

## CITY OF SOUTH SAN FRANCISCO

### CONSISTENCY CHECKLIST AND INITIAL STUDY

Former San Francisco Public Utilities Commission Opportunity Site Residential Project

#### **INTRODUCTION**

This document ("Checklist") examines the environmental effects of the proposed development of the Former San Francisco Public Utilities Commission ("SFPUC") Opportunity Site Residential Project (the "Project," described in detail below). This document has been prepared in accordance with the relevant provisions of the California Environmental Quality Act ("CEQA") of 1970 (as amended) and the State CEQA Guidelines ("CEQA Guidelines") as implemented by the City of South San Francisco (the "City").

As supported by the analysis presented in this document, the Project would not necessitate the need for preparation of a subsequent environmental document pursuant to the criteria of CEQA Guidelines Section 15162 because as proposed, the project would not result in new or substantially more severe significant environmental effects than what was analyzed in the El Camino Real/Chestnut Avenue Area Plan ("ECR/C Area Plan" or "Area Plan") Program Environmental Impact Report ("EIR") ("ECR/C EIR") as updated by the Community Civic Campus Project Subsequent EIR ("Civic Project SEIR"). The ECR/C EIR and Civic Project SEIR are collectively referred to as the ECR/C EIRs.<sup>1</sup> This document includes a description of the Project and a comparison of the potential impacts of the Project to those identified in the ECR/C EIRs.

This document also examines the consistency of the Project with the ECR/C Area Plan for the purposes of 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.

#### **LEGAL AUTHORITY**

##### ***CEQA Guidelines Section 15168***

CEQA requires local governments to conduct environmental review on public and private development projects. CEQA and the CEQA Guidelines establish the type of environmental documentation which is required for subsequent actions covered by a program EIR. The Project would implement the vision and goals described in the ECR/C Area Plan for the Project area, and is a component of the ECR/C Area Plan analyzed in the ECR/C EIR. CEQA and the CEQA Guidelines allow for limited environmental review of subsequent projects within the scope of the analysis of a program EIR, which involves the examination of the subsequent project in light of the program EIR to determine whether an additional environmental document must be prepared. The CEQA Guidelines require agencies to use checklists or similar mechanisms to conduct this analysis.

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<sup>1</sup> The full, original ECR/C EIRs are available for public review at the City of South San Francisco Planning Division, 315 Maple Avenue, in South San Francisco and online on the City of South San Francisco website at <http://weblink.ssf.net/weblink/Browse.aspx?startid=341385&row=1&dbid=0> and <http://weblink.ssf.net/weblink/0/fol/341385/Row1.aspx>. Both of the ECR/C EIRs are incorporated by reference.

CEQA Guidelines section 15168(c) explains how the City should use the ECR/C EIR with later activities within the scope of the Area Plan:

*Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.*

- 1. If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.*
- 2. If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.*
- 3. An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.*
- 4. Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the program EIR.*
- 5. A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.*

### **CEQA Guidelines Section 15183**

The Project also is designed to be consistent with the development standards in the Area Plan and Zoning Code, which were analyzed in the ECR/C EIRs. CEQA and the CEQA Guidelines mandate that projects consistent with the development density established by existing zoning policies or community plan 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 that are peculiar to the project or its site. Specifically, in approving a project meeting the requirements of CEQA Guidelines section 15183, the City must limit its examination of environmental effects to those that the agency determines, in an initial study or other analysis:

- 1. Are peculiar to the project or the parcel on which the project would be located,*
- 2. Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,*
- 3. Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or*

4. *Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.*

(CEQA Guidelines § 15183(b).) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then no additional EIR is required to address that impact. Uniformly applied development policies and standards include those policies in the General Plan, Area Plan, and Municipal Code, as well as applicable regional, state, and federal laws.

## **APPLICABILITY**

One purpose of the Checklist is to analyze whether the construction or operation of the Project could result in any new or substantially more severe significant environmental impacts than those identified in the ECR/C EIRs or require new mitigation measures. This Checklist demonstrates that none of the conditions described in Section 15168 have occurred and, thus, that no further environmental documentation is required for the Project pursuant to CEQA Guidelines Section 15168. As determined in the analysis provided in the Checklist, as proposed, the Project will not involve “new significant environmental effects or a substantial increase in the severity of previously identified significant effects” that were not previously identified ECR/C EIRs. Additionally, no new mitigation measures would be required; mitigation measures that were adopted for the ECR/C EIRs continue to remain applicable. The environmental impacts associated with the Project would be within the scope of impacts analyzed in the ECR/C EIRs and would not be new or greater. On the basis of substantial evidence in the light of the whole record, the City has determined that no further CEQA documentation is required for adoption of the Project because the Project meets the requirements under CEQA Guidelines section 15168(c) and that the Project qualifies for a CEQA exemption under CEQA Guidelines section 15183.

In addition, the Project qualifies for other CEQA exemptions, which are discussed in further detail under *Other Available CEQA Mechanisms* below.

## **BACKGROUND**

### ***ECR/CEIR***

The ECR/C Area Plan was prepared to guide development in the approximately 98-acre planning area located along El Camino Real from Southwood Drive to north of Sequoia Avenue, establishing new land use, development, and urban design regulations for the Area Plan area for a 20-year planning period (2010-2030). Environmental impacts resulting from the development contemplated under the ECR/C Area Plan, and associated General Plan and Zoning Ordinance amendments were considered. On July 27, 2011, after public review and comment, the City certified the ECR/C EIR (State Clearinghouse #2010072015), adopted CEQA findings and a statement of overriding considerations, and adopted the ECR/C Area Plan.

The Draft and Final ECR/C EIR is available at the following link:

<http://weblink.ssf.net/weblink/Browse.aspx?startid=51192&row=1&dbid=0>.

In order to estimate buildout, the ECR/C EIR assumed that approximately 70 percent of the Area Plan area

would be redeveloped. (ECR/C EIR, p. 2-17.) Specifically, the ECR/C EIR assumed that the High Density Residential site would be redeveloped at approximately 108 density units per acre, and the El Camino Real Mixed Use North (High Intensity or Medium Intensity) sites will be redeveloped at an average FAR of 2.1. (*Id.*)

Below, **Table A** shows the land use assumptions underlying the ECR/C EIR.

**Table A. ECR/C EIR Buildout Assumptions**

	<i>Existing</i>	<i>Proposed Plan</i>	<i>Increase</i>
<b>Population and Housing</b>			
Population <sup>1</sup>	400	4,800	+4,400
Housing Units	132	1,587	+1,455
Households <sup>2</sup>	125	1,223	+1,098
<b>Non Residential and Jobs</b>			
Retail and Services (sf)	250,900	426,300	+175,400
Office (sf)	304,800	377,800	+73,000
Public/Institutional (sf)	60,500	110,500	+50,000
Jobs <sup>3</sup>	1,900	2,500	+600
Employed Residents <sup>4</sup>	200	2,400	+2,200
Jobs/Employed Residents	8	1.0	

<sup>1</sup> Buildout population was calculated assuming 3.04 persons per household; totals are rounded to the nearest hundred.

<sup>2</sup> Households are estimated as 95 percent of the total housing units, assuming a 5 percent vacancy rate.

<sup>3</sup> Jobs at buildout rounded to the nearest hundred. Jobs projected under the proposed Plan exclude any expansion of Kaiser that may result in the future.

<sup>4</sup> Employed residents at buildout were calculated using the ratio of employed residents to total population as projected for 2030 in the City of South San Francisco by ABAG (50% of total population).

Sources: ABAG Projections 2009; Dyett & Bhatia 2010.

The ECR/C Area Plan identifies a Focus Area within which it designates opportunity sites broken down into ten blocks. (ECR/C Area Plan, Figure 1-2, p. 3.) The ECR/C Area Plan provides an illustrative vision and massing for each of the ten blocks.<sup>2</sup> (ECR/C Area Plan, pp. 50-58). **Table B** shows the development assumptions of the ECR/C EIR by each block identified in the ECR/C Area Plan. (ECR/C EIR Traffic Impact Analysis, Appendix B, El Camino Real/Chestnut Avenue Area Plan Land Use Projections.)

However, the ECR/C Area Plan and EIR acknowledge that a development project does not have to be consistent with the illustrative vision and massing and detailed *block-by-block* projections to be consistent with the Area Plan. (ECR/C EIR, p. 2-17; ECR/C Area Plan, p. 50.) As such, so long as a project is consistent with the ECR/C Area Plan designation and applicable policies, and the *overall* capacity shown in **Table A** has not been exceeded, that project may rely on the ECR/C EIR for CEQA coverage. In addition to the Area Plan's flexibility

<sup>2</sup> The Project is located within the Focus Area and proposes development of Blocks A, B, and C.

for block specific development, it should also be noted that there are currently no other residential projects moving forward in the Plan Area with the exception of the SummerHill project at 988 El Camino Real.

**Table D**, at the end of this section, shows the total remaining overall capacity under the ECR/C Area Plan, taking into consideration the projects approved in the ECR/C Area Plan area since the certification of the ECR/C EIR. In addition to not exceeding the overall capacity in the ECR/C Area Plan, there are also no other residential units going forward in the Plan Area aside from the Project and the SummerHill project at 988 El Camino Real.

**Table B. ECR/C EIR Buildout Assumptions By Block<sup>3</sup>**

**NET NEW DEVELOPMENT BY BLOCK**

	<i>Project</i>
<b>BLOCK A</b>	
Residential Units	419
<b>Block B &amp; C</b>	
Residential Units	137
Retail and Services (sf)	11,600
<b>BLOCK D &amp; E</b>	
Residential Units	224
Retail and Services (sf)	76,100
<b>BLOCK F &amp; G</b>	
Retail and Services	34,500
Office (sf)	73,000
Civic (Library) (sf)	50,000
<b>BLOCK H, I, &amp; J</b>	
Residential Units (sf)	370
Retail and Services (sf)*	(8,500)
<b>OUTSIDE FOCUS AREA</b>	
Residential Units	305
Retail and Services (sf)	61,700

\* No new net Retail and Services; Assume 0 sf

**SUMMARY OF NET NEW DEVELOPMENT**

	<i>Project</i>
Residential Units	1,455
Retail and Services (sf)*	175,400
Office (sf)	73,000
Civic (sf)	50,000

\*No new net Retail and Services; Assume 0 sf

**Civic Project SEIR**

Since certification of the ECR/C EIR and adoption of the ECR/C Area Plan in 2011, the City has updated its plans for a portion of the Area Plan area to provide a new civic center, which would house a library, recreation center, a new police station, and city offices on land designated as Mixed Use in the original ECR/C Area Plan, and replace the existing Municipal Services Building with a new fire station on land designated as Public in the original ECR/C Area Plan ("Civic Project"). In addition to clean-up edits, the Civic Project made the following

<sup>3</sup> The residential units projection for the Civic Project Blocks (D & E) in the Traffic Appendix of the ECR/CEIR (224 unit growth) vary from those stated in Table 2-3 of the Area Plan (290 unit growth) by 66 units. This variation does not affect the conclusions of this Consistency Checklist because the overall buildout capacity governs this analysis and there is enough available overall buildout capacity to cover the Project.

notable changes to the ECR/C Area Plan:

- Changed property south of El Camino Real and east of Oak Avenue from Public to Mixed-Use High Intensity; and
- Added “community class spaces” and “residential amenities with transparency” to the definition of active uses.

The Summary of Changes to Community Civic Campus Project attached hereto includes all changes made to the ECR/C Area Plan, the General Plan, and the Zoning Ordinance. The Civic Project elements are also shown below in **Table C**.

