120 E. GRAND PROJECT - CITY OF SOUTH SAN FRANCISCO ADDENDUM

1.0 INTRODUCTION AND BACKGROUND

The City of South San Francisco (“City”) approved the Downtown Station Area Specific Plan (“DSASP”) in February 2015, following the City’s certification of an Environmental Impact Report (“EIR” or "DSASP EIR") under the California Environmental Quality Act (“CEQA”). The EIR analyzed the impacts of 1,435 residential units, 511,780 square feet of commercial business space, 21,250 square feet of industrial space, 268,800 square feet of commercial retail space, and 1,185,000 square feet of office and research and development space. (DSASP, p. 3.9; Draft EIR, p. 3-13.)

SSF East Grand Venture, LLC, doing business as Trammell Crow Company ("TCC") proposes to develop an approximately 4.64 acre site at 120 and 130 East Grand Avenue and 129, 145, 160, and 180 Sylvester Road (the "Project Site") within the DSASP area and less than 500 feet east of the South San Francisco Caltrain Station.

TCC proposes to demolish the existing industrial buildings (131,951 square feet) and improvements on the Project Site and develop an approximately 504,000 square foot (floor area as defined in the City's Zoning Code) office and R&D campus with parking and improvements (the "Project"). The Project would include 3 main buildings (approximately 326,000 square feet in Building 1 at 160/180 Sylvester Road, 150,000 square feet in Building 2 at 120/130 East Grand, and 26,000 square feet in Building 3 at 145/129 Sylvester Road) and a parking structure of approximately 240,000 gross square feet (includes 2,000 square feet of amenity space that qualifies as floor area under the City's Zoning Code) also at 145/129 Sylvester Road.

The Project Site is designated East of 101 Transit Core and zoned East Transit Core. Permitted uses include offices and research and development ("R&D") at a base floor area ratio of 1.0, and up to 8.0 with the provision of community benefits.

Because the Project exceeds the commercial square footage studied as part of the original DSASP EIR, This addendum to the DSASP EIR has been prepared to evaluate whether the Project, either as a result of this increase in development or other project-specific or parcel-specific information, would result in new or substantially more severe significant environmental impacts than were disclosed in the DSASP EIR.

2.0 SUBSEQUENT ENVIRONMENTAL REVIEW

This Addendum to the DSASP EIR has been prepared in accordance with CEQA, Public Resources Code ("PRC") Section 21000 et seq., as amended and the Guidelines for Implementation of the California Environmental Quality Act, California Code of Regulations ("CCR") Title 14, Section 15000 et seq. ("CEQA Guidelines"). Per Section 15164(a) of the CEQA Guidelines, the lead agency or responsible agency shall prepare an Addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent EIR ("SEIR") or Negative Declaration have occurred. Per Section 15164(b), an Addendum to a certified EIR may be prepared if only minor technical changes or additions are necessary. The analysis within this document will demonstrate that the proposed modifications to the DSASP project will not trigger the criteria set forth in Section 15162, and thus, an Addendum is the appropriate CEQA document. See Section 3.0, below, for further information. It is also noted that due to the Project's consistency with the densities permitted in the existing General Plan and Zoning Code, the City also finds that a streamlined environmental review process is appropriate pursuant to CEQA Guidelines Section 15183, which allows a streamlined environmental review process for projects that are consistent with the densities established by existing

zoning, community plan or general plan policies for which an EIR was certified. Please see the analysis of the Project's consistency with density requirements of the General Plan and Zoning Code in Section 5.11 below.

2.1 Scope of the Addendum

This Addendum includes the following sections that will address various aspects about the Project:

- Introduction and Project Background
- Subsequent Environmental Review
- CEQA Analysis Approach
- Project Description
- Environmental Impact Comparison to the DSASP EIR, using the current CEQA Guidelines
- Determination

List of Exhibits

- Exhibit A - Air Quality and Greenhouse Gas Emissions Assessment
- Exhibit B - Arborist's Report
- Exhibit C - Historic Resources Evaluation Report
- Exhibit D - Phase I ESA - 120 East Grand
- Exhibit E - Phase I ESA - 160-180 Sylvester Road
- Exhibit F - Phase I ESA - 145 Sylvester Road
- Exhibit G - Phase I ESA - 129 Sylvester Road
- Exhibit H - Phase II ESA
- Exhibit I - Noise Technical Report
- Exhibit J - CEQA Transportation Analysis
- Exhibit K - TDM Plan
- Exhibit L - Paleontological Resources Report
- Exhibit M - Archaeological Resources Report

3.0 CEQA Analysis Approach

In the case of a project proposal requiring discretionary approval by the City for which the City has certified an EIR for the overall project, the City must determine whether an SEIR is required. The CEQA Guidelines provide guidance in this process by requiring an examination of whether, since the certification of the EIR and approval of the proposed project, changes in the project or conditions have been made to such an extent that the proposal may result in new significant impacts not previously identified or a substantial increase in severity of previously identified significant impacts. If so, the City would be required to prepare an SEIR. The examination of impacts is the first step taken by the City in reviewing the CEQA treatment of the project. The following review proceeds with the requirements of CEQA Guidelines Section 15162 in mind. Section 15162 is discussed in detail below.

An Addendum to a certified EIR may be prepared if only minor technical changes or additions are required, and none of the conditions identified in CEQA Guidelines Section 15162 are present. The following identifies the standards set forth in Section 15162(a) as they relate to the project:

> (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
>
> (2) Substantial changes occur with respect to the circumstances under which the project is

undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

(3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:

(a) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;

(b) Significant effects previously examined will be substantially more severe than shown in the previous EIR [or negative declaration];

(c) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

(d) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Section 15162 provides that the lead agency's role in project approval is completed upon certification of the EIR or Negative Declaration and approval of the project, unless further discretionary action is required. The approvals requested as part of the Project are considered discretionary actions. Therefore, CEQA review is required.

As noted above, while the majority of this document addresses consistency with the DSASP EIR, the City is also able to make findings pursuant to CEQA Guidelines Section 15183 because the Project is consistent with the densities permitted on the Project Site consistent with the General Plan and Zoning Code. In summary, Section 15183 specifies that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Accordingly, this document considers whether there are any effects that are peculiar to this Project and the Project Site that would not have been analyzed as significant effects in the EIR for the South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan (SCH Number 2021020064) (the "General Plan EIR") or which would be more severe than studied in the General Plan EIR.[1] Please see the analysis in Section 5.11 below.

4.0 Project Description

4.1 Project/Site Overview and Uses

The Project is anticipated to begin demolition in April of 2023 and complete all construction by August of 2025. TCC proposes to demolish the existing industrial buildings and improvements on the Project Site and develop an approximately 504,000 square foot (floor area as defined in the City's Zoning Code) office and R&D campus with parking and improvements. The Project would include 3 main buildings (approximately 326,000 square feet in Building 1 at 160/180 Sylvester Road, 150,000 square feet in Building 2 at 120/130

[1] September 6, 2022, available at: https://shapessf.com/wp-content/uploads/2022/09/SSF-GPU-Final-EIR_Combined.pdf.

East Grand, and 26,000 square feet in Building 3 at 145/129 Sylvester Road) and a parking structure of approximately 240,000 gross square feet (includes 2,000 square feet of amenity space that qualifies as floor area under the City's Zoning Code) also at 145/129 Sylvester Road.

Details for each building are as follows:

- **Building 01 – 160-180 Sylvester Street Parcels:** New 11-story + penthouse building consists of 326,000 square feet with a typical lab/office floor plate on levels 3-11 of approximately 32,000 square feet, and smaller floor plates for Levels 1 and 2 allowing for plaza entry areas and service yards. At the roof level there will be an enclosed penthouse and mechanical equipment that will be visually screened. Interior improvements shall include finished lobbies, elevators, stairs, toilet rooms, and required MEP support spaces.

- **Building 02 – 120-130 East Grand Avenue:** New, five-story tall building + penthouse consisting of 150,000 square feet with a typical lab/office floor plate on levels 2-5 at approximately 29,000 square feet, and a larger ground level to accommodate greater active functions along East Grand and Sylvester. At the roof level there will be an enclosed penthouse and mechanical equipment that will be visually screened. Interior improvements shall include finished lobbies, elevators, stairs, toilet rooms, and required MEP support spaces.

- **Building 03 - 145/129 Sylvester Street Parcels***:* New, three-story tall building + mechanical roof top equipment area consisting of 26,000 square feet with an amenity or retail space programmed at the ground floor and other amenity spaces, such as fitness and conferencing, on the upper levels. The ground floor plan will be "split" to provide access to the associated parking structure. At the roof level there will be a mechanical equipment area that will be visually screened.

- **Parking Structure – 145/129 Sylvester Street Parcels:** New stand-alone nine-story parking structure with 756 proposed parking stalls and 2,000 square feet of amenity or retail space. The overall structure is proposed at approximately 240,000 square feet. 10% of parking spaces will be electrical vehicle charging capable spaces and up to 35% are allowed as compact.

4.2 Circulation, Parking, and Transportation Demand Management

Vehicular access to the Project Site would be provided via Sylvester Road off East Grand Avenue and also via a right-in/right-out driveway on East Grand Avenue to the east of Sylvester Road.

The Project would include 756 parking stalls in the Parking Structure. 10% of parking spaces will be electrical vehicle charging capable spaces and up to 35% are allowed as compact.

The Project will also include a Transportation Demand Management (TDM) Program (included as Exhibit K to this addendum) designed to reduce the number of peak-hour vehicle trips generated by the project by implementing measures aimed at reducing vehicle trips, such as transit subsidies, shuttle resources, guaranteed ride homes, preferential carpool parking, bike parking, telework options, and annual online surveys. Also included are participation in the last-minute shuttle program (operated by Commute.org), easy access to the South San Francisco Caltrain Station, onsite amenities including a public café, public plaza, on-site dining, outdoor amenities, a separate amenity building, and a fitness center; a real-time transportation information kiosk/screen and mobile app.

4.3 High Quality Design

The Project has been designed to be aesthetically timeless with long-lasting low-maintenance exterior materials. Design details and materials are shared across buildings but each has its own composition and form to provide variety and interest. Building materials used in the project include high-performance glazing, glass-fiber-reinforced concrete, metal panel, and precast architectural concrete. The building systems have been carefully integrated into the proposed structures to reduce impacts to surrounding neighbors by screening views to equipment and mitigating noise where they would negatively impact others. The proposed design will positively enhance the built environment upon completion and for many decades into the future.

4.4 Sustainability Measures (Green Building)

The Project incorporates a number of design components and building measures that encourage sustainability, including:

- All-electric design
- LEED Gold target certification
- High-performance building envelope design
- Access to high quality transit network
- Bicycle facilities that exceed local ordinance requirements
- Parking structure designed for future photovoltaic installation on roof
- Electrical vehicle charging stations and future charging stations
- Water efficient fixtures and systems
- Low albedo materials for roof and ground-scape to reduce heat island effect
- Management of construction waste to reduce impacts to landfills
- Low-VOC materials throughout project
- Access to high-quality views for building occupants

4.5 Street and Frontage Improvements

The Project includes updates to public and private street frontages of the proposed sites. The north Project boundary includes the public right-of-way along East Grand Ave. The East Grand street frontage has been designed to include new landscaping, trees, and sidewalk for an enhanced public experience. The intersection of East Grand Ave and Sylvester Road will be upgraded to include a new signal and crosswalks to improve pedestrian safety. Sylvester Road is a private road that will be upgraded along the frontage of all three buildings. Sylvester Road will include shared lanes for bicycles and vehicles. Crosswalks will be clearly marked for pedestrian safety when traveling from the Parking Structure to Building 01. New street trees, street lighting, and sidewalks will be provided along the property boundaries on Sylvester Road. This Project will transform Sylvester Road from an industrial warehouse road into a pedestrian friendly street representative of the Downtown District design standards of South San Francisco.

4.6 Infrastructure Improvements

The Project will construct new infrastructure within Sylvester Road to serve this project and its neighbors. New underground infrastructure includes a joint trench with power and telecommunication services. The upgraded power infrastructure will be undergrounded and include new interrupter load switches to supply power to the Project. The telecommunications pathways will provide for current and future needs as

technology advances. Also proposed are new sanitary sewer, fire water, and domestic water lines. The Project will reduce stormwater impacts with onsite bio-retention.

