7 Linden Project Information –Environmental Consistency Analysis

I. Purpose

On October 12, 2022, a programmatic Environmental Impact Report (EIR) was certified by the City Council (Final Program Environmental Impact Report General Plan Update, Zoning Code Amendments, and Climate Action Plan, State Clearinghouse #2021020064). The program EIR assessed the potential environmental impacts associated with the implementation of the proposed South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan, which established new land use, development, and includes amendments to the Zoning Code necessary to implement the General Plan Update over a 20-year planning period. The Zoning Code Amendments also incorporate a number of major policies from documents that were previously adopted. The updated 2022 Climate Action Plan (CAP) includes a community-wide inventory of greenhouse gas (GHG) emissions and identifies strategies and measures to reduce GHG emissions generated by existing and future uses in the City.

The California Environmental Quality Act (CEQA) provides for limited environmental review of subsequent projects under a program EIR (CEQA Guidelines Section 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 543 apartment units (Project) that is a subsequent project within the General Plan Update (CEQA Guidelines Section 15168(c)(4)). This ECA also examines consistency of the Project with the General Plan Update 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, all the Project's environmental effects were previously analyzed in the General Plan Update program EIR and no event pursuant to Public Resources Code Section 21166 has occurred since preparation and certification of the General Plan Update 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 the General 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), the Project is consistent with the applicable general plan designation, applicable general plan policies and applicable zoning designations and regulations,
    - As described in Section 9 (Description of the Project) and Section 10 (Existing Setting), the project occurs within the City limits on a site less than five acres, and

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 XIV (Traffic/Transportation), XI (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 XIII (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, consistent with the General Plan Update, for which an EIR was certified.

II. Project Description

1. **Project Title**
   7 South Linden 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**
   Deanna Chalfant, Vice President, Development
   650.655.7897
   Dchalfant@essex.com

4. **Preparer and Phone Number**
   Margaret Netto, Netto Planning Services LLC
   (650) 796-5828

5. **Project Location**
   7 South Linden, South San Francisco, CA 94080
   APN: 014-074-010

6. **Project Sponsor's Name and Address**
   Owner: Essex Property Trust, Inc
   1100 Park Place, Suite 200, San Mateo, California 94403
   (650) 655-7800

7. **General Plan Designation**
   High Density Mixed Use

8. **Zoning**

High Density Mixed Use

9. **Description of Project**

The Project site consists of 4.23 acres, bordered by South Linden Avenue to the west, Colma Creek Canal to the south and the Southern Pacific Railroad spur to the north and east. The Project site is an infill, redevelopment site that is currently developed with two single-story industrial warehouse buildings with a surface parking lot surrounded by urban uses, and located entirely in the High-Density Mixed-Use Zoning District in the Lindenville sub-area.

The Project includes the full demolition of the existing buildings and surface parking lot located at 7 South Linden Avenue. The site would be redeveloped into a seven-story; 543-unit apartment complex in one building over parking; project amenities include fitness room, lounge area, courtyards, leasing office, and roof decks. The project would have a residential density of 139 dwelling units per acre (du/acre), which meets the base density of 140 du/acre. The Project would provide 10% low-income units and 5% very low-income units, for a total of 15% (82 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 82'-7 1/2' consistent with the high-density mixed-use maximum height limit of 85-feet.

The five upper floors would consist of studios, and one- and two-bedroom apartments. These floors surround four common landscape courtyards totaling 24,777 square feet on Level 3. The courtyards would be furnished with barbeques, dining areas, lounge furniture, and a swimming pool in one of the courtyards on the east side of the Project. Two roof decks would be located on Level 7. 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 mail room, lobbies, leasing area, utilities, and residential units so the parking is shielded from public view to those walking adjacent to the Project on South Linden Avenue. These uses provide interest and activation along South Linden Avenue. The Level 7 roof decks are located on the corners of the building, creating a step-back defining the top of the corner elevation. This corner element keeps consistent architectural language which breaks up the massing, while providing a residential amenity space.

Residents would have access to the units from the lobby and the entrance on South Linden Avenue. The main lobby on South Linden Avenue provides easy access to the downtown shops and the Caltrain station. 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 driveways on South Linden Avenue, which are located at the north and south ends of the Project at approximately 600-feet apart. The north elevation would be located 70 feet south of the South Linden Avenue/Railroad Avenue intersection and would be restricted to right turn only movements due to its proximity to the traffic signal at South Linden Avenue and Railroad Avenue. The northern and the southern project driveways would be interconnected via an internal perimeter access road that runs along the east and south property lines at the back of the proposed building.

Project Site Plan

January 24, 2023

Parking and Circulation. The parking garage would contain 565 parking spaces as well as 136 long-term and 18 short-term bicycle parking spaces shown on the site plan above. 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. Access to the floor would be provided by two elevators and several staircases. The site plan shows two access gates from South Linden Avenue. The south gate would provide access to 110 parking spaces. The following requirements apply to the Project:

Multi-family Residential

- **One covered parking space shall be designated per unit.**

Based on this requirement, the Project would be required to provide 543 parking spaces. The Project meets and exceeds the parking requirements for multifamily residential. Because the Project is also within close proximity to the Caltrain station, it is expected that many residents would also use public transportation, and therefore, 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. 7 Linden Project Summary

Number of Units	**543**
Lot Area	**4.22 ac**
Building Gross Floor Area	**468,162**
Parking Spaces	**565**
Amenities	**11,065**

As a new high-density development within a one-half mile radius of the Caltrain Station, the Project would promote ridership and reduce emissions, provide high-quality residential opportunities for younger employees and older retirees who desire a convenient location within proximity to the downtown, and increase the population close to Grand Avenue to support nearby businesses, per the General Plan Update goals. In addition, as required, the Project would include a robust TDM plan for the purpose of reducing 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 project site is located within walking distance of the new South San Francisco Caltrain station and the North County Samtrans Route 130 bus stop at Grand Avenue/Linden Avenue. Residents can access the new South San Francisco Caltrain station platform via the pedestrian/bike plaza located on the southeast quadrant of the Airport Boulevard/Grand Avenue intersection, which is less than a 10-minute walk from the project site.
- ✓ The Project would provide entrances along Linden Avenue with a direct path from the sidewalk to the front door. The proximity to bus and transit stops encourages the use of Caltrain and SamTrans/Shuttle buses for residents of the proposed project.
- ✓ The Project would include pedestrian scale lighting along the project frontages. This measure would encourage residents to walk to nearby destinations and ensure well-lit paths to nearby transit stops.
- ✓ As part of the Project, new sidewalks, curbs and gutters would be installed along the project frontage on Linden Avenue. The Project would remove two existing driveways (curb-cuts) along Linden Avenue and provide a continuous sidewalk along its frontage on the east side of Linden Avenue
- ✓ The residential units would include high-bandwidth internet connections to facilitate telecommunicating. Access to high-bandwidth internet connection would allow residents to work from home and therefore reduce the number of commute trips to and from project site.

- ✓ A community room with breakout rooms would be provided to serve the residents of the project. The rooms would have typical office amenities. Having these available within the residential development permits employees to work away from their employer's primary location, decreasing the need for parking and office space at the work site, and saving time and resources spent on commuting. The resident lobby also would have spaces for residents to facilitate working from home.
- ✓ The Project would provide bicycle storage per City requirements and repair station.
- ✓ The Project provides unbundled parking.
- ✓ The Project would provide a gym and swimming pool on site so that residents can conduct their fitness activities without leaving the project site, thus reducing overall vehicular trips.

TDM Programmatic Measures

- ✓ Transportation Coordinator. Identify a Transportation Coordinator (could be an existing on-site staff person) for the community who would 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.
- ✓ Real-Time Transit Information. The Project would install flat-screen computer monitors in the resident lobby and in the mail room that would display real-time information of all local transportation options, customized to the project's location, which would enable residents to select the best way to commute.
- ✓ The Transportation Coordinator would distribute a carpool matching application to all residents. The application would match residents who work in the same area who may be able to carpool or vanpool together. Some residents who may be reluctant to reach out to find carpool partners via Merge or Waze Carpool may be more likely to fill out a form that would be administered by their Transportation Coordinator.
- ✓ The Project would offer transit subsidies to all residents. The Project would free transit passes to residents for first year od tenant's residency.
- ✓ Carpool and Vanpool Incentive Programs. The 511 Regional Rideshare Program and the Peninsula Traffic Congestion Relief Alliance (511.org and commute.org) offer a number of incentive programs to encourage people to try carpooling and vanpooling. Most of these programs are designed to reward someone for forming or trying a carpool or vanpool and provide an award or subsidy after the first three or six months of use.
- ✓ 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 consistent with the City's goal of increasing the quantity and density of residential units in the City, to promote increased Caltrain ridership and to promote a healthy ecosystem that supports downtown businesses. In the public realm around the site, the Project would provide streetscape improvements such as undergrounding overhead utility lines along all frontages of the property, widening and installing new sidewalks along the Project frontage on South Linden Avenue. Improved public utilities, such as storm drains, and new sanitary sewer cleanouts would be completed within South Linden Avenue. The Project would include the provision of electric charging stations, and a mechanical stacking parking system to achieve maximin efficiency. The Project would also be in compliance with the City's Reach Codes.

10. **Existing Setting**

The Project site is located six blocks south 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 two single-story industrial warehouses with surface parking.

11. **Surrounding Land Uses and Setting**

The subject site is located on the south side of South Linden Avenue between Railroad Avenue to the north and South Canal Street to the south. To the north across the railroad tracks is access to a multi-tenant commercial building and two-story, single-family homes. To the south is the Lindenville Storm Water Pump Station and Colma Creek. To the east are railroad tracks and a multi-tenant commercial building. To the south across South Linden Avenue are two-story, multi-tenant commercial buildings.

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

Development would be subject to:

- Entitlements from the City of South San Francisco.

III. Determination

The Project is within the scope of the General Plan Update 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 General Plan Update.

2. This subsequent Project would have no additional significant environmental effects not discussed or identified in the General Plan Update program EIR;

3. No substantial changes to the General Plan Update are proposed as part of this Project. Further, no substantial changes have occurred with respect to the circumstances under which the General Plan Update program EIR was certified, and no new information, which was not known and could not have been known at the time that the General Plan Update 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 General Plan Update program EIR would 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 General Plan Update program EIR. However, Agriculture and Mineral Resources have not been analyzed as part of the ECA. Given the location of the City of South San Francisco in the urbanized context of the San Francisco Bay Area and the lack of mineral or agricultural resources in the area, these resources are anticipated to not be major considerations for the Project.

Issue Areas/Documentation:

I.	**AESTHETICS, LIGHT, AND GLARE --** *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)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Documentation:

a. As described in the General Plan Update program EIR (p. 3.1-12) because South San Francisco is a fully built city, new development would primarily occur on parcels that already contain some existing homes or businesses. with the majority of potential growth occurring within the East of 101, Lindenville, Downtown, and El Camino planning sub-areas, which are not located in the vicinity of I-280 and SR-35. Furthermore, as discussed under Impact AES-1 of the General Plan Update program EIR, all development under the General Plan Update area would be subject to development and design standards for each zoning district as well as any other sections of the South San Francisco Municipal Code (SSFMC) and Zoning Ordinance that protect scenic resources, thereby minimizing potential impacts to existing views that can be seen from I-280 or SR-35.

   The height of the Project would be 82'-71/2" to the top of the parapet which is allowable under the High-Density Mixed-Use Zoning District development standards. Nonetheless, the Project would be subject to the City's design review process which would ensure the proposed building design and construction materials would not adversely affect the area's visual quality. Since the land use designations are approved by the City Council 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 General Plan Update program EIR.

b. There are no officially designated State Scenic Highways that traverse the Project site, it does not contain historic buildings that could be considered scenic resources. As discussed under Impact AES-1, all development under the Project would be subject to development and design standards for each zoning district as well as any other sections of the SSFMC and Zoning Ordinance that protect scenic resources, thereby minimizing potential impacts to existing views that can be seen from I-280 or SR-35 objectives. The six "protected trees" as defined by SSFMC 13.30.030 would be removed; however, as a condition of approval the applicant is subject to the City's Replacement Ordinance SSFMC 13.30.080 which requires three fifteen-gallon-size or two twenty-four-inch-box-minimum-size trees for each tree removed. The Project would plant 120 trees meeting the minimum requirement, which would help preserve the scenic beauty of the City. The Project would also provide new landscaping along the perimeter of the site. Therefore, the Project would not have a substantial adverse effect on a scenic highway, consistent with the General Plan Update program EIR.

c. The City of South San Francisco is located in an urbanized area The existing 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 Zoning Code Amendments that are part of the General Plan Update contains architectural guidelines, design review criteria, lot and development standards, landscaping requirements, and other regulations for various land uses in order to promote aesthetic quality within the City and protect scenic views. The architecture of the proposed building was designed to consider the shape of the

site with the main façade along South Linden Avenue broken up with bays of contrasting materials. The façade steps down at the corners with resident roof decks which breaks up the massing while providing an amenity space. The proposed building is contemporary with high-quality materials proposed and breaks up the façade with cast in place concrete, metal and glass railings and awning. cementitious horizontal siding, wood like siding and painted stucco. The Project provides landscaping and street trees along the South Linden Avenue which softens the appearance of the new building.

