measure MM4.2-1 requires the emissions modeling of construction activities to identify appropriate mitigation measures to reduce emissions below significance criteria;
- Mitigation Measure MM4.2-2 requires quantification of operational emissions to demonstrate that adequate measures have been identified to reduce emissions; and
- Mitigation Measure MM4.2-3 requires a health risk assessment that assesses the impacts of air pollution sources that could affect the project's residents and, if necessary, identify appropriate measures to reduce the potential health risk to below significant level.

To address these mitigation measures, the Air Quality Assessment performed the following analyses for the Project, reproduced in *italics* below:

Evaluate Construction Activities (MM 4.2-1)

CalEEMod was used to compute emissions associated with this mitigation measure assuming that all equipment met U.S. EPA Tier 4 interim engines standards, BAAQMD best management practices for construction, and electrified welders were included. With these implemented, the project's cancer risk levels (assuming infant exposure) and annual PM2.5 concentrations would be reduced to 3.83 per million with use of Tier 4 equipment. Assuming a lesser level of mitigation that achieves an 85-percent reduction, increased cancer risks would be reduced to below 10 chances per million. As a result, the project's construction risks would be reduced below the BAAQMD single-source thresholds identified in Table 1.

Operational Emissions (MM 4.2-2)

This mitigation measure requires quantification of operational emissions to demonstrate that adequate measures have been identified to reduce project air pollutant emissions. The CalEEMod model that was used to compute construction air pollutant emissions was also used to compute operational emissions. The model was run with default inputs for the project land use and types describe previously for the construction emissions. CalEEMod provided annual emissions in tons. These were divided by 365 days to compute average daily emissions. Operational emissions are below thresholds so no measures to reduce air pollutant emissions from project operation are required.

Exposure to Sources of Toxic Air Contaminants (MM 4.2-3)

The Project site is located near several sources of toxic air contaminants that include U.S. Highway 101, the Caltrain rail line, Airport Boulevard, and several stationary sources permitted by BAAQMD. The effect of these sources was evaluated in the 2015 Air Quality Study and those findings are applied to this analysis. The following analysis was conducted in the 2015 Air Quality Study to address these sources:

- *The EMFAC2011 emission factor model and the CAL3QHCR dispersion model along with hourly meteorological data from San Francisco International Airport and obtained from BAAQMD was used to model impacts associated with traffic on U.S. Highway 101. The BAAQMD Roadway Screening Analysis Calculator was used to assess impacts from the local busy roadways, which are Airport Boulevard and Grand Avenue.*
- EPA emissions factors for diesel train locomotives and the AERMOD dispersion model along with hourly meteorological data from the San Francisco International Airport and obtained from CARB was used to model impacts associated with nearby train activity.
- *The BAAQMD Stationary Source Screening Analysis Tool, along with BAAQMD's appropriate Distance Multipliers were used to address impacts from nearby stationary sources affecting any of the sites.*
- *The maximum single-source and cumulative source health risk impacts were computed at the location where the maximum impacts occur; otherwise known as the maximum effected individual or MEI. Project-specific mitigation measures would be required if the health risk thresholds are exceeded.*

Project-specific mitigation measures would be required if the health risk thresholds are exceeded

In June 2010, BAAQMD adopted thresholds of significance to assist in the review of projects under CEQA and these significance thresholds were contained in the District's 2011 CEQA Air Quality Guidelines. These thresholds were designed to establish the level at which BAAQMD believed air pollution emissions would cause significant environmental impacts under CEQA. The thresholds were challenged through a series of court challenges and were mostly upheld. BAAQMD updated the CEQA Air Quality Guidelines in 2017 to include the latest significance thresholds, which were used in this analysis and are summarized in Table 2 - Air Quality Significance Thresholds. Impacts above these thresholds are considered potentially significant.

Table 2. Air Quality Significance Thresholds

Criteria Air Pollutant	Construction Thresholds	Operational Thresholds	
	Average Daily Emissions (lbs./day)	Average Daily Emissions (lbs./day)	Annual Average Emissions (tons/year)
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (Exhaust)	82	15
$PM_{2.5}$	54 (Exhaust)	54	10
CO	Not Applicable	9.0 ppm (8-hour average) or 20.0 ppm (1-hour average)	
Fugitive Dust	Construction Dust Ordinance or other Best Management Practices	Not Applicable	
Health Risks and Hazards	**Single Sources Within 1,000-foot Zone of Influence**	**Combined Sources (Cumulative from all sources within 1,000-foot zone of influence)**	
Excess Cancer Risk	10 per one million	100 per one million	
Hazard Index	1.0	10.0	
Incremental annual $PM_{2.5}$	0.3 $\mu g/m^3$	0.8 $\mu g/m^3$	
Greenhouse Gas Emissions			
Land Use Projects – direct and indirect emissions	Compliance with a Qualified GHG Reduction Strategy OR 1,100 metric tons annually or 4.6 metric tons per capita (for 2020) *		
Note: ROG = reactive organic gases, NOx = nitrogen oxides, PM_{10} = course particulate matter or particulates with an aerodynamic diameter of 10 micrometers (µm) or less, $PM_{2.5}$ = fine particulate matter or particulates with an aerodynamic diameter of 2.5µm or less. GHG = greenhouse gases. *BAAQMD does not have a recommended post-2020 GHG threshold.			

Summary of Findings

Project-specific measures were identified to meet the mitigation requirements. These measures are as follows:

In response to ***Mitigation Measure MM4.2-1****, a measure to reduce construction exhaust emissions was developed to ensure localized construction emissions do not lead to significant health risk impacts:*

Implement the following measures to reduce diesel particulate matter emissions by 85 percent such that increased cancer risk and annual PM2.5 concentrations from construction would be reduced below TAC

significance levels as follows:

1. All construction equipment larger than 25 horsepower used at the site for more than two continuous days or 20 hours total shall meet U.S. EPA Tier 4 emission standards for PM (PM10 and PM2.5), if feasible, otherwise,

a. If use of Tier 4 equipment is not available, alternatively use equipment that meets U.S. EPA emission standards for Tier 3 engines and include particulate matter emissions control equivalent to CARB Level 3 verifiable diesel emission control devices that altogether achieve an 85 percent reduction in particulate matter exhaust in comparison to uncontrolled equipment; alternatively (or in combination).

b. Use of electrical or non-diesel fueled equipment.

2. Alternatively, the applicant may develop another construction operations plan demonstrating that the construction equipment used on-site would achieve a reduction in construction diesel particulate matter emissions by 85 percent or greater. Elements of the plan could include a combination of some of the following measures:

a. Implementation of No. 1 above to use Tier 4 or alternatively fueled equipment,

b. Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors,

c. Use of electrically powered equipment,

d. Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,

e. Change in construction build-out plans to lengthen phases, and

f. Implementation of different building techniques that result in less diesel equipment usage.

Such a construction operations plan would be subject to review by an air quality expert and approved by the City prior to construction.

No additional project measures were identified to meet Mitigation Measures MM4.2-2 or MM4.2-3.

The BAAQMD's recommended Best Management Practices (BMPs) that would be required are listed under DSASP Mitigation Measure 1. The Air Quality Assessment determined that the Project would have emissions less than the BAAQMD significance thresholds for evaluating impacts related to ozone and particulate matter. Therefore, the Project would not contribute substantially to existing or projected exceedances of those standards. The following BAAQMD best management practices will be required of the applicant and implemented by the construction contractor, and will be included as conditions of approval for the project:

BAAQMD Required Fugitive Dust Control Measures: *The construction contractor shall reduce construction-related air pollutant emissions by implementing BAAQMD's basic fugitive dust control measures, including:*

- *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 track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.*
- *All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.*

- *All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.*
- *A publicly visible sign shall be posted with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action with 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.*

BAAQMD Required Basic Exhaust Emissions Reduction Measures. *The construction contractor shall implement the following measures during construction to reduce construction-related exhaust emissions:*

- *Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to five minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations). Clear signage shall be provided for construction workers at all access points.*

  All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

BAAQMD Toxic Air Contaminants (TAC) Requirements. *The construction contractor shall implement the following measures during demolition and construction to reduce TAC emissions:*

- *Notify BAAQMD at least ten business days before any demolition activities. The purpose of the notification process is to assure that buildings are demolished in compliance with procedures that assure asbestos is not released into the environment.*
- *Require surveys and removal of lead-based paints by licensed contractors certified in the handling methods requisite to protect the environment, public health, and safety.*

BAAQMD Architectural Coating Requirement. *The construction contractor shall implement the following measures to reduce emissions of volatile organic compounds (VOCs):*

- *Use paints and solvents with a VOC content of 100 grams per liter or less for interior surfaces and 150 grams per liter or less for exterior surfaces.*

BAAQMD Hearth Emissions. *If fireplaces or wood burning stoves are installed in new residential units, require cleaner-burning (e.g., natural gas or propane) U.S. Environmental Protection Agency (USEPA) certified stoves and inserts.*

Exhaust Emissions Reduction. *The construction contractor shall implement the following measures during construction to further reduce construction-related exhaust emissions:*

- *All off-road equipment greater than 25 horsepower (hp) and operating for more than 20 total hours over the entire duration of construction activities shall meet the following requirements:*

  1. Where access to alternative sources of power are available, portable diesel engines shall be prohibited; and

  2. All off-road equipment shall have:

  a. Engines that meet or exceed either USEPA or California Air Resources Board (CARB) Tier 2 off-road emission standards, and

  b. Engines that are retrofitted with a CARB Level 3 Verified Diesel Emissions Control Strategy (VDECS). Acceptable options for reducing emissions include the use of newer late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such are available.