FIGURE 1 – PROJECT VICINITY MAP

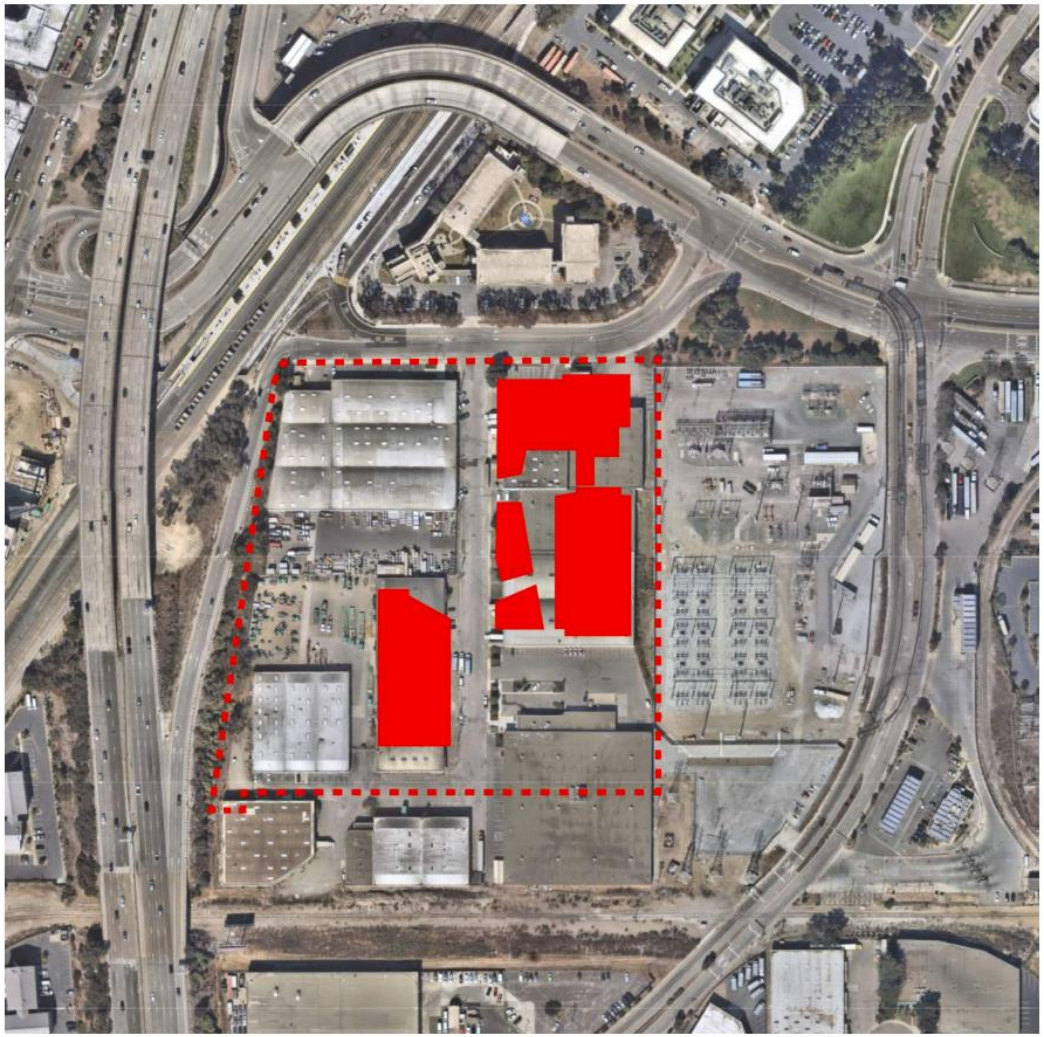

FIGURE 2 – SITE PLAN

FIGURE 3 - EXISTING CONDITIONS IMAGE KEY

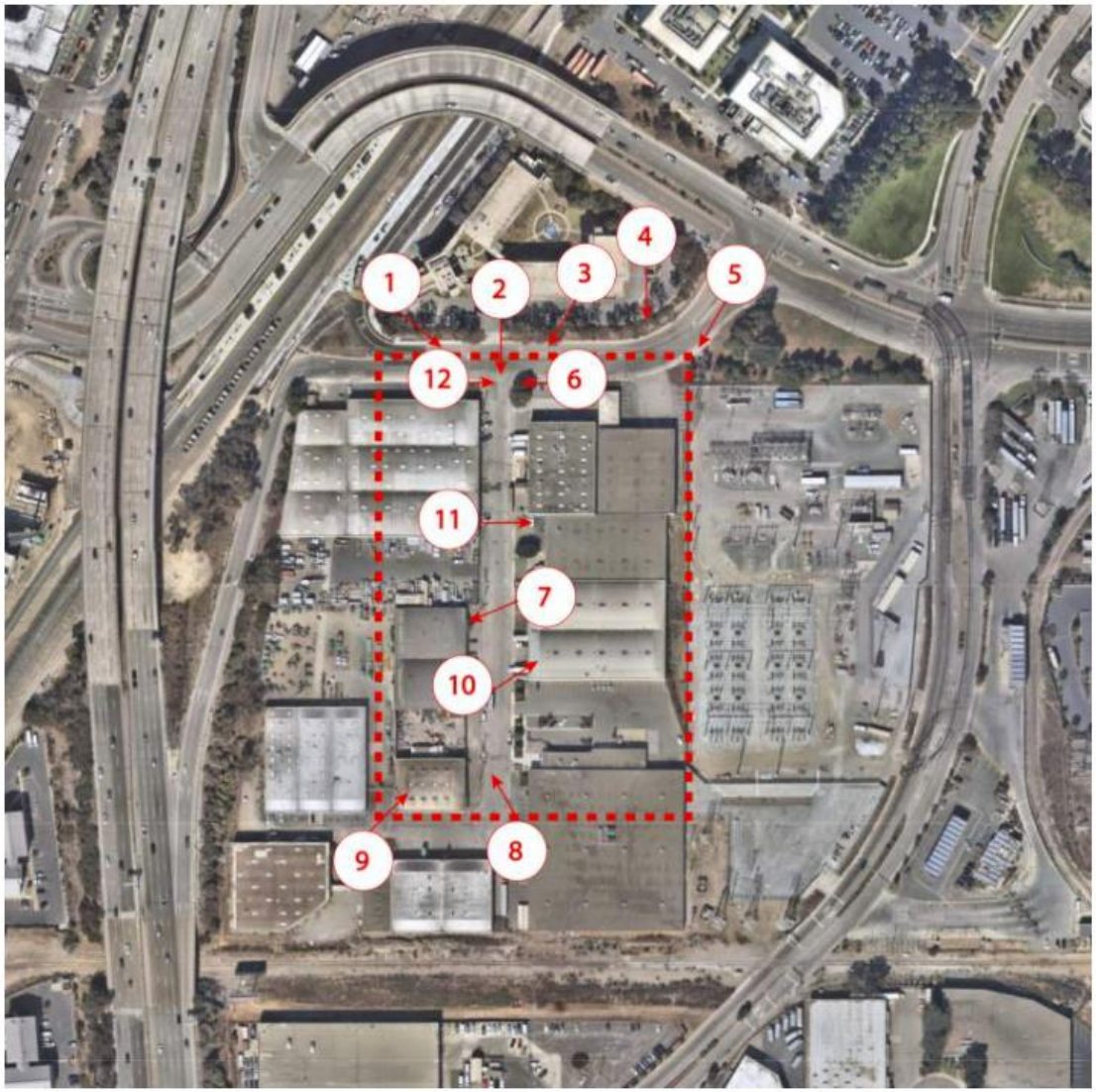

FIGURE 4 – EXISTING CONDITIONS IMAGES


VIEW 1


VIEW 2


VIEW 3


VIEW 4


VIEW 5


VIEW 6


VIEW 7


VIEW 8


VIEW 9


VIEW 10


VIEW 11


VIEW 12

5.0 ADDENDUM CHECKLIST

5.1 Aesthetics/Visual Resources

AESTHETICS *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Have a substantial adverse effect on a scenic vista?	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No	No	No
c) In a non-urbanized area, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	No	No	No

Documentation:

a. DSASP EIR: The EIR states that changes to a scenic vista would be considered substantial if the development permitted under the DSASP were to result in obstruction of a publicly accessible scenic view, or removal, alteration, or demolition of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area as viewed from public vantage points. Due to the inconsistent development patterns and lack of an urban skyline, the DSASP does not include any panoramic view of scenic resources. Nor are any scenic vistas identified to be outside of the study area by the General Plan or the East of 101 Area Plan. While small portions of the San Bruno Mountains and Sign Hill Park are visible from certain locations in the DSASP area, there are no designated outlooks within the study area and no designated places where people would gather in order to gain a view of San Bruno Mountain or Sign Hill Park. Any blockage resulting from future development would be consistent with the City regulations. Impacts are less than significant. (EIR page 4.1-9). Structures associated with cumulative projects could block

individual focal views in the City, but the combination of existing regulations and local design review procedures restricts the possibility that future development would substantially block visually important features within the City. Impacts are less-than significant. (EIR page 4.1-13.) (**Less Than Significant**).

Project: Circumstances on the Project Site have not changed since adoption of the DSASP EIR. The Project Site is surrounded by development and does not provide access to scenic vistas. The Project's increase of office and R&D space above what was studied in the DSASP EIR would not change this conclusion, and the Project would have less than significant impacts, consistent with the DSASP EIR. (**Less Than Significant**).

b. DSASP EIR: The EIR states that although the DSASP area is not located within a state scenic highway, the Downtown Subarea contains historic buildings that could be considered scenic resources. Noting that the DSASP's main objective is to revitalize Downtown while protecting the historic building fabric of the area, adherence to the DSASP's policies, objectives, and guidelines would maintain the integrity of the existing historic resources. For example, building heights along Grand Avenue would vary from the front to the rear of the parcel to protect the historic character of the "unique" one-, two-, or three-story buildings, where taller new buildings would be constructed behind the historic buildings. Impacts would be less than significant. (EIR page 4.1-10). Other cumulative projects would comply with General Plan regulations and policies which hold all new development to the aesthetic standards throughout the City. Cumulative impacts would be less than significant. (EIR pages 4.1-13, 4.1-14). (**Less Than Significant**).

   Project: The Project is consistent with all requirements with regard to nearby historic buildings, and is not located within a scenic state highway area. The Project's increase of office and R&D space above what was studied in the DSASP EIR would not change this conclusion, and the Project would have less than significant impacts, consistent with the DSASP EIR. (**Less Than Significant**).

c. DSASP EIR: According to the EIR, development under the DSASP would result in an improvement, rather than a degradation, of the visual quality of the area. The DSASP encourages intensification of use in the Downtown area, located west of US-101, while respecting the historic fabric, especially Grand Avenue. The DSASP capitalizes on the Eastern Neighborhood's close proximity to the Caltrain station, regional highways, San Francisco and Silicon Valley, and the biotechnology hub for a high-density employment area. The DSASP contemplates taller buildings in this area to accommodate corporate offices, hotels, and other major facilities due to its visibility from the airport and various employment centers on the peninsula. Both the Downtown and East of 101 subareas comprised of inconsistent building heights, aesthetic quality, and lack a cohesive street grid network. There is little to no streetscaping and the streets are not designed for optimal pedestrian and commercial activity. Implementation of the DSASP would establish design guidelines and standards that would improve the overall aesthetic quality of the study area as a whole. Implementation of the DSASP will create new development opportunities, refresh and update existing buildings, establish cohesive aesthetic themes and overall make the study area more attractive to pedestrian and commercial activity. The impact is less than significant. (EIR page 4.1-11). The same is true with regard to cumulative impacts, because design review would consider the type and placement of development throughout the City such that the visual character of areas will be protected and enhanced. (EIR page .4.1-14) (**Less Than Significant**).

   Project: Consistent with the above-described DSASP EIR analysis, the Project would intensify the Downtown area and improve the visual quality of the area, with brand new high quality design replacing aging industrial uses and with new improvements. As explained with regard to thresholds a, b, and d, the Project would not conflict with any aesthetics related regulations. The Project's increase of office and R&D space above what was studied in the DSASP EIR would not change this conclusion, and the Project would have less than significant impacts, consistent with the DSASP EIR. (**Less Than Significant**).

d. DSASP EIR: According to the EIR, redevelopment is anticipated to be largely similar to the existing land uses today. The City's Municipal Code includes multiple building, construction, and zoning requirements that are intended to minimize light impacts. The DSASP also requires all new pedestrian light fixtures to be designed to focus light onto sidewalks and to minimize light spillover into adjacent upper level building windows or into the night sky. Therefore, the EIR concludes that no new sources of substantial light or glare would result from implementation of the DSASP. (EIR, page 4.1-8). (**Less Than Significant**).

Project: The Project would comply with all light-related requirements of the General Plan, DSASP, and Zoning Code and would therefore not have significant impacts, consistent with the DSASP EIR. The Project's increase in office and R&D use would cause a negligible increase in light over what was studied relative to development of the entire DSASP area, and impacts would be less than significant. (**Less Than Significant**).

5.2 Agriculture and Forestry Resources

AGRICULTURE and FORESTRY RESOURCES. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
(a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	No	No	No
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No	No	No
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g)).	No	No	No
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No	No	No
e) Involve other changes in the existing environment which, due	No	No	No

to their location or nature, could result in conversion of Farmland, to non- agricultural use or conversion of forestland to non-forest use?			

Documentation:

a, b, e. DSASP EIR: (Farmland) As described in the EIR, the DSASP area is in an urbanized area of San Mateo County and is currently developed with commercial, industrial, and residential uses. The Farmland Mapping and Monitoring Program of the California Resources Agency has not designated the DSASP area as Prime Farmland, Unique Farmland, or Farmland of Statewide Important. No agricultural uses or related operations are present in the DSASP area or vicinity, and the area is not zoned for agricultural uses. Accordingly, the EIR concluded there would be no impact related to buildout of the DSASP. EIR page 5-1. (**NO IMPACT**).