Implementation of the Project would be beneficial to the area, as it would eliminate an existing warehouse building, and parking lot and replace it with 543 new residential units within a seven story, high- quality, modern building. In the public realm around the site, the Project would include streetscape improvements, such as undergrounding overhead utility lines, widening and installing new sidewalks, and landscaping and street trees along the Project frontage on South Linden Avenue. The overall Project would enhance the visual quality of the site and its surroundings consistent with the General Plan Update program EIR. Therefore, the Project would not result in a negative aesthetic impact to the surrounding area.

d. The land uses accommodated under the General Plan Update have the potential to include sources of light and glare, such as security lighting or new glass panel buildings. However, the area is currently developed. Redevelopment would not result in a substantial net increase in nighttime lighting or daytime glare sources. The SSFMC includes multiple building and construction regulations and zoning requirements that are intended to minimize localized light and glare impacts. Additionally, newly revised zoning regulations, Section 20.300.008 (C) (revised) establishes general standards for outdoor lighting, including maximum heights for lighting fixtures, locations and shielding for lighting fixtures, and submittal of photometric data from lighting manufacturers to the City by the project applicant to demonstrate that the lighting requirements have been satisfied. The Project has been designed to adhere to these requirements as all lighting would be shielded and downlight (see Project Design Plan Sheet L1-3), and, therefore, no new sources of substantial light or glare not evaluated by the General Plan Update program EIR would result from implementation of the Project.

No new impacts have been identified and no new mitigations are required for the Project., other than those identified in the General Plan EIR.

II. 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. In June 2010, Bay Area Air Quality Management District's (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 its thresholds in the CEQA Air Quality Guidelines in 2017 and again in 2022 (GHG thresholds only). The latest BAAQMD significance thresholds, which were used in this analysis and are summarized below in Table 2. Impacts above the threshold are considered potentially significant.

The 2017 Clean Air Plan, adopted by BAAQMD in April 2017, includes control measures that are intended to reduce air pollutant emissions in the Bay Area either directly or indirectly. Plans must show consistency with the control measures listed within the Clean Air Plan. General Plan consistency was evaluated in the General Plan Update program EIR. A significant and unavoidable impact was identified because VMT would increase at a greater rate than population. Mitigation measures would ensure that certain Clean Air Plan measures are properly implemented so that some projects developed under the General Plan would not have significant air quality impacts. MM AIR-1a would reduce construction period impacts by requiring individual projects facilitated by the General Plan to incorporate Basic Construction Mitigation Measures recommended by BAAQMD.

Because the General Plan does not contain a land use diagram that identifies special overlay zones around existing and planned sources of TACs, MM AIR-1b would be required to ensure that future development would result in less than significant impacts related to exposing sensitive receptors to substantial pollutant concentrations. To reduce Vehicle Miles Traveled (VMT), MM TRANS-1 requires the City to implement its TDM Ordinance as part of the Zoning Code Amendments and parking requirements. The City shall also update its TDM Ordinance and parking requirements every five to ten years and establish an East of 101 Area Trip Cap, to achieve the maximum feasible reductions in vehicle travel. The City shall achieve the performance standards outlined in the TDM Ordinance.

The Project is consistent with the General Plan Update program EIR. At the project-level, there are no consistency measures or thresholds. Therefore, the Project would not conflict with the latest Clean Air planning efforts. Additionally, 1) the Project would have construction and operational emissions below the BAAQMD thresholds (see Impact 2 below), 2) the Project would be considered urban infill, 3) the Project would be located near transit with regional connections and 4) the Project includes a TDM program in accordance with the City's TDM Ordinance (attached to the ECA). Therefore, no new impacts would occur as a result of the Project.

b. The Bay Area is considered a non-attainment area for ground-level ozone and $PM_{2.5}$ under both the Federal Clean Air Act and the California Clean Air Act. The area is also considered non-attainment for PM_{10} under

the California Clean Air Act, but not the federal act. The area has attained both State and federal ambient air quality standards for carbon monoxide. As part of an effort to attain and maintain ambient air quality standards for ozone and PM_{10}, the BAAQMD has established thresholds of significance for these air pollutants and their precursors.

Table 2. BAAQMD CEQA 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 1000-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 µg/m^3	0.8 µg/m^3	
Greenhouse Gas Emissions			
Land Use Projects – (Must Include A or B)	A. Projects must include, at a minimum, the following project design elements: 1. Buildings a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development). b. The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines. 2. Transportation a. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA: i. Residential projects: 15 percent below the existing VMT per capita ii. Office projects: 15 percent below the existing VMT per employee iii. Retail projects: no net increase in existing VMT b. Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2. B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).		
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.			

An Air Quality Assessment and Greenhouse Gas prepared by Illingworth & Rodkin, Inc. dated November 14, 2022 (attached to this ECA) determined the Project is consistent with the development planned to occur under the General Plan Update program 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 Project land uses, and construction information inputted into the CalEEMod (Table 3 Summary of Project Land Inputs) were as follows:

Table 3. Summary of Project Land Use Inputs

Project Land Uses	Size	Units	Square Feet (sf)	Acreage
Apartments Mid Rise	542	Dwelling Unit	439,653	4.22
Enclosed Parking with Elevator	560	Parking Spaces	224,000*	
*CalEEMod default square footage used				

For all projects, MM AIR-1a (see below) would require implementation of BAAQMD-recommended best management practices. BAAQMD recommends implementation of eight Basic Construction Measures to reduce construction fugitive dust emissions. The BAAQMD determines a less than significant impact with respect to construction fugitive dust emissions if the following Basic Construction Measures listed on Page 17-18. Operational air emissions from the Project would be generated primarily from autos driven by future residents. Evaporative emissions from architectural coatings and maintenance products (classified as consumer products) are typical emissions from these types of uses. CalEEMod was used to estimate emissions from operation of the proposed project assuming full build-out.

Annual emissions were predicted using CalEEMod. The daily emissions were calculated assuming 365 days of operation. Table 4 shows average daily emissions, reactive organic gases (ROG), nitrogen oxides (NOX), Sulfur Dioxide (SO2), Suspended Particulate Matter (PM10, PM2.5), and Lead (Pb) are "criteria air pollutants". The operational period emissions would not exceed the BAAQMD significance thresholds.

Table 4. Operational Period Emissions

Scenario	ROG	NOx	PM_{10}	$PM_{2.5}$
2025 Project Operational Emissions (*tons/year*)	3.49	0.90	2.09	0.55
BAAQMD Thresholds (tons /year)	*10 tons*	*10 tons*	*15 tons*	*10 tons*
Exceed Thresholds?	No	No	No	No
Total (lbs./day)	19.13	4.92	11.44	2.99
BAAQMD Thresholds (lbs./day)	*54 lbs.*	*54 lbs.*	*82 lbs.*	*54 lbs.*
Exceed Threshold?	No	No	No	No

Notes: [1] Assumes 365-day operation.

Accordingly, the Project is consistent with the analysis in the General Plan Update program EIR. No new impacts would occur as a result of the Project.

c-d. Project impacts related to increased community risk can occur either by introducing a new source of Toxic Air Contaminants (TACs) with the potential to adversely affect existing sensitive receptors in the project vicinity or by significantly exacerbating existing cumulative TAC impacts. This project would introduce new sources of TACs during construction (i.e., on-site construction and truck hauling emissions) and operation (i.e., mobile sources).

MM AIR-1b contained in the General Plan Update program EIR addresses exposure of sensitive receptors to TACs and air pollution. Under this mitigation measure, projects that may result in TAC emissions that are located within 1,000 feet of a sensitive receptor are required to prepare a Health Risk Assessment (HRA). Based on the results of the HRA, the Project may be required to identify and implement measures (such as air filtration systems) to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards. Measures identified in the HRA are to be included into the site development plan as a component of the Project.

There are both existing and planned sensitive receptors within 1,000 feet of the project site. The closest sensitive receptors to the project site are the single-family homes to the north and northwest of the project site. There are two residential projects east of the site, at 40 Airport Boulevard and 124 Airport Boulevard, that were recently entitled but not yet constructed. The analysis assumes these projects would be constructed and occupied prior to the start of construction of this project. Project construction activity would generate dust and equipment exhaust that would affect nearby sensitive receptors. The Project would not include stationary sources of air pollutants or TACs. Traffic generated by the project would consist of mostly light-duty gasoline-powered vehicles, which would produce low levels of TAC and air pollutant emissions in the local area.

Project impacts to existing sensitive receptors were addressed for temporary construction activities and long-term operational conditions. There are also several sources of existing TACs and localized air pollutants in the vicinity of the Project. The impact of the existing sources of TAC was also assessed in terms of describing the cumulative risk which includes the Project contribution.

For this Project, these sources include only on- and near-site construction activity. The project impact is computed by adding the construction cancer risk for an infant to the increased cancer risk for the project operational conditions for the generator at the maximum exposed individuals (MEI) over a 30-year period. The Project MEI is identified as the sensitive receptor that is most impacted by the project's construction and operation.

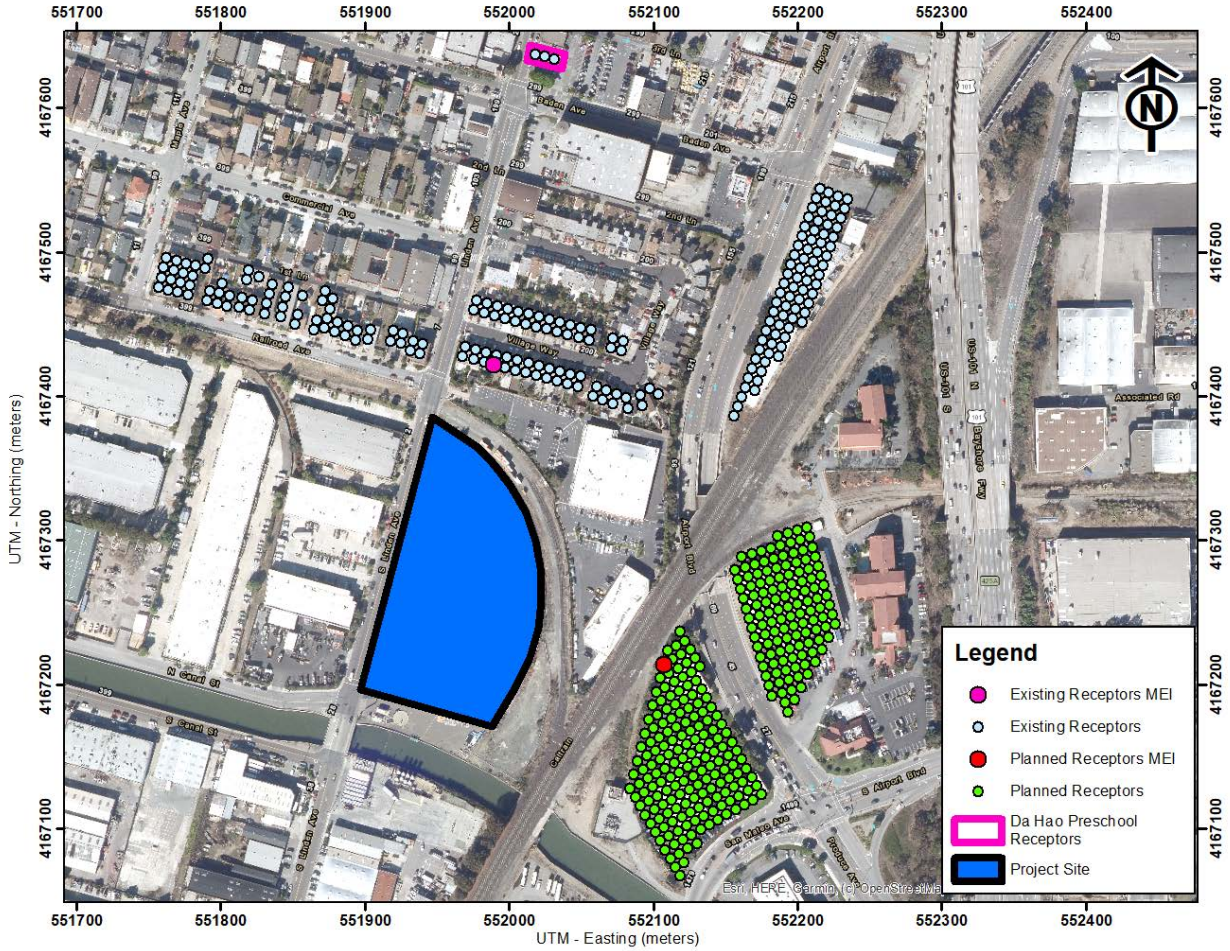
There are two scenarios evaluated in this HRA: (1) impacts to existing sensitive receptors and (2) impacts to planned sensitive receptors. For this project, the sensitive receptors identified in Figure 1 are the construction MEIs. Project HRA impacts are shown in Table 5. The unmitigated maximum cancer risks, annual $PM_{2.5}$ concentration, and Hazard Index from construction activities at the residential project MEI location would exceed the single-source significance thresholds for planned sensitive receptors at 124 Airport Boulevard (east of the Project site). In this case, additional measures are required under MM AIR-1b to reduce impacts below the thresholds. If these residential areas are not occupied at the time of Project construction, then the maximum HRA impacts for existing sensitive receptors would not exceed the thresholds and no additional measures are required under MM AIR-1b.