Community risk impacts from the existing and TAC sources upon the project site are reported in Table 3 - Impacts from Combined Sources to Project Site Receptors. The risks from the singular TAC sources are compared against the BAAQMD single source threshold. The risks from all the sources are then combined and compared against the BAAQMD cumulative-source threshold. As shown, none of the sources exceed the single-source or cumulative-source thresholds.

Table 3. Impacts from Combined Sources to Project Site Receptors

Source	Maximum Cancer Risk (per million)	Maximum Annual $PM_{2.5}$ ($\mu g/m^3$)	Maximum Hazard Index
Highway 101	8.24	<0.3	0.01
CalTrain Zone 1	1.18	0.01	0.01
Airport Boulevard	1.93	0.11	0.04
Grand Avenue	1.50	0.01	0.04
NOD Auto Body Shop Inc (Facility ID #15132, Auto Body Coating Operation), MEI at 1000 feet	-	-	<0.01
NOD Auto Body Shop Inc (Facility ID #20215, Auto Body Coating Operation), MEI at 150 feet	-	-	<0.01
Unocal #1020—Grand Martco Inc (Facility ID #109214, Gas Dispensing Facility), MEI at 775 feet	0.69	-	<0.01
Chico's Service Station (Facility ID #200891, Gas Dispensing Facility), MEI at 670 feet	0.88	-	<0.01
A&K Supreme Auto (Facility ID #201062, Auto Body Coating Operation), MEI at 190 feet	-	-	<0.01
BAAQMD Single-Source Threshold	***10***	***0.3***	***1.0***
Exceed Threshold?	*No*	*No*	*No*
Cumulative Total	14.42	0.43	<0.15
BAAQMD Cumulative Source Threshold	***100***	***0.8***	***10.0***
Exceed Threshold?	*No*	*No*	*No*

d. The DSASP program EIR (pp. 4.2-22 through 4.2-27) concluded that development within the specific plan area in accordance with the DSASP regulations had the potential to expose sensitive receptors (e.g., proposed residential uses) to toxic air contaminants (TACs) and particulates (PM2.5) if located within 500 feet of a freeway, urban road with 100,000 vehicles/day, or the Caltrain railroad. The Air Quality Assessment (Illingworth & Rodkin, Inc., February 3, 2022) concluded that operation of the Project is not considered a source of TAC or fine particulate matter (PM2.5) emissions. As a result, the Project operation would not cause emissions that expose sensitive receptors to unhealthy air pollutant levels. Because the Project would not be a source of TACs, it would not contribute cumulatively to unhealthy exposure to TACs. In addition, because the Project site is located within 500 feet of the Caltrain railroad and the US-101, DSASP EIR Mitigation Measure MM4.2-3 requires a Health Risk Assessment to be prepared and approved by the City.[1] As summarized in Table 3 of the Air Quality Assessment reproduced above, the Project risk impacts from single and cumulative sources noted in Table 4 were below the BAAQMD thresholds for single source and cumulative sources and concluded that there were no significant health impacts on future residents locating within the Project.

[1] Please note that to the extent this Consistency Checklist considers air-quality issues in relation to future residents of the Project, it does so for informational purposes only pursuant to the judicial decisions in *CBIA v. BAAQMD* (2015) 62 Cal.4th 369, 386 and *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473, which confirm that the impacts of the environment on a project are excluded from CEQA unless the project itself "exacerbates" the effect of existing environmental hazards or conditions. As such, the impacts of any existing air quality conditions on the future residents of the Project are not subject to CEQA analysis.

Table 4. Community Risk Impacts from Single and Cumulative Sources

Source	Maximum Cancer Risk (per million)	Maximum Annual $PM_{2.5}$ Concentration ($\mu g/m^3$)	Maximum Hazard Index
VMAP			
Local Roadways – Airport Blvd. at >200ft West	1.8	0.1	<0.04
Local Roadways – Grand Ave at >350 ft West	1.4	0.0	<0.04
U.S. 101 at >175 ft	7.7	0.3	<0.01
Caltrain at >500 feet	1.1	0.0	<0.01
Stationary Source G11137 at 200 ft	1.6	0.00	<0.01
Stationary Source G9214 at 800 ft	0.4	0.00	<0.01
Cumulative Total	14.0	0.4	<0.1
BAAQMD Threshold - Single Source	***10.0***	***0.3***	***1.0***
BAAQMD Threshold – Cumulative Sources	***100***	***0.8***	***10.0***
Significant	***No***	***No***	***No***

Accordingly, the Project is consistent with the analysis in the DSASP program EIR. As a condition of approval, the applicant will be required to notify all prospective tenants in writing that the project is within an urban downtown with regular and typical noise and emissions due to its location.

e. The Project would contain a restaurant. As part of standard project review, the restaurant would be subject to City approval for safety and odor control. Furthermore, the Project would accommodate refuse and recycling in enclosed trash rooms on each residential floor and the lower/street level of the garage. Refuse and recycling pick-up would be provided by a local waste service provider (South San Francisco Scavenger) and would occur on a regular basis. Consequently, no odor impacts are anticipated as a result of the Project.

No new impacts have been identified and no new mitigations are required for the Project.

IV. BIOLOGICAL RESOURCES – *Would the project:*
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Documentation:

a-c. The DSASP area is currently developed with residential, commercial uses and office uses. There are no large open spaces in the Project area. Open space within the Downtown area consists of developed parkland, mostly graded vacant lots, and a portion of the PG&E transmission corridor. The City's General Plan identifies the areas of the City that support biological resources, which generally consist of San Bruno Mountain, Sign Hill, and wetland areas along Colma Creek (South San Francisco 1999, Open Space and Conservation Element). The City requires assessment and protection of biological resources for development in these areas. The DSASP area is densely developed and not located in an area that supports biological resources. Only a small portion on the southern boundary of the DSASP is adjacent to the Colma Creek Canal. The area is located south of Airport Boulevard and Highway 101, east of the railroad track and east of San Mateo Avenue. The Project is north of Airport Boulevard and not located adjacent to the Colma Creek Canal.

Riparian habitat in South San Francisco is limited to Colma Creek and the Bay fringe. However, the DSASP does not propose any land use directly adjacent to the canal, and the area directly adjacent to the canal is currently in use for utility infrastructure and right-of-way. The Project is not proximate to this location. Therefore, consistent with the DSASP program EIR, this Project would not result in any substantial adverse impacts to sensitive plant or animal species.

d-e. Construction and development associated with implementation of the Project would not occur within an area containing habitat that supports biological resources. Therefore, the Project would have no impact on wildlife movement corridors. Landscaping vegetation within the DSASP area could provide potential nesting habitat for migrating birds. If vegetation removal were to occur during the February 1 through August 31 bird nesting period, construction would be required to comply with applicable regulations in the California Fish and Game Code (Sections 3503, 3513, or 3800), which would protect nesting birds from construction disturbances and will be required as a condition of approval.

Landscaped areas in the Project area may contain trees defined as protected by the South San Francisco Tree Preservation Ordinance contained in Title 13, Chapter 13.30 of the City's Municipal Code. Development activities could involve removal or pruning of protected trees. However, such activities would be required to comply with the Tree Preservation Ordinance as part of the Project approval process, including obtaining a permit for any tree removals or alterations of protected trees, and avoiding tree roots during trenching for utilities. This would be required as a condition of approval. The Conditions of Approval impose specific conditions on the Project to ensure that the Project complies with applicable regulations and City requirements, and the Mitigation Monitoring and Reporting Program (MMRP) mitigation measures implement existing, not new, mitigation. Therefore, the Project remains consistent with the analysis of the DSASP program EIR.

f. There is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan that is applicable to the DSASP area or Project.

No new impacts have been identified and no new mitigation measures are required for the Project.

V. CULTURAL RESOURCES -- *Would the project:*
a) Cause a substantial adverse change in the significance of a historical resources defined in CEQA Guidelines Section 15064.5?
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines Section 15064.5?
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?
d) Disturb any human remains, including those interred outside of formal cemeteries?

Documentation:

a. The DSASP program EIR (pp. 4.3-11 through 4.3-13) identifies 12 historic resources within the DSASP area and an additional 12 sites within a one-half mile radius of the area boundaries. Although the Grand Avenue commercial corridor was suggested as a historic district, it was never formally designated. The DSASP program EIR concluded that there were potential impacts to these resources only for project sites located on or directly adjacent to a historic resource. The Project site is not close to any identified historic resources, therefore, would have no impact on historical resources.

Consistent with EIR Chapter 4, the DSASP specifies standards, guidelines, and mitigations for historic resources identified in the DSASP. Implementation of DSASP mitigation measure MM4.3-1 would require a qualified professional to conduct site-specific historical resource evaluation for future development within the DSASP area that would demolish or otherwise physically affect buildings or structures 45 years old or older or would otherwise affect their historic setting.