Project: The Project site is within the DSASP area and none of the circumstances described in the EIR have changed. No impact would occur. (**NO IMPACT**).

c, d, e. DSASP EIR: (Forestland) As described in the EIR, there are no forest lands present in the DSASP area or in its vicinity. Therefore, there would be no impacted related to buildout of the DSASP. EIR page 5-1. (**NO IMPACT**).

Project: The Project site is within the DSASP area and none of the circumstances described in the EIR have changed. No impact would occur. (**NO IMPACT**).

5.3 Air Quality

AIR QUALITY. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Conflict with or obstruct implementation of the applicable air quality plan?	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	No	No	No
c) Expose sensitive receptors to substantial pollutant concentrations?	No	No	No
d) Result in other emissions (such as those leading to	No	No	No

odors) adversely affecting a substantial number of people?			

Documentation:

a. DSASP EIR: The DSASP EIR indicated that implementation of the DSASP has the potential to conflict with or obstruct implementation of the 2010 Clean Air Plan. (DSASP EIR, p. 4.2-12.) Although implementation of mitigation measure MM4.2-2 would reduce this impact, it would not be reduced to a less-than-significant level. MM4.2-2 requires project-specific implementation of recommended BAAQMD operational mitigation measures as necessary to reduce operational emissions of criteria air pollutants to below significance criteria. (DSASP EIR, p. 4.2-21.) The recommended measures include, but are not limited to, increasing on-street parking fees; daily parking charges for employees; providing a parking "cash-out" incentive for employees who use alternative transportation to commute; providing subsidized or free transit passes to employees; encouraging alternative compressed work schedules and telecommuting; and providing a ridesharing program. (DSASP EIR, pp. 4.2-21–22.) Notwithstanding this mitigation measure, the DSASP EIR concluded that, this impact would remain a significant and unavoidable impact. (DSASP EIR, pp. 4.2-14–15.)

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

The DSASP EIR found that implementation of the DSASP would result in operational air pollutant emissions from area and vehicular sources. (DSASP EIR, pp. 4.2-16, -18.) Area sources of air pollutant emissions associated with the proposed project include fuel combustion emissions from space and water heating, fuel combustion from landscape maintenance equipment, and ROG emissions from periodic repainting of interior and exterior surfaces. (DSASP EIR, pp. 4.2-19–20.) Implementation of the DSASP would not result in significant ROG, NOx, CO, SO2, and PM2.5 emissions because emissions of NOx and CO would be reduced at the planning horizon of the plan compared to existing conditions, and emissions of ROG and PM2.5 would not exceed the significant thresholds. (DSASP EIR, p. 4.2-20.) The DSAP EIR found that implementation of the DSASP would result in a level of PM10 emissions that would exceed the significance thresholds. (DSASP EIR, pp. 4.2-20–21.) Mitigation measure MM4.2-2 requires compliance with BAAQMD operational mitigation measures as necessary to reduce operational emissions of criteria air pollutants to below significant criteria. (DSASP EIR, p. 4.2-22.) Even with implementation of MM4.2-2, however, the DSASP EIR concluded that operational emissions would be significant and unavoidable impacts since the mitigation measure cannot guarantee that emissions would be lessened to below a significance level. (*Id.*) (**Significant and Unavoidable**)

Project: As described in the 120 East Grand Avenue Air Quality and Greenhouse Gas Emissions

Assessment prepared for the Project (**Exhibit A** to this document), determination of whether a project supports the goals in the 2017 Clean Air Plan is achieved by a comparison of project-estimated emissions with BAAQMD thresholds of significance. If project emissions would not exceed the thresholds of significance after the application of all feasible mitigation measures, the project is consistent with the goals of the 2017 Clean Air Plan. As shown in Exhibit A's Table 2-7 and Table 2-8, emissions generated during Project construction and operations would not exceed the BAAQMD's significance thresholds. Therefore, the Project would neither conflict with nor obstruct reduction measures in the 2017 Clean Air Plan.

Additionally, the Project Site can be identified for its "location efficiency". Location efficiency describes the location of the Project Site relative to the type of urban landscape its proposed to fit within, such as an 'urban area', 'compact infill', or 'suburban center'. In general, compared to the statewide average, a project could realize vehicle miles traveled (VMT) reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center (CAPCOA 2021), and thus reductions in air pollutant emissions, a primary goal of the 2017 Clean Air Plan. The Project Site represents an urban/compact infill location within the central portion of South San Francisco. The Project Site is served by existing public transportation. Additionally, the Project is in proximity to surrounding nonresidential land uses. The increases in land use diversity and mix of uses in the Project Area would reduce vehicle trips and VMT by encouraging walking and non-automotive forms of transportation, which would result in corresponding reductions in transportation-related emissions, a primary goal of the 2017 Clean Air Plan. (**Less Than Significant**).

b. DSASP EIR: The EIR explains that the Bay Area Air Basin is in a nonattainment zone for ozone, PM_{10}, and $PM_{2.5}$. Therefore there is an existing cumulative impact. It further indicates that operational-related PM_{10} emissions related to development of the DSASP uses are potentially significant, as shown in Table 4.2-8. (EIR, p. 4.2-20). Implementation of mitigation measure MM4.2-2 would reduce this impact to less-than-significant, which recommends implementation of mitigation measures pursuant to BAAQMD's CEQA Guidelines to reduce impacts to less-than-significant. (EIR, p. 4.2-22). As discussed above, there is an existing cumulative impact due to the DSASP study area's nonattainment status. Even with the implementation of mitigation measure 4.2-2, the construction and operation of DSASP projects would result in a cumulatively consideration contribution to a potentially significant cumulative impact associated with criteria pollutants. EIR, p. 4.2-29. (**Significant and Unavoidable**).

Project: As explained in Exhibit A, three basic sources of short-term emissions will be generated through construction of the Project: operation of the construction vehicles (i.e., tractors, forklifts, pavers), the creation of fugitive dust during clearing and grading, and the use of asphalt or other oil-based substances during paving and coating activities. Construction activities such as excavation and grading operations, construction vehicle traffic, and wind blowing over exposed soils would generate exhaust emissions and fugitive PM emissions that affect local air quality at various times during construction. Effects would be variable depending on the weather, soil conditions, the amount of activity taking place, and the nature of dust control efforts. The dry climate of the area during the summer months creates a high potential for dust generation. Construction-generated emissions associated the Project were calculated using the CARB-approved CalEEMod computer program, which is designed to model emissions for land use development projects, based on typical construction requirements. Predicted maximum daily construction-generated emissions for the Project are summarized in Exhibit A's Table 2-6. Construction-generated emissions are short-term and of temporary duration, lasting only if construction activities occur, but would be considered a significant air quality impact if the volume of pollutants generated exceeds the BAAQMD's thresholds of significance. As shown in Table 2-6, emissions generated during Project construction would not exceed the BAAQMD's thresholds of significance during construction. Therefore,

criteria pollutant emissions generated during Project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is nonattainment under an applicable federal or State ambient air quality standard.

With regard to operations, Implementation of the Project would result in long-term operational emissions of criteria air pollutants such as PM10, PM2.5, CO, and SO2 as well as O3 precursors such as ROG and NOX. As previously described, projected emissions associated with proposed operations are compared to the existing baseline, which includes the current operation of six warehouse buildings spanning 93,250 square feet. Predicted maximum daily operational-generated emissions of criteria air pollutants for the Proposed Project are summarized in Exhibit A's Table 2-7 and compared to the operational significance thresholds promulgated by the BAAQMD. As shown in Table 2-7, the Project's emissions would not exceed any BAAQMD thresholds for any criteria air pollutants during operations. Impacts are therefore less than significant. (**Less Than Significant**).

c. DSASP EIR: The EIR defines sensitive receptors as day care centers, schools, retirement homes, hospitals, medical patients in residential homes, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. CO concentrations were modeled for six intersections that would operate at a Level of Service ("LOS") F with project implementation, with emission concentrations modeled at 30 feet away from the roadway. Modeling results are presented in EIR Table 4.2-10. Because CO concentrations would not exceed state and federal standards at 1-hour and 8-hour ambient air quality standards, impacts to sensitive receptors in close proximity to these intersections would be less-than-significant. (EIR, p. 4.2-23).

The EIR further indicates that the area south of Railroad Avenue currently includes mixed industrial uses, and that industrial uses in the area would be required to demonstrate compliance with BAAQMD emissions to obtain permits to operate, and therefore would not result in a substantial increase in risk of exposure. However, new sensitive receptors, including residential uses may be located within a screening distance (300 feet) from existing gas stations or dry cleaning operations, and vice versa. Mitigation measure MM4.2-3 requires the preparation of a health risk assessment ("HRA") whenever a project would introduce new sensitive receptors within the siting distance for any use listed in the ARB Air Quality and Land Use Handbook, found at Table 4.2-11, to reduce potential impacts to less-than-significant. (EIR, p. 4.2-26). If a potentially significant health risk is identified in the HRA, appropriate measures shall be identified to reduce the potential risk below a significant level or site the sensitive receptor in another location. The EIR also indicates that residential uses proposed within 500 feet of US-101 may be exposed to substantial concentrations of diesel particulate matter ("DPM"). Mitigation measure MM4.2-4 requires the preparation of an HRA if a proposed project is a land use listed in the ARB Air Quality and Land Use Handbook, found at Table 4.2-11, is not subject to a BAAQMD permit and is within siting distance of sensitive receptor. (EIR, p. 4.2-26). DPM resulting from construction impacts would not be potentially significant, as demonstrated in Table 4.2-4. (EIR, p. 4.2-17). With the implementation of mitigation measures MM4.2-3 through MM4.2-5 impacts related to TAC emissions from US-101, gas stations, and dry cleaning facilities will be reduced from potentially significant to less-than-significant. (EIR, p. 4.2-25). (**Less Than Significant).**

Project:[2] As explained in Exhibit A, the nearest sensitive land use is an apartment building located

[2] To the extent this Addendum considers air-quality issues in relation to future residents of the Project, it does so for informational purposes only pursuant to the judicial decisions in *CBIA v. BAAQMD* (2015) 62 Cal.4th 369, 386 and *Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 473, which confirm that the impacts of the environment on a project are excluded from CEQA unless the project itself "exacerbates" such impacts. As such, any air quality impact on the future residents of the Project is not an impact under CEQA.

approximately 0.17 mile west of the site, across the 101 freeway and on Airport Boulevard. Pursuant to DSASP mitigation, a Health Risk Assessment (HRA) was performed to determine the health risk associated with construction and operations of the Project. The HRA's methodology is described in Exhibit A, at pages 26-29.

Exhibit A concludes that with regard to cancer risk, impacts for all modeled scenarios would be below the 10 in one million threshold for both operations and construction. Further, these calculations are conservative because they do not account for any pollutant-reducing remedial components inherent to the Project or the Project site. (Exhibit A, pages 29-30). With regard to non-carcinogenic hazards (the chronic hazard index), Exhibit A likewise concludes that the Project would not surpass significance thresholds. (Exhibit A, pages 30-31). With regard to Carbon Monoxide (CO) hotspots, the analysis concludes that at all times, the Project would generate far fewer than 44,000 vehicles per hours at a single intersection and would therefore have less than significant impacts. Impacts would be less than significant. (**Less Than Significant**).

d. DSASP EIR: The EIR notes that the DSASP accommodates new industrial uses to an area south of Railroad Avenue and Airport Boulevard. Some new uses may produce objectionable odors during industrial processing and manufacturing, and may be located within one mile of odor sensitive receptors in residential and commercial areas. The EIR indicates it is not known what industrial processes might be proposed under the DSASP, and therefore impacts are potentially significant prior to mitigation. Accordingly, mitigation measure MM4.2-6 requires a project applicant for a new industrial land use identified as a typical source of odors in the BAAQMD CEQA Guidelines or ARB Air Quality and Land Use Handbook to demonstrate implementation of best management practices to minimize odors recommended by the BAAQMD CEQA Guidelines. (EIR, p. 4.2-28). Because odors are localized in nature, cumulative projects would not result in a cumulative order. Similar to what is proposed in mitigation measure MM4.2-6, proposed projects would be reviewed and compared to the BAAQMD CEQA Guidelines and implement odor reducing recommendations. (EIR, p. 4.2-30). (**Less Than Significant**).

Project: With regard to construction, as discussed in Exhibit A the Project may cause objectionable odors from diesel exhaust in the immediate Project Site vicinity, however these would be short-term and would rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people. With regard to operation, the Project is not an industrial use or one would typically involve obnoxious odors such agriculture, wastewater treatment plants, etc. Further, any potential R&D-related odors would be addressed through compliance with BAAQMD Regulation 7, Odorous Substances. Impacts would be less than significant, and MM 4.2-6 is not required. (**Less Than Significant**).