Table 5. Construction Risk Impacts at the Off-site MEI

Source		Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Construction - **Existing** Receptors	Unmitigated	3.46	0.03	<0.01
Project Construction - **Planned** Receptors	Unmitigated	**12.43**	0.09	0.01
	Mitigated	2.18	0.02	<0.01
BAAQMD Single-Source Threshold		***6.0***[1]	***0.3***	***1.0***
Exceed Threshold?	Unmitigated	***Yes***	*No*	*No*
	Mitigated	*No*	*No*	*No*
Most Impacted School – Da Hao Preschool				
Project Construction	Unmitigated	0.18 (child)	<0.01	<0.01
BAAQMD Single-Source Threshold		***6.0***[1]	***0.3***	***1.0***
Exceed Threshold?	Unmitigated	*No*	*No*	*No*

1

Figure 1. Location of Project Construction Site, Off-Site Sensitive Receptors, and Maximum TAC Impact



Health Risks from Project Operation

Operation of the project would have long-term emissions from mobile sources (i.e., traffic). While these emissions would not be as intensive at or near the site as construction activity, they would contribute to long-term effects to sensitive receptors.

[1] Project site and receptors are located in an overburden community as defines by BAAQMD.

Project Traffic

Diesel powered vehicles are the primary concern with local traffic-generated TAC impacts. This Project would generate 2,788 daily trips[2] with a majority of the trips being from light-duty gasoline-powered vehicles (i.e., passenger cars). The project is not anticipated to generate large amounts of truck trips that would involve diesel vehicles. Per BAAQMD recommended risks and methodology, a road with less than 10,000 total vehicle per day is considered a low-impact source of TACs and does not need to be considered in the CEQA analysis.[3] In addition, projects with the potential to cause or contribute to increased cancer risk from traffic include those that attract high numbers of diesel-powered on road trucks or use off-road diesel equipment on site such as a distribution center, a quarry, or a manufacturing facility. Accordingly, This is not a project of concern for non-BAAQMD permitted mobile sources. Emissions from project traffic are considered negligible and not included within this analysis.

Cumulative Community Risks of all TAC Sources at the Offsite Project MEI

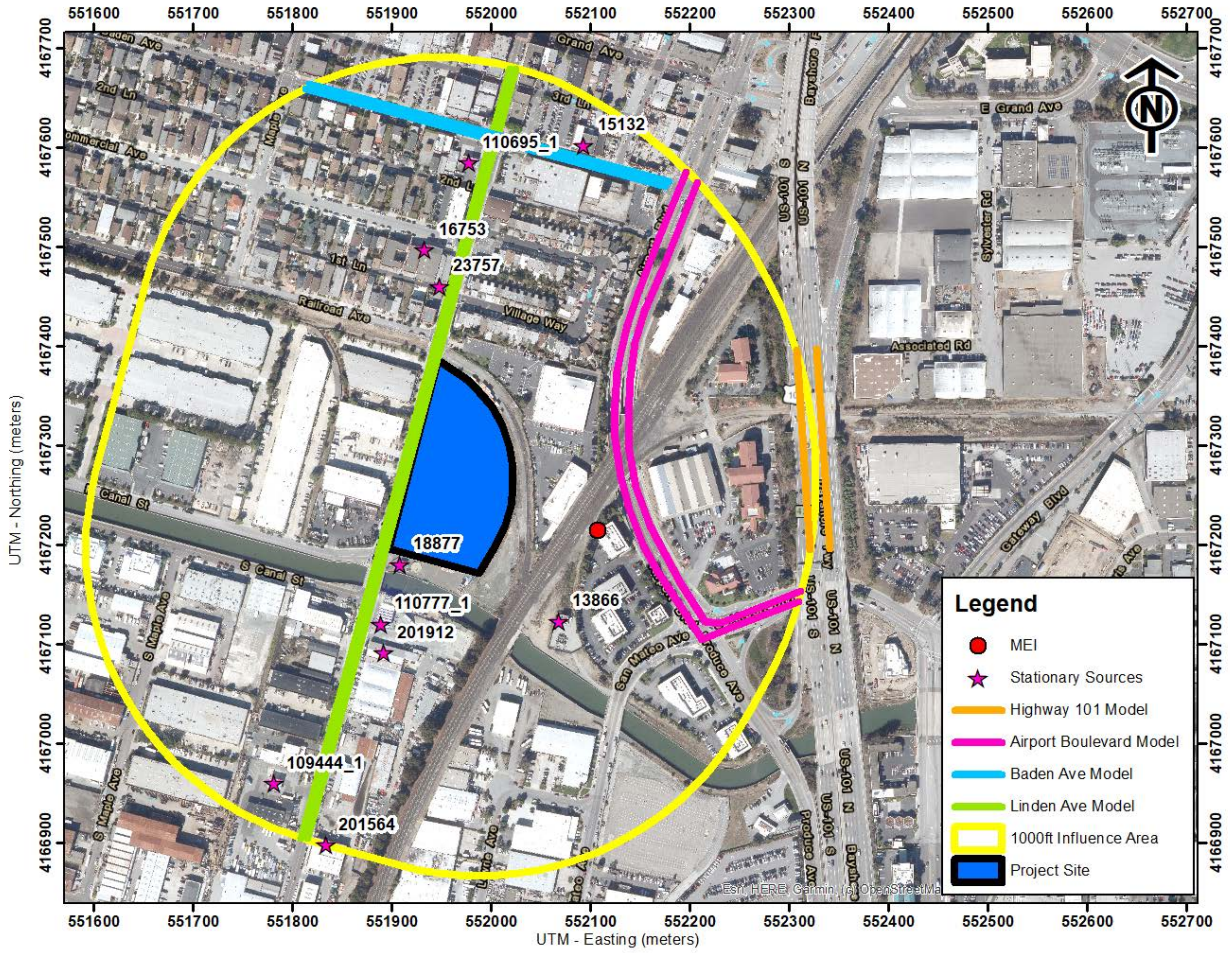
Community health risk assessments typically look at all substantial sources of TACs that can affect sensitive receptors that are located within 1,000 feet of a project site (i.e., influence area). These sources include rail lines, highways, busy surface streets, and stationary sources identified by BAAQMD.

A review of the Project area based on provided traffic information indicated that traffic on U.S. Highway 101, Airport Boulevard, Baden Avenue, and Linden Avenue would exceed 10,000 vehicles per day. Other nearby streets would have less than 10,000 vehicles per day. A review of BAAQMD's highway and railway raster data identified one railway with the potential to affect the project MEI. In addition, there are several development projects whose construction would contribute to the cumulative risk. The risk impacts from these developments are included within the analysis. A review of BAAQMD's stationary source map website identified eleven stationary sources with the potential to affect the project MEI. Figure 2 shows the location of the sources affecting the MEI. Community risk impacts from these sources upon the MEI are reported in Table 6.

[2] Hexagon Transportation Consultants. July 1, 2022. *7 South Linden Avenue Transportation Study – South San Francisco, California*

[3] Bay Area Air Quality Management District, 2012, *Recommended Methods for Screening and Modeling Local Risks and Hazards, Version 3.0.* May. Web: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/risk-modeling-approach-may-2012.pdf?la=en

Figure 2. Project Site and Nearby TAC and $PM_{2.5}$ Sources



Highways & Railways – U.S. Highway 101, CalTrain Zone 1

The Project MEI is approximately 1,000 feet west of U.S. Highway 101 and approximately 580 feet northwest of CalTrain Zone 1. A refined analysis of the impacts of TACs and $PM_{2.5}$ to the MEI receptor is necessary to evaluate potential cancer risks and $PM_{2.5}$ concentrations from Highway 101. A review of the traffic information reported by Caltrans indicates that Highway 101 traffic includes 178,000 vehicles per day (based on an annual average)[4] that are about 5.1 percent trucks, of which 1.5 percent are considered diesel heavy duty trucks and 3.7 percent are medium duty trucks.[5]

Summary of Cumulative Health Risk Impact at Construction MEI

Table 7 reports both the Project and cumulative community risk impacts at the sensitive receptors most affected by construction (i.e. the MEI). The Project would not have an exceedance with respect to community risk caused by Project construction activities since the cancer risk, annual $PM_{2.5}$ concentration, and hazard index do not exceed the BAAQMD single-source and cumulative-source thresholds.

[4] Caltrans. 2022. *2020 Traffic Volumes California State Highways.*
[5] Caltrans. 2022. *2020 Annual Average Daily Truck Traffic on the California State Highway System.*

Table 6. Impacts from Combined Sources at Project MEI

Source		Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts				
Project Construction - **Planned** Receptors	Unmitigated	**12.43**	0.09	0.01
	Mitigated	2.18	0.02	<0.01
BAAQMD Single-Source Threshold		***6.0***	***0.3***	***1.0***
Exceed Threshold?	Unmitigated	***Yes***	*No*	*No*
	Mitigated[6]	*No*	*No*	*No*
Cumulative Impacts				
Highway 101		0.98	0.05	<0.01
CalTrain Zone 1		22.10	0.05	0.01
Airport Boulevard		1.84	0.18	<0.01
Baden Avenue		0.03	<0.01	<0.01
Linden Avenue		0.41	0.03	<0.01
NOD Auto Body Shop Inc (Facility ID #15132, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 650 feet		-	-	<0.01
City of SSF Water Quality Plant (Facility ID #13866, Generator), MEI at 1000 feet		5.19	<0.01	0.01
South San Francisco Water Quality (Facility ID #13866, Generator), MEI at 830 feet		0.77	<0.01	<0.01
E & S Auto Collision Inc (Facility ID #16753, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 200 feet		-	-	<0.01
Transform Auto Body (Facility ID #23757, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 200 feet		-	-	<0.01
Bayside Collision Center (Facility ID #201564, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 170 feet		-	-	<0.01
Lindenville Auto Body Center Inc. (Facility ID #201912, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 1000+ feet		-	-	<0.01
Penske Truck Leasing - ATTN: Allan Wells (Facility ID #109444_1, Gas Dispensing Facility), MEI at 1000+ feet		0.01	-	<0.01
South City Shell (Facility ID #110695_1, Gas Dispensing Facility), MEI at 490 feet		0.35	-	0.01
Store #58304 (Facility ID #110777_1, Gas Dispensing Facility), MEI at 970 feet		0.58	-	<0.01
Cumulative Total – **Planned** Receptors	Unmitigated	44.69	<0.43	<0.16
	Mitigated	34.44	<0.36	<0.16
BAAQMD Cumulative Source Threshold		***100***	***0.8***	***10.0***
Exceed Threshold?	Unmitigated	*No*	*No*	*No*
	Mitigated	*No*	*No*	*No*

Implement General Plan MM AIR-1a and AIR-1b

MM AIR-1a

This mitigation requires that individual developments facilitated by the City's General Plan shall incorporate the following Basic Construction Mitigation Measures recommended by BAAQMD:

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

[6] Mitigation Measures MM AIR- 1a and 1b

- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure [ATCM] Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Prior to the commencement of construction activities, individual project proponents shall post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number shall also be visible to ensure compliance with applicable regulations.

MM AIR-1b

The Project is located within 1,000 feet of existing and proposed sensitive receptors, therefore, a health risk assessment of project emissions was conducted. Cancer risk thresholds would be exceeded at planned land uses that are not currently developed or occupied by sensitive receptors (i.e., residents). If residential uses exist at 124 Airport Boulevard at the time that construction begins for the proposed Project, then additional measures to reduce construction period TAC emissions are required under MM AIR-1b. The Project would be required to implement a feasible plan to reduce DPM emissions by 55 percent such that increased cancer risk and annual $PM_{2.5}$ 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 (PM_{10} and $PM_{2.5}$), 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 a 55 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 55 percent or greater. Elements of the plan could include a combination of some of the following measures:

    - Implementation of No. 1 above to use Tier 4 or alternatively fueled equipment,
    - Installation of electric power lines during early construction phases to avoid use of diesel generators and compressors,
    - Use of electrically powered equipment,
    - Forklifts and aerial lifts used for exterior and interior building construction shall be electric or propane/natural gas powered,
    - Change in construction build-out plans to lengthen phases, and
    - 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.

Effectiveness of Mitigation Measure MM AIR-1b

CalEEMod was used to compute emissions associated with this mitigation measure assuming that all equipment met U.S.