A Historic Resource Evaluation Report was prepared for the Project by Brad Brewster, dated May 2021 (Attachment 1). The existing development on the site consists of 421 Cypress Avenue, known as the Bertolucci's Restaurant. The approximately 10,000 square feet one-to-two story building was originally constructed in 1926 as a two-story hotel called the Liberty Hotel with a ground floor restaurant and was expanded in various phases from 1945 to 1972 to become Bertolucci's Restaurant comprising the entire ground floor. Although the property meets the minimum age threshold for potential eligibility, it does not appear to be individually eligible for listing in the California Register because it does not meet any of the criteria required for a finding of individual historic significance. The Historic Resource Evaluation concluded that the existing buildings on the Project site are not listed, or eligible to be listed, on the City's Historic Resources Inventory, the California Register of Historic Resources (CRHR), or the National Register of Historic Places (NRHP). Although not deemed historic, the applicant would install a plaque on the wall along Cypress Avenue, recognizing the old Bertolucci's site, its founders and significance in Downtown, South San Francisco. Moreover, the "Bertolucci's" neon roof sign would be retained and repurposed into the new building façade. Consequently, the Project would have no impact on historic or significant cultural resources, consistent with the DSASP program EIR.

b. The Project would not cause a potentially significant impact to any known archaeological resources in the project vicinity. Based on the California Historical Resources Information (CHRIS) Letter, dated April 28, 2022 (Attachment 2), Native American resources have been found in areas marginal to the San Francisco Bay shore, and inland near intermittent and perennial water resources and near areas populated by oak, buckeye, manzanita, and pine as well as near a variety of plant and animal resources. The Project site is located west of Point San Bruno, approximately 230 meters west of the edge of the historic Bayshore margins and associated marshlands, which is approximately 700 meters north of Colma Creek, and San Bruno Canal. Given the similarity of these environmental factors, there is moderate to high potential for unrecorded Native American resources to be within the proposed Project site.

However, the Project would be subject to mitigation measures contained in the DSASP EIR. The DSASP program EIR (pp. 4.3-13 through 4.3-14) also concluded that there is a high potential for new development facilitated by the DSASP to disturb unrecorded archaeological resources, which represented a potentially significant impact. DSASP Mitigation Measures MM4.3-2 through MM4.3-4 of the DSASP program EIR require that, prior to any earth-disturbing activities (e.g., excavation, trenching, grading) or in the event that any deposit of prehistoric or historic archaeological materials are encountered during project construction activities, all work within 100 feet shall be stopped and a qualified archaeologist be contacted to assess the deposit and make recommendations, possibly including complete avoidance of the resources, in-place preservation, and/or data recovery. Additionally, prior to start of construction, the construction project manager/supervisor would undergo worker environmental awareness training which includes the ability to identify and protect significant cultural resources that may exist on site or provide evidence of such training that is City-approved. These measures, which will be required as conditions of approval for the project, would reduce the potential impacts of the Project on archaeological resources to a less-than-significant level. By imposing these conditions, the City is implementing existing, not new, mitigation; therefore, the Project remains consistent with the analysis of the DSASP program EIR.

c. The Project would not cause a potentially significant impact to any known paleontological resources in the project vicinity. The DSASP program EIR (p.4.3-14) concluded that earthmoving activity associated with DSASP-facilitated development could potentially disrupt, alter, or eliminate as-yet undiscovered paleontological resources, which represented a potentially significant impact. DSASP Mitigation Measures MM4.3-5 through MM4.3-6 of the DSASP program EIR require that, prior to the issuance of grading or demolition permits, the Community Development Department, in coordination with a qualified paleontologist, assess individual development proposals for the potential to destroy unique paleontological resources and to determine provisions to protect such resources when applicable, possibly including complete avoidance of the resources, in-place preservation, and/or data recovery, as detailed in MM4.3-5 and MM4.3-6. Additionally, under MM4.3-6, should paleontological resources or unique geologic features be identified at a particular site during project construction, construction shall cease within 100 feet of the find and the City shall be notified.

   Under MM4.3-6, a City-approved paleontologist shall assess the significance of the find and impacts to any significant resources shall be mitigated to a less-than-significant level through methods determined adequate by the paleontologist and as approved by the City. These measures, which will be required as conditions of approval for the Project, would reduce the potential impacts of the Project on paleontological resources to a less-than-significant level, consistent with the evaluation of the DSASP program EIR. By imposing these conditions, the City is implementing existing, not new, mitigation; therefore, the Project remains consistent with the analysis in the DSASP program EIR.

d. The Project would not cause a potentially significant impact to any known cemeteries or human remains in the project vicinity (DSASP program EIR p. 4.3-15). However, should any human remains be found during on- or off-site improvements associated with the Project, the DSASP program EIR identifies California Health and Safety Code Section 7050.5, which requires that no further disturbances shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to state law. Public Resources Code Section 5097.98 outlines the Native American Heritage Commission notification process and the required procedures if the County Coroner determines the human remains to be Native American. Compliance with this standard state regulation would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant and no mitigation would be required, consistent with the evaluation of the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

VI. GEOLOGY AND SOILS – *Would the project:*
a) Expose people or structures to 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 known fault (Division of Mines and Geology Special Publication 42)?
ii) Strong seismic ground shaking?
iii) Seismic-related ground failure, including liquefaction?
iv) Landslides?
b) Result in substantial soil erosion or the loss of topsoil?
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial risks to life or property?
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Documentation:

a. (i.-iv.) The DSASP area is not located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1994, and no known active or potentially active faults traverse the study area. Because ground rupture generally only occurs at the location of a fault, and no active faults are known to traverse the DSASP area, the Project would not be subject to a substantial risk of surface fault ruptures. The City and the larger San Francisco Bay Area are in a seismically active region. A rupture of the Peninsula Segment of the San Andreas Fault could result in intensities registering 7.1 on the modified Mercalli intensity scale in the South San Francisco area. Most of the City would experience an intensity level of VII (Nonstructural Damage) or VIII (Moderate) from a rupture of the Peninsula Segment of the San Andreas Fault during an earthquake with a 7.1 magnitude. According to the South San Francisco General Plan, portions of the DSASP area are located in areas potentially subject to extremely high or very high levels of ground shaking (see General Plan Health and Safety Element Figure 8- 2 [General Plan Policies for Seismically Sensitive Lands]).

The structural design of the proposed building must adhere to State and City building code standards, such as the California Building Code, which define minimum acceptable levels of risk and safety. Additionally, in accordance with General Plan Policy 8.1- I- 1, special occupancy land uses (hospitals, schools, and other structures that are important to protecting health and safety in the community) would not be located in the areas designated as seismically sensitive in General Plan Figure 8–2. Compliance with existing state and City regulations would be consistent with the analysis of the DSASP program EIR, which identified that existing regulations would reduce impacts to a less-than-significant level. Because the DSASP area is located in a seismically active region, the potential for seismic-related ground failure exists, including liquefaction. Most of the DSASP area is located in an area with very low susceptibility for liquefaction, except a portion of the DSASP area east of U.S. 101 with a moderate to very high risk for liquefaction (U.S. Geological Survey). However, proposed development must adhere to the California Building Code and the Seismic Hazards Mapping Act, which include requirements for geotechnical investigations in areas with high risks for liquefaction, including mitigation to minimize risks. SFFMC Section 15.56.140 (Grading Permit

Requirements) also requires a soils engineering report and an engineering geology report that would identify

potential geotechnical hazards and make recommendations to minimize hazards. Compliance with existing state and City regulations would be consistent with the analysis of the DSASP program EIR, which identified that existing regulations would reduce impacts to a less-than-significant level.

A Preliminary Geotechnical Report, dated April 7, 2022, was prepared for the Project by Cornerstone Earth Group (Attachment 4). This report concluded that although portions of the site contain soil conditions susceptible to liquefaction, the site can be developed as planned provided the recommendations presented in the report are incorporated into the Project plans and specifications and are implemented to address soil conditions specific to this site. To reduce the risk of damage to the buildings during an earthquake due to liquefaction, ground improvements will be implemented per the geotechnical report (included as a Project Condition of Approval).

The parts of the San Francisco Bay region having the greatest susceptibility to landslides are hilly areas underlain by weak bedrock units with slopes greater than 15 percent. In South San Francisco, this hazard is primarily located on the southern flank of San Bruno Mountain in the Terra Bay development and near Skyline Boulevard. Because the DSASP area is located in an area with slopes less than 15 percent, natural slope instability is not a concern. Excavation wall stability would be regulated by California Building Code Chapter 33 and consistent with the DSASP program EIR analysis.

b-e. Earth-disturbing activities associated with construction would be temporary and erosion effects would depend largely on the areas excavated, the quantity of excavation, and the length of time soils are subject to conditions that would be affected by erosion processes. In addition, all construction activities would be required to comply with California Building Code Chapter 18, which regulates excavation activities and the construction of foundations and retaining walls, and California Building Code Chapter 33, which regulates safeguarding activities, including drainage and erosion control. Additionally, development would continue to be required to comply with the National Pollutant Discharge Elimination System (NPDES) general permit for construction activities. Pursuant to this permit, as part of an erosion control plan, construction site erosion and sedimentation control best management practices (BMPs) would be implemented and would include such measures as silt fences, watering for dust control, straw bale check dams, hydroseeding, and other measures. Further, development under the DSASP would be required to comply with all applicable provisions of the San Mateo Countywide Stormwater Pollution Prevention Program (STOPPP) and requires runoff management programs that would include BMPs to control erosion and sedimentation. Following construction, future development would consist almost entirely of impervious surfaces and would not be subject to substantial erosion or topsoil loss. As discussed in the DSASP program EIR analysis, the soil in South San Francisco is generally characterized as having a low expansion potential, with the exception of areas at the base of the San Bruno Mountains or adjacent to San Francisco Bay. Development in the DSASP area would not be located in an area at high risk for expansive soils. Additionally, future development must comply with the California Building Code and SSFMC Section 15.56.140 (Grading Permit Requirements), which require a soil engineering report and an engineering geology report that would identify potential geotechnical hazards and make recommendations to minimize hazards.