Impacts of the proposed land uses and land use intensities of the Civic Project were not considered in the existing ECR/C EIR, so a supplemental EIR was prepared to specifically consider whether the Civic Project would result in any new significant impacts not identified in the 2011 ECR/C EIR, or if the Civic Project would cause a substantial increase in the severity of the previously identified significant impacts (“Civic Project SEIR”). The Civic Project SEIR also discusses any pertinent new information or changes in circumstances that could result in new significant impacts not identified in the ECR/C EIR. Mitigation measures required in the ECR/C EIR were identified and, where appropriate, were clarified, refined, revised, or deleted, and new mitigation measures were identified. The City Council certified the Civic Project SEIR (State Clearinghouse #2010072015), adopted CEQA findings and a mitigation monitoring and reporting program, and adopted the changes to the ECR/C Area Plan, as well as associated zoning and General Plan amendments, on December 13, 2017.

It is important to note that the Civic Project SEIR covers impacts related to the Civic Project, which is located on a small portion of the original Area Plan area. (Civic Project SEIR, p. 1.0-2.) The 2011 ECR/C EIR was greater in scope than the Civic Project SEIR and covered the full Area Plan area, including the Project site. As such, the analysis in this CEQA Checklist primarily relies on the analysis (and Area-wide land use assumptions) of the ECR/C EIR. However, the analysis also takes into consideration any new information, analysis, and mitigation measures presented by the Civic Project SEIR that potentially applies to the SFPUC Project.<sup>4</sup>

The Draft and Final ECR/C Civic Project SEIR is available at the following link:

<http://weblink.ssf.net/weblink/Browse.aspx?startid=51192&row=1&dbid=0>

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<sup>4</sup> For example, because the Civic Project SEIR presents a new Traffic Impact Analysis with updated trip generation counts, the traffic impact analysis in this CEQA Checklist will consider the SFPUC Project’s potential impacts based on the land use assumptions underlying the updated trip generation counts provided by the updated Civic Project SEIR Traffic Impact Analysis.

**Table C. Civic Project Elements**

Type of Space	Purpose and Size
Performance space	<ul style="list-style-type: none"> <li>• 100-seat theater</li> </ul>
Exhibit space	<ul style="list-style-type: none"> <li>• 300 square feet of gallery space</li> </ul>
Social space	<ul style="list-style-type: none"> <li>• 3,000 square feet of informal social space</li> <li>• Library reading rooms and seating areas for children, teens, and adults</li> <li>• Library collaboration spaces</li> </ul>
Program spaces	<ul style="list-style-type: none"> <li>• 6,000-square-foot social hall, frequent rentals</li> <li>• 1,600-square-foot library program room</li> <li>• 1,100-square-foot maker space “Tinker Lab”</li> <li>• 800-square-foot technology lab</li> </ul>
Classrooms	<ul style="list-style-type: none"> <li>• Four large classrooms (1,200 square feet)</li> <li>• Two medium-sized classrooms (1,000 square feet)</li> <li>• One large dance studio (1,600 square feet)</li> <li>• One medium dance studio (800 square feet)</li> </ul>
Retail	<ul style="list-style-type: none"> <li>• 300-square-foot café</li> <li>• 500-square-foot Friends of the Library store</li> </ul>
Civic	<ul style="list-style-type: none"> <li>• 3,000-square-foot council chambers, flexible for City programming and rentals</li> <li>• City Council support spaces</li> </ul>
Preschool*	<ul style="list-style-type: none"> <li>• Three 20-child classrooms</li> <li>• Staff workspace and support space</li> <li>• Secure outdoor play space for 60 children</li> </ul>
Staff space	<ul style="list-style-type: none"> <li>• Library offices and workstations</li> <li>• Parks and Recreation Department offices and workstations</li> <li>• Shared reception, collaboration, and breakout space</li> <li>• Space for future staff growth</li> </ul>
Storage and building support	<ul style="list-style-type: none"> <li>• Building and program storage</li> <li>• Building systems, restrooms</li> </ul>
Outdoor space	<ul style="list-style-type: none"> <li>• Building rooftops: up to 6,000 square feet of usable rooftop area</li> <li>• Events plaza: for day-to-day informal gathering and seating with the ability to host periodic special events for 350–500 people</li> <li>• Meadow: for casual gathering and passive recreation</li> <li>• Centennial Trail: connection to the existing trail with a bike and running path</li> </ul>
Parking	<ul style="list-style-type: none"> <li>• Up to 294 spaces, both underground and aboveground</li> </ul>

Source: South San Francisco 2017

Notes\*: 1. Programming for purposes of CEQA but minor variations possible in final Community Civic Campus Project.

2. Preschool programming is under consideration for purposes of CEQA but may not be included in final Community Civic Campus Project if alternative locations are identified.



### Remaining Capacity

As noted, **Table A** above shows the buildout capacity associated with the ECR/C Area Plan.<sup>5</sup> Since the 2011 adoption of the ECR/C Area Plan, the City has approved the following projects within the Area Plan area, all of which will contribute to the buildout capacity outlined in **Table A**, above:

- Civic Project: 145,000 sf of Public/institutional use, consisting of a Library (50,000 square feet), a Recreation Center (43,500 square feet); Police Station with office space for the City's IT and HR staff (44,500 square feet); and Fire Station (7,000 square feet).<sup>6</sup>
- 988 El Camino Real Project: 172 apartments above approximately 10,915 square feet of commercial space.<sup>7</sup>

**Table D** shows that there is remaining buildout capacity available within the Area Plan area for the Project's proposed 800 residential units and 21,299 sf of commercial uses (discussed further below) with excess capacity even after approval of the Project for all land use categories, except Public/Institutional uses. Moreover, development projects that have been approved within the Area Plan area have not utilized the full residential capacity assumed for the given blocks. As noted, the approved Civic Project does not include any residential units, although the ECR/C EIR assumed 224 housing units for Blocks D and E where the Civic Project is located. Similarly, the 988 El Camino Real Project (Block I), will only construct 172, of the 370 housing units assumed for Blocks H, I, and J. See **Table B** above, for the Area Plan block-by-block capacity.

**Table D. Capacity under ECR/C Area Plan**

Land Use Category	ECR/C Area Plan EIR Land Use Assumptions <sup>A</sup>	Approved/Pending Developments				Remaining Capacity
		Civic Project <sup>B</sup>	988 ECR <sup>C</sup>	PUC Project	Total	
Residential (Units)	1,455	0	172	800	972	483
Retail and Service Uses (Square Feet)	175,400	0	10,915	21,299 (Retail Childcare)	32,214	143,186
Office Uses (Square Feet)	73,000	44,500 (Police, IT, HR)	0	0	44,500	28,500
Public/Institutional Uses (Square Feet)	50,000	100,500 (Library, Rec Facility, Fire Station)	0	0	100,500	-50,500 <sup>8</sup>

<sup>5</sup> The Civic Project SEIR, being limited in scope to cover only the Civic Project, did not update the analysis for the full Area Plan area, and thus did not update land use assumptions for the entire Area Plan area.

<sup>6</sup> El Camino Real/Chestnut Area Plan Update SEIR, Transportation Impact Analysis, Project Description, p. 25 (2017)

<sup>7</sup> 988 El Camino Real Mixed-Use Development, Initial Study and Consistency Checklist, Project Description, p. 5 (2018)

<sup>8</sup> As described above, the Civic Project SEIR analyzes the impacts resulting from the change in uses proposed in the Civic Project that caused the ECR/C EIR buildout capacity for Public/Institutional uses to be exceeded.

<sup>A</sup> Source: *El Camino Real/Chestnut Area Plan EIR, Tables 2.4-1 and 2.4-2, p. 2-18 (2011)*

<sup>B</sup> Source: *El Camino Real/Chestnut Area Plan Update SEIR, Transportation Impact Analysis, Project Description, p. 25 (2017)*

<sup>C</sup> Source: *988 El Camino Real Mixed-Use Development, Initial Study and Consistency Checklist, Project Description, p. 5 (2018)*

## **OTHER AVAILABLE CEQA MECHANISMS**

The City has chosen to rely on the CEQA review processes provided by CEQA Guidelines sections 15168. Nevertheless, because the Consistency Checklist shows that the Project would have no new or more significant impacts on the environment than disclosed in the ECR/C EIRs in accordance with the requirements of various sections of the CEQA Guidelines, the Project also qualifies for a few additional CEQA exemptions.

### ***Projects Consistent with Community Plan and Zoning***

The Project also is designed to be consistent with the development standards in the Zoning Code, which were analyzed in the ECR/C EIRs. CEQA and the CEQA Guidelines mandate that projects consistent with the development density established by existing zoning policies or community plan 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 that are peculiar to the project or its site. (Public Resources Code Section 21083.3; Guidelines Section 15183) The CEQA Guideline provides that a project is “consistent” if its density is the same or less than the standard expressed for the parcel in the community plan for which an EIR has been certified and if the project complies with the density-related standards contained in that plan. (CEQA Guidelines section 15183(i)(2)) As discussed in the “Land Use Designations” section below, the proposed Project’s density, at 121 units per acre (800 units / 6.6 acres) is consistent with the Zoning for the site. The El Camino Real/Chestnut High Density Residential zoning allows a base density of 120 units per acre base and a bonus density of incentives of 180 units per acre. Accordingly, with the incentives program, the Project is consistent with the Zoning for which an EIR was certified.

Specifically, in approving a project meeting the requirements of CEQA Guidelines section 15183, the agency must limit its examination of environmental effects to those that the agency determines, in an initial study or other analysis:

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

(CEQA Guidelines § 15183(b).) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then no additional EIR is required to address that impact. Uniformly applied

development policies and standards include those policies in the General Plan, Area Plan, and Municipal Code, as well as applicable regional, state, and federal laws.

***Mixed Use, Transit Priority Area Projects***

There is also an exemption for projects consistent with a Specific Plan. (Public Resources Code §21155.4) That section provides that residential, employment center, and mixed-use development projects that meet three specific criteria and have no new or more significant impacts than disclosed in applicable EIRs are statutorily exempt from CEQA review. The first criterion is that the project must be located within a transit priority area, which is “an area within one-half mile of a major transit stop that is existing or planned.” A major transit stop includes an “existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” (Pub. Resources Code § 21064.3.) The Project site is within one half mile of the South San Francisco Bart station, which qualifies as an existing major transit stop under the statutory definition. The second criterion is that the project is undertaken to implement and is consistent with a specific plan that was approved pursuant to a certified EIR. Although not specifically called a Specific Plan, the Area Plan has all of the information required by Government Code section 65451: text and diagrams that specify the (1) distribution, location, and extent of the uses of land, including open space, within the area covered by the plan, (2) distribution, location, and extent and intensity of major components of public and private transportation, sewage, water, drainage, solid waste disposal, energy, and other essential facilities proposed to be located within the area covered by the plan and needed to support the land uses described in the plan, (3) standards and criteria by which development will proceed, and standards for the conservation, development, and utilization of natural resources, where applicable, and (4) measures including regulations, programs, public works projects, and financing measures necessary to implement paragraphs (1), (2), and (3). The Area Plan also includes a statement of its relationship to the General Plan. Accordingly, the CEQA exemption provided by Public Resources Code section 21155.4 applies to the Project. The third criterion is that the project is consistent with the general use designation, density, building intensity, and applicable policies specific for the project area in a sustainable communities strategy (“SCS”). The Project site is within the Plan Bay Area El Camino Real Priority Development Area. Accordingly, the Project meets the criteria required to be exempt from CEQA under Public Resources Code section 21155.4.