EPA Tier 4 Interim engine standards and most portable equipment would be electric. With these implemented, the Project's construction cancer risk levels (assuming infant exposure) would be reduced by 82 percent to 2.18 chances per million. Assuming a lesser level of mitigation that achieves a 55-percent reduction in the project's cancer risk, increased cancer risks would be reduced to below 6 chances per million. As a result, the Project's construction risks would be reduced below the BAAQMD single-source thresholds. Furthermore, mitigation of this Project is not required if the nearby development projects at 40 Airport Boulevard and 124 Airport Boulevard are not occupied at the start of construction of this Project. All existing modeled sensitive receptors were below a cancer risk level of 6.0 per million without additional measures required under MM AIR-1b.

On-site Community Risk Assessment for TAC Sources - New Project Residences

South San Francisco's *General Plan Update, Zoning Code Amendments, and Climate Action Plan* addresses the exposure of sensitive receptors to substantial levels of air pollutants or TACs:

Policy CHEJ-3.5 Discourage development of sensitive uses near sources of pollution. Discourage the development of sensitive land uses (schools, healthcare facilities, and elder and childcare centers) within 500 feet of highways and stationary sources of pollution. For sensitive land uses that cannot be sited at least 500 feet away, potential design mitigation actions include:

- Locate air intake systems for heating, ventilation, and air conditioning (HVAC) systems as far away from existing air pollution sources as possible.
- Using high-efficiency particulate matter (HEPA) filters in the HVAC system and develop a maintenance plan to ensure the filtering system is properly maintained.
- For nonresidential buildings, consider utilizing o0nly fixed windows next to any existing sources of pollution.
- Plant landscape barriers between highways and residential areas to reduce noise and air pollution from residents.

The General Plan Update program EIR identified MM AIR-1b to address potential exposure of new sensitive place sensitive receptors within 1,000 feet of uses generating TACs, such as roadways with volumes of 10,000 average annual daily trips or greater. This mitigation measure requires General Plan projects to prepare a health risk assessment that identifies potential impacts, and if necessary, identify and implement measures (such as air filtration systems) to reduce potential exposure to particulate matter, carbon monoxide, diesel fumes, and other potential health hazards.

A health risk assessment was completed to determine the impact that existing air pollutant and TAC sources would have on the new proposed sensitive receptors (residents) that the project would introduce. The same TAC sources identified above were used in this health risk assessment.[7]

<u>Nearby Highways and Roadways – Highway 101, Airport Boulevard, Baden Avenue, and Linden Avenue</u>

The highway and roadway analysis for the new project residents was conducted in the same manner as described above for the off-site MEI. However, year 2025 (operational year) emission factors were conservatively assumed as being representative of future conditions, instead of 2023 (construction year). An analysis based on 2025 resulted in the following increased ADTs:

- Highway 101 – 186,900 vehicles
- Airport Boulevard – 29,584 vehicles
- Baden Avenue – 16,039 vehicles

[7] We note that to the extent this analysis considers *existing* air quality issues in relation to the impact on *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" such impacts.

- Linden Avenue – 15,955 vehicles

The Project set of receptors were placed throughout the project area and were spaced every 23 feet (7 meters). Highway and roadway impacts were modeled at receptor heights of 5 feet (1.5 meters), 20 feet (6.1 meters), and 30 feet (9.1 meters) representing sensitive receptors on the first, second, and third floors of the building. The portions of Highway 101 and each local roadway included in the modeling are shown in Figure 3 along with the project site and receptor locations where impacts were modeled.

Maximum increased cancer risks were calculated for the residents at the Project site using the maximum modeled TAC concentrations. A 30-year exposure period was used in calculating cancer risks assuming the residents would include third trimester pregnancy and infants/children and were assumed to be in the new housing area for 24 hours per day for 350 days per year. Cancer risks associated with each roadway are greatest closest to each respective roadway and decrease with distance from the road. The highway and roadway community risk impacts at the project site are shown in Table 8. Risk values were computed using modeled DPM and $PM_{2.5}$ concentrations and BAAQMD recommended methods and exposure parameters.

Railroad: Diesel Trains

The railroad analysis for the on-site project residents was conducted in a similar manner as described above for the off-site construction MEI. Emissions for the 2025-2054 period were conservatively used for this evaluation. Impacts to future project residents on the first through third floor building levels of the proposed project were evaluated.

Stationary Sources

The stationary source screening analysis for the new project sensitive receptors was conducted in the same manner as described above for evaluating the off-site MEI for construction. Table 8 shows the health risk screening assessment results from the stationary sources.

Summary of Cumulative Health Risks at the Project Site

Health risk impacts from the existing and TAC sources upon the project site are reported in Table 7. 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. Additional measures to reduce exposure to TACs and air pollutants under MM AIR-1b are not required and therefore, there were no significant health impacts on future residents locating within the Project. Therefore, consistent with the General Plan Update program EIR, this Project would not result in any substantial adverse impacts to substantial levels of toxic air contaminants or cumulatively considerable impacts.

Table 7. Impacts from Combined Sources at Project MEI

Source		Cancer Risk (per million)	Annual $PM_{2.5}$ ($\mu g/m^3$)	Hazard Index
Project Impacts				
Project Construction - **Planned** Receptors	Unmitigated	**12.43**	0.09	0.01
	Mitigated	2.18	0.02	<0.01
BAAQMD Single-Source Threshold		***6.0***	***0.3***	***1.0***
Exceed Threshold?	Unmitigated	***Yes***	*No*	*No*
	[8]Mitigated	*No*	*No*	*No*
Cumulative Impacts				
Highway 101		0.98	0.05	<0.01
CalTrain Zone 1		22.10	0.05	0.01
Airport Boulevard		1.84	0.18	<0.01
Baden Avenue		0.03	<0.01	<0.01
Linden Avenue		0.41	0.03	<0.01
NOD Auto Body Shop Inc (Facility ID #15132, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 650 feet		-	-	<0.01
City of SSF Water Quality Plant (Facility ID #13866, Generator), MEI at 1000 feet		5.19	<0.01	0.01
South San Francisco Water Quality (Facility ID #13866, Generator), MEI at 830 feet		0.77	<0.01	<0.01
E & S Auto Collision Inc (Facility ID #16753, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 200 feet		-	-	<0.01
Transform Auto Body (Facility ID #23757, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 200 feet		-	-	<0.01
Bayside Collision Center (Facility ID #201564, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 170 feet		-	-	<0.01
Lindenville Auto Body Center Inc. (Facility ID #201912, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 1000+ feet		-	-	<0.01
Penske Truck Leasing - ATTN: Allan Wells (Facility ID #109444_1, Gas Dispensing Facility), MEI at 1000+ feet		0.01	-	<0.01
South City Shell (Facility ID #110695_1, Gas Dispensing Facility), MEI at 490 feet		0.35	-	0.01
Store #58304 (Facility ID #110777_1, Gas Dispensing Facility), MEI at 970 feet		0.58	-	<0.01
Cumulative Total – **Planned** Receptors	Unmitigated	44.69	<0.43	<0.16
	Mitigated	34.44	<0.36	<0.16
BAAQMD Cumulative Source Threshold		***100***	***0.8***	***10.0***
Exceed Threshold?	Unmitigated	*No*	*No*	*No*
	Mitigated	*No*	*No*	*No*

[8] Mitigation Measure AIR-1b

Figure 3- Project Site, Nearby Cumulative Sources, and Onsite MEIs

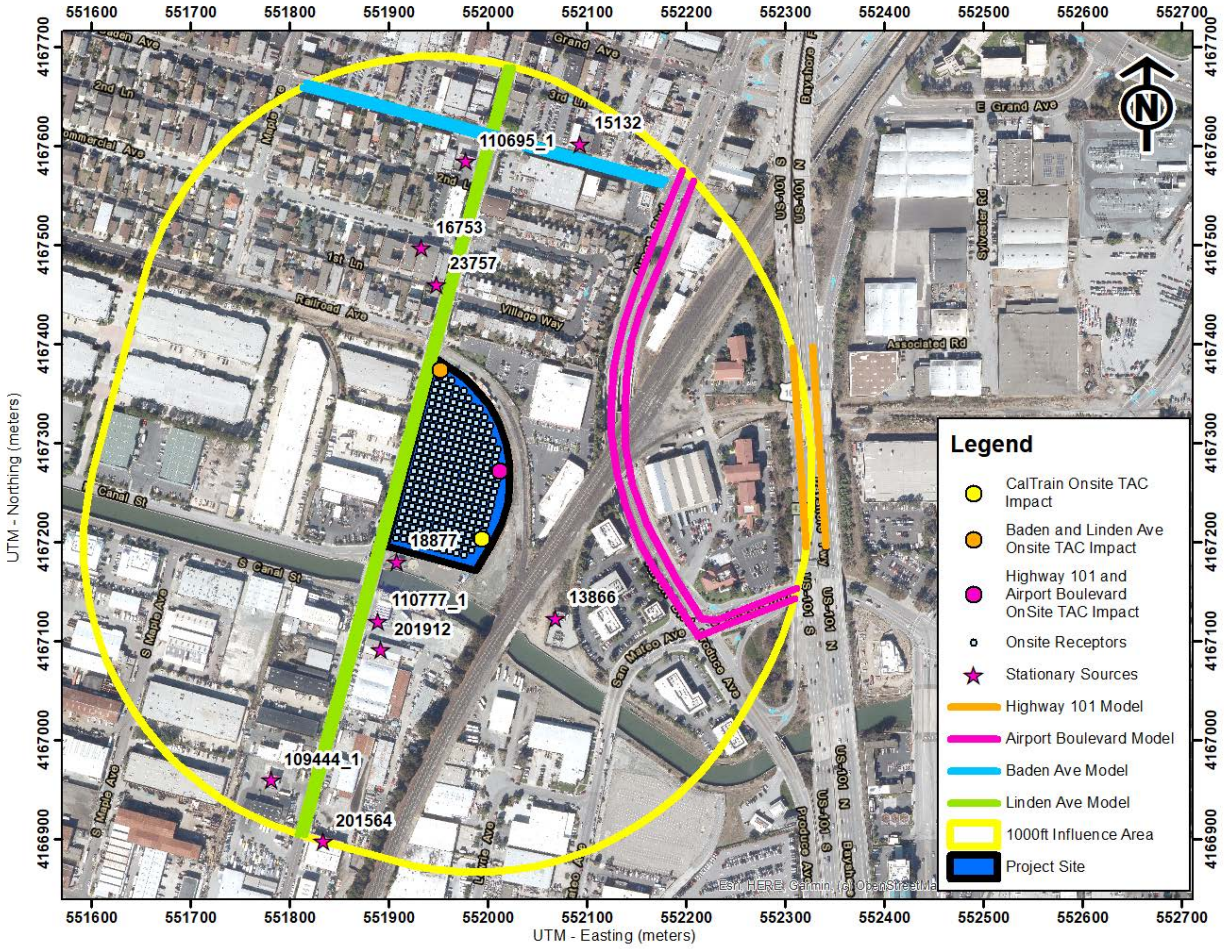


Table 8. Impacts from Nearby Sources to Project Site Receptors

Source	Maximum Cancer Risk (per million)	Maximum Annual $PM_{2.5}$ ($\mu g/m^3$)	Maximum Hazard Index
Highway 101	0.54	0.03	<0.01
CalTrain Zone 1	1.76	<0.01	<0.01
Airport Boulevard	0.52	0.05	<0.01
Baden Avenue	0.11	0.01	<0.01
Linden Avenue	2.71	0.27	<0.01
NOD Auto Body Shop Inc (Facility ID #15132, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 840 feet	-	-	<0.01
City of SSF Water Quality Plant (Facility ID #13866, Generator), MEI at 300 feet	5.19	0.01	<0.01
South San Francisco Water Quality (Facility ID #13866, Generator), MEI at 45 feet	8.53	0.01	<0.01
E & S Auto Collision Inc (Facility ID #16753, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 270 feet	-	-	<0.01
Transfrom Auto Body (Facility ID #23757, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 260 feet	-	-	<0.01
Bayside Collision Center (Facility ID #201564, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 1000+ feet	-	-	<0.01
Lindenville Auto Body Center Inc. (Facility ID #201912, Automotive Body, Paint, and Interior Repair and Maintenance), MEI at 300 feet	-	-	<0.01
Penske Truck Leasing - ATTN: Allan Wells (Facility ID #109444_1, Gas Dispensing Facility), MEI at 830 feet	0.01	-	<0.01
South City Shell (Facility ID #110695_1, Gas Dispensing Facility), MEI at 650 feet	0.70	-	<0.01
Store #58304 (Facility ID #110777_1, Gas Dispensing Facility), MEI at 190 feet	5.66	-	<0.01
BAAQMD Single-Source Threshold	***10.0***	***0.3***	***1.0***
Exceed Threshold?	*No*	*No*	*No*
Cumulative Total	25.73	<0.39	<0.15
BAAQMD Cumulative Source Threshold	***100***	***0.8***	***10.0***
Exceed Threshold?	*No*	*No*	*No*

d The Project would not contain any food service uses, or other uses that generate objectionable odors. As part of standard project review the outdoor fireplace (courtyard) 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, other than those identified in the General Plan EIR.