The Project would not produce wastewater that requires support of septic tanks or alternative wastewater disposal systems. The City would continue to provide wastewater service to the entire DSASP area including the Project site. Therefore, this Project is consistent with the DSASP program EIR analysis and would have a less than significant impact on geology and soils.

No new impacts have been identified and no new mitigations are required for the Project.

VII. GREENHOUSE GAS EMISSIONS -- *Would the project:*
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
c) Expose people or structures to a significant risk of loss, injury or death involving flooding caused by sea level rise resulting from global climate change?

Documentation:

a, b. As demonstrated in the Air Quality Assessment prepared by Illingworth & Rodkin, dated February 3, 2022, (Attachment 9) greenhouse gas (GHG) emissions associated with development of the Project would occur during short-term construction activities, consisting primarily of emissions from equipment exhaust and worker vendor trips. There would also be long-term operational emissions associated with vehicular traffic within the project vicinity, energy and water usage, and solid waste disposal.

On April 20, 2022, BAAQMD adopted new thresholds of significance for operational GHG emissions from land use projects for projects beginning the CEQA process. The following framework is how BAAQMD will determine GHG significance moving forward.[1] Note BAAQMD intends that the thresholds apply to projects that begin the CEQA process after adoption of the thresholds, unless otherwise directed by the lead agency. The new thresholds of significance are:

A. Projects must include, at a minimum, the following project design elements:
    a. Buildings
        i. The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).
        ii. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
    b. Transportation
        i. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
            1. Residential Projects: 15 percent below the existing VMT per capita
            2. Office Projects: 15 percent below the existing VMT per employee
            3. Retail Projects: no net increase in existing VMT
        ii. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

[1] Justification Report: BAAQMD CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Project and Plans. Web: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-thresholds-2022/justification-report-pdf.pdf?la=en

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

Any new land use project would have to include either section A or B from the above list, not both, to be considered in compliance with BAAQMD's GHG thresholds of significance. The City has not adopted a GHG reduction strategy that meets CEQA. Therefore, the project must comply with A above to be considered a less-than-significant impact.

The Project would be constructed in conformance with CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures, water-efficient irrigation systems, and compliance with current energy efficacy standards. The Project is evaluated against each of the Section A BAAQMD GHG thresholds that apply:

Buildings:

i. The project will not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).

Project Conforms – compliance with City Reach Code prohibits natural gas infrastructure in new buildings.

ii. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

Project Conforms – the Project would meet CALGreen Building Standards Code requirements that are considered to be energy efficient.

Transportation:

i. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target.

Project Conforms – Pursuant to SB 743, the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b) states that vehicle miles travelled (VMT) will be the mandate metric in analyzing transportation impacts for land use projects for CEQA purposes. The City has adopted thresholds of significance to guide in determining when a project will have a significant transportation impact. The City provides screening criteria for development projects. The criteria are based on the type of project, characteristics, and/or location. If a project meets the City's screening criteria, the project is expected to result in less-than-significant impacts, and a detailed CEQA VMT analysis is not required.

The City's policy states that projects within ½ mile of an existing or planned high-quality transit corridor or major transit station should be presumed to have a less-than-significant impact on VMT. However, this presumption would not apply if the project FAR is less than 0.75, includes parking that is higher than required by the City, is inconsistent with Plan Bay Area, or replaces affordable residential units with a smaller number of market-rate units. The project site is located within half mile of the South San Francisco Caltrain Station and the high-quality transit service provided by SamTrans route 130. The Project is proposing an FAR of 4.70, fewer than the required number of parking spaces, is consistent with the DSASP, and would provide 15% below market rate (BMR) units. Therefore, the project is expected to result in a less-than-significant VMT impact. The City has a VMT analysis methodology and threshold that meets SB 743 targets. The traffic analysis provided by the applicant included a conforming VMT analysis.[2]. Therefore, this part of the threshold has been met.

[2] 421 Cypress Avenue Transportation Study December 10, 2021

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

Project Conforms – The Project would include electric vehicle charging infrastructure that meets or exceeds current Building Code CALGreen Tier 2 compliance.

Because the Project would meet the BAAQMD GHG thresholds, it is considered to have less-than-significant GHG emissions impacts. Implementation of the General Plan, along with mitigation measure MM4.4-1 (requiring implementation of BAAQMD Best Management Practices to reduce GHG emissions during construction) would reduce this impact to less than cumulatively significant**.** Best management practices would include but are not limited to: using alternative fueled (e.g., biodiesel, electric) construction vehicles/equipment of at least 15 percent of the fleet; using local building materials of at least 10 percent; and recycling or reusing at least 50 percent of construction waste or demolition materials.

Incorporation of the General Plan policies would reduce the generation of waste from construction activities, thereby reducing the emission of GHGs associated with waste disposal and decomposition. Implementation of Mitigation Measure MM4.4-1 would reduce GHG emissions associated with waste and would have the potential to reduce combustion-related GHG emission by reducing the amount or type of fuel utilized at construction sites. In summary, construction emissions would be temporary in nature and would not significantly contribute to regional GHG levels with implementation of the appropriate prescribed mitigation measures. The Project would achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

The Project would also be subject to Mitigation Measures MM4.4-2 through MM4.4-10, as applicable, which would be incorporated into the Project as conditions of approval. As such, the Project's GHG emissions would be a less-than-significant impact. This Project is consistent with the DSASP program EIR analysis and would not result in new or unidentified impacts. By imposing these conditions, the City is implementing existing, not new, mitigation; therefore, the Project remains consistent with the analysis of the DSASP program EIR. Therefore, the emissions of GHGs from new development within the DSASP would be consistent with BAAQMD thresholds. Accordingly, this Project is consistent with the DSASP program EIR analysis and would not result in new or unidentified impacts.

c. The DSASP program EIR (pp. 4.4-5 through 4.4-9) determined that the DSASP area is unlikely to be subject to flooding due to sea level rise associated with global climate change. Therefore, the Project within the DSASP should not expose people or structures to a significant risk of loss, injury or death involving flooding caused by sea level rise resulting from global climate change. This Project is consistent with the DSASP program EIR analysis and would not result in new or unidentified impacts.

No new impacts have been identified and no new mitigations are required for the Project.

VIII. HAZARDS AND HAZARDOUS MATERIALS -- *Would the project:*
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, wouldit create a significant hazard to the public or the environment?
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?
h) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Documentation:

a. The Project would include 99 residential units and associated parking, amenities, and infrastructure. It would not involve routine transport, use, or disposal of hazardous materials, nor would it result in hazardous emissions. The DSASP program EIR (p. 5-4) concluded that, while some hazardous substances may be generated, stored, transported, used, or disposed of in association with residential and non-residential development projects Downtown (e.g., cleaning supplies), existing local, State, and federal regulations and oversight would reduce the potential threat to a less-than-significant impact. This Project is consistent with the DSASP program EIR analysis and would not result in new or unidentified impacts.

b, c. The Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. The Project site does contain lead and other environmental constituents which will be removed, as part of construction activities, or remain on the subject site. No manufacturing or industrial processes that utilize or produce dangerous substances, other than those typical of construction activities (e.g., use of fuels, welding equipment), are proposed with this Project. The DSASP program EIR (p. 5-4) concluded that, with mandatory local, State, and federal regulations in place, the risk to the public or the environment from upset and accident conditions would represent a less-than-significant impact. The Project is farther than a one-quarter mile from the nearest school, Spruce Elementary School. As such, this Project is consistent with the DSASP program EIR analysis and would not result in new or unidentified impacts.

d. According to the State Water Resources Control GeoTracker database there are several open and closed hazardous materials cases in the DSASP area. Cases are concentrated south of Grand Avenue and along the US 101 corridor. The majority of cases involve leaking underground storage tanks (LUST). Other cases involve solvents and cases involve leaking dry-cleaning chemicals. A Phase I Environmental Assessment (Phase I) has been prepared for the Project site by RMD Environmental Solutions (Attachment 3).

Consistent with the DSASP, the Phase I identifies constituents that are above commonly used environmental screening levels at locations within the Project site's boundary. These constituents are frequently associated with infill locations.

As detailed in the Phase I, the following summarizes known environmental conditions:

418 Linden Avenue-Apartments – This listing is located approximately 200 feet northwest of the Subject Property (upgradient). This site is listed in the RCRA NONGEN / NLR database. The site is listed as storing hazardous waste. No violations were noted. RMD does not consider this listing to be a REC with respect to the Subject Property.

217 California Avenue #4 – This listing is located approximately 220 feet north of the Subject Property (upgradient). This site is listed in the RCRA NONGEN / NLR database. The site is listed as storing hazardous waste. No violations were noted. RMD does not consider this listing to be a REC with respect to the Project.

Pyramid Printing and Graphics, 226 Miller Avenue – This listing is located approximately 175 feet west of the Subject Property (cross gradient). This site is listed in the SAN MATEO CO. BI database. This site is listed as storing motor vehicle fuel and generating and recycling waste oil/solvents. No violations were noted. RMD does not consider this listing to be a REC with respect to the Subject Property.

Parking Lot, 220 Miller Avenue – This listing is located approximately 50 feet west of the Subject Property (cross gradient). This site is listed in the CPS-SLIC and CERS databases. In 2015, West Incorporated applied for a subsurface drilling permit to collect soil samples at the site. Lead was detected at a maximum concentration of 11,000 milligrams per kilogram (mg/kg), which is above the RWQCB established environmental screening levels. San Mateo County Ground Water Protection Agency (SMCGPP) determined that additional investigation was warranted. Site assessment is being overseen by SMCGPP. RMD does not consider this listing to be a REC with respect to the Subject Property.