**SUPPLEMENTAL STUDIES AND ANALYSES INCORPORATED INTO THE ENVIRONMENTAL CONSISTENCY ANALYSIS**

Studies and supplemental analyses were provided as part of the Environmental Consistency Analysis and are incorporated by reference and made a part of this ECA, as if set forth fully herein. A list of the submitted studies and supplemental analyses is listed below:

- a. Air Quality Assessment
- b. Arborist Report and Tree Assessment
- c. Geotechnical Report and Environmental Soils Report
- d. Phase I Environmental Site Assessment
- e. Noise and Vibration Assessment
- f. Wind Effects Assessment

- g. Shadow Analysis extracted from Submittal Set Project Plans
- h. Fehr & Peers Traffic Assessment
- i. Water Supply Assessment
- j. Kimley Horn Transportation Impact Analysis
- k. Preliminary TDM Plan
- l. ECR/C SEIR Mitigation Monitoring and Reporting Program

**PROJECT INFORMATION**

1. **Project Title**  
SFPUC Opportunity Site Residential Project
2. **Lead Agency Name and Address**  
City of South San Francisco  
315 Maple Avenue  
South San Francisco, CA 94080
3. **Contact Person**  
Tony Rozzi, Principal Planner  
City of South San Francisco - Planning Division  
(650) 877-8535  
[Tony.Rozzi@ssf.net](mailto:Tony.Rozzi@ssf.net)
4. **Project Location**  
Mission Road between Grand Avenue and Oak Avenue, South San Francisco, California, APN: 093-312-060 and 093-312-050. See **Figure 1**.
5. **Project Sponsor's Name and Address**  
SSF PUC Housing Partners LLC  
Brian Baker, VP of Development  
L37 Partners  
500 Sansome, Ste 750  
San Francisco, CA 94111
6. **General Plan and Area Plan Designations**  
High Density Residential; El Camino Real Mixed Use North, High Intensity; Park and Recreation
7. **Zoning**  
El Camino Real/Chestnut High Density Residential (ECR/C-RH)
8. **Existing Setting**  
The Project site is approximately 6.6 acres and is known by Assessor's Parcel Number ("APN") 093-312-060 ("Project Site"). It is located within the City's El Camino Real/Chestnut Avenue Area Plan, approximately 1/3 mile to ¾ mile from South San Francisco BART Station. (See **Figure 1**.) It is bounded by Mission Road to the East, a proposed extension of Oak Avenue to the South, and the BART right-of-way to the west.  
  
The Project Site is currently vacant, primarily cleared dirt, brush, and small groupings of trees. Colma Creek is currently expressed as a concrete channel with sloped embankments and a paved pedestrian/bicycle trail at its eastern side (Centennial Way). The Project Site was owned by the San Francisco Public Utilities Commission historically, but is currently owned by the South San Francisco Redevelopment Agency.

## 9. **Project Description**

### ***Overview***

The Project Site is divided into 3 parcels, identified as Parcel 1, 2 and 3. Parcel 1 measures approximately 1.48 acres, Parcel 2 measures approximately 3.43 acres and Parcel 3 measures approximately 1.69 acres.

The Project contains three vertical development structures on these three parcels. Parcel 1 will have Building C2, Parcel 2 will have Building C1 and Parcel 3 will have Building B. All vertical development structures will be constructed with up to five stories of Type IIIA construction with up to three stories of Type IA construction, with stair and elevator penthouses extending 8-12-feet in height above the max. 85-foot tall roofs, which is permitted with discretionary approval.

Building C1 will be over a single basement structure and 3 above grade levels of type IA construction and up to 5 levels of type IIIA construction. The basement has 3 level stacker parking with pits and Level 1 has 2 level stacker parking. Level 1 is laminated with a double height entry lobby and residential units and at the south end of the building is a 8,372 sf childcare center. Level 2 will have 2 landscaped podium courtyards, a club room and residential units. Level 3 will have residential units. There will be 5 levels of type IIIA construction above level 3 with residential units with setbacks at various levels to conform to the zoning requirements.

Building C2 will consist of 100% affordable housing and will have 2 levels of type IA construction and 1 to 5 levels of type IIIA construction. Level 1 will have stacker parking with pits and will be laminated with the entry lobby and residential units. Level 2 will have a podium courtyard, a community room/club room and residential units. Levels 3 to 7 will have residential units with setbacks at various levels to conform to the zoning requirements.

Building B will be over a single basement structure and have 3 above grade levels of type IA construction and 5 levels of type IIIA construction. The basement has 3 level stacker parking with pits and Level 1 has 2 level stacker parking for residential units and surface parking for the Market Hall. Level 1 is laminated with the entry lobby and residential units and has a 12,992 sf double height Market Hall (with a mezzanine) facing an outdoor market plaza. Level 2 will have surface parking for the residential units and will be laminated with the residential units. Level 3 will have a landscaped podium courtyard, a club room and residential units. There will be 5 levels of type IIIA construction above Level 3 with residential units.

Usable open space for the residential program, exceeding the 150 square foot per dwelling unit requirement in the Municipal Code, will be provided on-site in a variety of ways including: private terraces, balconies of the dwelling units and common area open space; Building C1 will have a landscaped podium courtyard on Level 2, Building C2 will have two landscaped podium courtyards on level 2, open areas on levels 2 and 4 and a roof deck on level 6. Building B will have an outdoor market plaza, a landscaped podium courtyard on level 3 and a roof deck on level 7. Off-site landscaped areas and park programming will be included as part of the Project, which will further benefit both Project residents and the greater neighborhood.

### Land Use Designations

Both the General Plan and the Area Plan show that Parcel B is designated as El Camino Real Mixed Use North, High Intensity and Parcel C is designated as High Density Residential.<sup>9</sup> The Zoning Code shows that both Parcel B and Parcel C are designated as El Camino Real/Chestnut High Density Residential.

### Uses

The Project will provide 800 residential units (including 13 flex units), 158 of which will be affordable to low-income households, improved parks and landscaping, and active ground floor uses throughout the two sites, including a day care and a Market Hall. The Project would be approximately 1,100,089 square feet, including non-ground floor open spaces, which is broken down below in **Table A** (all sizes are approximate and in square feet):

**Table E. Project Area**

Area (Gross Square Footage)	Building		
	B	C1	C2
Residential Area (Including amenity areas)	243,328	460,762	185,398
Commercial Area	12,992	-	-
Day Care Area	-	8,372	
Parking Area	86,129	87,888	19,515
Building Totals	342,449	557,022	204,913
<b>Project Total</b>	<b>1,100,089</b>		

**Figure 2** shows conceptual site plans for the ground floor and podium levels of the Project.

### Residential Uses

The Project's residential units, including the affordable units, will be comprised of a mix of studio, one-bedroom, two-bedroom, and three-bedroom units. Flex units will also be provided in Building C1. Most of these units will open to the park and the Centennial trail. 20% of the Project's residential units will be affordable and these units will be provided in Building C2. **Table B** provides the residential unit breakdown for each building.

**Table F. Residential Unit Counts**

Dwelling Units	Building		
	B Market Rate	C1 Market Rate	C2 Affordable
Studio	16	53	19
One Bedroom	163	186	45
Two Bedroom	48	134	54

<sup>9</sup> General Plan, p. 2-23 and ECR/C Area Plan, p. 47-48.

Three Bedroom	7	22	40
Flex	0	13	0
Building Totals	234	408	158*
<b>Project Totals</b>	<b>800</b>		

\*158 affordable units is 20% of 787 units (13 Market rate flex units are not accounted in the calculations). The Project will include a number of residential amenities, including podium level landscaped courtyards, a fitness center and dog amenities. Building B and C1 will also have a club room/sky lounge with an outdoor roof deck.

#### Active Uses

Ground-floor active uses would include high-quality retail spaces along the Oak Avenue right of way and adjacent open Plaza with high floor-to-ceiling storefront glass, called Market Hall. The Market Hall will generally cater to smaller local businesses that can utilize both a storefront for the public as well as production space. A childcare center near the south-east corner of Parcel 2 along Mission Road will be provided with a secure exterior playground space for the facility. The childcare center will be open to the public with a dedicated open space private to the childcare. Additional proposed active uses include ground floor flex-units (described above) and new green space along the Centennial Way Trail north from Oak Avenue (described below).

#### Open Space/Recreational Uses

A 1-acre Community Park will be provided between Buildings C1 and C2 and the creek, a 0.8 acre publicly accessible paseo and plaza provided between Buildings C1 and C2, and approximately 0.2 acres of Market Hall Plaza and 0.2 acres of Picnic Area will be provided on the Building B Lot. In addition, approximately 37,490 sf (landscaped podium courtyard) of open space will be provided as common open space and approximately 10,415 sf will be provided for the residential units as private open space. Building upon the existing site amenities, the project will provide a series of linked public open space arrayed along the Centennial Trails. Multiple access points from Mission Road to the Community Park will be provided. The Community Park will include children play area, sculpture lawn, adult fitness stations and seating. The Centennial Way pedestrian/bike trail Improvement will include better lighting, new interpretive signs, seating and bike share stations along the trail. Oak Ave will extend over Colma Creek, connect to Antoinette Lane and terminate into a shared street with a welcoming occupiable stair and accessible switchback path that traverses up the bank to El Camino Real. The improved pedestrian and bicycle circulation of the site will facilitate integrated connections between the new housing, commercial zones, the new civic center, BART and the City's primary park -Orange Memorial Park to the south.

#### ***Parking, Circulation, and Transportation Demand Management***

##### Vehicle

Vehicular drop off for Building C1 and C2 is provided at the Paseo between the two Entry lobbies with a round out and a drop off zone. The move in/move out and loading areas are in the Paseo and screened with trees. Drop off for the daycare is provided off Mission Road in an off-street driveway with additional



dedicated parking inside the C1 garage on Level 1.

Vehicular access is provided to Building C2 garage through the Paseo, to Building C1 garage through Mission Road and Building B residential and Market Hall garages are accessed through a separate driveway off the Oak Avenue shared public right-of-way extension. Offsite improvements include a 4-way controlled stop at Mission Road/Oak Avenue and restriping and signal timing at El Camino Real/McClellan.

The Project would include approximately 879 off-street parking spaces with potential to later add more capacity with installation of additional stacking systems to over 900 total off-street spaces. The total parking spaces for each building is provided below in **Table C**.

**Table G. Vehicle Parking**

Parking	Building		
	B	C1	C2
Building Totals	289	475	115
<b>Project Total</b>	<b>879</b>		

#### Pedestrian and Bicycle

New pedestrian and bicycle connections in form of paseo and linear plaza will be provided to connect Mission Road and Centennial Trail. Pedestrian and bicycle access is provided to the Project Site. Long term bicycle parking is provided within the residential garage at a 1:1 ratio. Centennial Trail will be improved with better lighting, new seating, interpretive signs and potentially bike share stations along the trail. New connections to the Centennial Trail include payment of a fee for a pedestrian trail connecting Mission Road to the Centennial Trail in the vicinity of the intersection of Sequoia Avenue and Mission Road and construction of a new pedestrian/bicycle bridge and pathway connecting the Kaiser property to Centennial Trail. Oak Ave will also be extended across Colma Creek to Antoinette Lane and leading to a shared street that ends with a staircase and accessible pedestrian and bike path up the bank to El Camino Real. Each building would contain short-term and long-term bicycle parking, as described in **Table D**.

**Table H. Bicycle Parking**

Parking	Building		
	B	C1	C2
Short-term - 93	29	48	16
Long-term - 800	234	408	158
Building Totals			
<b>Project Total</b>	<b>893</b>		

#### Transportation Demand Management

Fehr & Peers has developed a TDM Plan that reduces peak hour driving drips and promotes travel by

alternative forms of transportation. The Plan is expected to meet a minimum alternative mode use of 28%. While the TDM Plan is not yet final, the Project team does not anticipate that it will change significantly.