III. 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 Project area is currently developed with industrial, commercial and office uses. There are no large open spaces in the Project area. Open space within the area consists of the Southern Pacific Railroad, the Lindenville Storm Water Pump Station and Colma Creek Canal. The 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 Project site is currently developed and not located in an area that supports biological resources. Colma Creek Canal is located south of the site next to the Lindenville Storm Water Pump Station.

Riparian habitat in South San Francisco is limited to Colma Creek and the Bay fringe. However, the Project is not directly adjacent to the canal. 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 General Plan Update 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 as shown in Exhibit 3.3-1 Existing Habitat and Protected Areas and Exhibit 3.3.2 Ecologically Sensitive Areas of the General Plan Update program EIR. Therefore, the Project would have no impact on wildlife movement corridors. Landscaping vegetation within the 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 would be required as a standard 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 SSFMC. Development activities could involve removal or pruning of protected trees. The Project proposes removal of five "protected trees" as defined by the City's Tree Preservation Ordinance. Policy ES-4.2 requires the avoidance of tree removal whenever possible, and when removals are warranted, that each removed tree be replaced with three new trees. The "protected trees" to be removed are in poor condition as described in the Arborist Report prepared by Arborwell dated January 24, 2022 (attached to the ECA). One hundred twenty trees are proposed to be planted which is consistent with tree removal requirements. All development facilitated by the proposed project would be subject to these mandatory requirements to preserve trees and other sensitive habitat. 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. General Plan Update Policy ES-4.1 requires the City to expand the tree canopy cover to increase environmental benefits, prioritizing disadvantaged communities and connected wildlife corridors. Action ES-4.1.1 requires the City to implement the City's Urban Forest Plan.. Therefore, development facilitated by the Project would not conflict with local policies or ordinances protecting biological resources, and impacts would be less than significant. Therefore, the Project remains consistent with the analysis of the General Plan Update 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 Project.

No new impacts have been identified and no new mitigation measures are required for the Project, other than those identified in the General Plan EIR.

IV. CULTURAL RESOURCES AND TRIBAL 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 pursuant to Section 15064.5?
c) Disturb any human remains, including those interred outside of formal cemeteries?
d) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?
e) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1?

Documentation:

a. As discussed in Archeological Assessment report prepared by Basin Research dated November 22, 2022, (attached to the ECA), the site was used as a compressed gas manufacturing plant from the early 1900s through 2001; subsequently leased as a bottled water distribution facility (2002 to 2014), along with various other month-to-month tenants that utilized warehouse and yard spaces. The existing two buildings, paved parking lots and minor landscaping would be demolished for the Project. The property does not meet the minimum age threshold (of 50 years)for potential eligibility, and 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). Therefore, the Project remains consistent with the analysis of the General Plan Update program EIR and is not historically significant.

b. The Project would not cause a potentially significant impact to any known archaeological resources in the project vicinity. Based on the Archeological Assessment, the archival and literature record and a review of focused subsurface archaeological testing within and adjacent to the Colma Creek alignment (Busby 2015) as well as within the Caltrans right-of-way (see AECOM 2017) suggests a low potential for exposing significant subsurface archaeological resources. In addition, the project location historically bordered a tidal marsh, which is unlikely to have had surfaces stable enough to support and preserve a prehistoric or contact-era shell midden associated with either prehistoric or historic period occupation by local Native American groups. Furthermore, a review of Nels C. Nelson's 1909 and/or ca. 1912 18 annotated Map of San Francisco Bay Region showing Distribution of Shell Heaps, indicates a lack of "shell heaps" within the general project area. The Project would be subject to mitigation measures contained in the General Plan Update program EIR. Construction operations could result in the inadvertent exposure of buried prehistoric or historic archaeological materials or tribal cultural resources that could be eligible for inclusion on the California Register of Historical Resources (PRC

Section 5024.1) and/or meet the definition of a unique archeological resource (PRC Section 21083.2) or a tribal cultural resource (PRC Section 21074). This significant impact would be reduced to a less-than-significant impact with implementation of Mitigation Measure CM-1 which requires the review, identification, evaluation and treatment of any significant archaeological finds by a Professional Archaeologist at the time of discovery in consultation with the City and local Native American tribes and/or individuals. This measure would be implemented in accordance with state law and the requirements of the City. Therefore, the Project remains consistent with the analysis of the General Plan Update program EIR. And those mitigation measures identified in the General Plan EIR.

Mitigation Measure CM-1

(a) The project proponent shall note on any plans that require ground disturbing excavation that there is a potential for exposing buried cultural resources including prehistoric Native American burials.

(b) The project proponent shall retain a Professional Archaeologist to provide preconstruction briefing(s) to supervisory personnel of any excavation contractor to alert them to the possibility of exposing significant prehistoric archaeological resources within the project area. The briefing shall discuss any archaeological objects that could be exposed, the need to stop excavation at the discovery, and the procedures to follow regarding discovery protection and notification of the project proponent and archaeological team. An "Alert Sheet" shall be posted in conspicuous locations at the project location to alert personnel to the procedures and protocols to follow for the discovery of potentially significant prehistoric archaeological resources.

(c) The project proponent shall retain a Professional Archaeologist on an “on-call” basis during ground disturbing construction for the project to review, identify and evaluate cultural resources that may be inadvertently exposed during construction. The archaeologist shall review and evaluate any discoveries to determine if they are historical resource(s) and/or unique archaeological resources under the California Environmental Quality Act. The Professional Archaeologist may consult with members of the local Native American community to assist with the identification of tribal cultural resources.

(d) If the Professional Archaeologist determines that any cultural resources exposed during construction constitute a historical resource and/or unique archaeological resource or tribal cultural resource, he/she shall notify the project proponent and other appropriate parties of the evaluation and recommended mitigation measures to mitigate to a less-than significant impact in accordance with California Public Resources Code Section 15064.5. Mitigation measures may include avoidance, preservation in-place, recordation, additional archaeological testing and data recovery among other options. The completion of a formal Archaeological Monitoring Plan (AMP) may be recommended by the Project Archaeologist if significant archaeological deposits are exposed during ground disturbing construction. Development and implementation of the AMP would be determined by the City of South San Francisco. Treatment of any significant cultural resources shall be undertaken with the approval of the project proponent and the City of South San Francisco

(e) A Monitoring Closure Report shall be filed with the City of South San Francisco at the conclusion of ground disturbing construction if archaeological and Native American monitoring of excavation was undertaken

In addition, the General Plan Update includes policies and actions specifically designed to address potential impacts to archaeological resources. Policy ES-10.1 requires the City to maintain formal procedures for minimizing and mitigating impacts to archaeological resources and Policy ES-10.2 requires the City to support educational efforts that increase community awareness, appreciation, and support for South San Francisco’s archaeological resources. Policy ES-10.3 requires that development proposals be referred to the Northwest Information Center (NWIC) of the California Archaeological Inventory, Native American Heritage Commission (NAHC), and local Native American tribes, for review and recommendations regarding supplemental field investigation. Policy ES-10.4 requires a records review for any development proposed in areas of known archaeological resources. Lastly, as required by Policy ES-10.5, if construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts, then all work within 100 feet of the discovery shall cease, the Economic and Community Development Department shall be

notified, and the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures. As stipulated by Policy ES-10.5, work may only resume when appropriate protections are in place and the protections have been approved by the Economic and Community Development Department. Compliance with this standard state regulation and City policies would protect archeological resources, and impacts related to archeological resources would be less than significant and no mitigation would be required, consistent with the evaluation of the General Plan Update program EIR.

c. The Project would not cause a potentially significant impact to any known cemeteries or human remains in the project vicinity (General Plan Update program EIR p. 3.4-35-36). However, should any human remains be found during on- or off-site improvements associated with the Project, the General Plan Update program EIR identifies California Health and Safety Code Section 7050.5, which requires that no further disturbances shall occur until the County Coroner (MM CM-2) 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. As discussed in the General Plan Update program EIR (pp. 3.4-39-42) as the City receives development applications for subsequent development under the General Plan planning area, those applications would be reviewed by the City for compliance with the policies and actions of the General Plan Update, the provisions of SB 18 and AB 52, the South San Francisco Municipal Code, and other relevant federal, State, and local regulations that protect cultural and Tribal Cultural Resource (TCRs), including Section 15064.5 of the CEQA Guidelines and Sections 5024.1 and 5097 of the PRC.

Mitigation Measure CM-2

The treatment of human remains and of associated or unassociated funerary objects discovered during any soil-disturbing activity within the project shall comply with applicable State laws. This shall include immediate notification of the San Mateo County Medical Examiner and the City of South San Francisco. In the event of the coroner's determination that the human remains are Native American, notification of the Native American Heritage Commission, is required who shall appoint a Most Likely Descendant (MLD) (Public Resources Code Section 5097.98). The project sponsor, archaeological consultant, and MLD shall make all reasonable efforts to develop an agreement for the treatment, with appropriate dignity, of human remains and associated or unassociated funerary objects (CEQA Guidelines Section 15064.5(d)). The agreement should take into consideration the appropriate excavation, removal, recordation, analysis, custodianship, curation, and final disposition of the human remains and associated or unassociated funerary objects. The California Public Resources Code allows 48 hours to reach agreement on these matters. If the MLD and the other parties do not agree on the reburial method, the Project would follow Public Resources Code Section 5097.98(b) which states that ". . . the landowner or his or her authorized representative shall reinter the human remains, and items associated with Native American burials with appropriate dignity on the property in a location not subject to further subsurface disturbance."

Compliance with MM-CM-2, standard state regulations and City policies, would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant and no additional mitigation would be required, consistent with the evaluation and mitigation measures identified in the General Plan Update program EIR.

d. The General Plan Update includes policies and actions intended to conserve and reduce impacts to Tribal Cultural Resource (TCR). Policy ES-11.1 requires the City to identify, preserve, and protect TCRs, traditional cultural landscapes, sacred sites, places, features, and objects, including historic or prehistoric ruins, burial grounds, cemeteries, and ceremonial sites in consultation or coordination with the appropriate Native America tribe(s). Policy ES-11.3 requires the City to Consult with local Native American tribes to identify, evaluate, and appropriately address TCRs and tribal sacred sites through the development review process. The General Plan Update also includes policies and actions intended to conserve and reduce impacts to archaeological resources, which can include TCRs. Policy ES-10.3 requires that development proposals be referred to the NWIC of the California Archaeological Inventory, NAHC, and local Native American tribes, for review and

recommendations regarding supplemental field investigation. Policy ES-10.4 requires a records review for any development proposed in areas of known archaeological resources. As required by Policy ES-10.5, if construction or grading activities result in the discovery of significant historic or prehistoric archaeological artifacts, then all work within 100 feet of the discovery shall cease, the Economic and Community Development Department shall be notified, and the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures. As stipulated by Policy ES-10.5, work may only resume when appropriate protections are in place and the protections have been approved by the Economic and Community Development Department. By adhering to the policies and actions in the General Plan Update, as well as the provisions under SB 18 and AB 52, potential impacts to existing or undiscovered eligible TCRs within the Planning Area.

e. As discussed in the Archeological Assessment, three cultural resources are within or adjacent to the project site. One prehistoric resource has been recorded as within and immediately adjacent to the project site (P-41-000050/CA-SMA-46) by the CHRIS/NWIC. P-41-00497 (CA-SMA-357H). Short segment of the former rail line that connected the old Southern Pacific Railroad alignment constructed in 1864 to a newer line that services the eastern edge of the San Mateo peninsula, is adjacent. The majority of the alignment has been removed over the last 15 years and no longer has integrity. A spur from this line formerly entered the project site but is no longer present. P-41-002147 (CA-SMA-353H) is a historic trash deposit that was evaluated as not eligible for the National Register of Historic Places. It is listed as destroyed. The single prehistoric resource, identified as Nelson Shellmound #385 (P-41-000050/CA-SMA46), has been mis-located (the site location was not mapped correctly; actual location is 2 miles north of project site at Visitation Point, Brisbane Railroad alignment was formerly along north and western boundary of parcel – appears to have been removed over last 15 years) by the CHRIS/NWIC based on BASIN's review of the original location map completed in 1909/1912 by Nelson (1909 and/or ca. 1912 annotated Nels C. Nelson Map of San Francisco Bay Region showing Distribution of Shell Heaps). Eight additional cultural resources are recorded within 0.25 mile of the project parcel including an additional three prehistoric sites mis plotted by the CHRIS/NWIC; three historic structures; one historic building, and one historic district. As discussed above, the General Plan Update includes policies and actions to conserve and reduce impacts to TCRs, such as Policy ES-11.1, Policy ES-11.3, Policy ES-10.3, and Policy ES-10.5. By adhering to the policies and actions in the General Plan Update, as well as the provisions under SB 18 and AB 52, potential impacts to existing or undiscovered eligible TCRs within the Project Area would be reduced to less than significant.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

V. ENERGY – *Would the project:*
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?
b) Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

a. As described in General Plan Update program EIR (pp. 3.5-21-3.5-23) all new development in the City would be required to meet State energy efficiency regulations including Title 24 Part 6 building energy efficiency standards that require new residential uses to meet a net zero energy use standard, which is met through installation of rooftop solar PV systems, enhanced insulation, and energy efficient appliances. Additionally, the SSFMC 15.26.020 requires new residential development to only include all-electric design features and prohibits the use of natural gas utilities. Other State energy efficiency regulations include SB 100 that requires 100 percent of retail sales of electricity to be generated from zero-carbon emission sources by 2045 and Executive Order N-79-20 that requires 100 percent of new passenger vehicles sold in California to be zero emissions by 2035.