Airport Boulevard Properties, 309/315/401/411/421 Airport Boulevard, 401-407 Cypress Avenue, and 216 Miller Avenue – This listing includes multiple parcels and is located to the east/southeast across Cypress Avenue from the Subject Property (downgradient). This site is listed in the ENVIROSTOR and VCP databases (https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=60002307). The DTSC is currently overseeing remediation at the site, which has a long history of usage dating from the late 1800s to present. Uses included residences, hotels, saloon, gas station, vehicle repair, waste oil collection, vehicle sales and service, blacksmith shop, and parking areas. Several USTs and used oil tanks were previously removed and cases closed by San Mateo County Environmental Health (SMCEH). Residual contaminants at the site included total petroleum hydrocarbons (TPH), tetrachloroethylene (PCE), trichloroethylene (TCE), lead, and polycyclic aromatic hydrocarbons (PAHs). A response plan for cleanup of the site was completed in March 2017. Cleanup consisted of removal of USTs, excavation of contaminated soil, and installation of a vapor barrier and sub-slab venting system beneath the building foundation. Residual contamination at the Airport Boulevard Properties likely do not present a threat to human health or the environment at the Subject Property based on the following:

- The Airport Boulevard Properties are located cross/down gradient of the subject property;
- Shallow soils in the area are described as clay which would limit the lateral mobility of residual VOCs in vapor; and
- Residual contamination has generally been addressed during cleanup activities overseen by the DTSC. RMD considers this listing to be a de minimis concern with respect to the Subject Property. A number of other facilities appear on databases indicating potential contamination concerns (e.g., Leaking Underground Storage Tank [LUST]; Spills, Leaks, Investigation, and Cleanup [SLIC]).

- Due to the regulatory status (closed case), distance, or downgradient locations, RMD did not identify any additional nearby facilities that would be a REC with respect to the Subject Property.

As discussed in the City's General Plan, the location of existing hazardous materials cases near future proposed development would be identified during the development approval process (South San Francisco 1999, Health and Safety Element). Redevelopment or development would be required to comply with all applicable regulations for remediation of hazards, such as those addressing underground storage tanks, disposal of environmentally impacted soil, and the discharge of water generated during construction. Compliance with existing regulations and necessary environmental actions that protect future site users from exposure to elevated concentrations of constituents would reduce impacts related to listed hazardous materials sites to a less-than-significant impact and would be consistent with the analysis in the DSASP program EIR. The Phase 1 prepared by RMD did not observe any underground storage tanks, or evidence of hazardous materials. Examples of constituents include adherence to work protection laws and practices, encapsulation of impacted soils under durable covers, separation of residential spaces from areas with elevated soil gas conditions, under the jurisdiction of an agency of applicable jurisdiction (e.g., County of San Mateo Health System, San Francisco Regional Water Quality Control Board, California Department of Toxic Substances Control).

e, f. The Project area is located approximately one mile north of the San Francisco International Airport (SFO). The DSASP area is located outside of all airport Safety Compatibility Zones. The DSASP area is located within Airport Influence Area B and is subject to Federal Aviation Administration (FAA) notification requirements (see Exhibit IV 10 [FAA Notification Form 7460—Filing Requirements, of the Comprehensive Airport Land Use Plan for the Environs of San Francisco International Airport]) (C/CAG 2012). The maximum building height allowed in the DSASP area is 85 feet, with the exception of the area East of 101, which is required to be consistent with the FAA regulations, and is below 163.2 feet Mean Sea Level, which is the lowest obstruction standard in the DSASP area (see Exhibit IV 14, 14 Code of Federal Regulations Part 77 Airport Imaginary Surfaces – North Side, of the Comprehensive Airport Land Use Plan for the Environs of San Francisco International Airport). The Project proposes a building height of 85 feet or 110 feet above Mean Sea Level measured to the top of parapet, consistent with the DSASP and the Airport Land Use Plan. Consistent with CFR Part 77, developers proposing structures taller than the notification elevations identified in Exhibit IV-10 of the Comprehensive Airport Land Use Plan would be required to file a notification with the FAA at least 30 days before the proposed start of construction. For the proposed Project site, pursuant to Exhibit IV 14, notification is required for buildings over 110-120 feet Mean Sea Level. This requirement would not be required for the Project. Most of the study area is located in an area that requires notification for buildings taller than 100 feet. Coordination with the FAA would ensure that a significant safety issue would not occur.

There are no private airstrips within two miles of the DSASP area. Therefore, implementation of the Project would not result in a safety hazard for people residing or working in the Project vicinity, consistent with the analysis of the DSASP program EIR.

g. Construction activities associated with development under the DSASP could potentially affect emergency response or evacuation plans due to temporary construction barricades or other obstructions that could impede emergency access on site. However, SSFMC Section 11.16.170 prohibits road closures or obstructions without approval by the SSF Chief of Police. Coordination with the Chief of Police would ensure that adequate emergency access is maintained during construction. As a result, the proposed project would be required to comply with the City's Municipal Code and not impair or interfere with emergency plans, and the project is consistent with the analysis of the DSASP program EIR.

h. The Project site is located in a downtown urban environment not adjacent to wildlands and, therefore, would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

This is consistent with the analysis of the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

IX. HYDROLOGY AND WATER QUALITY -- *Would the project:*
a) Violate any water quality standards or waste discharge requirements?
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?
e) 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?
f) Otherwise substantially degrade water quality?
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?
j) Inundation by seiche, tsunami, or mudflow?

Documentation:

a-d. To comply with the Clean Water Act (CWA), San Mateo County and the twenty cities and towns in the County, including the City, formed the San Mateo Countywide Storm Water Pollution Prevention Program (STOPPP). STOPPP holds a joint municipal NPDES permit from the San Francisco Bay Regional Water Quality Control Board (RWQCB). The permit includes a comprehensive plan to reduce the discharge of pollutants to creeks, San Francisco Bay, and the ocean to the maximum extent possible. The San Mateo Countywide STOPPP includes a Site Design Standards Checklist to evaluate proposed projects against guidelines intended to reduce stormwater pollution; this checklist would be completed and required by the Water Quality Division and is included as a Condition of Approval. Construction activities would continue to be required to comply with the NPDES general permit for construction activities, pursuant to which BMPs would be implemented to control stormwater during construction, including silt fences, watering for dust control, straw bale check dams, hydroseeding, and other measures.

Colma Creek is the City's main natural drainage system. A small area along the southern boundary of the DSASP area is adjacent to Colma Creek; however, Colma Creek does not intersect the DSASP area at any point, and future development of the Project would not alter the course of Colma Creek or any other

waterway. Surface and stormwater runoff from the DSASP area is collected by the City's storm drainage system. The existing storm drainage system in the Project area is designed to accommodate flows from urbanized development and takes into account the high ratio of impervious surfaces in the area. The Project would remove the existing building and surface parking lot on the site and redevelop the area with similar uses. The ratio of impervious surface area would be similar to existing conditions, thereby not increasing runoff or stormwater flows over existing conditions. During construction, erosion and run-off would be controlled through required compliance with the NPDES general permit for construction activities, including preparation of a Storm Water Pollution Prevention Plan. Compliance with existing regulations would ensure that the Project is consistent with the analysis of the DSASP program EIR and would not violate any water quality standards or waste discharge requirements.

e. Redevelopment under this Project would require new drainage structures and localized on-site storm drain systems. This Project proposes a new storm drain system to accommodate anticipated runoff and sizing will be required to comply with City Engineering Division requirements, as appropriate during the Building Permit process. The San Mateo Countywide STOPPP has a Site Design Standards Checklist to evaluate proposed projects against guidelines intended to reduce stormwater pollution. This Project would be required to conform to those provisions, and the development would be required to comply with all applicable regulations pertaining to water quality. Compliance with existing regulations would ensure that the Project is consistent with the analysis of the DSASP program EIR and would not violate any water quality standards or waste discharge requirements.

f. With implementation of the San Mateo Countywide Stormwater Pollution Prevention Plan (SWPPP) as part of the NPDES permit program, Project construction would result in no degradation of existing water quality. Furthermore, operation of the Project would not generate any foreseeable uses that would substantially degrade water quality. The Project is in compliance with all applicable regulations, as evaluated by the DSASP program EIR and, as a result, no additional water quality impacts are anticipated with implementation of this Project.

g-j. Portions of the DSASP area east of US 101, north of Armour Avenue, and south of 2nd Lane are within the 100-year flood hazard area, but the Project is not within this portion of DSASP (California Department of Water Resources 2013). The Project is not located in, nor are residences being proposed, in the east of U.S.101 area; therefore, no impact would occur in this area. The Project is consistent with the analysis of the DSASP program EIR.

The Project area is not located in a potential dam failure inundation area (Association of Bay Area Governments (ABAG) 2003). A 1.5-million-gallon storage reservoir located on the top of San Bruno Hill poses the greatest risk of seiche hazards in the DSASP area. However, because the reservoir holds a relatively small volume of water, water released during seiching would be largely absorbed in the vegetated hillsides. Because the hillsides are not very steep, the flow of water would not be rapid. Also, water would drain away from the hill instead of ponding and resulting in high water levels. Thus, seiche inundation impacts are considered to be less than significant in the Project area.