The TDM measures in the draft TDM Plan are as follows:

- **Marketing and Monitoring:** The TDM Plan includes the appointment of a Transportation Coordinator who will be responsible for implementing and managing the TDM program and serve as a liaison on transportation matters between the Project Sponsor, the City of South San Francisco, and the Project's tenants. This section of the TDM Plan also indicates that commute trip reduction marketing materials will be supplied to Project residents and employees and annual monitoring of vehicle trips will be undertaken by the Transportation Coordinator.
- **Land Use:** The TDM Plan notes that an on-site child care facility as well as other on-site amenities, including a Market Hall for artisan production and ancillary food and beverage retail, exercise facilities for residents, a community clubhouse with a shared kitchen/bar area, co-working common spaces, parks and play areas, including children's play facilities, adult outdoor fitness equipment, and public art installations, will be included in the Project to reduce vehicle trips made by Project residents and employees.
- **Site Improvements:** In addition, the TDM Plan notes that enhanced pedestrian and bicycle improvements will be completed with the Project to encourage residents to use alternative modes of transportation instead of driving. Other TDM site improvements include transit access improvements, real-time transit displays and multimodal wayfinding signage, passenger loading zones, secure bicycle storage, bike repair station, and wiring for internet service.
- **Incentive Programs and Services:** The proposed TDM Plan also includes the following incentive programs and services:
  - Subsidized or discounted transit program for the affordable units
  - Unbundled parking costs

### ***Grading***

The western portion of the existing site is currently graded to drain from Colma Creek down to the lower Mission Boulevard elevation, and primarily sheet flows to the drainage ditch that currently runs along Mission. There is approximately 10 feet of elevation fall across the site, from the Western corner at the pedestrian trail on Colma Creek, to the Eastern corner. The average slope along this run is roughly 1.3%. The eastern portion of the existing site is graded from West to East with a fall of about 8 feet across the site and an average slope of 1.5%.

The proposed Project will generally maintain the existing grading and drainage patterns. The approximate earthwork volumes include 30,385 CY of CUT and 10,505 CY of fill that will result in a net off haul of roughly 19,880 CY of soil.

Positive drainage will be maintained away from building pads and accessible routes will comply with the requirements of the California Building Code.

### ***Frontage and Off-Site Improvements***

The Project will provide frontage and off-site improvements, consistent with the Grand Boulevard Plan. On

the East side of the Project, surface improvements will include a pedestrian sidewalk along Mission Street along with planting along the street Frontage and new driveway cuts for the Project. Park improvements between Project property and the Centennial Trail are also being proposed, above the existing BART tunnel on BART property. Utility improvements will include converting the existing drainage ditch running along Mission into a below grade box-culvert as well as undergrounding the existing overhead PGE pole line along Project frontage where feasible.

On the West side of the Project, improvements will include upgrades to the Centennial Trail along Colma Creek and at the Southeast corner of the Project, a new Market Hall and Plaza area at the intersection of Oak Avenue Extension and Antoinette Lane.

Phase 1 of the Oak Avenue extension, which will be completed as part of the Project, will connect Oak Avenue to Antoinette Lane. A bridge will be constructed over Colma Creek for this purpose. Phase 1 of the Oak Avenue extension will also contain bike and pedestrian improvements to be constructed therewith. The right of way for a future Oak Avenue vehicular extension to connect to El Camino Real will be reserved on the Project site, along with the right to construct pedestrian and bike improvements in connection therewith.

The extension is expected to be phased – Phase 1 will include crossing the creek and tying into Antoinette Lane in the permanent condition. It will then connect to an interim parking lot that will lead to a set of stairs and ramp to provide a pedestrian connection to El Camino Real. Phase 2 may include completion of the road from Antoinette Lane to El Camino Real.

The new Oak Ave extension work will include providing a maintenance road and access to the existing BART and SF PUC facilities located south of the Eastern Project site. The ultimate Phase 2 Oak Avenue extension itself will cross the existing BART tunnel and property as well as a portion of SSF owned and Kaiser Permanente owned property along El Camino Real.

#### ***On Site Infrastructure Improvements***

On-site infrastructure improvements will include new water services for irrigation, domestic, and fire; sewer laterals to each building; and electric, gas, and data tie-ins from the mains in Mission and Antoinette. In addition, there will be a few utility relocations as required, including: an Overhead PGE power line that runs south through the site and crosses Colma Creek to the nearby Kaiser property; an existing water main that runs south through the Western site and crosses Colma Creek; and an existing sewer main relocated outside the building footprint and into the Oak Avenue extension on the Southern site. Each of these main relocations would be covered with new easements or right of way for Oak Avenue proposed for the Utility Provider.

Other on-site improvements will include lighting and landscape upgrades as well as new storm drain infrastructure improvements including water quality components to comply with the Municipal Regional Stormwater Permit. Storm drain improvements would connect to the new box culvert on Mission or tie into existing storm drain pipes near Antoinette. There will be one new stormwater connection that will discharge to Colma Creek.

## 10. Surrounding Land Uses and Setting

The Project Site is within the El Camino Real / Chestnut Area Plan area (see **Figure 1**).

Plans for a new Community Civic Campus (“Campus”) are underway on the parcels immediately to the southeast of the Project Site. The Campus will house new municipal facilities including a Police Operations Center, 911 Dispatch Center, Fire Station, and a Library/Parks & Recreation Community Center. The Oversight Board recently approved the City’s proposal to purchase the properties for the Campus. The project is expected to be completed by 2021 and cost approximately \$210 million. It will be funded by proceeds from bonds related to Measure W, a local sales and use tax increase of 0.5% that took effect in April 2016. To the northeast of the site, the County of San Mateo is exploring the possibility of redeveloping its former County Municipal Court site into housing and other complementary uses. The County recently solicited qualifications from architecture and planning firms for the completion of a Master Plan for the site. The City anticipates the County will select a firm and begin the master planning process in late 2017. In addition to these public projects, there are several private development projects underway in the vicinity. The most recent housing projects completed or under construction include the following:

- Park Station Lofts, located at 1200 El Camino Real, includes 99 units;
- A Mid-Peninsula Housing Project, located at 636 El Camino Real, includes 109 affordable units and 5,700 square feet of commercial space;
- The Mission & McLellan project, located at 1309 Mission Road, includes 20 units and 6,000 square feet of commercial space; and
- City Ventures’ Transit Village Residential Project, located across the street from the South San Francisco BART Station at 1256 Mission Road, includes 31 units.

**Figure 1** shows the PUC Site within the context of the El Camino Real/Chestnut Avenue Area Plan.

## 11. Required approvals

City: The Project requires:

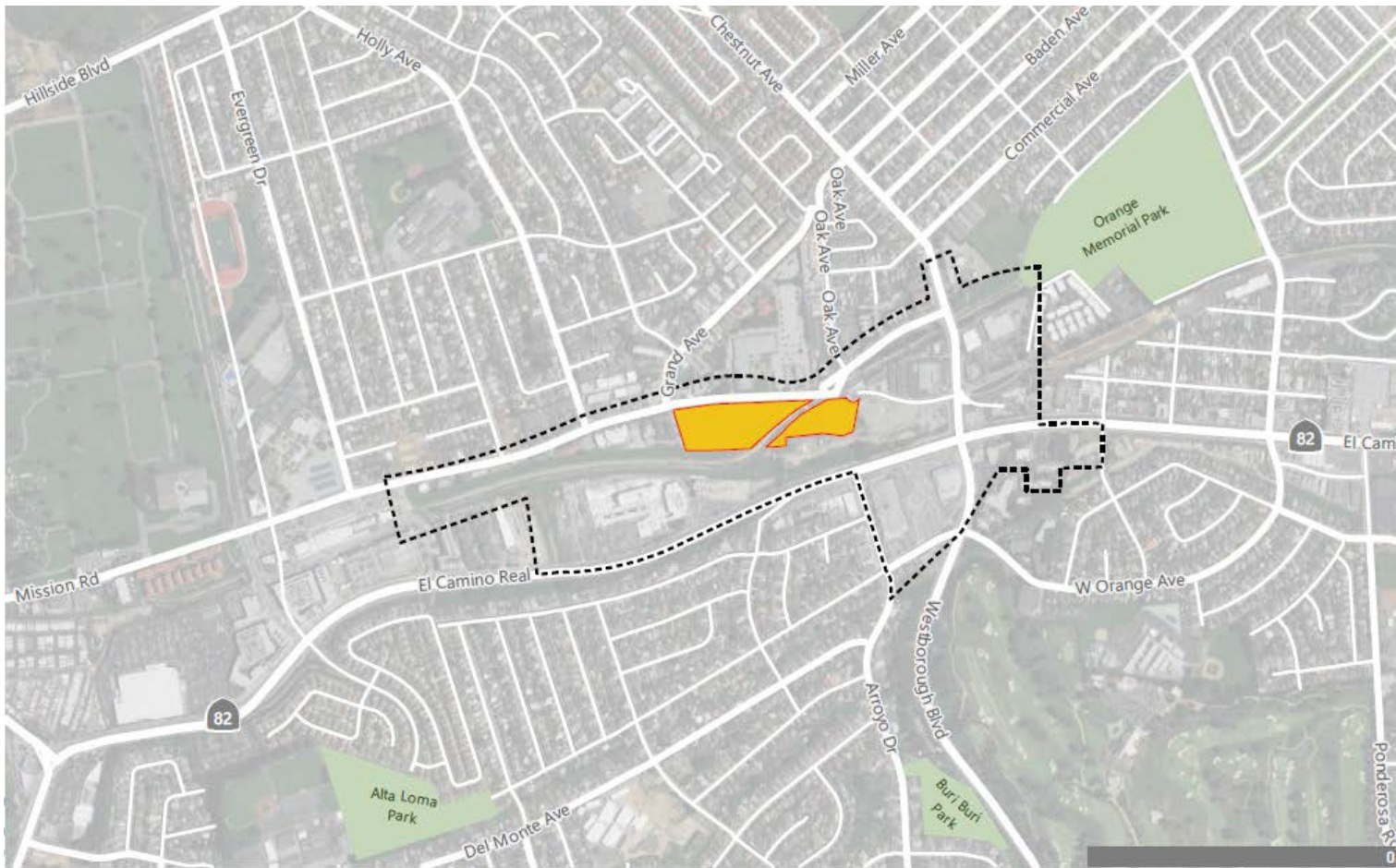
- Conditional Use Permit for conditional uses and incentive bonuses per SSF Table 20.270.003 and Section 20.270.004(A) and Area Plan Table 4-1;
- Design Review;
- Transportation Demand Management Plan;
- Waivers and Modifications Request, including;
  - Build-To Line Waiver along Mission Road per SSF Code 20.270.004(C);
  - Active Frontage Chief Planner Waiver for 50% Active Use along Mission Road per SSF Code 20.270.005(B)(4);
  - Ground Floor Entrance Chief Planner Alternative Design Approval for Buildings C1 and C2 facing BART right of way and Colma Creek per SSF Code 20.270.005(G)(5);

- Parking Management and Monitoring Plan;
- Vesting Tentative Tract Map;
- State Density Bonus Law for (1) 25% bonus on Parcel B from General Plan and Area Plan density per Government Code Section 65915(f)(1) (2) development standard waiver to increase the FAR by 10% on Parcel B from the permitted FAR per Government Code Section 65915(e); and (3) development standard waiver from rear yard setback requirements set forth in 20.270.004(D)(1-4) for Buildings Parcels B, C1 and C2 fronting BART and Colma Creek per Government Code Section 65915(e);
- Affordable Housing Agreement;
- Development Agreement; and
- Purchase and Sale Agreement.