Compliance with the General Plan Update and Climate Action Plan policies and actions, adherence to the development standards in the South San Francisco Municipal Code and Zoning Ordinance, and compliance with State regulations would ensure that implementation of the proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy. These policies and actions would minimize demands for energy resources and ensure their efficient use. Furthermore, the Project minimizes petroleum fuel use for transportation by locating new housing and jobs in the East of 101, Lindenville, Downtown, and El Camino planning sub-areas, which are well served by Caltrain, BART, or SamTrans service and have good access to opportunity (such as jobs, neighborhood amenities, and health care facilities). Finally, the implementation of Mitigation Measure (MM) TRANS-1 in Section 3.14 Transportation, which requires the City to implement its Transportation Demand Management (TDM) Ordinance as part of the Zoning Code Amendments and parking requirements, would reduce VMT. Therefore, the Project would be designed and built to minimize energy consumption and would ensure that building energy consumption would not be wasteful, inefficient, or unnecessary. In addition, implementation of the Project would minimize petroleum fuel use for transportation. The Project would incorporate TDM Program Measures and is located within proximity to the Caltrans station. Thus, transportation fuel consumption would not be wasteful, inefficient, or unnecessary. Impacts would be less than significant.

b. As noted above all new development in the City would be required to meet State energy efficiency regulations including Title 24 Part 6 building energy efficiency standards that require new residential uses to meet a net zero energy use standard, which is met through installation of rooftop solar PV systems, enhanced insulation, and energy efficient appliances. Additionally, the SSFMC Section 15.26.020 requires new residential development to only include all-electric design features and prohibits the use of natural gas utilities. Implementation of the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency. Therefore, no new significant impacts or substantially more severe impacts would occur.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan update EIR.

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 General Plan Update 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 Project area. As shown in Exhibit 2-5 of the General Plan EIR Update program EIR, the majority of potential growth under the General Plan would occur within the East of 101, Lindenville, Downtown, and El Camino planning sub-areas, all of which are outside the Alquist-Priolo Earthquake Fault Zone. Because ground rupture generally only occurs at the location of a fault, and no active faults are known to traverse the 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 7.2 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 7.2 magnitude. According to the General Plan Update EIR, the estimated ground shaking intensities in the City, assuming a magnitude 7.2 earthquake on the Peninsula segment of the San Andreas Fault, are shown in Exhibit 3.6-2 of the General Plan Update program EIR. The southwestern corner and most of the City east of El Camino Real is located within Zone VIII (Very Strong) and is estimated to experience moderate structural damage. The remainder of the City, including the portions fronting the San Francisco Bay, are located within Zone IX (Violent) and are estimated to experience heavy structural damage. However, the intensity of ground shaking would ultimately depend on the characteristics of the fault, distance from the fault, magnitude and duration of the earthquake, and site-specific geologic conditions.

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, the General Plan Update includes policies and actions to minimize structural damage and minimize the exposure of people to risk of injury or death from structural failure in the event of surface fault rupture during an earthquake. Action CR-1.3.3 requires the City to require real estate disclosures of all hazards identified in the Hazard Mitigation Plan, including hazards associated with geologic hazards, for commercial and residential properties, including ownership and rental. Compliance with existing state and City regulations would be consistent with the analysis of the General Plan Update program EIR, which identified that existing regulations would reduce impacts to a less-than-significant level. Because the area is located in a seismically active region, the potential for seismic-related ground failure exists, including liquefaction.

A Preliminary Geotechnical Report dated February 4, 2022, was prepared for the Project by Cornerstone Earth Group (attached to this ECA). As described, the Project site is located on the northeastern side of the San Francisco Peninsula on the flatlands transitioning between hills and former mudflats. Locally, the northern part of the site is mapped as Colma Formation (Qc) with the southern portion mapped as artificial fill (Qaf), and artificial fill overlaying tidal flat alluvial material (Qaf/tf) (Bonilla, 1998). The Colma Creek channel, adjacent to the southern property line, previously ran through the middle portion of the site. Tidal flat alluvial material is mapped and described as Bay Mud (Qhbm) by Helly and LaJoie (1979). Bay Mud (Qhbm) deposits are generally unconsolidated, saturated, dark plastic clays and silts rich in organic material.

As noted in the report, the site is within a State-designated Liquefaction Hazard Zone (CGS, South San Francisco Quadrangle, 2021). However, the Project 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.

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 Project 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 General Plan Update program EIR analysis.

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 would be implemented per the geotechnical report (included as a Project Condition of Approval). Compliance with existing state and City regulations would be consistent with the analysis of the General Plan Update program EIR, which identified that existing regulations would reduce impacts to a less-than-significant level.

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.

Furthermore, the General Plan Update includes a number of policies and actions specifically designed to protect residents from injuries and minimize property damage resulting from geologic hazards, such as expansive soils. Action CR-1.3.3 calls for the City to enact an ordinance to require real estate disclosures of all hazards identified in the Hazard Mitigation Plan. Policy CR-4.1, which requires the City to protect existing and new buildings, infrastructure, and other assets from seismic hazards, would also be protective of development on expansive soils. Policy CR-1.4 requires the City to periodically adjust infrastructure design standards to address asset-specific vulnerabilities associated with the hazards.

Compliance with the rules and regulations of the South San Francisco Municipal Code and Zoning Ordinance, including compliance with the CBC, and implementation of the policies and actions in the General Plan Update, would ensure that potential impacts related to expansive soils remain less than significant.

Further, development under the General Plan Update program EIR would be required to comply with all applicable provisions of the San Mateo Countywide Stormwater Pollution Prevention Program (STOPPP), https://www.smcgov.org/planning/stormwater-treatment-requirements 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 General Plan Update 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 Project 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 Lindenville area including the Project site. Therefore, this Project is consistent with the General Plan Update 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, other than those identified in the General Plan update EIR.

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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?

Documentation:

a-b. As demonstrated in the Air Quality Assessment prepared by Illingworth & Rodkin, dated November 14, 2022, 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 would determine GHG significance moving forward.[9] 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:

1) Projects must include, at a minimum, the following project design elements:
   a). Buildings
      i) The project would not include natural gas appliances or natural gas plumbing (in both residential and non-residential development).
      ii) The project would 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 (16.8 percent in Petaluma) below the existing VMT per capita
         (2) Office Projects: 15 percent (16.8 percent in Petaluma) 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.

2) 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.

CalEEMod Modeling

CalEEMod was used to predict GHG emissions from operation of the site assuming full build-out of the project.

[9] 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

The project land use types and size and other project-specific information were input to the model, as described above within the construction period emissions. CalEEMod output.

Construction GHG Emissions

GHG emissions associated with construction were computed at 1,136 MT of CO_2e for the total construction period. These are the emissions from on-site operation of construction equipment, vendor and hauling truck trips, and worker trips. Neither the City nor BAAQMD have an adopted threshold of significance for construction related GHG emissions, though BAAQMD recommends quantifying emissions and disclosing that GHG emissions would occur during construction. BAAQMD also encourages the incorporation of best management practices to reduce GHG emissions during construction where feasible and applicable.

Operational GHG Emissions

The CalEEMod model, along with the project vehicle trip generation rates, was used to estimate daily emissions associated with operation of the fully-developed site under the proposed project. As shown in Table 9 for informational purposes, annual GHG emissions resulting from operation of the proposed project are predicted to be 2,195 MT of CO_2e in 2025.

Table 9. Annual Project GHG Emissions (CO_2e) in Metric Tons

Source Category	Proposed Project in 2025
Area	6.74
Energy Consumption	0.00
Mobile	2,041.38
Solid Waste Generation	125.38
Water Usage	21.67
Total (MT CO_{2e}/year)	2,195.17

For the Project to be considered less than significant, it must be consistent with a local qualified GHG reduction strategy or meet the minimum project design elements recommended by BAAQMD. The City's CAP was developed alongside the October 2022 update to the City's General Plan. The General Plan Update program EIR provided the environmental review and subsequent public review process that would qualify the updated 2022 CAP under CEQA Guidelines Section 15183.5(b). As such, the City's CAP is considered a qualified GHG reduction strategy under CEQA Guidelines Section 15183.5(b)(1). Furthermore, the Project meets the project-level thresholds recommended by BAAQMD. The Project would be all electric powered (no natural gas usage), energy efficient, include EV charging stations and have a low rate of VMT per capita, since it is in close proximity to transit with regional connections, employment centers and services.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

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, would it 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 543 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 Land Use Map for the General Plan Update (Exhibit 2-4) identifies the following land use designations that have the potential to generate hazardous materials: Business Technology Park, Business Technology Park High, Mixed Industrial, Mixed Industrial High, and Industrial Transition Zone. During construction activities, for example, commercially available hazardous materials (e.g., fuels, solvents, paints, and some consumer electronics) would be used and may generate small amounts of hazardous waste. Likewise, demolition of existing structures could potentially result in the release of hazardous building materials (e.g., asbestos, lead paint, etc.). However, all new development (construction and operations) would be required to comply with mandatory regulations for hazardous materials adopted by the Environmental Protection Agency (EPA), Occupation Safety and Health Administration (OSHA), United State Department of Transportation (USDOT), Department of Toxic Substance Control (DTSC), Caltrans, California Highway Patrol (CHP), local Certified Unified Program Agency (CUPA), and BAAQMD as described in the Regulatory Framework section (p 3.8.11). Mandatory compliance with regulations would ensure that all impacts would be less than significant. This Project is consistent with the General Plan Update 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 contaminants of concern (COCs) (most notably arsenic, lead, mercury, benzo (A) pyrene, and Total Petroleum Hydrocarbons (TPHo)) and other environmental constituents which would 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 General Plan program EIR (p. 3-8-28) 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 further than a mile from the nearest school, Spruce Elementary School. As such, this Project is consistent with the General Plan Update program EIR analysis and would not result in new or unidentified impacts.

d. As discussed in the General Plan Update (p. 3-29) according to a GeoTracker search performed on March 3, 2022, a total of 46 open sites are located within the Planning Area. Of the 46 open sites, seven are LUST Cleanup Sites: Arco #6073 (2300 Westborough Boulevard), California Golf Club of San Francisco (844 West Orange Avenue), Grand Avenue Gas (1086 Grand Avenue), Monfredini Property (477 Forbes), Tony's Services (209 El Camino Real), Union Carbide Corporation (7 South Linden Avenue), and Unocal #6980 (192 El Camino Real). As discussed in Impact HAZ-1, HAZ-2, HAZ-3, and the Regulatory Framework (p.3.8.11), any development on a contaminated site would be required to comply with mandatory regulations, which would ensure it does not create a significant hazard to the public or the environment. Based on a letter San Mateo County Environmental Health Services dated June 10, 2022, the Project site is eligible for closure under the Lot Threat Closure Policy. As part of the closure process, all remaining wells that were installed as part of investigation and remediation for this case must be properly destroyed in accordance with California Well Standards and the San Mateo County Well Ordinance. Currently, the closure process is underway. A Phase I Environmental Assessment (Phase I) has been prepared for the Project site by Cornerstone Earth Group dated September 13, 2021 and a Soil, Soil Vapor, and Ground Water Quality Evaluation dated February 20, 2019. (attached to the ECA). Consistent with the General Plan Update program EIR, 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.

The Project site 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 General Plan Update program EIR. Therefore, implementation of the Project would not result in a safety hazard for people residing or working in the Project vicinity or the environment, consistent with the analysis of the General Plan Update program EIR.

e,f. The Project area is located approximately one mile north of the San Francisco International Airport (SFO). The Planning Area is located within the Federal Aviation Regulation Part 77 SOI and within the boundaries of Airport Influence Areas A and B of the SFO ALUCP, which was adopted in 2012. The SFO ALUCP requires all residential development within Area A, which is the entirety of San Mateo County, to provide real estate disclosures (see SFO ALUCP Appendix G-7). Additionally, within Area B, the ALUC C/CAG is responsible for reviewing proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezoning, and land development proposals.

The maximum building height allowed in the mixed-use residential zoning district is 85 feet, which is required to be consistent with the FAA regulations (below 163.2 feet Mean Sea Level). 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 General Plan Update program EIR 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. The notice helps the FAA evaluate the effect of the proposed construction or alteration on safety in air commerce and the efficient use and preservation of the navigable airspace and of airport traffic capacity at public use airports. 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. However, most of the City is located in an area that requires notification for buildings taller than 100 feet. Coordination with the FAA would ensure that a significant safety would not occur. 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 General Plan Update program EIR.