5.4 Biological Resources

BIOLOGICAL RESOURCES. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a	No	No	No

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?	No	No	No
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No	No	No
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No	No	No
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No	No	No

Documentation:

A,b, c. DSASP EIR: The EIR states that the DSASP area is currently developed with residential, commercial, and

office uses, and that it does not support biological resources. The EIR notes that riparian habitat in South San Francisco is limited to along Colma Creek and along the Bay fringe, and the DSASP would not likely propose any development in these areas. Only a small portion of the southern boundary of the study area is adjacent to the Colma Creek Canal, and projects that could impact that area are required to prepare biological assessments and comply with General Plan Policies 7.1-I-2 and 7.1-I-5. Development of the DSASP would have a less than significant impact with regard to sensitive plant or animal species and riparian habitat or other sensitive communities, or wildlife movement corridors. (Draft EIR pages 5-1, 5-2). (**Less Than Significant**)

Project: Circumstances on the Project site have not changed since certification of the DSASP EIR. The site is developed with industrial uses and improvements, and is not considered to support biological resources. It is not located adjacent to Colma Creek. The Project's increase in office and R&D use over what was studied relative to development of the entire DSASP area does not change that conclusion, and impacts would be less than significant, consistent with the DSASP EIR. (**Less Than Significant**)

d. DSASP EIR: The EIR noted that landscaping vegetation within the DSASP could provide potential nesting habitat for migrating birds, but that construction under the DSASP would not occur all at once and would be spread out. Therefore, relatively minor amounts of landscaping would be removed at any one time. As such, access and use of wildlife nursery sites would not be substantially interrupted. Additionally, if vegetation removal were to occur from February 1 through August 31 in bird nesting season, construction would be required to comply with applicable regulations of the California Fish and Game Code (Section 3503, 3513, or 3800), which would protect nesting birds from construction disturbances. Impacts would be less than significant. (Draft EIR page 5-2). (**Less Than Significant**).

Project: Conditions on the Project Site have not changed, and the DSASP EIR's analysis still applies. As shown in the Arborist's Report (**Exhibit B** to this addendum) there are currently 8 trees on the Project Site, of which 3 are protected and a Tree Removal Permit will be sought to remove them. A total of 94 trees will be added as part of the Project. The Project would be required to comply with the above-noted requirements, and impact would be less than significant. (**Less Than Significant**).

e. DSASP EIR: The EIR analysis indicates that landscaped areas in the DSASP contain trees protected by the City's Tree Preservation Ordinance, Title 13, Chapter 13.30. While development activities could involve the removal of some of these trees, such projects would be required to comply with the Tree Preservation Ordinance as part of the approval process, including obtaining a permit for any tree removals or alterations, and avoiding tree roots during trenching for utilities. Impacts would therefore be less than significant. (Draft EIR, page 5-2). (**Less Than Significant**).

Project: There are currently 8 trees on the Project Site, of which 3 are protected by the City's Tree Preservation Ordinance. As noted above, the Project will comply with the City's Tree Preservation Ordinance and obtain a permit for tree removal. A total of 94 trees would be added as part of the Project. Impacts would therefore be less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

f. DSASP EIR: As disclosed in the EIR, there is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan that is applicable to the DSASP area. (Draft EIR, page 5-2). Accordingly, no impact would occur. (**No Impact**).

Project: Conditions have not changed, and the Project would have no impact. (**No Impact**).

5.5 Cultural and Tribal Cultural Resources

CULTURAL and TRIBAL CULTURAL RESOURCES. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Guidelines section 15064.5?	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in CEQA Guidelines section 15064.5?	No	No	No
c) Disturb any human remains, including those interred outside of formal cemeteries?	No	No	No

Documentation:

a. DSASP EIR: The EIR identifies that the future development activity pursuant to the DSASP could adversely affect previously unrecorded historic-period resources, through activities, including but not limited to, demolition, relocation, or alteration of a historic-period buildings or structures. Implementation of mitigation measure MM4.3-1 would require a qualified professional to conduct site-specific historical resources evaluation for future developments in the DSASP area that would demolish or otherwise physically affect buildings or structures 45 years or older or would otherwise affect their historic setting. Although implementation of mitigation measure MM4.3-1 would reduce the magnitude of any impact, the potential for future physical demolition of a historical resource would remain, therefore, the impact on historical resources would be significant and unavoidable. (EIR page 4.3-12). (**Significant and Unavoidable**).

Project: With regard to the Project, the nearest designated historic resource to the Project Site is the Bank of South San Francisco which is approximately 1,500 feet northwest from the closest part of the Project Site. The Project Site is not located within or near a designated historic district. Consistent with MM 4.3-1, Brewster Historic Preservation prepared a Historic Resources Evaluation Report for the Project dated August, 2022 (**Exhibit C** to this Addendum) to evaluate the potential historic significance of the structures on the Project Site. The report concludes that none of the structures are eligible for listing as historic resources, and therefore their demolition would not cause a significant impact. (Exhibit C, pages 41-44). (**Less Than Significant Impact**).

b. DSASP EIR: The EIR identifies that construction activities associated with ground disturbance in the DSASP area may unearth previously unidentified archaeological resources located below the level of previous ground disturbance activities, thereby resulting in a potentially significant impact. When earth-disturbing activities would encounter previously undisturbed soils, mitigation measure MM4.3-2 would require the preparation of a technical report that identifies and evaluates any archaeological resources within the development area

and include recommendations for avoiding impacts on archaeological resources or reducing its impact to less-than-significant. (EIR, p. 4.3-13). Mitigation measure MM4.3-3 requires all earth-disturbing activity to cease within 100 feet of the disturbance if an archaeological site or other suspected historical resource defined by CEQA Guidelines Section 15064.5 is discovered. Impacts to any significant resources shall be mitigated to a less-than significant level through methods determined by a City-approved archaeologist. EIR, p. 4.3-14. Mitigation measure MM4.3-4 requires all construction personnel involved in ground-disturbing activities to undergo environmental awareness training, and for the applicant's grading and excavation to seek comments and suggestions to monitoring plans and discuss excavation and grading plans from City-approved consultants. *Id.* The implementation of mitigation measures MM4.3-2 through MM4.3-4 would reduce this impact to less than significant. (EIR, p. 4.3-13). The EIR identifies that the project presents cumulatively significant impacts for archaeological resources, but that adherence to existing federal, state, and local regulations as well as the implementation of mitigation measures MM4.3-2 through MM4.3-4 would ensure project impacts to archaeological resources are reduced, resulting in a less-than-significant cumulative impact. EIR, p. 4.3-17. (**Less Than Significant**).

Project: With regard to the Project, as explained in the Archaeological Resources Report prepared by Basin Research Associates (**Exhibit M** to this document), no recorded archaeological resources or known tribal cultural resources are present within the Project Site. The Project has a low potential to affect both unknown prehistoric and tribal cultural resources, and the implementation of DSASP EIR MMs 4.3-3 and 4.3-4 would further ensure that Project impacts are less than significant. (**Less Than Significant**).

c. DSASP EIR: The EIR identifies that the potential to disturb human remains outside of formal cemeteries within the DSASP area is low due to previous urban development. If human remains are inadvertently discovered during ground-disturbing activities, compliance with state regulations concerning the discovery of human remains and/or Native American human remains will be required pursuant to Health & Safety Code Section 7050.5 and Public Resources Code Section 5097.98. Compliance with these regulations would result in a less-than-significant impact and no mitigation is required. (EIR, p. 4.3-15). The EIR also notes that impacts related to disturbing human remains are site specific and not cumulative in nature, and that compliance with the law would ensure less than significant impacts. (EIR, page 4.3-15). (**Less Than Significant**).

Project: As discussed above, Exhibit M concludes that no known villages have been reported in, adjacent or near the Project Site, and because of that and the previously disturbed nature of the Project Site, there is low potential to affect burial grounds, cemeteries, or other human remains. Consistent with the DSASP EIR, the Project would comply with the law to the extent required, and impacts would be less than significant. (**Less Than Significant**).

5.6 Energy

ENERGY – *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary	No	No	No

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?	No	No	No

Documentation:

a, b. DSASP EIR: The EIR found that the DSASP is consistent with the City's General Plan Public Facilities Element because, although future development under the DSASP could include the expansion of energy infrastructure, electricity demand generated by future development projects could be supplied without the need for additional construction or expansion of energy facilities beyond that which was previously planned. (DSASP EIR, p. 4.11-52.) Therefore, the DSASP EIR found that the DSASP would not conflict with the applicable goals, objectives, and policies of the City's General Plan Public Facilities Element.
The DSASP EIR stated that implementation of the DSASP would not require or result in the construction of new energy production or transmission facilities, or expansion of existing facilities, the construction of which could cause a significant environmental impact. (DSASP EIR, 4.11-53–54.) Even though the DSASP would increase the use of electricity within the study area, the DSASP would also be required to comply with the energy conservation measures contained in Title 24, which would reduce the amount of energy needed for the operation of any buildings constructed as part of the Specific Plan. (DSASP EIR, pp. 4.11-53–54.) Electricity and natural gas are currently provided to the project site by PG&E. South San Francisco also has partnered with Peninsula Clean Energy (PCE), a Community Choice Aggregation, which allows the purchase of electricity from renewable sources through PG&E infrastructure.

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

Finally, cumulative energy impacts would be less than significant since PG&E is able to meet future projected demands, and an action plan has been identified to address energy issues on a broader scale. (DSASP EIR, p. 4.11-55–56.) Also, the cumulative impact related to the supply of natural gas and to the need for additional or expanded facilities is less than significant. (DSASP EIR, p. 5.11-56.)

Project: The Project would have an incremental increase in the demand on utilities and services, such as nonrenewable energy resources, for construction and operation of the Project. The Project Site's current building and other buildings in the vicinity are being served by existing utility capacities. Further, PG&E infrastructure already is present on the Project Site. The Project Site is already subject to all applicable federal, state, and local energy standards and efficiency regulations.

The Project would not result in a new or substantially increased significant impact with respect to energy consumption. Although the Project would be anticipated to generate some additional energy demand, the Project would continue to be consistent with all applicable energy standards. Buildings anticipated when the DSASP EIR was adopted in 2014 would have been constructed under the 2013 version of Title 24, Parts 6 and 11 (Building Energy Efficiency Standards). There have since been two updates, with each update resulting in more energy efficient buildings. The California Energy Commission estimated that non-residential

buildings constructed to meet the 2019 Title 24 standards would use about 30 percent less energy due mainly to lighting upgrades compared to buildings constructed to meet 2016 Title 24, and likely even more energy savings compared to the 2013 Title 24 standards assumed in the DSASP EIR analysis. (See https://www.energy.ca.gov/sites/default/files/2020-03/Title_24_2019_Building_Standards_FAQ_ada.pdf.)

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

Further, the Project Site's proximity to the Caltrain station and implementation of a TDM program would help ensure reduced energy use. Because the Project is being developed in an urban area that is already served by existing utilities and transit services, and that the Project would be developed to achieve efficient energy usage, the Project would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to energy. Impacts would be less than significant. (**Less Than Significant**).

5.7 Geology and Soils

GEOLOGY AND SOILS – *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (Division of Mines and Geology Special Publication 42)?	No	No	No
ii) Strong seismic ground shaking?	No	No	No
iii) Seismic-related ground failure, including liquefaction?	No	No	No

iv) Landslides?	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	No	No	No
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	No	No	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	No	No	No
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	No	No	No

Documentation:

a-e. DSASP EIR: The EIR determined that there would be a less-than-significant impact on geology and soils as a result of implementation of the DSASP. (DSASP EIR, pp. 1-2, 5-4.) No known active or potentially active faults traverse the study area and the study area is not subject to a substantial risk of surface fault ruptures. (DSASP EIR, p. 5-2.) Despite this, portions of the study area are located in areas potentially subject to extremely high or very high levels of ground shaking. (DSASP EIR, p. 5-3.) The structural design of any proposed buildings must adhere to state and City building code standards, such as the California Building Code ("CBC"), which defines minimum acceptable levels of risk and safety. (*Id.*) In addition, all construction activities would comply with CBC Chapter 18, regulating grading activities, including drainage and erosion control. (*Id.*) Development would also be required to comply with a NPDES general permit for construction activities, requiring construction site erosion and sedimentation control best management practices to be implemented. (*Id.*) (**Less Than Significant**).