Caltrans: The Project requires encroachment permits from Caltrans for improvements within the Mission Road right-of-way.

BART: The Project requires encroachment permits for improvements (i.e. pedestrian access to Centennial Trail from the Project and various parks) within the BART right-of-way as well as permits to allow for excavation and foundation installations for the Project that will be done in BART's Zone of Influence.

**FIGURE 1 – PROJECT VICINITY MAP**





-  Project Site
-  Precise Plan Boundary

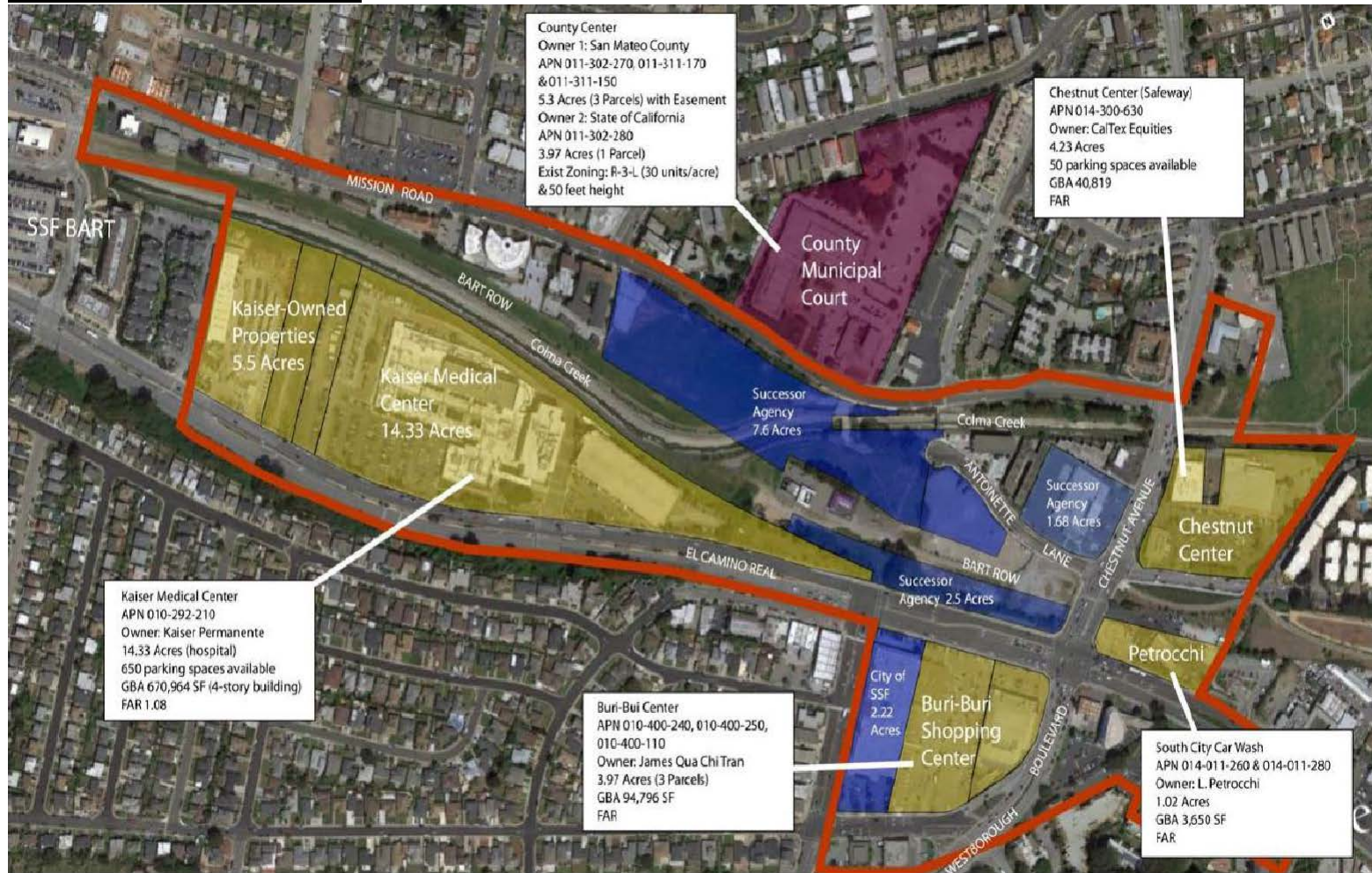


FIGURE 2 – CONCEPTUAL SITE PLAN





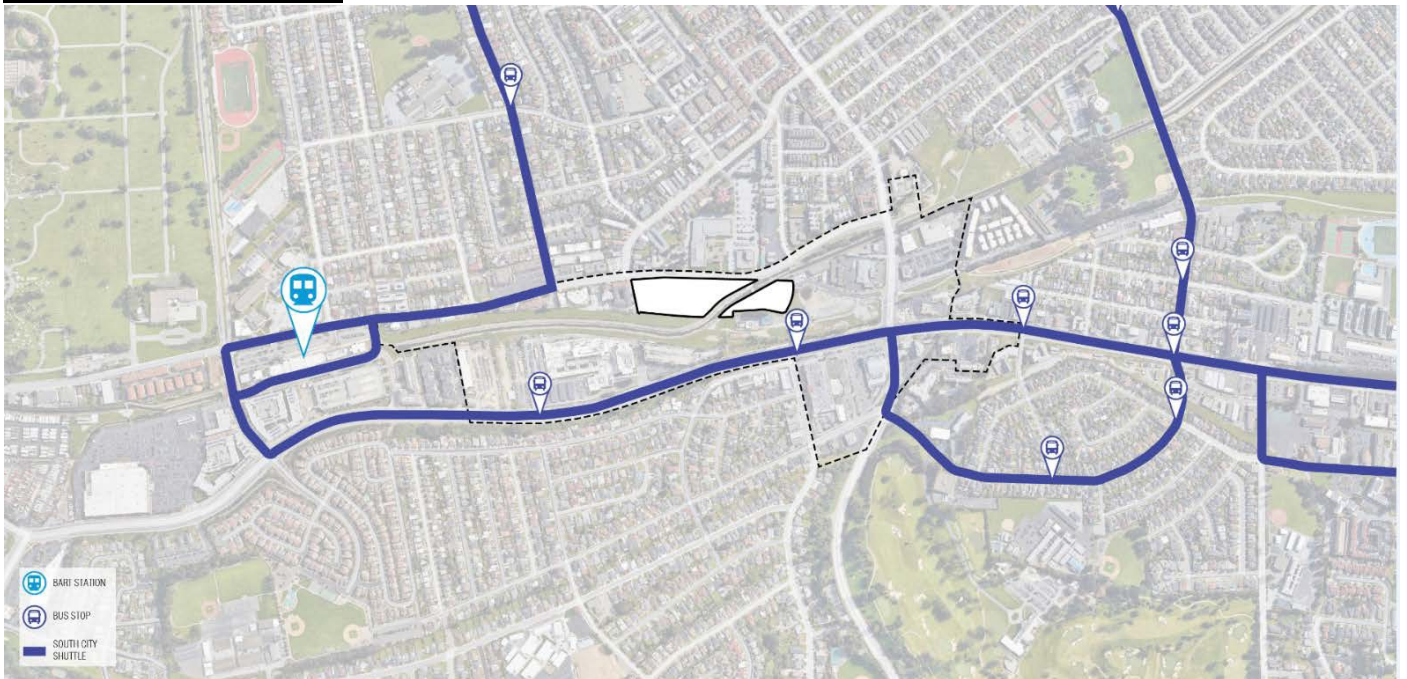
**FIGURE 3 – PROJECT CONTEXT**



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**FIGURE 4 – TRANSIT MAP**



**FIGURE 5 – PROJECT MASSING**



## 12. Analysis of Impacts

This Environmental Consistency Analysis provides an analysis of each environmental issue identified in the ECR/C EIRs to determine whether new effects would occur or new mitigation measures should be required. This document assesses the Proposed Project to determine whether it is within the scope of the ECR/C EIRs or the Project would result in new significant impacts or substantially more severe impacts under CEQA Guidelines Section 15162 and 15168. The Checklist uses a modified form of the Appendix G Initial Study environmental checklist, as recently amended by the CEQA Guidelines amendments adopted in December of 2018.

### DETERMINATION

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

1. This subsequent Project is within the scope of the project covered by the Final EIR for the City's Area Plan and Civic Campus SEIR.
2. This subsequent Project will have no additional significant environmental effects not discussed or identified in the ECR/C EIRs;
3. No substantial changes to the Area Plan are proposed as part of this Project. Further, no substantial changes have occurred with respect to the circumstances under which the ECR/C EIRs were certified, and no new information, which was not known and could not have been known at the time that the ECR/C EIRs were certified as complete has become available.
4. No new or additional mitigation measures or alternatives are required.
5. All applicable policies, regulations, and mitigation measures identified in the ECR/C EIRs will be applied to this subsequent Project or otherwise made conditions of approval of this subsequent Project.

**I. AESTHETICS/VISUAL RESOURCES**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>AESTHETICS/VISUAL RESOURCES.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?				X

- a. At the outset, it is noted that State Legislature has specified pursuant to SB 743 that “aesthetic impacts of...a mixed use residential project on an infill site within a transit priority area shall not be considered significant impacts on the environment” under CEQA. (Pub. Res. Code §21099(d)(1)) “Transit priority area” means an area within one-half mile of a major transit stop. (Pub. Res. Code §21099(a)(7)) The Project is in fact in a transit priority area as it is within one half mile of the South San Francisco BART station. Accordingly, aesthetic impacts may not be considered significant impacts for this project under CEQA.

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Nonetheless each aesthetic impact area is disclosed for informational purposes. The ECR/C EIR identified that new development could affect scenic views of San Bruno Mountain and Sign Hill from some viewpoints in the area. (ECR/C EIR, p. 3.8-9 to 10) However, according to the ECR/C EIR, development standards based on policies in the Area Plan limit tower dimensions and require a minimum tower separation. Design guidelines in the Zoning Code and Area Plan would help ensure that views of Sign Hill and San Bruno Mountain would be available. Additionally, views that exist along street intersections will remain uninterrupted, and in the instance of the extension of Oak Avenue view corridors will be added. As such, the ECR/C EIR concludes that compliance with the City's Zoning Code and the Area Plan's policies and design guidelines would ensure a less than significant impact on scenic views of Sign Hill and San Bruno Mountain. (ECR/C EIR, p. 3.8-9.)

The Civic Project SEIR notes that buildings in the Area Plan area would be visible from Sign Hill and San Bruno Mountain, however, the Area Plan area is already developed and new construction would blend with existing structures. (Civic Project SEIR, p. 3.1-7.) The Civic Project SEIR concluded that impacts on scenic vistas resulting from the Civic Project would be less than significant without the need for mitigation. (*Id.*)

The Project's three buildings range from 75-84'. The height complies with the height restrictions of the Zoning Code, which permits a maximum height of 120 feet on the Project Site or 160 feet with discretionary approval. (Zoning Code, Figure 20.270.004-2) The Project complies with the Area Plan policies intended to protect scenic vistas, including the requirement for Design Review.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to scenic vistas compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to scenic vistas and no further review is necessary.

- b. The ECR/C EIR explains that the Area Plan area is not visible from a State Scenic Highway. (ECR/C EIR, p. 3.8-7.) According to the ECR/C EIR, El Camino Real is a State Highway, but it is not an official designated State Scenic Highway, nor is it eligible to become a State Scenic Highway. (*Id.*) The ECR/C EIR determined there would be no impact on state scenic highways with the development of the Plan. (*Id.*) The Civic Project SEIR also concluded that the Civic Project would have no impact on any scenic highway. (Civic Project SEIR, p. 3.1-8.)