There are no private airstrips within two miles of the Project 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 General Plan Update program EIR.

g. Construction activities associated with development under the General Plan Update 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. Additionally, a 27' Emergency Vehicle Access (EVA) is proposed along the perimeter of the property to improve emergency access. As a result, the 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 General Plan Update program EIR.

h. The Project site is located in an 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 General Plan Update program EIR.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

IX. HYDROLOGY AND WATER QUALITY -- *Would the project:*
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin?
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) Result in substantial erosion or siltation on- or off-site; ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or iv) Impede or redirect flood flows
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Documentation:

a. The Project would be required to comply with the Clean Water Act (CWA) and regulations enforced by the Regional Water Quality Control Board (RWQCB). In addition, the Project would comply with requirements of the SSFMC, and the General Plan Update and Climate Action Plan policies and actions related to water quality. Therefore, the Project, at operation, would not violate any water quality standards or Water District Regulations (WDR) or otherwise substantially degrade surface or groundwater quality. SSFMC 14.04.133 (Site design and stormwater treatment requirements for regulated projects) requires that regulated projects implement design strategies on-site, including minimizing impervious surfaces, conserving natural areas, and minimizing stormwater runoff. The City has reviewed the Project's Storm Water Quality Control Plan (See Plan Sheet C4). As such, implementation of the Project would result in a less than significant impact relative to this topic. Construction activities would continue to be required to comply with the National Pollution Discharge Elimination System (NPDES) general permit for construction activities, pursuant to which Best Management Practices (BMPs) would be implemented to control stormwater during construction, including silt fences, watering for dust control, straw bale check dams, hydroseeding, and other measures. 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 General Plan Update program EIR and, as a result, no additional water quality impacts are anticipated with implementation of this Project

b. The General Plan Update includes policies and actions to maximize infiltration and rainwater retention and minimize impacts to groundwater recharge. Policy ES-7.3 requires new development and redevelopment projects to meet federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, and stormwater infiltration. Policies ES-2.2 and ES-3.3 require the City to maintain standards for new construction adjacent to the San Francisco Bay and Colma Creek, such as requiring no net new impervious areas. The City has reviewed the Project's Storm Water Quality Control Plan (See Plan Sheet C4).

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 buildings 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 General Plan Update program EIR and would not violate any water quality standards or waste discharge requirements.

c. 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 would 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 General Plan Update program EIR and would not alter drainage patterns.

   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 General Plan Update 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.

d. 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 project area does not contain steep slopes. Hillsides surrounding the project 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 project area, as evaluated in the General Plan Update program EIR.

e. As discussed under Impact HYD-2, while development under the Project could lead to an increased demand for water, which could lead to an increase in groundwater pumping, groundwater supply is expected to be 100 percent reliable in all year types through 2045.20 Additionally, the General Plan Update contains several policies and actions that would facilitate groundwater recharge by encouraging pervious surfaces in new developments and requiring projects to meet federal, State, regional, and local stormwater requirements, including stormwater infiltration. The Project would adhere to all stormwater requirements. Therefore, implementation of the Project would not conflict with or obstruct implementation of a sustainable groundwater management plan and impacts would be less than significant.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

X. LAND USE AND PLANNING -- Would the project:
a) Physically divide an established community?
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Documentation:

a. The physical division of an established community typically refers to the construction of a physical feature (such as a wall, interstate highway, or railroad tracks) or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas (General Plan Update program EIR p. 3.10-17). The Project does not contemplate or authorize any such physical changes to the community. Rather, the Project includes a new 26-foot-wide EVA around the perimeter of the property to improve emergency access. The General Plan Update contains a multitude of policies and actions to require and ensure community connectivity as buildout occurs. Policy LU-8.3 requires the improvement of pedestrian connections and sidewalk infrastructure. The Project proposes new pedestrian path improvements along with a new bike path within the EVA. The Project would result in construction of a residential building on a parcel that is already developed. The Project would therefore not divide an established community. The Project is consistent with the General Plan Update program EIR 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 (General Plan Update program EIR p 3.10-18). The Project complies with the zoning and general plan designation of high-density mixed-use. The Project would have a residential density of 139 dwelling units per acre (du/acre), which is consistent with the maximum density of 140 du/acre allowed by the General Plan Update program EIR. The Project would provide 10% low-income units and 5% very low-income units, for a total of 15% (82 units) Below Market Rate (BMR) units as required by code. The General Plan Update 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.

   Furthermore, the General Plan Update includes policies and actions related to land use compatibility. Action SA-12.5.1 requires the General Plan to be in conformance with land use compatibility standards in the ALUCP. Policy SA-21.3 allows building heights within maximum limits permitted under FAA regulations. The complex would be a maximum height of 82'-7 ½" consistent with the high-density mixed-use maximum height limit of 85-feet. These actions, along with the requirements of the ALUCP and South San Francisco Municipal Code ensure that future development would be consistent with the ALUCP. Therefore, the Project would not cause a significant environmental impact due to a conflict with ALUCP for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant. As a result, no potentially significant land use or planning impacts are anticipated and no further analysis beyond the General Plan Update program EIR is necessary.

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

XI.	**NOISE AND VIBRATION –** *Would the project:*
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b)	Generation of excessive groundborne vibration or groundborne noise levels?
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Documentation:

a-b The noise environment is predominantly controlled by vehicular traffic on Linden Avenue and railroad noise. The General Plan Update includes policies that require preparation of acoustical studies for residential development where the existing noise levels exceed an exterior noise level of 65 dBA CNEL. Additionally, General Plan Update policies require that new office, residential and commercial development be designed to reduce interior noise levels. Individual development projects would be required to demonstrate compliance with these standards during the design review process. 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 at night. The General Plan Update 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.

An Environmental Noise Study was prepared by Salter dated January 20, 2022 (attached to this ECA). 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. Therefore, compliance with mandatory requirements of the Municipal Code and General Plan Update would ensure that construction noise occurs only at appropriate times of day and is minimized to acceptable levels. Therefore, construction noise impacts would be less than significant.

The General Plan Update (p.3.11-30) concluded that future development would be required to comply with requirements of the General Plan Update and SSFMC protecting against noise impacts. Specifically, Policy 1-1 requires that all new development within the City complies with the Land Use/Noise Compatibility guidelines, along with associated actions that require projects must be assessed through the subdivision, site plan, conditional use permit, and other development review processes, and that such projects must incorporate conditions of approval and General Plan update program EIR mitigation measures that ensure noise compatibility where appropriate. In addition, Section 20.300.009 (Performance Standards) (revised) of the Zoning Ordinance also establishes land use development requirements and limitations, as well as

acoustic design requirements for development in noise impacted areas.

The Environmental Noise Study recommends sound transmission class (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. The common outdoor use spaces include four enclosed courtyards and two roof decks. At Level 3 courtyard spaces, noise levels are expected to be below DNL 65db. At Level 7 roof decks, the noise levels are expected to be below DNL 65db. Outdoor-use spaces noise levels at the interior courtyard are expected to be below DNL 65 dB. Therefore, the Project would comply with generation of excessive groundborne vibration and groundborone noise level, thus no mitigation necessary.

The General Plan Update indicates that several modeled roadway segments (Table 3.11.8: Year 2040 Traffic Noise Without and With the Proposed Project) would experience a reduction in traffic noise levels with implementation of the General Plan Update, compared to conditions that would exist without the General Plan Update, due to lower anticipated average daily trips generated by the proposed land uses compared to the total development that could occur under the existing General Plan. The General Plan Update (p. 3.11-30) concluded the highest increase that would occur along these modeled roadway segments would occur along Grand Avenue from Linden Avenue to Airport Boulevard. The Proposed Plus Project conditions would result in calculated traffic noise levels of 61.9 dBA CNEL as measured at 50-feet from the centerline of the nearest travel lane. This would result in a 1.7 dBA increase in traffic noise levels compared to noise levels that are calculated under buildout conditions without the Project. These resulting noise levels are considered “normally acceptable” for all land use types. Therefore, according to the significance impact criteria identified above, a 5 dBA increase would be considered significant for these conditions. Because the increase would only be 1.7 dBA, this impact would be considered less than significant, and no mitigation would be required. Therefore, Project-related impacts associated with increases in traffic noise would not have an impact and have been adequately addressed by the General Plan Update program EIR.

The General Plan Update program EIR (p. 3.11.32) states the effects of groundborne vibrations typically only cause a nuisance to people, but at extreme vibration levels, damage to buildings may occur. Construction activities and the operation of heavy trucks, buses, and trains can produce vibration that may be felt by adjacent uses. New development under the General Plan Update would result in additional residential and nonresidential development, as well as other private and public improvements, throughout the Planning Area. Construction of land uses accommodated by the General Plan Update area would not take place all at once and would be spread throughout the area so that limited receptors would be exposed to construction noise at any given time.

As noted above, 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, temporary generators shall be located far from sensitive receptors, and a written notice would go out to the neighborhood within 115 feet informing them of the estimated start date and duration of vibration generating construction activities and therefore would be considered less than significant. Project construction would 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 General Plan Update program EIR.

The Project 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 Project 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 would be exposed to a CNEL of less than 65 dBA due to airport operations. Impacts would be less than significant. As a result, the Project would not expose people to excessive noise and no further analysis beyond the General Plan Update program EIR is necessary.

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

XII. POPULATION AND HOUSING -- *Would the project:*
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Documentation:

a. The Project would have a residential density of 139 dwelling units per acre (du/acre), which meets the base density of 140 du/acre. The Project would provide 10% low-income units and 5% very low-income units, for a total of 15% (82 units) Below Market Rate (BMR) units. The General Plan Update program 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 adopted General Plan Update, construction of 543 new residential units and up to 1,629 new residents (3.10 persons per household) would be consistent with the General Plan Update, where additional population growth due to the higher-density areas within the planning 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 Update. 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 General Plan Update program EIR and no further analysis is required.

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

b. The General Plan Update includes policies and actions to ensure that existing housing is appropriately protected, and additional housing is added to support future growth within the City by 2040. The Project site is a commercial site with a surface parking lot. The Project would not displace any existing residents but would add 543 residential units. The General Plan Update anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040. This new growth would increase the City's population by approximately 40,068, construction of replacement housing elsewhere would not be necessary The Project is consistent with this evaluation from the General Plan Update program EIR and no further analysis is required

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

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XIII. PUBLIC SERVICES AND RECREATION -- *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?
Would the project
b) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
c) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

Documentation:

a. The South San Francisco Municipal Code contains rules and regulations related to fire protection services. Chapter 8.75 of the Municipal Code requires that all residential and nonresidential development projects pay public safety impact fees to provide funding for adequate fire equipment, vehicles, and facilities to meet the broad range of needs of South San Francisco residents and employees. All development pursuant to the General Plan Update would be required to pay this fee. However, construction of new fire facilities is not expected as a result of this Project as the General Plan Update program EIR has evaluated that current provision is adequate.

Further reducing impacts to fire services, all development pursuant to the General Plan Update 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 residential development would not exceed what was previously analyzed, which the current site was developed to support. Implementation of the 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 General Plan Update program EIR analysis, and no further action is required.

In addition, all projects within the police service area would be required to comply with City ordinances and General Plan Update policies and actions that address police protection services, including payment of public safety impact fees to provide funding for adequate police equipment, vehicles, and facilities to meet the broad range of needs of South San Francisco residents and employees. Therefore, impacts of the proposed project on police protection services are not cumulatively considerable and the cumulative impact would be less than significant.

b. It is expected that existing facilities serving the General Plan Update area would satisfy most, if not all, of the park and open space needs generated by the General Plan Update buildout, including this Project. The General Plan Update area is expected to accommodate 40,068 new residents, 14,312 new housing units, 42,297 new jobs, and 14,100,523 new square feet of nonresidential building space at buildout. More specifically, Orange Memorial Park and Centennial Way, along with 316 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. Additionally, as described in Chapter 2, Project Description of the General Plan EIR, the planning area could yield new parks, improved open space adjacent to State Route 35, and pedestrian and bicycle connections primarily east of US101 and along the transit corridors (Exhibit 2-4). The General Plan EIR also identifies planned and proposed parks and open spaces throughout the City, primarily within the Westborough, Orange Park, Lindenville, and East of 101 planning sub-areas (Exhibit 3.13-4). a network of new open space opportunities is anticipated that would further serve the entire General Plan Update area, and the Project would pay Parkland Acquisition and Construction fees as required by SSFMC Section 8.67. The Project would be in compliance with all applicable General Plan Update regulations, and, as a result, is consistent with the General Plan Update program EIR's analysis.

c. 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 areas, centrally located furnished with barbeques, dining areas, lounge furniture, and swimming pool with access to a 2,528 square foot fitness center 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 General Plan Update program EIR. Also, all projects would be required to comply with City ordinances and other policies that address library facilities and services, including library impact fees. Therefore, cumulative impacts would be less than significant.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

XVI. TRANSPORTATION -- *Would the project:*
a) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)??
d) Result in inadequate emergency access?