Project: The Project is consistent with the DSASP EIR analysis. The Project would continue to comply with California Building Code standards and the recommendations of a Geotechnical Engineer and would conform to structural design plans. With respect to cumulative geology and soils impacts, the Project would be one of numerous sites anticipated to undergo development/redevelopment in the vicinity and would contribute to a cumulative increase in sites facing these impacts. However, each new development, including the Project, must comply with state, regional, and local laws concerning erosion control and storm water pollution. As

such, the Project-specific contribution would be reduced through applicable measures and would be less than cumulatively considerable. Impacts would remain less than significant. (**Less Than Significant**).

f. DSASP EIR: The EIR identifies that ground-disturbing construction activities from development projects under the DSASP would have the potential to uncover and potentially destroy unknown paleontological resources or unknown geologic features, resulting in a potentially significant impact. Mitigation measure MM4.3-5 requires a project applicant to retain a professional paleontologist to prepare a technical report that determines whether a project's earth-disturbing activities could directly or indirectly destroy a unique paleontological resource, site, or unique geologic feature and recommendations for avoiding or reducing impacts to less-than-significant level. EIR, p. 4.3-14. Mitigation measure MM4.3-6 requires all construction to cease within 100 feet of the discovery of a paleontological resource or unique geologic feature. A City-approved paleontologist shall determine how to mitigate impacts to less-than-significant, with limited exception for unnecessary or infeasible measures as determined by the City. EIR, p. 4.3-15. With the implementation of mitigation measures MM4.3-5 and MM4.3-6, the impact would be reduced to less-than-significant. EIR, p. 4.3-14. The EIR identifies that cumulative effects of ground-disturbing activities may uncover previously unknown paleontological resources or unique geologic features. Adherence to existing federal, state, and local regulations, as well as the implementation of mitigation measures MM4.3-5 and MM4.3-6 would reduce to the cumulative impact to less-than-significant. EIR, p. 4.3-17.

Project: Consistent with DSASP EIR MM 4.3-5, as described in the Paleontological Resources Report prepared by J.P. Walker Paleontological for the Project (**Exhibit L** to this document), the Project Site is developed and has no exposed native soils. It is expected that any construction excavations will be relatively shallow and therefore confined to the artificial fill. Building foundations will use auger cast piers placed to greater depths that will likely intersect the Pleistocene age alluvium and the Pleistocene Colma Formation. However, the known fossil locations associated with these units are more than six miles from the project site. The local depositional conditions probably vary widely from those at the locations where the finds are listed. A formal paleontological site records search was also completed by the UCMP for the Project Site, and found that the nearest vertebrate find is a single Pleistocene Equus tooth (UCMP 64829) from UCMP locality V6319 that is located approximately 2.4 miles (3.8) km west of the Project Site, near the I-280/Westborough interchange. Based on the location information, the vertebrate find appears to be in the Merced Formation, a unit not present at the Project Site (Bonilla 1971). The other fossil locations, while in units present at the Project Site, are far enough away that the depositional setting is not related to the units at the Project Site. Furthermore, these units will only be encountered at depth via augering for the piers, displacing relatively small amounts of material with little or no geologic context, therefore the potential of encountering fossil material is considered low. Impacts would be less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

5.8 Greenhouse Gas Emissions and Energy

GREENHOUSE GAS EMISSIONS & ENERGY. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the	No	No	No

environment?			
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No	No	No

Documentation:

a. DSASP EIR - Construction: The EIR assumes that approximately equal amounts of construction will be conducted each year to reach the DSASP's build-out conditions, and the analysis assumes that an areawide average of 25 percent of existing development is assumed to be demolished and reconstructed over the same period of time. EIR Table 4.4-3 identifies the anticipated emissions from construction over the development of the DSASP. (EIR, p. 4.4-22). Even temporary GHG emissions resulting from construction would be considered cumulatively considerable without the implementation of Bay Area Air Quality Management District ("BAAQMD") recommended Best Management Practices ("BMPs"), the General Plan policies, and Climate Action Plan ("CAP") policies to reduce construction-related GHG emissions. This is considered a potentially significant impact. Because BAAQMD does not identify numerical thresholds for construction related emissions, compliance with adopted state, regional, and local plans and policies are used to determine significance. Mitigation measure MM4.4-1 requires all construction projects to incorporate to the fullest extent feasible, BAAQMD's most recent BMPs for GHG emissions, which may include practices such using alternative-fueled construction vehicles and equipment and using at least 10 percent local building materials. Implementation of the General Plan and CAP policies along with mitigation measure MM4.4-1 would reduce this construction-related impact to less-than-significant. **(Less Than Significant**)

Project - Construction: As discussed in Exhibit A, construction-generated activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project Site, and off-road construction equipment (e.g., dozers, loaders, excavators). Exhibit A's Table 3-2 illustrates the specific construction generated GHG emissions that would result from construction of the Project. As shown in Table 3-2, Project construction would result in the generation of a maximum of approximately 3,638 metric tons of CO2e over the course of construction. Once construction is complete, the generation of these GHG emissions would cease. Furthermore, GHG emissions generated by the construction sector have been declining in recent years. For instance, construction equipment engine efficiency has continued to improve year after year. The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower (hp) and were phased in from 1996 to 2000. In 1996, a Statement of Principles pertaining to off-road diesel engines was signed between the USEPA, CARB, and engine makers (including Caterpillar, Cummins, Deere, Detroit Diesel, Deutz, Isuzu, Komatsu, Kubota, Mitsubishi, Navistar, New Holland, Wis-Con, and Yanmar). On August 27, 1998, the USEPA signed the final rule reflecting the provisions of the Statement of Principles. The 1998 regulation introduced Tier 1 standards for equipment under 50 hp and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. As a result, all off-road, diesel-fueled construction equipment manufactured in 2006 or later has been manufactured to Tier 3 standards. Tier 3 engine standards reduce precursor and subset GHG emissions such as nitrogen oxide by as much as 60 percent. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased in over the period of 2008-2015. The Tier 4 standards require that emissions of nitrogen oxide be further reduced by about 90 percent. All off-road, diesel-fueled construction equipment manufactured in 2015 or later will be manufactured to Tier 4 standards. In addition, the California Energy

Commission recently released the 2022 Building Energy Efficiency Standards contained in the California Code of Regulations, Title 24, Part 6 (also known as the California Energy Code). The increased requirements contained in the new regulations, which go into effect in January of 2023, further reduce the generation of GHG emissions. For all of the reasons set forth above and in Exhibit A to this addendum and discussed below with regard to the Project's compliance with the City's Climate Action Plan, impacts would be less than significant. (**Less Than Significant**).

DSASP EIR - Operations: The EIR indicates that the DSASP would result in long-term operational impacts from the generation of GHGs during the operation of land uses under the DSASP, based on thresholds of significance which have been established as 3.58 MT CO_2e per service population for 2020 and 3.08 MT CO2e based on the total number of residents and employees anticipated under DSASP development ("service population") for 2035. The incorporation of design features such as providing infrastructure, enhancing connectivity for bicycle and pedestrian use, and the integration of higher density and mixed-use development near transit facilities reduces operational emissions. However, as shown in EIR Table 4.4-4, even with the incorporation of the foregoing project design features, the DSASP would result in 3.77 MT CO_2e, exceeding both 2020 and 2035 thresholds of 3.58 MT CO2e and 3.08 MT CO_2e, respectively. (EIR, p. 4.4-24). This is considered a potentially significant impact prior to mitigation. Implementation of mitigation measures MM4.4-2 through MM4.4-10 would incorporate applicable measures from the CAP and other supporting measures in order to reduce the GHG emissions anticipated from DSASP implementation. (EIR, p. 4.4-24). Mitigation measure MM4.4-2 requires employers in the DSASP area to subscribe to the City's Transportation Demand Management ("TDM") Ordinance and include a minimum of 39 percent of its employees. Mitigation measure 4.4-3 requires the implementation of smart parking policies which would reduce available parking by 10 percent. Implementation of mitigation measure MM4.4-4 requires a minimum of 60 electrical vehicle charge stations installed within nonresidential land uses and within residential units with charging capabilities available for a minimum of 200 vehicles. Mitigation measure MM4.4-5 requires a minimum of 25 percent of lawnmowers and leaf blowers to be electric and the provision of sufficient electrical outlets available outdoors. The incorporation of mitigation measure MM4.4-6 requires all new development to comply with CALGreen Tier 1 standards and exceed 2013 Title 24 standards by a minimum of 10 percent. Mitigation measure MM 4.4-7 requires at least 322,000 sf of nonresidential development and 85 residential units to use high albedo surfaces and technologies identified in the voluntary CALGreen standards. Mitigation measure MM4.4-8 requires the development of an educational information packet for residential and nonresidential landowners that detail potential behavioral changes that can be instituted to save energy. Implementation of MM.4.4-9 requires at least 35,000 sf of nonresidential land use roof space to be converted to solar panels, 205 residential units to be equipped with solar water heaters, and the electricity of an additional 75 dwelling units to be offset by solar panel arrays associated with new residential development. Mitigation measure MM4.4-10 requires nonresidential and residential land uses to reduce per capita water consumption by 40 gallons a day. Reduction assumptions and calculations are included in Appendix C of the EIR. With the implementation of mitigation measures MM4.4-2 through MM4.4-10 impacts would be less than cumulatively significant. (**Less Than Significant**).

Project - Operations: As shown in Exhibit A's Table 3-3, Project operations would result in the increased generation of approximately 2,401 metric tons of CO2e per year beyond existing conditions. Consistent with current BAAQMD CEQA analysis guidance, Project operation emissions are compared for consistency with the overall Citywide GHG-reduction program encapsulated in the 2022 CAP. For all of the reasons described below under threshold b) and in Exhibit A to this addendum, impacts are less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

b. DSASP EIR: The EIR indicates that development of the DSASP would be consistent with AB 32 goals with the implementation of mitigation measures. The EIR also indicates that vehicle miles traveled ("VMT") generated under the DSASP could further or hinder the region's ability to achieve SB 375 targets. This is considered a potentially significant impact prior to mitigation. With the implementation of the DSASP's project design features, and mitigation measures MM4.4-2, MM4.4-3, and MM4.4-4, traffic in the DSASP area is anticipated to be reduced by 14 to 34 percent. Therefore DSASP implementation would further the goals of AB 32 and SB 375. With the implementation of mitigation measures MM4.4-2 through MM4.4-10 impacts would be less than cumulatively significant. (**Less Than Significant**).

Project: As detailed in Exhibit A, the Project is consistent with the applicable measures in both the previous 2014 Climate Action Plan (CAP) and the recently adopted 2022 CAP. (Exhibit A, pages 42-46). All development in the City, including the Project, is required to adhere to all applicable City-adopted policy provisions supporting its GHG-reduction program, including those contained in the currently applicable 2022 CAP. The City ensures all provisions of the CAP are incorporated into projects and their permits through development review and applications of conditions of approval as applicable. All of the applicable and feasible provisions of the City's GHG-reduction program as promulgated by its CAP documents will be incorporated into the Project. Consistent with the DSASP EIR noted above, the Project will also be required to implement all other GHG-reducing requirements including the City's TDM Program (see the transportation section below for further discussion) and the DSASP's applicable mitigation. While the Project would slightly exceed the commercial development studied by the DSASP EIR, because it is designed to be consistent with all applicable plans, policies, and regulations related to GHG emissions (as determined by evaluation of consistency with the 2022 CAP as directed by BAAQMD), and additionally because regulations have become more stringent since adoption of the DSASP, any potential increase in emissions is considered negligible and impacts would be less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

5.9 Hazards and Hazardous Materials

HAZARDS AND HAZARDOUS MATERIALS. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	No	No	No
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	No	No	No
c) Emit hazardous emissions or	No	No	No

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 § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	No	No	No
e) For a project located within an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No	No	No
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	No	No	No
g) Expose people or structures to a significant risk of loss, injury, or death involving wildland fires?[3]	No	No	No

Documentation:

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

Project: The Project would be required to comply with all of the requirements listed above, and no unusual risks would occur with this type of use. Impacts would be less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

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

[3] This threshold is addressed in Section 5.20.

p. 5-5.)

Project: A Phase I Environmental Site Assessment (ESA) was prepared for 120 East Grand Avenue (Exhibit D to the addendum), 160-180 Sylvester Road (Exhibit E to this addendum), 145 Sylvester Road (Exhibit F to this addendum), and 129 Sylvester Road (Exhibit G to this addendum). A Phase II ESA was also prepared for the Project (Exhibit H to this addendum). As described in more detail in Exhibit D to this addendum, there was no evidence of recognized environmental conditions (RECs) associated with 120 East Grand Avenue. As described in more detail in Exhibit E to this addendum, there was evidence of one REC (volatile organic compounds impacts and open cleanup case under oversight of the San Mateo County Department of Environmental Health Case No. 559191) and historical REC (HREC) (a former leading underground storage tank case) at 160-180 Sylvester Road. The potential to encounter impacted soils from fill materials in the area was also identified and noted to require proper management and offsite disposal. As described in more detail in Exhibit F to this addendum, there is one REC associated with likely vapor migration from the cleanup case at 160-180 Sylvester Road. The potential to encounter impacted soils from fill materials in the area was also identified and noted to require proper management and offsite disposal. As explained in Exhibit G to this addendum, there were no RECs identified for 129 Sylvester Road and no further assessment was recommended.