There have been no new scenic highway designations within the Project's proximity.<sup>10</sup> Highway 280 is a State Scenic Highway located approximately one mile from the Project Site, but is not visible from the Project Site nor can the Project Site be seen from it.

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<sup>10</sup> California Department of Transportation, California Scenic Highway Mapping System, available at [http://www.dot.ca.gov/hq/LandArch/16\\_livability/scenic\\_highways/](http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/) (last accessed 09/04/18).

See also analysis of potential impacts related to scenic vistas above.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to scenic resources compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to scenic resources and no further review is necessary.

- c. The ECR/C EIR concluded that implementation of the ECR/C Area Plan would have a beneficial impact on the visual character of the Area Plan area. (ECR/C EIR, p. 3.8-7) The Area Plan is aimed at improving the existing aesthetic value of the Planning Area and calls for the development of a vibrant corridor that is walkable and pedestrian-scaled. The Area Plan's new construction development standards are an integrated package of requirements for the street and building interface, land use, building height, and building setbacks which help minimize negative aesthetic impacts and ensure harmony with the scale and character of surrounding development. (*Id.*) The Area Plan establishes pedestrian oriented areas by maximizing active frontages along key streets and open space connections, developing the area with an overall character and urban design scheme that promotes livability and sustainability. (ECR/C EIR, p. 3.8-8) The Civic Project SEIR concluded that the Civic Project would have a less than significant impact on visual character. (Civic Project SEIR, p. 3.1-7.)

Implementation of the Project is consistent with the Area Plan's aesthetic vision for the Project Site. The Project would replace a vacant parcel with uses that would activate Mission Road, Centennial Way, and Colma Creek consistent with the Area Plan's goal to create a walkable, pedestrian-oriented area. This goal also is supported by the Project's proposed construction of significant pedestrian and streetscape enhancements along El Camino Real and Chestnut Area, as well as attractive and usable publicly accessible open space amenities. The Project would be subject to the Area Plan's design guidelines, which ensure conformity with the Area Plan's vision. The Project complies with the Area Plan policies intended to protect scenic vistas, including the requirement for Design Review.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to visual character compared to those analyzed in the ECR/C EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to visual character and no further review is necessary.

- d. The ECR/C EIR concluded that impacts of the original Area Plan from construction and operation as a result of light and glare would be less than significant because the Area Plan area is highly developed and has a number of existing light sources. (ECR/C EIR, p. 3.8-11) The Area Plan allows residential uses, which the ECR/C EIR found may increase the amount of nighttime lighting. (*Id.*). However, the ECR/C EIR found that compliance with the City's Zoning Ordinance, which contains general standards for lighting, including

standards that control outdoor artificial light, would reduce potentially significant long-term light and glare impacts to less than significant levels (*Id.*).

The Civic Project SEIR also found that the Civic Project would result in less than significant impacts related to light and glare with implementation of Area Plan policies. (Civic Project SEIR, p. 3.1-9.)

Proposed development on the vacant Project Site would increase nighttime lighting and glare. Nonetheless, all new lighting would be subject to the Zoning Code, which contains general standards for lighting as well as standards that control outdoor artificial light. Implementation of existing Zoning and Area Plan standards would reduce impacts from project nighttime lighting. In addition, to confirm that the Project would not adversely affect the light received by neighboring uses, the applicant submitted a Shadow Study prepared by BAR Architects on June 10, 2019, which demonstrates that there will be little to no adverse shading effects to the adjacent properties as a result of the Project.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to light or glare compared to those analyzed in the ECR/C EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to light and glare and no further review is necessary.

It is also noted that Illingworth & Rodkin considered potential wind impacts in a letter report dated August 22, 2019 ("Wind Report"). In summary, the Wind Report states that adverse wind issues for off-site pedestrians are not expected since the project buildings do not exceed 100 feet in height. The proposed project would consist of three buildings that would be up to 85 feet high. Further, several features are included in the project that would lessen the channeling and downward acceleration of wind caused by the buildings. The project landscaping plan includes existing and planned trees in strategic areas to reduce wind flow. The project includes articulated buildings that pose various angled obstructions to wind.

## II. AGRICULTURE and FORESTRY RESOURCES

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>AGRICULTURE and FORESTRY RESOURCES.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
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?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forestland to non- forest use?				X



- a, b, e. As described in the ECR/C EIR, there are no agricultural resources in the Area Plan area, and therefore, development in accordance with the Area Plan would have no impact on any agricultural resources. (ECR/C EIR, p. 3.12-2.) The Civic Project SEIR confirmed that no changes have occurred in the Area Plan area since the certification of the ECR/C EIR, and concluded that the Civic Project would continue to have no impact related to agricultural resources. (Civic Project SEIR, p. 3.0-2.)

The Project Site is a vacant lot located in an urbanized area and is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Department of Conservation.<sup>11</sup> There are no Williamson Act contracts covering the Project Site and the site is not zoned for agricultural uses.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to farmland compared to those analyzed in the ECR/C EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in no impacts related to agricultural resources and no further review is necessary.

- c, d, e. As described in the ECR/C EIR, there are no forestry resources in the Area Plan area, and therefore, development in accordance with the Area Plan would have no impact on any forestry resources. (ECR/C EIR, p. 3.12-2.) The Civic Project SEIR confirmed that no changes have occurred in the Area Plan area since the certification of the ECR/C EIR, and concluded that the Civic Project would continue to have no impact related to forestry resources. (Civic Project SEIR, p. 3.0-2.)

The Project Site is a vacant lot located in an urbanized area and is not designated as forestland, timberland, or zoned for forestland or timberland.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to forestland compared to those analyzed in the ECR/C EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in no impacts related to forestland and no further review is necessary.

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<sup>11</sup> California Department of Conservation, San Mateo County Important Farmland 2016, available at <ftp://ftp.consrv.ca.gov/pub/dlrp/EMMP/pdf/2016/smt16.pdf> (last accessed 9/18/18).

### III. AIR QUALITY

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>AIR QUALITY.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?				X
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?				X
c) Expose sensitive receptors to substantial pollutant concentrations?				X
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?				X

- a. The ECR/C EIR found that new development under the Area Plan would be consistent with the 2010 Bay Area Clean Area Plan, in that the projected Vehicle Miles Traveled (VMT) increase for the Area Plan area is less than the projected population increase, and the Area Plan policies are consistent with the air quality plan control measures in the 2010 Bay Area Clean Area Plan. (ECR/C EIR, p. 3.2-17) The ECR/C EIR's analysis followed the Bay Area Air Quality Management District's (BAAQMD's) guidelines, which specify that plan-level air quality impact is evaluated by determining the proposed plan's VMT increase and comparing it to the project population increase. The Area Plan would increase the City's population by 20.4 percent, while VMT would increase by approximately 16.6 percent. The ECR/C EIR also found that the City's General Plan policies conformed to the control strategies included in the 2010 Bay Area Clean Air Plan and concluded that impacts would be less than significant. (ECR/C EIR, pp. 3.2-18 to 24)

As noted in the Civic Project SEIR, since the ECR/C EIR was prepared, BAAQMD has prepared a new Clean Air Plan (the 2017 Clean Air Plan). The Civic Project SEIR found that the Area Plan would remain consistent

with the 2017 Clean Air Plan because development planned for the City, including in the Area Plan area, is consistent with the growth projections used by BAAQMD to develop the 2017 Clean Air Plan. (Civic Project SEIR, p. 3.2-21.)

The Project is consistent with the land use designations and development density presented in the General Plan and Area Plan, and therefore would not cause the City to exceed the population or job growth projections used to inform the air quality forecasts of the 2017 Clean Air Plan. The Project also supports the primary goals in the 2017 Clean Air Plan, which, among other goals, aims to reduce Bay Area greenhouse gas (GHG) emissions and promote locating new development near transit and pedestrian and cycling opportunities. The Project is a transit-oriented mixed-use development, and will improve the City's pedestrian and bicycle infrastructure to help encourage alternative modes of transportation. Accordingly, the Project remains consistent with the Clean Air Plan, consistent with the conclusions in the ECR/C EIR, and, as such, would not conflict with or obstruct the implementation of either of those plans.

- b. The ECR/C EIR did not calculate whether development of the Area Plan area would violate air quality standards during construction, but, as discussed above, did conclude that operation of development permitted by the Area Plan area would be consistent with the goals and policies of the 2010 Clean Air Plan. The Clean Air Plan is BAAQMD's strategy to reduce emissions and ambient concentrations of ozone, fine particulate matter, toxic air contaminants, as well as greenhouse gases that contribute to climate change and thus consistency with the Clean Air Plan indicates that the Area Plan would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

The Civic Project SEIR calculated construction-related, operational, and cumulative emissions (Civic Project SEIR, pp. 3.2-22–3.2-23). According to that document, all construction projects in South San Francisco are required to implement the BAAQMD's Basic Construction Mitigation Measures (see Table AQ-1, below) as a condition of project approval, making the measures generally applicable standards. With implementation of the measures, the Civic Center Project would conform to BAAQMD recommendations related to fugitive dust emissions and all criteria pollutant emissions would remain below their respective thresholds, with the exception of NO<sub>x</sub>. But implementation of Mitigation Measure 3.2.2, which requires all diesel-powered construction equipment comply with California Air Resource Board (CARB) regulations (have Tier 3 engines or better) would reduce impacts to less than significant (Civic Project SEIR, p. 3.2-23). Operational emissions were less than significant without any mitigation. (*Id.*) The Civic Project SEIR also concluded that the Civic Project would make a less than cumulatively considerable contribution to any air quality violations because its project-level impacts were less than significant and air quality analysis is inherently cumulative. (Civic Project SEIR, p. 3.2- 28.)

There have been no changes in circumstances since the preparation of the Civic Project SEIR. Like that project, the Project would comply with General Plan Policy 7.3-I-3, which requires projects to incorporate BAAQMD's recommended BMPs during construction to ensure that the Project would not exceed the significance threshold for construction projects. Compliance with these BMPs would be included as a Condition of Approval and are listed in Table AQ-1 below. In addition, the Project would need to comply with the generally applicable state requirement for construction equipment to meet CARB's Tier 3 engine requirements as well as the BAAQMD regulations listed in Table AQ-2 below. In addition, as noted in the

Project's Air Quality and Greenhouse Gas Assessment (the "Air Quality Assessment")<sup>12</sup>, the construction activities in connection with the Project are considered to be less-than-significant by BAAQMD CEQA Air Quality Guidelines if best management practices are implemented to reduce emissions.<sup>13</sup> The Air Quality Assessment also found that the Project's operational emissions would be less-than-significant.<sup>14</sup>

**TABLE AQ-1**  
**BAAQMD BASIC AND ADDITIONAL CONSTRUCTION MEASURES**

<b>BAAQMD Basic Construction Mitigation Measures</b>
1. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
2. All haul trucks transporting soil, sand, or other loose material off site shall be covered.
3. All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.
4. All vehicle speeds on unpaved roads shall be limited to 15 miles per hour.
5. All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
6. Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.
7. All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.
8. Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The air district's phone number shall also be visible to ensure compliance with applicable regulations.
<b>BAAQMD Additional Construction Mitigation Measures</b>
1. All exposed surfaces shall be watered at a frequency adequate to maintain minimum soil moisture of 12 percent. Moisture content can be verified by lab samples or moisture probe.
2. All excavation, grading, and/or demolition activities shall be suspended when average wind speeds exceed 20 mph.
3. Wind breaks (e.g., trees, fences) shall be installed on the windward side(s) of actively disturbed areas of construction. Windbreaks should have at maximum 50 percent air porosity.
4. Vegetative ground cover (e.g., fast-germinating native grass seed) shall be planted in disturbed areas as soon as possible and watered appropriately until vegetation is established.
5. The simultaneous occurrence of excavation, grading, and ground-disturbing construction activities on the same area at any one time shall be limited. Activities shall be phased to reduce the amount of disturbed surfaces at any one time.