The Project area is not located in an area at risk for tsunami inundation; therefore, a significant impact related to tsunamis would not occur (California Emergency Management Agency (EMA) et al. 2009). The potential for inundation by mudflow is considered low because the DSASP area does not contain steep slopes. Hillsides surrounding the DSASP area are covered by development and/or landscaping. Rainfall onto these areas would encounter vegetation or impervious surfaces and would not pose a risk of causing saturated soil to loosen and flow downhill. Thus, there would be no mudflow inundation impact on the DSASP area, as evaluated in the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

X. LAND USE AND PLANNING -- Would the project:
a) Physically divide an established community?
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

Documentation:

a. The DSASP program EIR (p. 4.5-10) concludes that implementation of the DSASP would reinforce, with no substantial change to, established community-wide land use patterns. The EIR also concludes that the DSASP land use characteristics, provisions, and development standards would result in beneficial land use effects. The DSASP has been incorporated into the City's General Plan and Zoning Ordinance. Existing land use on the site consists of a restaurant, five small residential units, and associated landscaping and parking. The Project would result in construction of a mixed-use residential building on a parcel that is already developed. The Project would therefore not divide an established community. The Project is consistent with the DSASP standards and zoning regulations and, as a result, no further analysis is required.

b. The Project would not conflict with any applicable land use policy plan, policy, or regulation of agencies with jurisdiction over the Project (DSASP program EIR p 4.5-11). After rezoning and a general plan amendment, the Project would comply with all applicable DSASP standards, guidelines, and regulations. The Project would have a residential density of 169 dwelling units per acre (du/acre), which is above the maximum base density of 100 du/acre and below the maximum density of 180 du/acre allowed by the DSASP Increased Density Incentive Program. The Project would provide 10% low-income units and 5% very low-income units, for a total of 15% (15 units) Below Market Rate (BMR) units as required by code. The DSASP EIR analysis accounted for anticipated growth including increase in density. The Project is consistent with the adopted residential land use and does not conflict with the policies that were adopted for the purpose of avoiding or mitigating environmental effect. Overall density for this Project would be consistent with the standards set forth in SSFMC Chapter 20.280 (Downtown Station Area Specific Plan District) with the density bonus at 180 du/acre permitted per the DSASP Increased Density Incentive Program with City Council approval. The Project proposes 169 du/acre consistent with DSASP development density.

Implementation of the DSASP would yield significant amounts of new residential and employment uses in the DSASP area, where development potential would be determined by applying the land use, density and intensity assumptions to land within each district. For the purposes of the DSASP and for assessing environmental impacts associated with the plan, it has been assumed that only 25 percent of parcels in the DSASP area would be developed within the plan's 20-year timeframe. Assuming such, the DSASP has the potential to add 1,435 units of residential uses to the existing 1,426 units in the area, for a total of 2,861 residential units in the proximity of the Caltrain station. Additionally, the DSASP has the potential to add a maximum of 1.2 million square feet of new office/R&D uses, which represents as many as 2,400 or more jobs added to the City. This Project represents 99 new residential units, which will bring the cumulative total to no fewer than approximately 1,335 total new residential units that have been entitled within the DSASP area since adoption in January 2015.[2] As a result, no potentially significant land use or planning impacts are anticipated and no further analysis beyond the DSASP program EIR is necessary.

[2] See City Council Staff Report 18-114, 2/28/18, analyzing the Downtown Transit Core (DTC) zoning text amendment and CEQA analysis, increasing the Maximum Density with Incentives to 180 du/ac

c. There is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan that is applicable to the DSASP area and the Project remains consistent with the analysis of the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

XI. MINERAL RESOURCES -- *Would the project:*
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land useplan?

Documentation:

a-b. No significant mineral deposits are identified in the DSASP area (DSASP program EIR p. 5-7). The Project site within the DSASP does not contain valuable or locally important mineral resources, nor will it consume extraordinary amounts of mineral resources. Therefore, Project implementation would not create an impact on mineral resources, consistent with the analysis of the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

XII. NOISE – *Would the project:*
a) Expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b) Expose persons to or generate excessive ground-borne vibration or ground-borne noise levels?
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?
f) For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels?

Documentation:

a-b Noise in South San Francisco is regulated by the City's Noise Ordinance (Chapter 8.32 of the Municipal Code). In addition, the Noise Element of the City's General Plan enumerates noise policies. More specifically, excessive, and unreasonable noise levels are defined as noise levels generated by construction activities, including demolition, alteration, and repair or remodeling of existing structures, and construction of new structures, on property within the City, at more than 90 decibels (dB) measured at any point within a residential district of the City and outside of the plane of the property. Therefore, construction noise is required to be less than 90 dB within residential districts and no construction noise is permitted between the hours of 8:00 PM and 8:00 AM the following day. The General Plan requires all exterior noise sources (construction operations, air compressors, pumps, fans, and leaf blowers) to use available noise suppression devices and techniques to bring exterior noise down to acceptable levels

compatible with adjacent land uses.

A Noise Assessment was prepared by Salter, dated May 3, 2022 (Attachment 8). The primary sources of noise from the Project would be temporary construction noise and operational noise. Construction noise is largely a function of the construction equipment used, the location and sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Construction noise levels would vary depending on construction phase, equipment type and duration of use, distance between noise source and receptor, and presence or absence of barriers between noise source and receptor. All noise-generating construction activities are anticipated to be conducted on weekdays between the hours of 8:00 AM and 8:00 PM in accordance with City requirements, which require noise suppression devices to reduce noise levels below 90 dB.

The DSASP program EIR (pp. 4.6-14 through 4.6-16) concluded that new DSASP-facilitated multifamily residential development could be exposed to noise levels exceeding City guidelines and State Title 24 standards, resulting in a potentially significant impact. Mitigation Measure MM4.6-3 states that a noise study consistent with the requirements of the California Building Code shall be conducted for new multifamily residential projects, and noise reduction measures necessary to achieve compatibility with the City's Noise Element guidelines and Title 24 standards (45 decibels (dBA) Community Noise Equivalent Level (CNEL) within residential units) shall be incorporated into the Project. The Noise Assessment recommends STC ratings for full window and door assembles (glass and frame). With the windows closed, standard residential construction provides approximately 20 to 25 dBA of noise levels in interior spaces. Thus, where exterior day-night average noise levels are 65 dBA Ldn/CNEL or less, the interior noise level can typically be maintained at a 45 dBA Ldn standard, assuming standard construction methods and the incorporation of forced air mechanical ventilation systems in residential units. Outdoor-use spaces noise levels at the interior courtyard are expected to be below DNL 65 dB. The Noise Assessment recommends a 6-foot-tall continuous from top to bottom glass wall to be constructed at the Level 7 terrace to reduce noise levels to DNL 65 dB. The 6-tall foot glass wall would be incorporated into the Project.

The STC window rating recommendation and 6-foot tall continuous wall will be required as conditions of approval for the Project, would reduce the potential noise impacts to a less-than-significant level and, therefore, these impacts have been adequately addressed by the DSASP program EIR. Specifically, as noted above, MM4.6-3 requires a Site-Specific Acoustical Analysis for multi-family residences be performed prior to building permits to ensure that the Project interior noise levels remain below 45dBA CNEL.

c. The DSASP program EIR (pp. 4.6-20 through 4.6-21) concluded that permanent noise levels from DSASP development would increase primarily due to new traffic patterns, new commercial development next to or below residential development, and site-specific sources, such as mechanical equipment. The addition of Project traffic from buildout of the entire DSASP (up to 1,400 new units) would result in an increase in noise levels of up to 3 dBA for two roadway segments in the DSASP area; however, those segments are not located adjacent to this Project (e.g. South Airport Boulevard between Airport Boulevard and Gateway Boulevard and Gateway Boulevard between Grand Avenue and South Airport Boulevard/Mitchell Avenue), and the Project represents only a fraction of the total expected units within the DSASP area. The Project would result in an increase in the ambient noise level from new operations and human activity; however, with incorporation of MM4.6-1, MM4.6-2 and MM4.6-3, impacts resulting from such increase would be mitigated, to the extent feasible, to a less than significant level as discussed in the DSASP EIR. Therefore, Project-related impacts associated with increases in traffic noise would not have an impact and have been adequately addressed by the DSASP program EIR.

d. The DSASP program EIR (p. 4.6-22) concluded that potentially significant temporary noise and vibration impacts could be generated by demolition and construction activities in the DSASP area. Construction of land uses accommodated by the DSASP area would not take place all at once and would be spread throughout the DSASP area so that limited receptors would be exposed to construction noise at any given

time. Under SSFMC Section 8.32.050(d), construction activities are limited to between the hours of 8:00 AM to 8:00 PM on weekdays, 9:00 AM to 8:00 PM on Saturdays, and 10:00 AM to 6:00 PM on Sundays and holidays, or as authorized by the construction permit. Construction noise that occurs during these hours is exempt from the noise level limits established in the City's Noise Ordinance because these hours are outside of the recognized sleep hours for residents and outside of evening and early morning hours and time periods where residents are most sensitive to exterior noise. Consequently, the City considers impacts resulting from construction noise during these hours to be less than significant. The Project entails no idling of construction trucks along streets, and any temporary generators would be located far from sensitive receptors, and a written notice will go out to the neighborhood within 115 feet informing them of the estimated start date and duration of vibration generating construction activities, and therefore, resulting impacts would be considered less than significant. Project construction would also be required to comply with all applicable City ordinances, including limits on construction hours. Therefore, impacts related to construction noise would be less than significant, and no further mitigation is required, as analyzed in the DSASP program EIR.

e, f. The DSASP area is located approximately 0.75 miles from the San Francisco International Airport (SFO). The latest published operational (2014) and future projected (2019) noise contours for SFO indicate that the Project site is well outside of the 65 dBA CNEL contour. Due to distance and the orientation of the airport runways, the DSASP area is not located within the 65 dBA CNEL noise contour of SFO (C/CAG 2012). Noise levels of 65 dBA CNEL and below are considered compatible with residential land uses in the City's General Plan (South San Francisco 1999, Noise Element). Therefore, it may be concluded that, under foreseeable future conditions, the site will be exposed to a CNEL of less than 65 dBA due to airport operations.