Documentation:

a-b. Pursuant to SB 743, the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b) states that vehicle miles traveled (VMT) is the 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 VMT policy states that projects within half mile of an existing or planned high quality transit corridor or major transit station should be presumed to have less-than-significant impact on VMT. 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 and 141. The Project is proposing an FAR of 4.9, is consistent with the General Plan and zoning designation and 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 also evaluated in the context of the General Plan Update program EIR. The Project would not trigger any of the mitigations that were identified in the General Plan Update program EIR because it meets the zoning and General Plan designation. Therefore, the Project is consistent with the General Plan Update program EIR, and no further analysis is required.

The City's Zoning Ordinance, including the Zoning Code Amendments that are part of the proposed General Plan Update, includes rules and regulations that would enhance transit facilities. One specific purpose of Chapter 20.400 (Transportation Demand Management) (revised) is to promote more efficient utilization of existing transportation facilities and ensure that new developments maximize transit, active transportation, carpooling, and vanpooling usage. Section 20.400.005 (Submittal Requirements and Approvals) (revised) requires that a project subject to the TDM Ordinance submit TDM documentation with the development application, which includes a completed TDM checklist of the trip reduction measures chosen by the applicant and a description of how the applicable performance requirements would be achieved and maintained over the life of the project. Hexagon Transportation Consultant. prepared a TDM Certification Checklist for the Project (attached to the ECA).

The Project consists of 543 dwellings units that would be built in a seven-story podium building. Based on the draft TDM Ordinance update, the Project falls under Tier 1 land use projects and is subject to implementing a list of TDM measures. Since the Project is located within a ½ mile of the Caltrain station, the total required points are 20. (See Residential TDM Table10 below) However, the Project commits to implementing TDM measures that would add up to a total of 46 points well beyond the required 20 points. This implementation of a TDM Plan therefore, would be consistent with the General Plan Update program EIR update implementing MM TRANS-1 and no further analysis is required. Even with the implementation of General Plan Update policies and actions and implementation of MMs TRANS-4 and TRANS-1, given the uncertainty around specific operational conditions and ability to mitigate such conditions in a constrained right-of-way, this impact remains significant and

unavoidable as discussed in the General Plan EIR. However, due to the programmatic nature of the Project, no additional mitigation measures are available, and the impact is considered significant and unavoidable. However, City Council adopted Statement of Overriding Considerations stating, "If the benefits outweigh the unavoidable adverse effects, those effects may be considered "acceptable" pursuant to CEQA Guidelines Section 15093(a). CEQA requires that a Lead Agency support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate".[10]

Table 10- Residential TDM for 7 S. Linden Avenue

Residential TDM Certification Checklist for 7 S. Linden Avenue Residential Development

TDM Measure	Points	✓
Unbundled parking	10	✓
Free transit passes to residents for first year of tenant's residency	10	✓
Sidewalk/bikeway facility improvement*	8	✓
Affordable Housing	6	✓
Transit facility improvement*	6	X
TDM coordinator/point of contact for commute assistance	5	✓
Onsite Carshare	3	X
Sidewalk-oriented pedestrian entrance	2	✓
Bicycle storage per City Code	2	✓
Mixed-use development with ground-floor retail	2	X
Bicycle repair station	1	✓
Pedestrian-oriented street lighting	1	✓
Promotional programs & materials	1	✓
Total Required if Located within ½ Mile of a High-Quality Transit Corridor or Low-VMT Residential Area	**20**	**46**
Total Required for Other Locations with Potential VMT Impact	**30**	

The Project does not conflict with program, plan ordinance or policy but provides bicycle and pedestrian facilities including bike storage, sidewalk and bike facility improvements and free transit passes and is in compliance with all applicable General Plan policy regulations including Congestion Management Programs and, as a result, would not create any conflicts with the transportation network. No new impacts would occur therefore no further analysis is required.

d. 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 General Plan Update 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 new sidewalks along the Project frontage on South Linden Avenue, new crosswalks, and ADA-compliant wheelchair ramps at the adjacent intersections that would improve pedestrian access and enhance pedestrian connectivity in the area. 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 are included in the project design and shall be required as Conditions of Approval for the Project:

1. Due to the proximity of the Project's north driveway to the signalized intersection of South Linden and Railroad Avenue, the Project's north driveway need to be restricted to right-turn movements only. Left turns into and out of the Project would occur at the project's south driveway.

2. Provide adequate site distance at the parking garage by installing all-way stop control at the garage entrances, widening the garage access, and/or installing an audible and visual warning system.

[10] CEQA Findings of Fact and Statement of Overriding Considerations South San Francisco General Plan Update Zoning Code Amendments and Climate Action Plan, page 139.

e. 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 to the 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.

   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 General Plan Update, including secure bike parking and sidewalk improvements and landscaping, and public bike racks. Moreover, the Project would construct a 10-foot sidewalk along South Linden Avenue, thereby improving pedestrian access to shopping, transit and amenities, and to the downtown area. As a result, the Project would not have an impact on alternative transportation modes, consistent with the analysis of the General Plan Update program EIR.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

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XV. UTILITIES AND SERVICES SYSTEMS -- *Would the project:*
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?
e) Comply with federal, State, and local statutes and regulations related to solid waste?

Documentation:

a. The General Plan Update program EIR (p. 3.15-28) concluded that both California South San Francisco District and the Westborough Water District (WWD) project sufficient water supply availability under normal water years and require conservation measures under dry year conditions per the Cal Water Shortage Contingency Plan and WWD Water Shortage Contingency Plan. Both water providers have accounted for the City's growth projections in their respective 2020 Urban Waste Management Plans (UWMPs) in accordance with Association of Bay Area Governments (ABAG) projections. However, it should be noted that ABAG's growth projections are inconsistent with the General Plan Update projections, as discussed in Section 3.12, Population and Housing of the General Plan Update program EIR. Nonetheless, as indicated in Impact UTIL-2, sufficient water supplies are available. In addition, most new development accommodated under the Project is expected to be infill and would rely on the existing distribution network that has sufficient capacity to convey available water supplies. Furthermore, will-serve letters have been received that demonstrate the availability of water to serve the development. As such, implementation of the Project would not result in the need to construct or expand water supply and treatment facilities that have not already been described and accounted for the in the 2020 UWMPs.

The General Plan Update area is expected to accommodate 40,068 new residents, 14,312 new housing units, 42,297 new jobs, and 14,100,523 new square feet of nonresidential building space at buildout. Development and growth in the City would increase City of South San Francisco–General Plan Update, Zoning Code Amendments, and Climate Action Plan Utilities and Service Systems Draft Program EIR. As the demand for wastewater treatment capacity increases, there may be a need to increase wastewater conveyance and treatment facilities, the construction of which could cause environmental impacts. The General Plan Update includes policies and actions to ensure that wastewater treatment capacity keeps pace with new development. 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 General Plan Update area. The Project would contribute approximately 132,980 gallons per day (gpd), which is equivalent to 0.13 million gallons per day (mgd), which remains under the 3,037,076 gpd or 3.03 MGD addition estimated as a result of the General Plan Update program EIR. Therefore, the Project would not conflict with RWQCB. No new impacts would occur.

b. The General Plan Update program EIR (pp. 3.15-28- 3.15-39) concluded that development occurring under the General Plan Update area 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 General Plan Update program EIR. The Project would not result in a significant new demand for water or wastewater facilities beyond existing City capacity. See items (c) and (d) below for further explanation.

The General Plan Update program EIR (pp. 3.15-42 - 3.15-43) concluded that no significant increase in storm water runoff was anticipated to be created by the General Plan Update 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 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 low impact development (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 139 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.

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 General Plan Update program EIR (p. 3.15-28) for all anticipated new development within the General Plan Update area; therefore, this Project is consistent with the General Plan Update program EIR analysis.

c. 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 SSFMC 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.

As described under Impact UTIL-3, the General Plan Update (p. 3-15-28) includes policies and actions that would reduce the need for wastewater treatment. The CAP also includes actions that would reduce the need for wastewater treatment. In accordance with City requirements, new development that occurs pursuant to the General Plan Update would be subject to the latest adopted edition of the California Plumbing Code and CALGreen Code, including the provisions for water-efficient fixtures and toilets, which would reduce the amount of effluent entering the wastewater system. The Project would provide water-efficient fixtures and toilets. Further, as discussed under Impact UTIL-3, there is sufficient capacity at the South San Francisco/San Bruno WQCP and Daly City's North San Mateo WQCP to accommodate wastewater collection and treatment generated by Project. 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 General Plan Update program EIR, including this Project, would not result in required upgrades to the reclamation plants and, therefore, the Project is consistent with the General Plan Update program EIR analysis.

d. The General Plan Update includes policies and actions to reduce and divert solid waste. Policy CP-5.4 requires 5 percent waste diversion for municipal construction and demolition projects. Policy CP6.1 requires maintenance and regular updates of the City's waste reduction plans and programs to ensure consistency with California's waste reduction goals. Policy CP-6.2 develops education and technical assistance programs to help all residents and businesses to compost and recycle. The Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, therefore, is consistent with the General Plan Update program EIR analysis.

f. Project construction would comply with all applicable solid waste regulations and land fill capacity exists for future General Plan Update area 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 General Plan Update program EIR analysis.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

XVI. WILDFIRE -- *Would the project:*
a) Expose people or structures, either directly or indirectly to a significant risk of loss, injury, or death involving wildland fires?
b) Substantially impair an adopted emergency response plan or emergency evacuation plan?
c) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
d) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?
f) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes??

a. The Project site is not located in a fire hazard zone (General Plan Update EIR Exhibit 3.16.1 p 3.16.12). The Project area is already located in a developed area of the City; however, development, could result in an incremental increase in exposure of people and structures to wildland fires and associated hazards within the Project area. Accordingly, the Project would be required to comply with fire protection measures in the policies and actions within the General Plan Update and the South San Francisco Municipal Code. Further, continued implementation of the San Mateo – Santa Cruz County CWPP, San Mateo County LHMP, San Mateo County EOP, and review of architectural and development plans by the SSFFD, Division of Fire Prevention, would assist in protecting life and property in the event of a wildfire. Additionally, implementation of the General Plan Update policies reduces potential impacts related to exposure to wildland fires and associated hazards to below a level of significance. No additional mitigation is required. Therefore, impacts related to exposure of people and structures to wildland fires and associated hazards, either directly or indirectly, would be less than significant.

b. Evacuation routes in the City are designed to accommodate development at buildout of the General Plan Update. In addition, the policies and actions in the General Plan Update are designed to facilitate and support the City's emergency response and do not have any direct or indirect impact on the environment. Additionally, all development in the City would be required to demonstrate compliance with applicable codes and regulations. Further, the California Fire Code establishes requirements for emergency access for fire apparatus. Chapter 15.24 of the Municipal Code requires development to demonstrate compliance with applicable fire safety measures prior to the issuance of building permits. As such, new development projects that occur pursuant to the Project would be assessed for compliance with applicable Fire Code requirements that pertain to emergency access as well as compliance with proposed policies and actions of the General Plan Update which would further enhance emergency response. As shown on Plan Sheet AP0.05 the Project would be constructed to comply with the Fire Code requirements including automatic sprinklers, knox box key for each building with access keys to entry doors and install emergency power systems. Accordingly, compliance with the CBC and General Plan Update policies and actions, as well as review of all new structures by the Police and Fire Departments to ensure adequate emergency access, would ensure that impacts remain less than significant.

c-f. The Project site is not located in a high fire hazard area, therefore, the risk of the Project exacerbating post-fire slope instability and drainage changes resulting in landslides or flooding is low. However, the Project would be subject to General Plan Update policies and actions as well as other local regulations that reduce flood and landslide risks. As such, impacts would be less than significant.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

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 General Plan Update, including its mitigation measures, it has been determined that the Project is consistent with the analysis of the General Plan Update 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 General Plan Update, the Project is not anticipated to have any cumulatively considerable impacts beyond those identified and analyzed in the General Plan Update 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 General Plan Update program EIR.

No new impacts have been identified and no new mitigations are required for the Project, other than those identified in the General Plan EIR.

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 General Plan Update 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 General Plan Update program EIR. No new impacts have been identified and no new mitigation measures are required.

References

1. Arborist Report by Arborwell dated January 24, 2022.
2. Archeological Assessment Report prepared by Basin Research Associates dated November 22, 2022.
3. Construction Air Quality and Green House Gas Assessment prepared by Illingworth and Rodkin dated November 14, 2022.
4. Geotechnical Investigation prepared by Cornerstone Earth Group dated February 4, 2022.
5. Environmental Noise Study prepared by Salter dated January 20, 2022
6. Shadow Study prepared by BDE dated October 12, 2022.
7. Phase 1 Environmental Site Assessment prepared by Cornerstone Earth Group dated September 12, 2021.
8. Project Plans prepared by BDE dated October 12, 2022
9. Soil, Soil Vapor, and Ground Water Quality Evaluation prepared by Cornerstone Earth Group dated February 120, 2019.
10. TDM Certification Checklist for 7 S. Linden Avenue prepared by Hexagon Transportation dated October 12, 2022.
11. Transportation Study prepared by Hexagon Transportation dated May 18, 2022.