Accordingly the Phase II ESA was prepared for the Project Site (except for 129 Sylvester Road where no further analysis is required), and as explained in Exhibit H, concluded as follows:

- The shallow fill material present below the concrete slabs at 120 East Grand Avenue, 145 Sylvester Road, and 160 and 180 Sylvester Road do not appear to be characterized as California hazardous or RCRA-hazardous waste.
- Limited chlorinated VOC impacts in shallow soil were detected at 160 and 180 Sylvester Road.
- There does not appear to be a vapor intrusion risk present at 145 Sylvester Road.
- A potential vapor intrusion risk is present at 160 and 180 Sylvester Road due to elevated VOC concentrations in groundwater and soil vapor. Given these results, the sources are proposed to be identified and removed. If they are not, vapor intrusion mitigation would be required. As 160 and 180 Sylvester Road, which is also known as the Alan Baker Property, is under regulatory oversight provided by the SMC-GPP, the redevelopment of this property, removal of vapor intrusion risk, and any vapor intrusion mitigation system will require their approval.

The Project will comply with all of the above recommendations and applicable regulatory requirements, and impacts would be less than significant, consistent with the DSASP EIR. **(Less Than Significant**).

e. DSASP EIR: The DSASP area is located approximately 0.75 mile north of the San Francisco International Airport ("SFO"). It is outside of all airport Safety Compatibility Zones; however, it is located within Airport Influence Area B of SFO and is subject to FAA notification requirements. (DSASP EIR, p. 5-5.) (**Less Than Significant**).

Project: Circumstances on the Project Site have not changed, and the Project would comply with applicable FAA notification requirements. (**Less Than Significant**).

f. DSASP EIR: The EIR noted that the DSASP area is currently urbanized, and intensified development would not introduce new land uses that would physically interfere with emergency response. (DSASP EIR, p. 5-5). (**Less Than Significant**).

Project: The Project is consistent with the requirements of the DSASP and does not pose unusual risk with regard to emergency response. Impacts would remain less than significant. (**Less Than Significant**).

5.10 Hydrology and Water Quality

HYDROLOGY AND WATER QUALITY. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface of ground water quality?	NO	NO	NO
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	NO	NO	NO
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 that would	NO	NO	NO
(i) result in substantial erosion or siltation on- or off-site?	NO	NO	NO
(ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	NO	NO	NO
(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?	NO	NO	NO
(iv) Impede or redirect flood flows?	NO	NO	NO
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	NO	NO	NO
e) conflict with or obstruct implementation of a water quality control plan or sustainable	NO	NO	NO

groundwater management plan?			

Documentation:

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

Project: The Project would be consistent with the requirements of the DSASP and would comply with all applicable regulatory requirements. Impacts would be less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

5.11 Land Use and Planning

LAND USE AND PLANNING. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project*:	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Physically divide an established community?	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation of an agency adopted for the purpose of avoiding or mitigating an environmental effect?	No	No	No

Documentation:

a. DSASP EIR: The EIR indicates that the DSASP would have no impact related to physically dividing an established community. Redevelopment under the DSASP would be consistent with existing uses in the DSASP area and surrounding area. Further, the DSASP proposes a below-grade pedestrian and bicycle undercrossing at East Grand Avenue that would provide an additional connection between development on either side of US-101 and also to the Caltrain station. Streetscape improvements and new public plazas would also encourage pedestrian connections throughout the DSASP area. (EIR, p. 4.5-10). (**No Impact**).

Project: The Project would enhance connections in the surrounding area, including by introducing new landscaping, trees, street lighting and sidewalks for an enhanced public experience. The intersection of East Grand Ave and Sylvester Road will be upgraded to include a new signal and new crosswalks to improve pedestrian safety. Sylvester Road will include shared lanes for bicycles and vehicles and a pedestrian crosswalk, which will be clearly marked for pedestrian safety when traveling from the Parking

Structure to Building 01. Consistent with the EIR, there would be no impact. (**No Impact**).

b. DSASP EIR: The EIR indicates the DSASP would not conflict with existing City policies or regulations that were adopted for the purpose of mitigating an environmental effect. The proposed DSASP included General Plan amendments that replaced the previous General Plan land use designations and standards for the DSASP area, and govern development in the DSASP area. Adoption of the DSASP also included Zoning amendments that added the DSASP as a zoning district, added a reference to the DSASP in District Purposes, updated land use regulations for consistency with the DSASP, and included development and design regulations and standards. The amendments to the General Plan and Zoning Ordinance were considered and adopted at the same time as adoption of the DSASP. The DSASP is consistent with applicable plans including, the South San Francisco Land Use Element and the South San Francisco General Plan Planning Subareas: Downtown and East of 101. Consistency with General Plan policies is provided at EIR Table 4.5-1, including but not limited to policies for the East of 101 Subarea which encourage a diverse range of nonresidential uses and the promotion of biotechnology, research and development, and other technology based employment in the East of 101 Subarea. (EIR, pp. 4.5-15 through 4.5-16). The EIR concluded that impact would be less than significant, and no mitigation was required. (EIR, p. 4.5-16). With regard to cumulative impacts, the EIR indicates cumulative projects would generally enhance existing land use patterns within the City, and are generally anticipated to be compatible with adjacent uses. Cumulative land use impacts have the potential to occur where a number of projects have the potential to conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. However, adherence to such plans, policies, and regulations generally prevents these conflicts. Future projects may include General Plan amendments or zone changes, but these modifications do not necessarily represent an inherent negative effect on the environment, if the proposed changes do not conflict with the policies that were specifically adopted for the purpose of avoiding or mitigating an environmental effect. Because there would be no conflicts with adopted plans and policies resulting from future development in the DSASP area, the cumulative impact would be less than significant. (EIR, p. 4.5-18). (**Less Than Significant**).

Project: The Project has been designed to comply with all General Plan, Zoning Code, and DSASP standards, including as recently amended in the City's comprehensive update. Notably, the Project is consistent with the densities assumed for the Project Site in the General Plan and Zoning Code, and studied in the General Plan EIR. The Project Site is designated East of 101 Transit Core, wherein development is permitted at up to 8.0 FAR with community benefits. The Project Site is zoned East Transit Core, wherein development is permitted at up to 8.0 FAR with community benefits. The Project's approximately 2.5 FAR is well within these limits. The Project would have less than significant impacts, consistent with the DSASP EIR and the General Plan EIR. (**Less Than Significant**).

5.12 Mineral Resources

MINERAL RESOURCES. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Result in the loss of availability of a known mineral resource that would be of value	No	No	No

to the region and the residents of the State?			
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No	No	No

Documentation:

a, b. According to the EIR, there are no known mineral resources in the DSASP area that would be of value to the region or the state. (EIR, p. 5-7). (**No Impact**).

Circumstances have not changed on the Project Site, and the Project would have No Impact. (**No Impact**).

5.13 Noise

NOISE. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	No	No	No
b) Generation of excessive ground- borne vibration or ground- borne noise levels?	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	No	No	No

Documentation:

a DSASP EIR: The EIR indicates that DSASP implementation would exceed established noise standards due to the development of new stationary sources, an increase of human activity in the DSASP area, and

the generation of vehicular traffic. To mitigate impacts, mitigation measure MM4.6-1 requires individual project applicants to submit a design plan that demonstrates that mechanical equipment will not exceed exterior noise limits as specified in the Noise Ordinance Section 8.32.030. (EIR, p. 4.6-17). When a non-residential use is proposed in an area that exceeds 70 dBA CNEL, mitigation measure, MM4.6-2 requires the project applicant to perform an acoustical analysis and determine the appropriate measures (*e.g.,* a sound wall) to reduce exterior noise levels below 70 dBA CNEL or conditionally up to 75 dBA CNEL. *Id.* Mitigation measure MM4.6-3 requires an acoustical analysis for certain multifamily uses. *Id.* With the implementation of mitigation measures MM4.6-1 through MM4.6-3, the DSASP EIR concludes that impacts of DSASP buildout would be less than significant. *Id.* With regard to cumulative impacts, the EIR indicates that development would result in an increase in the ambient noise level from new operational sources and increased human activity in the DSASP area, but that construction would occur over a long period of time in the area. Further, the implementation of mitigation measures MM4.6-1, MM4.6-2, and MM4.6-3 would mitigate noise impacts applicable to all projects, as well as compliance with all General Plan and Municipal Code requirements for DSASP and nearby projects outside the DSASP. Therefore, the cumulative impact would be less-than-significant. (EIR, p. 4.6-22). (**Less Than Significant**).

Project: For the Project, the RCH Group prepared a Noise Technical Report dated September 2022 that is included as Exhibit I to this addendum. With regard to construction-related impacts, the Noise Technical Report explains that Project construction would result in a temporary increase in ambient noise levels in the vicinity of the project site, and that maximum noise levels generated by construction equipment would range from 77 to 90 dB, Lmax at 50 feet. (Exhibit I, pages 11-12). The nearest noise-sensitive receptor is an apartment building approximately 780 feet west of the site on Airport Boulevard. Project construction noise at these apartments, and other nearby land uses, would be masked by rail line and traffic noise from Highway 101 and Airport Boulevard. Construction activities would occur only during the adopted construction hours contained in the South San Francisco Noise Ordinance. The Noise Ordinance exempts noise from construction activities that take place on weekdays between the hours of 8:00 a.m. and 8:00 p.m., on Saturdays between the hours of 9:00 a.m. and 8:00 p.m., and on Sundays and holidays between the hours of 10:00 a.m. and 6:00 p.m. Therefore, Project construction impacts would be a less-than-significant, consistent with the DSASP EIR. **(Less Than Significant).**

With regard to operational impacts for the Project, consistent with DSASP MM 4.6-2, RCH Group conducted an analysis of existing 24-hour noise levels and measured noise between 71-74 dB, CNEL at three measurement sites. Therefore, the site is less than 75 dB, CNEL threshold which is considered conditionally acceptable for non-residential uses, and it is concluded that the site is noise appropriate for the proposed use. Therefore, the land use compatibility impacts would be less than significant. With regard to equipment noise caused by the Project, it would not be substantial. Mechanical equipment would be required to comply with the City's Noise Ordinance § 8.32.030 as noted in DSASP MM 4.6-1. The Project applicant would be required to submit a design plan for the Project demonstrating that the noise level from operation of mechanical equipment will not exceed the exterior noise level limits for adjacent receiving land use categories as specified in Noise Ordinance § 8.32.030. Therefore, noise impacts from Project stationary equipment during operations would result in a less than significant impact. With regard to traffic noise, a doubling of sound energy results in a 3 dB increase in sound, which means that a doubling of sound energy (e.g., doubling the volume of traffic on a road) would result in a barely perceptible change in sound level. The Project is located east of Highway 101 and nearby major roadways (Airport Boulevard and Grand Avenue). The DSASP EIR indicates a significant and unavoidable impact related to a substantial permanent increase in ambient noise levels due to traffic noise. However, the Project would not result in a doubling of traffic on nearby roadways and any increase in traffic noise would be negligible compared to the existing noise generated by Highway 101 and other nearby major roadways. Therefore, noise impacts from Project-related motor vehicles during operations would be a less than significant impact. Overall, the Project would

have less than significant impacts under this threshold, consistent with (and with regard to traffic noise, less impactful than) the DSASP EIR. (**Less Than Significant**).

b. DSASP EIR: With regard to construction, the EIR indicates that construction activities within approximately 25 feet of existing sensitive uses could exceed the 85 vibration velocity decibels ("VdB") threshold for some projects. EIR Table 4.6-7 indicates that vibration levels due to construction activities (*e.g.,* bulldozing activity, drilling, jackhammering, and loaded trucks) could reach up to approximately 87 VdB within 25 feet of an active construction site. This is a potentially significant impact prior to mitigation. Mitigation measure MM4.6-4 requires written notification to all residents and nonresidential tenants within 115 feet of the vibration-generating construction activities, location of stationary vibration sources, and prohibits idling trucks on streets serving the construction site. (EIR, p. 4.6-19). With the implementation of mitigation measure MM4.6-4, this impact would be reduced to less-than-significant. (EIR, p. 4.6-18). With regard to cumulative impacts, the EIR concludes that cumulative development in the DSASP area and surrounding area is not likely to result in the exposure of people to or the generation of excessive groundborne vibration and/or noise levels, due to the localized nature of vibration impacts and because all construction would not occur at the same time or at the same location. Therefore, the cumulative impacts from excessive groundborne vibration would be less-than-significant. (EIR, p. 4.6-23). (**Less Than Significant**).

With regard to operations, the EIR explains that the commuter line which bisects the DSASP area would have the potential to exceed the Federal Transportation Authority ("FTA") disturbance criteria for Category 1 (vibration-sensitive equipment) uses up to 115 feet from the rail line, up to 70 feet for Category 2 uses (residences and buildings where people normally sleep), and up to 55 feet for Category 3 (institutional land uses). The freight line would potentially exceed FTA disturbances for Category 1 greater than 300 feet from the rail line, up to 200 feet for Category 2 uses, and up to 150 feet for Category 3 uses. Mixed-use developments within 0.25 miles of the rail line could contain all three categories of uses. This is considered a potentially significant impact. Mitigation measure MM4.6-5 requires projects to implement the current FTA and Federal Railroad Administration ("FRA") guidelines to limit the extent of the exposure that sensitive uses by requiring a site-specific vibration analysis prior to obtaining a building permit. Vibration control measures shall meet 65 VdB, 72 VdB, and 75 VdB respectively for Category 1, Category 2, and Category 3 uses. EIR, pp. 4.6-19 through 4.6-20. With the implementation of mitigation measure MM4.6-5, the impact would be less-than-significant. (EIR, p. 4.6-19). With regard to cumulative development in the DSASP area, the EIR concludes it is not likely to result in the exposure of people to or the generation of excessive groundborne vibration and/or noise levels due to the localized nature of vibration impacts. Therefore, the cumulative impact from excessive groundborne vibration would be less than significant. (EIR, p. 4.6-23). (**Less Than Significant**).