No new impacts have been identified and no new mitigations are required for the Project.

XIII. POPULATION AND HOUSING -- *Would the project:*
a) Induce substantial 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)?
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Documentation:

a. The project would have a residential density of 169 dwelling units per acre (du/acre), which is above the base density of 80 du/acre and below the maximum density of 180 du/acre allowed by the DSASP. The Project would provide 10% low-income units and 5% very low-income units, for a total of 15% (15 units) Below Market Rate (BMR) units as required by code. The DSASP EIR analysis accounted for anticipated growth including increase in density. The Project is consistent with the adopted residential land use and does not conflict with the policies that were adopted for the purpose of avoiding or mitigating environmental effect. With the utilization of State Density Bonus Law and general plan/zoning amendments, overall density for this Project would be consistent with the standards set forth in SSFMC Chapter 20.80 (Downtown Station Area Specific Plan District) with density bonus at 180 du/acre permitted per the community benefits program with Council approval.

With the adopted DSASP, General Plan and Zoning amendments, construction of 99 new residential units and up to 293 new residents (2.96 persons per household) would be consistent with the General Plan,

where additional population growth due to the higher-density areas within the DSASP area has been accounted for in future population growth projections for the City. Additionally, a higher employment rate has also been accounted for in the General Plan. Therefore, the Project is consistent with all governing documents and policies regulating the City and would not exceed the build-out estimated population of the amended General Plan. Thus, the impacts from direct population growth as a result of new housing units with this Project would be consistent with the DSASP program EIR and no further analysis is required.

The DSASP provides for infill development that makes maximum use of existing infrastructure. The DSASP area is located in the center of a dense urban area, and implementation of the DSASP would not include extension of the existing infrastructure, only site-specific infrastructure upgrades, as needed. The Project is consistent with this evaluation from the DSASP program EIR and no further analysis is required.

b, c. The DSASP program EIR (pp. 4.7-11 through 4.7-12) concluded that the DSASP, and projects facilitated thereunder, would not result in significant displacement impacts. Implementation of the DSASP would not displace significant numbers of residents or residential units necessitating construction of replacement housing elsewhere. Most new development would occur on commercial or vacant sites. Therefore, displacement of substantial existing housing would not occur. Since the DSASP would increase the study area housing stock 1,435 housing units, construction of replacement housing elsewhere would not be necessary. Existing land use on the site consists of a restaurant, five small residential units, and associated landscaping and parking. The existing commercial space and residential units are vacant, and the Project would not displace any existing residents. The Project is consistent with this evaluation from the DSASP program EIR and no further analysis is required.

No new impacts have been identified and no new mitigations are required for the Project.

XIV. PUBLIC SERVICES -- *Would the project:*
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:
Fire protection?
Police protection?
Schools?
Parks?
Other public facilities?

Documentation:

a. The City has implemented a Public Safety Impact Fee (Resolution 97-2012) for all new development. This fee is intended to fund improvements in infrastructure or public services necessitated by new development. All development pursuant to the DSASP would be required to pay this fee. However, construction of new fire facilities is not expected as a result of this Project as the DSASP program EIR has evaluated that current provision is adequate.

Further reducing impacts to fire services, all development pursuant to the DSASP would be required to comply with provisions of the California Building Code and Fire Code pertaining to fire protection systems and equipment, general safety precautions, and many other general and specialized fire safety requirements for new and existing buildings and premises, including emergency access provisions (see

SSFMC Sections 15.08.010 and 15.24.010, adopting the California Building Code and California Fire Code). The existing water, wastewater, electric, gas, and solid waste infrastructure is adequate to support the Project, as the mixed-use development would not exceed what was previously analyzed, which the current site was developed to support. Implementation of the proposed Project would not contribute to an incremental increase in demand for public facilities and paying impact fees would ensure that adequate funding for additional staffing and/or equipment would be provided to maintain acceptable levels of service throughout the community. Compliance with the City's Municipal Code requirements, payment of Public Safety Impact Fees, Parkland Acquisition and Construction fees, and school district fees to the South San Francisco Unified School District would ensure that this Project is consistent with the DSASP program EIR analysis and no further action is required.

No new impacts have been identified and no new mitigations are required for the Project.

XV. RECREATION – *Would the project:*
a) Result in an increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Documentation:

a. It is expected that existing facilities serving the DSASP area would satisfy most, if not all, of the park and open space needs generated by the DSASP buildout, including this Project. More specifically, Orange Memorial Park and Centennial Way, along with 218 total acres of parks and open space, 3.0 acres per 1,000 residents provides a wide range of regional facilities available for the residents of the City. In addition to Orange Memorial Park and Centennial Way, there are a wide variety of City, County, educational, and private recreational facilities within the City. Also, the DSASP program EIR (p. 4.9-8 through 4.9-9) concluded that there would be no significant parks and recreation impacts resulting from the DSASP or projects built under it. Additionally, upon build-out of the DSASP, a network of new open space opportunities is anticipated that will further serve the entire DSASP area, and the Project would pay Parkland Acquisition and Construction fees as required by SSFMC Section 8.67. The Project will be in compliance with all applicable DSASP regulations, and, as a result, is consistent with the DSASP program EIR's analysis.

   The Project is requesting a waiver to the useable open space requirement by providing 95 square feet per unit in lieu of the required 100 square feet per unit. The Project would not result in a substantial increase in the use of existing neighborhood parks or recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. However, the Project does provide common useable open space, centrally located, furnished with barbeques, dining areas, lounge furniture, and a recirculating fountain with access to a 1,480 square foot amenity space for the residents. As a result, the Project would not have an adverse physical effect on the environment related to recreational facilities and is covered by the analysis of the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

XVI. TRANSPORTATION/TRAFFIC -- *Would the project:*
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?
b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?
e) Result in inadequate emergency access?
f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Documentation:

a. The DSASP program EIR (pp. 4.10-61 through 4.10-68) identified significant and unavoidable impacts at five area intersections, as well as impacts on freeway segments, freeway ramps, and transit service. Mitigations were suggested by the EIR, but the City Council determined that such impacts could not be avoided even with the incorporation of these measures, and that no other feasible mitigations or alternatives would avoid or lessen the impacts. Consequently, the City adopted a Statement of Overriding Considerations for the DSASP program EIR on January 28, 2015 that determined the new development benefits outweigh the potential traffic impacts.

Since the adoption and certification of the DSASP Program EIR, the California Natural Resources Agency adopted new CEQA Guidelines to implement the requirements of California Senate Bill (SB) 743. Specifically, SB 743 and the resulting CEQA Guideline section 15064.3 changed the CEQA transportation impact analysis significance criteria to eliminate auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA. The changes in CEQA Guidelines to implement SB 743 present vehicle miles traveled (VMT) as an appropriate measure of transportation impacts.

The City of South San Francisco has adopted thresholds of significance to guide in determining when a project will have a significant transportation impact. The City provides screening criteria for development projects. The criteria are based on the type of project, characteristics, and/or location. If a project meets the City's screening criteria, the project is expected to result in less-than-significant impacts, and a detailed CEQA VMT analysis is not required. The City's policy states that projects within ½ mile of an existing or planned high-quality transit corridor or major transit station should be presumed to have a less-than-significant impact on VMT.

The Project site is located within half mile of the South San Francisco Caltrain Station (a major transit station) and the high- quality transit service provided by SamTrans route 130. The project is proposing an FAR of 4.70 and fewer than the required number of parking spaces but is otherwise consistent with

the Downtown Station Area Specific Plan (DSASP) development standards both as proposed and through utilization of State Density Bonus Law and as such would provide 15% below market rate (BMR) units. Therefore, the Project is expected to result in a less-than-significant VMT impact.

The potential impacts of the Project were evaluated in the context of the DSASP program EIR. The traffic generated by the Project was found to be consistent with the DSASP program EIR. The study included the analysis of AM and PM peak hour traffic operations for five intersections, four of which were analyzed in the DSASP EIR. The Project would not result in new or more severe impacts than those previously analyzed in the DSASP program EIR nor trigger any of the mitigations that were identified in the DSASP EIR. Therefore, the Project is consistent with the DSASP EIR and no further analysis is required.

b. The Project is in compliance with all applicable DSASP regulations including Congestion Management Programs and, as a result, would not create any additional transportation or traffic impacts in excess of those addressed by the DSASP program EIR and the Statement of Overriding Considerations. A Transportation Study prepared by Hexagon Transportation Consultants, dated December 10, 2021 (Attachment 6) identified that no impacts are anticipated for any of the five study intersections analyzed. The project would not trigger any of the mitigations that were identified in the DSASP EIR. The City Engineer has peer reviewed the supplemental traffic memorandum and determined that no further traffic analysis is required. No new impacts would occur; therefore, no further analysis is required.

c. The Project would not result in a change in air traffic patterns at SFO or any other airport, including either an increase in air traffic levels or a change in location that results in substantial safety risks. The Project is consistent with this evaluation from the DSASP program EIR and no further analysis is required.