<sup>12</sup> Public Utilities Commission Mixed-Use Development Air Quality & Greenhouse Gas Assessment prepared by Illingworth & Rodkin, Inc., dated March 19, 2019.

<sup>13</sup> Air Quality Assessment, p. 10-11.

<sup>14</sup> *Id.* at p. 12.

6. All trucks and equipment, including their tires, shall be washed off prior to leaving the site.
7. Site accesses to a distance of 100 feet from the paved road shall be treated with a 6- to 12-inch compacted layer of wood chips, mulch, or gravel.
8. Sandbags or other erosion control measures shall be installed to prevent silt runoff to public roadways from sites with a slope greater than one percent.
9. Minimizing the idling time of diesel-powered construction equipment to 2 minutes.
10. The project shall develop a plan demonstrating that the off-road equipment (more than 50 horsepower) to be used in the construction project (i.e., owned, leased, and subcontractor vehicles) would achieve a project wide fleet-average 20 percent NOx reduction and 45 percent PM reduction compared to the most recent CARB fleet average. Acceptable options for reducing emissions include the use of late model engines, low-emission diesel products, alternative fuels, engine retrofit technology, after-treatment products, add-on devices such as particulate filters, and/or other options as such become available.
11. Use low VOC (i.e., ROG) coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).
12. Requiring that all construction equipment, diesel trucks, and generators be equipped with Best Available Control Technology for emission reductions of NOx and PM.
13. Requiring all contractors use equipment that meets CARB's most recent certification standard (Tier 4) for off-road heavy-duty diesel engines.

**TABLE AQ-2**  
**ADDITIONAL BAAQMD REGULATIONS**

<b>BAAQMD Toxic Air Contaminants (TAC) Requirements.</b> The construction contractor shall implement the following measures during demolition and construction to reduce TAC emissions:
Notify BAAQMD at least ten business days before any demolition activities. The purpose of the notification process is to assure that buildings are demolished in compliance with procedures that assure asbestos is not released into the environment.
Require surveys and removal of lead-based paints by licensed contractors certified in the handling methods requisite to protect the environment, public health, and safety.
<b>BAAQMD Architectural Coating Requirement.</b> The construction contractor shall implement the following measures to reduce emissions of volatile organic compounds (VOCs):
Use paints and solvents with a VOC content of 100 grams per liter or less for interior and 150 grams per liter or less for exterior surfaces.
<b>BAAQMD Hearth Emissions.</b>
If fireplaces or wood burning stoves are installed in new residential units, require cleaner-burning (e.g., natural gas or propane) USEPA-certified stoves and inserts.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, and the Air Quality Assessment found that its impacts to construction and project level emissions would be less-than-significant, the Project would not result in any new or more significant impacts related to cumulatively considerable net increases of any criteria pollutant for which the Project region is in non-attainment compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the

Project would result in less-than-significant impacts related to any net increase of any criteria pollutant for which the Project region is in non-attainment and no further review is necessary.

- c. The ECR/C EIR (p. 3.2-25) concluded that two permitted sources of toxic air contaminant (TAC) emissions exist within the Area Plan area: a dry cleaner located at 1053 El Camino Real, and a stand-by diesel generator located at 1040 Old Mission Road, which is a site owned by the County of San Mateo. As stated in the ECR/C EIR, BAAQMD's Air Quality and Land Use Handbook recommends a 300-foot buffer around dry cleaning operations, but the dry cleaner is required to phase out perchloroethylene operations by 2023, which would reduce health risks to a less than significant level. Projects proposed prior to the phase-out will be required to complete a site-specific analysis. The risks from the generator were considered de minimus because it is less than 50 horsepower and operates only one day per week. The Area Plan area did not have sufficient traffic volumes to pose a significant risk from mobile sources of air pollutants to sensitive receptors. Therefore, the ECR/C EIR concluded that development pursuant to the Area Plan would have less than significant impacts.

Consistent with the ECR/C EIR, the Civic Project SEIR concluded that the Civic Project would have less than significant impacts related to TACs. (Civic Project SEIR, pp. 3.2-24–3.2-25.) Regarding construction TACs, the Civic Project SEIR found that the use of TAC sources (diesel-powered equipment) would be temporary and episodic, reduced by compliance with BAAQMD's regulations and California regulations limiting the idling of vehicles, and that diesel fumes disperse rapidly over relatively short distances. For these reasons, construction emissions would not expose sensitive receptors to substantial amounts of air toxins. The Civic Project SEIR also concluded that the project's operational emissions would not create significant TAC impacts because the proposed use would not include any stationary sources.

The Air Quality Assessment found that the Project would have a less-than-significant impact with respect to community risk caused by project construction activities based on the combined cancer risk concentrations and hazard risk values projected.<sup>15</sup> It also found that community risk impacts from combined sources upon the Project site would be considered a less-than-significant impact.<sup>16</sup> Lastly, the Air Quality Assessment noted that the operation of the Project is not expected to be source of TAC or localized air pollutant emissions because it would not generate substantial truck traffic or include stationary sources of emissions.<sup>17</sup> In addition to the foregoing, the Project would be subject to the same BAAQMD and state regulations discussed in the ECR/C EIRs.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, and the Air Quality Assessment found that its impacts relating to the exposure of sensitive receptors to substantial pollutant concentrations would be less-than-significant, the Project would not result in any new or more significant impacts related to such exposure compared to those analyzed in those EIRs. No changes have occurred and

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<sup>15</sup> *Id.* at p. 20-21.

<sup>16</sup> *Id.* at p. 17.

<sup>17</sup> *Id.* at p. 14.

no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts relating to the exposure of sensitive receptors to substantial pollutant concentrations and no further review is necessary.

- d. The ECR/C EIRs (ECR/C EIR, p. 3.2-27; Civic Project SEIR, p. 3.2-26) identifies BAAQMD- recommended screening distances for known odor-emitting sources, and determines that none of them are located within the Area Plan area, or within a one-mile distance. New industrial uses are not permitted in the Area Plan area. The ECR/C EIRs thus conclude that development consistent with the Area Plan would not result in significant impacts related to odor. There have been no changes in circumstances related to emissions, such as those leading to odors, since preparation of the ECR/C EIRs.

The Project does not propose uses typically associated with objectionable odors, such as wastewater treatment plants, sanitary landfills, food processing facilities, chemical manufacturing plants, rendering plants, paint/coating operations, asphalt batch plants, agricultural feedlots, and dairies. Instead the Project would consist of commercial and residential uses. The Project may contain a café or restaurant, but would not contain uses that would cause objectionable odors. As part of standard project review, equipment used for outdoor food preparation (courtyard) and the outdoor fireplace (courtyard) would be subject to City approval for safety and odor control. The Project will also be required to comply with zoning standards related to odors. Furthermore, the Project will accommodate refuse and recycling in an enclosed trash rooms at the street level lower/street level of the garage fed by trash chutes. Refuse and recycling pick-up would be provided by a local waste service provider (South San Francisco Scavenger) and would occur on a weekly basis.

As discussed in the Civic Project SEIR, Project odors generated during construction would be intermittent, temporary, and would disperse rapidly with distance from the source, and therefore construction-related odors would not result in the frequent exposure of a substantial number of individuals to objectionable odors. The Project is required to comply with BAAQMD Regulation 8, Rule 3, Architectural Coatings, and Rule 15, Emulsified Asphalt, which establish volatile organic compound (VOC) content limits for these construction materials. VOCs are the main sources of odors from these sources.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, the Project would not result in any new or more significant impacts related to emissions, including those leading to odors, compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts relating to emissions, including those leading to odors and no further review is necessary.

#### IV. BIOLOGICAL RESOURCES

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>BIOLOGICAL RESOURCES.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
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 Wildlife or U.S. Fish and Wildlife Service?				X
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?				X
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?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X



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?				X
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- a. The ECR/C EIR did not find any impacts to special-status species within the Area Plan area. (ECR/C EIR, pp. 3.12-9 to 10.) Three special-status species were analyzed for the potential to occur in the Area Plan area: San Francisco garter snake, Alameda song sparrow, and congested-headed hayfield tarplant. The analysis concluded that there were no wetlands, coastal resources, or other habitats within the Area Plan area suitable to support those species, and there have been no reported occurrences of those species within the Area Plan area. (*Id.*)

The Civic Project SEIR performed subsequent analysis of the area within 1 mile of the Civic Project site, an area which includes the Project Site. (Civic Project SEIR, pp. 3.3-11 to 13.) This subsequent analysis showed that the area remained, “fairly consistent with the conditions analyzed in the [ECR/C] EIR,” and therefore, “the three species discussed in the [ECR/C] EIR still do not have the potential to occur on the project site.” (Civic Project SEIR, p. 3.3-15.) However, the Civic Project SEIR concludes that, “the disturbed habitat and large trees on the [Civic Project] site may provide suitable habitat for nesting raptors, migratory birds, and special-status bats.” (*Id.*) As such, the Civic Project SEIR provides Mitigation Measures 3.3.1a-f, which require certain protections of these resources applicable during the construction phase of that project. (Civic Project SEIR, pp. 3.3-15 to 16.) With implementation of these mitigation measures, the Civic Project SEIR found impacts related to special-status species to be less than significant. (Civic Project SEIR, p. 3.3-15.)

While the Project Site is the only area within the ECR/C Area Plan area that is not paved, it was previously developed as a driving range with a structure. (ECR/C EIR, 3.12-4.) Further, although Colma Creek bisects the Project Site, it is completely channelized and lined with concrete sides, with no aquatic vegetation present. (Civic Project SEIR, p. 3.3-15.) Therefore, Colma Creek in this area is not suitable to support special-status aquatic species. (*Id.*) To the extent that the Project Site contains the potential habitat subject to Civic Project SEIR Mitigation 3.3.1a-f, it will incorporate those measures in order to minimize any potentially significant impact to special-status species. See the ECR/C EIR Mitigation Monitoring and Reporting Program.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, construction of the Project and related improvements would not result in any new or more significant impacts related to special-status species located on land or in Colma Creek compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to special-status species and no further review is necessary.

- b, c. The ECR/C EIR did not identify any riparian habitats or other natural communities or wetlands or Waters of

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the United States in the Area Plan area. (ECR/C EIR, p. 3.12-10.) The Civic Project SEIR confirms that the conditions on the Civic Project site have not changed since the ECR/C EIR analysis and concludes that that project would have no impacts related to such habitats. (Civic Project SEIR, pp. 3.3-16, 17.)

Similarly, the conditions on the Project Site have not changed since the ECR/C EIR and Civic Project SEIR analysis.

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to riparian habitats or other natural communities or wetlands or Waters of the United States compared to those analyzed in the ECR/C EIR. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in no impacts related to such resources and no further review is necessary.

- d. The ECR/C EIR analysis showed that the Area Plan area was highly urbanized, was not located in a migratory corridor, and would not interfere with any wildlife migration routes. (ECR/C EIR, p. 3.12-10.) As such, the ECR/C EIR concludes that the implementation of the ECR/C Area Plan would result in no impacts related to wildlife movements and nursery sites. (*Id.*) According to the Civic Project SEIR, site conditions have not changed since the ECR/C EIR analysis was performed with regard to wildlife movements and nursery sites. (Civic Project SEIR, p. 3.3-17.) The Civic Project SEIR concludes that that project would result in no impacts related to wildlife movement. (Civic Project SEIR, p. 3.3-18.)