Project: The Project's Noise Technical Report concludes that with regard to construction-related impacts, vibrational effects from typical construction activities are only a concern within 25 feet of existing structures, and there are no structures within 25 feet of the Project site. Further, the Project would be required to follow DSASP EIR MM 4.6-4 to implement vibration control measures. Therefore, construction vibration would be a less than significant impact, consistent with the DSASP EIR. With regard to ground vibration from Caltrain passbys, the western building façade of Proposed Building 01 (located on 160 and 180 Sylvester Road) would be closest to the Caltrain rail line and would be located approximately 450-470 feet east of the outermost track of the rail line. The VdB from passing commuter rails along the Caltrain rail line would attenuate to approximately 51 VdB at 450 feet. This level of vibration would be well below the 75 VdB threshold established by DSASP EIR MM 4.6-5, and impacts would therefore be less than significant. (Exhibit I, pages 14-15). Impacts would overall be less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

c. DSASP EIR: The EIR indicates that people working or residing in the DSASP area would not be impacted by excessive noise levels from airports or private airstrips. The DSASP area is not near a private airstrip, so there would be no impact with regard to private airstrips. (EIR p. 4.6-14). With regard to the airport, the General Plan Noise Element provides that noise levels of 65 units of decibels ("dBA") community noise equivalent level ("CNEL") and below are considered compatible with residential land uses. The proposed project would not expose people residing or working in the DSASP area to excessive noise levels from aircrafts. Therefore, there would be less than significant impacts. (EIR, p. 4.6-14). (**Less Than Significant**)

Project: The Project Site is approximately 1.7 miles north of the San Francisco International Airport. The Project site is not within an aircraft insulation area as shown on Figure 9-1 Aircraft Noise and Noise Insulation Project (page 279, South San Francisco General Plan). The contours indicate the Project site is located outside the 65 dB, CNEL aircraft noise contour. Therefore, aircraft noise would be a less-than-significant impact, consistent with the DSASP EIR. **(Less Than Significant).**

5.14 Population and Housing

POPULATION AND HOUSING. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No	No	No

Documentation:

a. DSASP EIR: As noted in the EIR, the DSASP intends to accommodate existing and future population growth forecasted by the City by introducing residential housing within the DSASP area. The DSASP EIR explained that the DSASP could result in the addition of up to 1,435 housing units between 2014 and 2035 in the study area. Up to 1.2 million square feet of new office/ research and development ("R&D") uses could be added in the study area, to be developed predominantly on the eastern side of the US-101, which could represent as many as 2,400 or more new jobs added to the City. The EIR indicates that the potential population increase resulting from the DSASP would only slightly increase the population estimated under the General Plan, by a difference of 48 residents.[4] Assuming the project is fully occupied as estimated once

[4] Based on an estimated 2.96 residents per residential unit.

built-out, this population growth would only represent 0.07 percent of the population at build-out of the General Plan. Additionally, project implementation will result in higher employment rates. The DSASP would be consistent with the governing documents and policies regulating the City and would not exceed built-out population estimates. Therefore, impacts from direct population growth as a result of the new housing units would be less than significant. With regard to cumulative impact, at the time the EIR was published, approved residential projects within the City would result in the construction of an additional 247 housing units. Utilizing an average person-per-household factor of 2.96, future residential development in the City could result in a population increase of approximately 731 residents, while the DSASP could increase the population by 4,248 residents. In consideration of the DSASP build out and other approved projects, the population could exceed the General Plan estimated population growth by 683 persons, which represents roughly 1.0 percent of the overall population at General Plan build-out. However, it is reasonable to assume that not each residential unit would by occupied by 2.96 people or some people may relocate to the DSASP area from other parts of the City. Population growth would remain consistent with regional and county population growth rates and would not be considered substantial, therefore, the cumulative impacts of population growth would be less-than-significant. (EIR, p. 4.7-13). (**Less Than Significant**).

Project: The Project would not include residential use and therefore would not cause any direct housing-related growth impacts. Likewise, as discussed above in Section 5.11, it is designed to be consistent with the DSASP, and recently amended General Plan and Zoning Code development standards, and impacts would be consistent with the DSASP EIR. (**Less Than Significant**).

b. DSASP EIR: As noted in the EIR, implementation of the DSASP would not displace significant numbers of residents or residential units because most development would occur on commercial or vacant sites. The DSASP also accommodates higher density development that could support any affordable housing units lots through redevelopment. Therefore, this impact is less-than-significant, no mitigation is necessary. (EIR, p. 4.7-12). With regard to cumulative impacts, the EIR indicates that substantial numbers of residents would not be displaced because new housing units would primarily be located on vacant or underutilized commercial sites. Additionally, cumulative development would not displace substantial numbers of housing or people such that the construction of new housing would be needed elsewhere. The cumulative impacts on the displacement of housing or people would be less-than-significant. (EIR, p. 4.7-13). (**Less Than Significant**).

Project: The Project would occur on a commercial site and as noted above with regard to the DSASP EIR, therefore would not cause displacement impacts. (**Less Than Significant**).

5.15 Public Services

PUBLIC SERVICES. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
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?	No	No	No
Police protection?	No	No	No
Schools?	No	No	No
Parks? (Note: impacts related to parks are analyzed in the Recreation Section)	No	No	No
Other public facilities? (Note: impacts to water supply, wastewater, and landfill capacity are analyzed in the Utilities and Service Systems Section)	No	No	No

Documentation:

a. DSASP EIR: (**Fire**) The EIR explains that at build-out, the DSASP may result in up to 1,435 residential units and up to 1.2 million sf of new office/research and development ("R&D") uses. Although the population growth under the DSASP is estimated to only account for 0.7 percent of the Citywide population pursuant to build-out conditions under the General Plan, this population increase would result in an increase in fire service calls. In order to maintain the City's current ratio of 1.33 firefighters per 1,000 residents, an additional five fire fighters would need to be provided to accommodate the population grown under the DSASP. Development under the DSASP would be subject to the Public Safety Impact fee to fund improvements or public services necessitated for all new development. Additionally, all new development would be required to comply with the provisions of the California Building Code and Fire Code and other generalized and specialized fire safety requirements, including South San Francisco Municipal ("SSFM") Code Sections 15.08.010 and 15.24.010. Compliance with these measures and impact fees would ensure the impact would be less-than-significant. (EIR, p. 4.8-9). With regard to cumulative impacts, the EIR indicates as additional development occurs, there may be a cumulative increase in demand for fire services. All cumulative development would be subject to the same impact fees, regulations and policies as stated above. As development occurs in the City, the South San Francisco Fire Department ("SSFFD") will need to monitor response times and requirement payment of public safety impact fees to ensure current levels of service. (EIR, p. 4.8-10). This would be a less-than-significant cumulative impact. (EIR, p. 4.8-10). (**Less Than Significant**).

(**Police**) The EIR explains that at build-out, the DSASP may result in up to 1,435 residential units, resulting in an estimated population growth of 4,248 residents; and up to 1.2 million sf of new office/research and

development ("R&D") uses, resulting in up to 2,400 new jobs to the City. Although the population growth under the DSASP would only account for 0.7 percent of the population estimated under build-out conditions under the General Plan, the increase in residential population would result in an increase in police service calls. In order to maintain the City's current ratio of 1.24 officers per 1,000 residents, an additional five officers would need to be provided to accommodate the population growth anticipated under the DSASP. Development under the DSASP would be subject to the Public Safety Impact fee to fund improvements or public services necessitated for all new development. New police facilities are not anticipated as a result of project implementation. Therefore, the impact on police protection services would be less-than-significant. (EIR, p. 4.8-15). With regard to cumulative impacts, the EIR indicates as additional development occurs, there may be a cumulative increase in demand for police protection services. This is a potentially significant impact. All cumulative development would be subject to the same impact fees as stated above. This would be a less-than-significant cumulative impact. (EIR, p. 4.8-10). (**Less Than Significant**).

(**Schools**) The EIR explains that at build-out, the DSASP may result in up to 1,435 residential units, resulting in an estimated population growth of 4,248 residents; and up to 1.2 million sf of new office/research and development ("R&D") uses, resulting in up to 2,400 new jobs to the City. It is estimated that full build-out under the DSASP would result in an increase of new students throughout the schools identified in Table 4.8-2. (EIR, p. 4.8-18). The EIR indicates that new student growth under the DSASP would not result in overcrowding. The South San Francisco Unified School District ("SSFUSD") does not place caps on enrollment at any of its schools, but limits the number of students in each classroom as follows: 24 students per classroom for grades K-3, 29 students per classroom for grades 4-5, and 33 students per class for grades 6-12. As enrollment increases, modular units are added to the school property. State law also requires project applicants of development located within the SSFUSD to pay all applicable development impact fees at the time building permits are issued. Enrollment is also declining in the SSFUSD, therefore no new facilities are anticipated. This impact would be less-than-significant. (EIR, p. 4.8-23.) With regard to cumulative impacts, the EIR indicates that increases in residential development throughout the City could generate additional demand for enrollment in local schools. Schools can accommodate increased enrollment by utilizing modular units to maintain the standard for class size. All new private development is required to pay development impact fees to the school districts to help fund construction of additional classrooms and offset any additional increases in education demand at elementary, middle, and high schools. (EIR, p. 4.8-24). Additionally, individual development projects would be evaluated to determine whether new school facilities would be required. The incremental effect of the proposed project on this impact would not be cumulatively considerable, and this cumulative impact would be less-than-significant. (EIR, p. 4.8-24). (**Less Than Significant**).

(Libraries) The EIR indicates that current staffing levels at the South San Francisco Library exceed average service ratios provided by the State of California Library Statistics. The Library currently has a 37 member staff, exceeding average ratios by 14 staff. At build-out the DSASP may result in up to 1,435 residential units and up to 1.2 million sf of new office/research and development ("R&D") uses. Based on a ratio of 2.96 persons per household, the DSASP could result in up to 4,248 additional residents. This residential population would require a total of 24 staff members under the Library Statistics standard, therefore a staff of 37 is sufficient to accommodate the residential growth. The South San Francisco Library system also has a combined collection of books and audio-visual materials that exceed the standard 2.0 items per capital recommended by the California Library Association. In addition, the Peninsula Library System, with a consortium of 35 public and community college libraries for the County of San Mateo, would be available to residents. This impact would be less-than-significant. (EIR, p. 4.8-23). With regard to cumulative impacts, the EIR indicates that the cumulative demand for library services within the City is expected to increase as a result of project build out and other cumulative growth.

However, the growth is not expected to decrease the recommended 2.0 items per capita recommended by the California Library Association, nor would it decrease the ratio of staffing below the average services ratio recommended by the State of California as discussed above. The current surplus of library staff would ensure that any additional cumulative development would be met adequately without significant concern. The cumulative impact on library services would be less-than-significant. (EIR, p. 4.8-24). (**Less Than Significant**).

Project: The Project is consistent with the DSASP and is also designed to be consistent with the recently amended General Plan and Zoning Code. It will further comply with all regulatory requirements and pay all applicable development impact fees addressing public services. These include the Parks and Recreation Impact Fee (SSFMC § 8.67), Childcare Impact Fee (SSFMC § 20.310), Library Impact Fee (SSF Resolution 121-2020), Public Safety Impact Fee (SSF Resolution 123-2020), School District Fee, Citywide Transportation Fee (SSF Resolution 120-2020), Commercial Linkage Fee (SSFMC § 8.69), East of 101 Sewer Impact Fee (Resolution 97-2002), and Sewer Capacity Charge (Resolution 56-2017). As such, the Project would not result in any public services impacts not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to public services as compared to the conclusions reached in the DSASP EIR. (**Less Than Significant)**.