The Project, as proposed, would operate within the existing roadway system and proposes pedestrian safety enhancements, including corner bulb outs, to help reduce pedestrian hazards. Additionally, the Transportation Study prepared by Hexagon evaluated on-site circulation to determine safety concerns and was peer-reviewed by the Engineering Division. The analysis summarized the following recommendations, which will be included in the project design and shall be required as conditions of approval for the Project:

- Parking spaces be assigned to individual residential units.
- Prior to final design, the dimensions of the stacker parking system should be reviewed by Public Works City staff. The parking stackers should have at least 7 feet of vertical clearance to allow usage by large passenger vehicles. The minimum basic dimension for standard parking spaces should be 8.5 feet by 18 feet, where 90-degree parking is provided.
- A loading zone be designated on Cypress Avenue or Lux Avenue along the project frontage for moving/delivery trucks and passenger loading.
- On-street parking along the project frontage on Tamarack Lane should not be permitted in order to provide adequate sight distance for vehicles exiting the parking garage.

d. The Project would utilize the existing roadways in the vicinity. The Project design would be required to comply with all applicable City codes and regulations pertaining to emergency access, as well as fire protection and security. In addition, all buildings would (1) include a sprinkler system; (2) Knox key box for emergency access for each building with access keys to entry doors, electrical/mechanical rooms, elevators, and others to be determined; and (3) maps mounted at entry gates for rapid orientation while responding to emergencies. Additionally, the City has implemented a Public Safety Impact Fee (Resolution 97-2012) for all new development. This fee is intended to fund

improvements to infrastructure or public services necessitated by new development to ensure adequate emergency access.

e. Implementation of the Project would not require on- or off-site improvements that would conflict with existing policies, plans, or programs that support alternative transportation. The Project site is located less than one-quarter mile from a regional rail station (Caltrain) and bus stop (SamTrans). In addition, the Project would support both bike and pedestrian usage consistent with the DSASP, including secure bike parking and sidewalk improvements and landscaping, and public bike racks. Moreover, the Project will construct a 10-foot sidewalk along its frontages in Cypress Avenue and Lux Avenue, thereby improving pedestrian access to shopping, transit and amenities, and to the downtown area. As a result, the proposed project would not have an impact on alternative transportation modes, consistent with the analysis of the DSASP program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

XVII. UTILITIES AND SERVICES SYSTEMS -- *Would the project:*
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?
b) Require or result in the construction of new water or wastewater treatment or distribution facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?
c) Require or result in the construction of a new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements
e) Result in a determination by the wastewater treatment provider that serves the project area that it does not have adequate capacity to serve the project area's projected demand in addition to the provider's existing commitments?
f) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?
g) Fail to comply with federal, state, and local statutes and regulations related to solid waste?

Documentation:

a. The DSASP program EIR (p. 4.11-30) concluded that the South San Francisco/San Bruno Water Quality Control Plant, located in South San Francisco, would ensure that the wastewater facility is able to continue to meet or exceed the wastewater treatment requirements established for it by the RWQCB, even with the additional wastewater generated by development permitted under the DSASP. The Project would contribute approximately 14,652 gallons per day (gpd), which is equivalent to 0.01 million gallons per day (mgd), which remains under the 894,384 mgd addition estimated as a result of the DSASP. Therefore, the Project would not conflict with RWQCB. No new impacts would occur.

b. The DSASP program EIR (pp. 4.11-21 through 4.11-24) concluded that development occurring under the DSASP would not necessitate the construction or expansion of water or wastewater treatment facilities. The demand generated by the Project would fall within the development estimates analyzed by the DSASP EIR. The Project would not result in a significant new demand for water or wastewater facilities beyond existing City capacity. See items (d) and (e) below for further explanation.

c. The DSASP program EIR (pp. 4.11-21 through 4.11-24) concluded that no significant increase in storm water runoff was anticipated to be created by the DSASP or DSASP-facilitated development. Furthermore, each project is required to submit documentation consistent with the State and County Water Pollution Prevention Program requirements, which are peer reviewed by the Water Quality Division of the City's Department of Public Works.

The Project as proposed is expected to qualify for a 100 percent San Mateo County Low Impact Development (LID) storm drainage treatment reduction credits under Special Project Category "C" (Transit-Oriented Development [TOD] Project) of the San Mateo County Water Pollution Prevention Program, which means that the Project would be 100 percent exempt (design approach to reducing stormwater runoff) from County LID requirements because the project: (1) is within one- half mile of a transit hub; (2) has a minimum density of 100 dwelling units per acre (project density would be approximately 169 units per acre); and (3) would contain no surface parking. The result would be that up to 100 percent of the Project site's impervious surface runoff could be treated with media filter devices (non-LID treatment) approved by the Bay Area Stormwater Management Agencies Association (BASMAA).

The Special Project may use either one or a combination of the two types of allowed non-LID treatment systems (high flow-rate media filters and high flow-rate tree well filters) to treat the total percentage of the C.3.d amount of stormwater runoff that results from adding together the Location, Density and Minimized Surface Parking credits that the project is eligible for. This proposed exemption is subject to City review and approval. The Project would be required to treat the total percentage of stormwater runoff that results from the credits therefore no impact would occur in this regard.

d. The City of South San Francisco is served by the Cal Water's South San Francisco District. Cal Water obtains water from a purchasing agreement with San Francisco Public Utilities Commission (SFPUC), which is supplied by local surface water sources within its Regional Water System, and from its own groundwater sources. Future area water supplies would be delivered through existing City supply facilities and new water infrastructure constructed for delivery into specific project sites. Adequate delivery was identified within the DSASP program EIR (p. 4.11-24) for all anticipated new development within the DSASP area; therefore, this Project is consistent with the DSASP program EIR analysis.

e. Sewage and wastewater generated within the City is collected through the City's sewer system and is disposed of and treated at the South San Francisco/San Bruno Water Quality Control Plant. The sanitary sewer system has an interconnecting network of approximately 12 miles of 6-inch to 30-inch-diameter gravity sewer mains, force mains, and twelve pump stations, which function together to bring wastewater from individual homes and businesses to the Water Quality Control Plant. Some pump stations act as tributaries to a few stations that handle most of the wastewater from large portions of the Project. Title 14 of the South San Francisco Municipal Code ensures the future health, safety, and general welfare of the City and provides regulations for the City's wastewater collection and treatment system.

Wastewater generation is correlated with water usage and continued water conservation practices would reduce the volume of wastewater generated. New developments, such as this Project, would be required to comply with all provisions of the NPDES program, as well as all applicable wastewater discharge requirements issued by the San Francisco Bay Area RWQCB. The City would maintain local sewer lines and perform upgrades on an as-needed basis. It is anticipated that the increased flows from development under the DSASP, including this Project, would not result in required upgrades to the reclamation plants and, therefore, the project is consistent with the DSASP program EIR analysis.

f, g. Project construction would comply with all applicable solid waste regulations, and land fill capacity exists for future DSASP buildout. Solid waste disposal and recycling in the City is regulated by the City's SSFMC, particularly Chapter 8.16 (Solid Waste—Scavenger Services) and Chapter 8.28 (Recyclable Materials). Under the SSFMC, future development would be required to have its solid waste, including construction and demolition debris, and recyclable materials collected by the Scavenger Company. Additional health and sanitation requirements set forth in the SSFMC would be met by the Scavenger Company. The Project would comply with federal, state, and local statutes and regulations related to solid waste and, therefore, is consistent with the DSASP program EIR analysis.

No new impacts have been identified and no new mitigations are required for the Project.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?
b) Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?

Documentation:

a. Based on the preceding discussion and the program EIR prepared for the DSASP, including its mitigation measures, it has been determined that the Project is consistent with the analysis of the DSASP program EIR and would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

b. According to CEQA Guidelines Section 15355, "'Cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The potential cumulative impacts of the Project have been considered for each environmental topic evaluated above. Given the relatively short-term nature of the Project's construction schedule, and the fact that it would serve an existing community within an urbanized area consistent with the adopted DSASP, the Project is not anticipated to have any cumulatively considerable impacts beyond those identified and analyzed in the DSASP program EIR.

c. The Project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, beyond those previously identified and analyzed in the DSASP

program EIR.

No new impacts have been identified and no new mitigations are required for the Project.

CONCLUSION

Based on the above analysis and supporting documentation, this ECA confirms that:
1) The Project does not exceed the environmental impacts analyzed in the DSASP Program EIR;
2) That no new impacts have been identified; and
3) No new mitigation measures are required.

As detailed in the analysis presented above, the Project would not result in greater impacts than were identified for the DSASP Program EIR. No new impacts have been identified and no new mitigation measures are required.

References

1. Historic Resource Evaluation Report prepared by Brad Brewster Historic Preservation, dated May 2021.

2. California Historical Resources Information System (CHRIS) Letter, prepared by Northwest Information Center, dated April 28, 2022.

3. Phase 1 Environmental Site Assessment 421 Cypress Avenue, 209 Lux, and 213 Lux Avenue South San Francisco prepared by RMD Environmental Solutions, dated January 18, 2022.

4. Geotechnical Feasibility Study prepared by Cornerstone Earth Group, dated April 7, 2022.

5. Plans prepared by Studio T-Square, dated August 6, 2021.

6. Traffic Study prepared by Hexagon Transportation Consultants, Inc., dated December 10, 2021.

7. Transportation Management Demand Management Plan 421 Cypress Avenue prepared by Hexagon Transportation Consultants; Inc., dated January 12, 2022.

8. Preliminary Environmental Noise Study prepared by Salter, dated May 3, 2022.

9. Bertolucci Mixed-Use Development Construction Community Health Risk prepared by Illingworth and Rodkin, dated February 3, 2022.

10. Shadow Study prepared by Studio T-Square, dated April 12, 2022.