5.16 Recreation

RECREATION. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Result in an increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	No	No	No
b) Include recreational facilities, or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	No	No	No

Documentation:

a. DSASP EIR: The indicates that the DSASP could generate additional demand for parkland in the City, however, it is expected that new residents would not substantially increase the use of existing neighborhood or regional facilities to the point of substantial deterioration. The existing parks-to-population ratio is 3.4 acres per 1,000 residents, which exceed the General Plan goal of 3.0 acres per 1,000 residents. However, the EIR notes that 1.2 acres per 1,000 residents of development parkland is truly available. Project implementation could result in a population increase of up to 4,248 residents, reducing the parks-to-population ratio. Because this increase represents only 0.7 percent of the total City

population, the increase is not expected to result in the substantial deterioration of existing park facilities. The EIR indicates in addition to the City parks which provide 218 total acres of parkland and open space, there are a wide variety of City, County, educational, and private recreational facilities within the City, as detailed in Table 4.9-1. (EIR, p. 4.9-3). The General Plan also requires projects to provide 0.5 acres per 1,000 new employees. Project implementation is expected to generate approximately 2,400 jobs which would necessitate the provision of 1.2 acres of new parks and open space. Additionally, the DSASP would add a network of new open space opportunities, new development within the DSASP area may be required to pay in-lieu fees to support population increases. The DSASP will provide open space in the form of parks, squares, paseos, courtyards and plazas and developers of certain projects would utilize open space and streetscape improvements in the design of their projects. Based on the foregoing, this impact would be less-than-significant. (EIR, p. 4.9-9) With regard to cumulative impacts, the EIR indicates in light of the existing parkland per resident ratio of 3.4 acres per 1,000 residents, the requirement for future development to dedicate parkland or pay in-lieu fees, and that future development under the DSASP would be expected to provide some open space, pocket parks, and recreational facilities, cumulative development would not significantly adversely affect recreational facilities in the City. The cumulative impact to existing parks and recreational facilities would be less-than-significant. (EIR, p. 4.9-11). (**Less Than Significant**).

Project: The Project is consistent with the DSASP and has been designed to be consistent with the recently amended General Plan and Zoning Code. Therefore, the Project would not result in a significant increase in use of parks and recreational facilities beyond that anticipated in the DSASP EIR and construction of new parks and recreational facilities would not be required. As such, the Project would not result in any recreation impacts not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to recreational facilities as compared to the conclusions reached in the DSASP EIR. (**Less Than Significant**).

b. DSASP EIR: The EIR indicates that development under the DSASP could include recreational components such as gym facilities, parks, or other recreational amenities, which could result in adverse impacts to the environment. The DSASP EIR analyzes all potential types of development, including the construction of recreational facilities. Future development under the DSASP would be required to comply with applicable local regulations and all mitigation measures identified in the EIR, including additional environmental review if impacts of a specific project are not adequately analyzed in the DSASP EIR. Because the existing parks and recreational facilities would be adequate to meet the needs generated by development in the DSASP area, the impact would be less-than-significant. (EIR, p. 4.9-10). With regard to cumulative impacts, development under the DSASP and other related projects in the City could result in the development of new recreational facilities, which may cause a significant effect on the environment, particularly during construction. Compliance with the City's construction ordinances, including the limitation of construction hours contained in the Municipal Code, it is likely that such impacts would be reduced to a level of less-than-significant. Cumulative development may also require the construction of new parklands, development under the DSASP would be required to comply with all applicable mitigation measures to reduce or avoid significant construction-related impacts. This cumulative impact is less-than-significant. (EIR, p. 4.9-11). (**Less Than Significant**).

Project: The Project is consistent with the DSASP and has been designed to be consistent with the recently amended General Plan and Zoning Code. Therefore, the Project would not result in a significant increase in use of parks and recreational facilities beyond that anticipated in the DSASP EIR and construction of new parks and recreational facilities would not be required. As such, the Project would

not result in any recreation impacts not previously analyzed, and would not result in a new or substantially more severe cumulatively considerable contribution to significant cumulative impacts with respect to recreational facilities as compared to the conclusions reached in the DSASP EIR. (**Less Than Significant**).

5.17 Transportation

TRANSPORTATION. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	No	No	No
b) Conflict with or be inconsistent with CEQA Guidelines Section 51064.3, subdivision (b)?	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	No	No	No
d) Result in inadequate emergency access?	No	No	No

Documentation:

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

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

Project: As explained in the Project's CEQA Transportation Analysis (Exhibit J to this addendum), with

regard to the transportation analysis, the DSASP EIR used Level of Service, ("LOS") methodology to evaluate whether implementation of the DSASP is likely to cause automobile delay at intersections and congestion on nearby individual highway segments to exceed LOS thresholds. SB 743, enacted in 2013, changed how lead agencies evaluate transportation impacts under CEQA. Starting on July 1, 2020, CEQA Guidelines Section 15064.3 directs agencies to utilize vehicle miles travelled ("VMT"), which measures the amount and distance of auto travel attributable to a project, as the primary metric for measuring transportation impacts. The project is presumed to have a less than significant impact on VMT as it is located less than 500 feet from the South San Francisco Caltrain Station east entrance. The project is proposing an FAR of 2.5, will not provide more than the maximum required number of parking spaces, and is consistent with the City's General Plan land use and zoning. Therefore, a detailed VMT analysis is not required. Further, the Project will implement its Transportation Demand Management (TDM) program (which is included as Exhibit K to this addendum) consistent with the City's applicable requirements, which will further ensure less than significant impacts.

The project would not remove any pedestrian facilities, nor would it conflict with any adopted plans or policies for new pedestrian facilities. Accordingly, the project would have no significant impact on pedestrian facilities. The project will provide on-site bicycle parking facilities. The project would not remove any bicycle facilities, nor would it conflict with any adopted plans or policies for new bicycle facilities. Accordingly, the project would have no significant impact on bicycle facilities. The project is expected to add a significant number of new transit riders. However, given the extensive services available, the new riders could be accommodated. The project would therefore have no significant impact on transit service. (**Less Than Significant**).

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

Project: The Project likewise would not include sharp curves or dangerous intersections or incompatible uses, and it has been designed to be consistent with the General Plan, DSASP, and Zoning Code. Vehicles would access the project site from East Grand Avenue via Sylvester Road. The intersection of East Grand Avenue and Sylvester Road will be signalized, and crosswalks with pedestrian push buttons and countdown timers will be provided with the redevelopment of parcels along Sylvester Road consistent with the Vehicle Access and Circulation improvements identified in the South San Francisco Caltrain Station Eastern Access Study. The project would reconstruct and widen the sidewalks along its frontages on East Grand Avenue and Sylvester Road to a minimum of 10 feet wide with a landscaped buffer. Pedestrian scale lighting and street trees would be provided along the project frontage on East Grand Avenue and Sylvester Road. All project improvements would meet applicable design standards. Thus, the project would improve pedestrian and bicycle safety in the area. Impacts would remain less than significant. (**Less Than Significant**).

5.18 Tribal Cultural Resources

TRIBAL CULTURAL RESOURCES. *Compared to the assumptions, analysis and conclusions presented in the*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or**

certified EIR, would the Project:			**Verification?**
a) Cause a substantial adverse change in the significance of a tribal cultural resources, 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:	No	No	No
i) 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)?	No	No	No
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	No	No	No

Documentation:

a(i-ii) DSASP EIR: Development projects under the DSASP are required through mitigation measures MM4.3-2 through MM4.3-4, if applicable, to conduct preconstruction surveys of previously undisturbed soils, to retain an archaeologist to document any cultural resources within the development area; require that earth-moving activities be halted if an archaeological resource is discovered; and require that all construction personnel ***receive environmental*** awareness training. (DSASP, p. 4.3-13.) Implementation of these mitigation measures would reduce this impact to less than significant. (Id.) Compliance with Public Resources Code Section 5097.98 would protect unknown and previously unidentified human remains, and impacts related to unknown human remains would be less than significant and no mitigation would be required. (DSASP EIR, p. 4.3-15.) Finally,

the DSASP EIR does not identify any significant tribal cultural resources within the DSASP area. (**Less Than Significant**).

Project: As discussed in more detail in Section 5.5 above and in Exhibit M to this document, there are no known tribal cultural resources on the Project Site. Exhibit M further concludes that no known villages have been reported in, adjacent or near the Project Site, and because of that and the previously disturbed nature of the Project Site, there is low potential to affect tribal cultural resources. Consistent with the DSASP EIR, the Project would comply with the law to the extent required, and impacts would be less than significant. (Less Than Significant)

5.19 Utilities and Services Systems

UTILITIES AND SERVICES SYSTEMS. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, would the Project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, , the construction or relocation of which could cause significant environmental effects?	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	No	No	No
c) Result in a determination by the wastewater treatment provider that serves the project area that it does not have adequate capacity to serve the project area's projected demand in addition to the provider's existing commitments?	No	No	No
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	No	No	No
e Fail to comply with federal, state, and local management and reduction statutes and regulations	No	No	No

related to solid waste?			

Documentation:

a, c. DSASP EIR: The DSASP EIR concluded that no more water treatment facilities are required to meet water demands associated with the implementation of the DSASP and the DSASP would not require the construction or expansion of water treatment facilities. (DSASP EIR, p. 4.11-24.) Further, cumulative development would not require or result in the construction of new water facilities or expansion of existing facilities. (DSASP EIR, p. 4.11-28.) The DSASP EIR found that implementation of the DSASP would not exceed wastewater treatment requirements of the applicable Regional Board, which would be a less-than-significant impact. (DSASP EIR, p. 4.11-40.) Although implementation of the DSASP would require additional wastewater to be treated, it would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. (*Id.*) As for cumulative wastewater impacts, the DSASP EIR anticipated that cumulative development would not exceed the capacity of the wastewater treatment system and all wastewater would be treated adequately. Therefore, the impact of cumulative development on wastewater treatment would be less than significant. (DSASP EIR, p. 4.11-42.) (**Less Than Significant**).

Project: The Project has been designed to be consistent with the DSASP, and recently amended General Plan and Zoning Code, and it would therefore likewise not require the construction or expansion of water treatment or wastewater treatment facilities. (**Less Than Significant**).

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

Project: The Project is within the scope of and consistent with the project analyzed in the DSASP WSA, and there have been (1) no changes in the project that would result in a substantial increase in water demand, and (2) no changes in circumstances or conditions substantially affecting the City's ability to provide sufficient water supplies to the project. There is also no significant new information indicating the project would result in water supply impacts more severe than those identified in the DSASP EIR. The Project's water supply impacts were therefore already addressed in the DSASP WSA and EIR, and a Project-specific WSA is not required. As is the case with DSASP development as concluded in the DSASP WSA (and development under the General Plan for that matter as concluded by the General Plan EIR), the City's water supplies are insufficient during dry years to satisfy the demands of existing and planned future uses, thereby requiring the City to implement its water shortage contingency plan to achieve necessary

demand reductions. However, the DSASP WSA concluded the City could achieve demand reductions necessary to address dry year supply deficiencies through implementation of its water shortage contingency plan, and there have been no changes in circumstances or conditions substantially affecting the City's ability to provide sufficient water supplies to the Project. There is also no significant new information that has become available since the DSASP WSA was prepared that was not known and that could not have been known at that time. In addition, regulatory requirements related to water efficiency have become more stringent since the adoption of the DSASP and the DSASP EIR, including with regard to CalGreen and the City's 2022 CAP. Further, the Project would comply with the requirements of the model water efficient landscape ordinance ("WELO"), as required by SSFMC Section 20.300.007. Impacts are less than significant, consistent with the DSASP EIR. (**Less Than Significant**).

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

Project: The Project would comply with all applicable solid waste regulations and land fill capacity exists for future DSASP buildout. Solid waste disposal and recycling in the City is regulated by the City's SSFMC, particularly Chapters 8.16 and 8.28. Under the SSFMC, future development would be required to have its solid waste and recyclable materials collected by the Scavenger Company. The Project would comply with federal, state, and local statutes and regulations related to solid waste, and, therefore, is consistent with the DSASP EIR analysis. (**Less Than Significant**).

5.20 Wildfire

WILDFIRE. *Compared to the assumptions, analysis and conclusions presented in the certified EIR, if located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	No	No	No
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	No	No	No
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that	No	No	No

may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	No	No	No

Documentation:

a-d. The DSASP area is not within a state responsibility area or within lands classified as very high fire hazard severity zones. It is located in an urban environment and is not expected to generate any wildfire impacts. (**Less Than Significant**).

Circumstances on the Project Site have not changed. (**Less Than Significant**).

5.21 Mandatory Findings of Significance

MANDATORY FINDINGS OF SIGNIFICANCE. *Compared to the assumptions, analysis and conclusions presented in the certified EIR:*	**Do Proposed Changes Involve New or More Severe Impacts?**	**Any New Circumstances Involving New or More Severe Impacts?**	**Any New Information Requiring New Analysis or Verification?**
a) Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	No	No	No
b) Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the	No	No	No

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?	No	No	No

Documentation:

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

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

  Project: The Project is consistent with this DSASP EIR analysis. As noted in the discussion of Transportation above, CEQA Guidelines Section 15064.3 now directs agencies to utilize vehicle miles travelled ("VMT"), which measures the amount and distance of auto travel attributable to a project, as the primary metric for measuring transportation impacts. Pursuant to CEQA Guidelines Section 15064.3 the Project is presumed to have a less than significant VMT impact.

  Further, the Project would not contribute to the significant and unavoidable impact to historical resources

identified in the DSASP EIR because a historic consultant evaluated and determined that the on-site buildings, although greater than 50 years old, are not historic and that the Project would not cause a substantial adverse change in the significance of a historical resource.

In regards to mandatory findings of significance, as indicated above, the Project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. Further, the Project would not have environmental effects which will cause substantial adverse effects on humans, either directly or indirectly.

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

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

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