Available data on movement corridors and linkages for the Project Site was accessed via the California Department of Fish and Wildlife ("CDFW") Biogeographic Information and Observation System ("BIOS") Viewer.<sup>18</sup> Data reviewed includes the Missing Linkages in California [ds420] layer, the Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620] layer, the Interstate Connections - California Essential Habitat Connectivity (CEHC) [ds619] layer, the Potential Riparian Connections - CEHC [ds622] layer, Linkage Design for the California Bay Area Linkage Network [ds852] layer, the Landscape Blocks for the California Bay Area Linkage Network [ds853] layer, and the Natural Areas Small - California Essential Habitat Connectivity (CEHC) [ds1073] layer.<sup>19</sup> The Project Site is not located within an identified corridor. In addition, the Project Site is urbanized, does not provide suitable movement opportunities, and is surrounded by additional urban land uses. Construction and development associated with implementation of the Project would not occur within an area containing habitat or wildlife corridors that supports biological resources.

Nevertheless, landscaping vegetation, including within the Project Site, could provide potential nesting habitat for migrating birds. If Project vegetation removal were to occur during the February 1 through August 31 bird nesting period, construction would be required to comply with generally applicable regulations in the California Fish and Game Code (Section 3503, 3513, or 3800), which would protect nesting birds from construction disturbances; compliance is required as a standard condition of approval.

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<sup>18</sup> CDFW, BIOS Viewer, <https://map.dfg.ca.gov/bios/?bookmark=648> (last accessed 9/18/18).

<sup>19</sup> <https://map.dfg.ca.gov/bios/?bookmark=648> (last accessed 9/18/18).

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to wildlife movements and nursery sites compared to those analyzed in the ECR/C EIR. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in no impacts related to wildlife movements and nursery sites and no further review is necessary.

- e. The ECR/C EIR analysis identified that new development would be subject to City Municipal Code, Chapter 13.30 ("Tree Preservation Ordinance"), and concluded the implementation of the Area Plan would not change nor conflict with the Tree Preservation Ordinance. (ECR/CEIR, p. 3.12-10.) The ECR/C EIR also found that the Area Plan area is not located within the area subject to the San Bruno Mountain Habitat Conservation. (*Id.*) The ECR/C EIR concludes that the implementation of the Area Plan would result in no impacts related to conflicts with local regulations protecting biological resources. (*Id.*) The Civic Project SEIR also concludes that the Civic Project would result in less than significant impacts related to conflicts with local regulations protecting biological resources, including tree preservation ordinances and habitat conservation plans. (Civic Project SEIR, p. 3.3-18.)

To the extent the Project involves removal or pruning of protected trees, it will comply with the Tree Preservation Ordinance, including obtaining a permit for any tree removals or alterations of protected trees. Compliance with the Tree Preservation Ordinance would be required as a condition of approval for the Project. The Project is not subject to any habitat conservation plan and would not conflict with General Plan policies regarding natural resources.

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to conflicts with local regulations protecting biological resources, compared to those analyzed in the ECR/C EIR in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in less-than-significant impacts related to conflicts with local regulations protecting biological resources and no further review is necessary.

- f. As disclosed in the ECR/C EIR and the Civic Project SEIR, there is no adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional, or state habitat conservation plan applicable to the Area Plan area. (ECR/C EIR, p. 3.12-10; Civic Project SEIR, pp. 3.3-18, 19.) Therefore, these EIRs conclude that the respective projects would result in no impacts related to conservation plans. (*Id.*)

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to any conservation plan, compared to those analyzed in the ECR/C EIR in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions,

as confirmed by the Civic Project SEIR. Therefore, the Project would result in no impacts related to any conservation plans and no further review is necessary.

**V. CULTURAL and TRIBAL CULTURAL RESOURCES**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>CULTURAL and TRIBAL CULTURAL RESOURCES.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 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:				
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), or				X

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 § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X
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- a. The ECR/C EIR identified one recorded historic resource within the Area Plan area, however, the resource has since been demolished. (ECR/C EIR, pp. 3.14-12.) The ECR/C EIR also identified seven unrecorded properties in and around the Area Plan area that meet the State Office of Historic Preservation's minimum age standard that buildings, structures, and objects 45 years or older may be of historical value. However, in addition to age, these unrecorded buildings would have to possess architecturally significant elements or integrity in order to be eligible to be determined for listing in the California Register of Historical Resources (CRHR). (*Id.*) The 1985-1986 South San Francisco Historic Preservation Survey does not identify any local historic resources within the Area Plan area. (ECR/C EIR, pp. 3.14-13.) The ECR/C EIR concluded that compliance with federal, state, and local laws would reduce potential impacts on historic resources to less than significant. (*Id.*) A new search was conducted in connection with the Civic Project SEIR to determine whether any resources are located within one-quarter mile of the Civic Project site. (Civic Project SEIR, p. 3.4-11.) Eight potentially historic resources were identified, none of which however were located within the Civic Project site. As such, the Civic Project SEIR concluded that that project would result in less than significant impacts related to historic resources.

The Project Site is partially located within the area studied by the Civic Project SEIR. The Civic Project SEIR considered resources within one-quarter mile of the Civic Project site. (Civic Project SEIR, Table 3.4-1) The PUC Project Site is directly adjacent to the Civic Project site and thus within the area subject to analysis in the Civic Project SEIR. The Project Site was not identified as a potentially historic resources. Further, the Project Site is vacant and thus contains no historic resources.

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to historic resources compared to those analyzed in the ECR/C EIR in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in less than significant impacts related to historic resources and no further review is necessary.

The ECR/C EIR found one Native American archaeological resource within the Area Plan area, but evaluation of the resource revealed that the site had been destroyed. (ECR/C EIR, p. 3.4-13.) The ECR/C EIR also found a sensitivity for historic archaeological materials within the Area Plan area, since it includes the former edge of marshlands, and that there may be potential for construction activities in the Area Plan area to impact prehistorical archaeological resources. (*Id.*) The ECR/C EIR outlines state regulations that provide guidance on the steps that must be taken if significant resources are uncovered during ground-disturbing activities associated with construction. Specifically, pursuant to CEQA Guidelines Section 15064.5(f), if potentially significant cultural resources are discovered, work would stop in that area until a qualified archaeologist can assess the significance of the find, and, if necessary, develop appropriate treatment measures in consultation with the City and other appropriate agencies and interested parties. If the archaeologist determines that the find does not meet the CEQA standards of significance, construction may proceed. On the other hand, if the archaeologist determines that further information is needed to evaluate significance, Department of Economic and Community Development staff would be notified and a data recovery plan would be prepared. In addition, General Plan Policy 7.5-I-5 requires the preparation of a resource mitigation plan and monitoring program by a qualified archaeologist in the event archaeological resources are uncovered. Based on required compliance with state law and General Plan Policy 7.5-I-5, the ECR/C EIR concluded that impacts from development within the Area Plan area on archaeological resources would be less than significant. (ECR/C EIR, p. 3.4-13.)

The Civic Project SEIR identified two archaeological Native American sites within one-quarter mile of the Civic Project site. Those resources consisted of a shell midden site (that is, “completely disturbed by landfill, planting of exotic species, and urbanization”) and a past habitation site (that was excavated and recorded in 2000). (Civic Project SEIR, Cultural Resources Appendix, p. 2.) The Civic Project SEIR found that due to that project site’s location near Colma Creek and the location of two identified archaeological resources near the site, project construction had the potential to impact unidentified archaeological resources during ground disturbance, and concluded that potential impacts would be reduced to less than significant with the implementation of Mitigation Measures 3.4.2a-c, which are consistent with state regulations of archaeological resources and with standard archaeological mitigation measures applicable to unexpected occurrences of potential archaeological resources. (Civic Project SEIR, pp. 3.4-11 to 12.)

The Project site is located within the one-quarter mile of the Civic Project site, and thus within the area subject to additional analysis under the Civic Project SEIR. The Project Site was not identified in that study as containing an archaeological resource.

The Project involves excavation of previously-undisturbed earth. As such, the Project proposes that compliance with Mitigation Measures 3.4.2a-c of the Civic Project SEIR, which are consistent with CEQA Guidelines Section 15064.5(f), be required as a condition of approval for the Project to prevent significant impacts related to potentially undiscovered archaeological resources. See the ECR/C EIR Mitigation Monitoring and Reporting Program. The Project would also comply with and applicable General Plan Policy 7.5-I-5, which requires the preparation of a resource mitigation plan and monitoring program by a qualified archaeologist in the event that archaeological resources are uncovered.

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to archaeological resources compared to those analyzed in the ECR/C EIR. The Project will incorporate Civic Project SEIR Mitigation Measures 3.4.2a-c in the event undiscovered archaeological resources are discovered. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in less than significant impacts related to archaeological resources and no further review is necessary.

The ECR/C EIR concluded that development in the Area Plan area would not cause a potentially significant impact to any known or unknown cemeteries or human remains in the project vicinity (ECR/C EIR, p. 3.4-14). There are no known cemeteries in the Area Plan area. As noted in the ECR/C EIR, should any unknown human remains be found during development of the Area Plan area, the developer would have to comply with California Health and Safety Code Section 7050.5, which requires that no further disturbances shall occur until the County Coroner has made the necessary findings as to the origin and disposition of the remains pursuant to Public Resources Code (PRC) Section 5097.98, which outlines the Native American Heritage Commission notification process and the required procedures if the County Coroner determines the human remains to be Native American. (*Id.*) The Civic Project SEIR also concluded that because compliance with state law concerning the discovery and disposition of human remains is required, project construction would result in a less than significant impacts. (Civic Project SEIR, p. 3.4-13.)

The Project would similarly be subject to the above-described state law relating to the discovery and disposition of human remains.

Because the Project is consistent with that which is analyzed in the ECR/C EIR, it would not result in any new or more significant impacts related to discovery and disposition of human remains compared to those analyzed in the ECR/C EIR. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in less than significant impacts related to discovery and disposition of human remains and no further review is necessary.



## VI. ENERGY

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>ENERGY.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?				X
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X

- a. Energy use for the Project would be required to comply with the Area Plan and would be moderated by the application of State regulations. The Project would have to adhere California's Energy Efficiency Standards for Residential and Nonresidential Buildings (Title 24, Part 6) and CALgreen Code (Title 24, Part 11), which outlines improved site planning and building design as well as energy conservation measures, ensuring that energy use will not be wasteful, inefficient and unnecessary. In addition, State regulations such as AB 1493 Pavley and SB 1078 Renewable Portfolio Standard will further ensure that energy use will not be wasteful, inefficient and unnecessary. In addition, the Project is situated in transit-oriented development area, within one half mile of multiple transit stations, including the South San Francisco BART station. Therefore, the Project would result in less than significant impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and no further review is necessary.
  
- b. In 2002, California established its Renewables Portfolio Standard Program, with the goal of increasing the percentage of renewable energy in the state's electricity mix to 20 percent of retail sales by 2017. In November 2008, Executive Order S-14-08 was signed requiring all retail sellers of electricity to serve 33 percent of their load with renewable energy by 2020. In 2015, Senate Bill 350 codifies the requirement for renewables portfolio standard to achieve 50 percent renewable by 2030, and in 2018, Senate Bill 100 requires 60 percent renewable by 2030 and 100 percent by 2045.<sup>20</sup> As discussed above, the Project would comply with the energy efficiency requirements of the Area Plan as well as state and local building codes and would not conflict with or obstruct implementation of city and State plans for renewable energy and energy efficiency. Therefore, the Project would result in less than significant impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation and

## **VII. GEOLOGY AND SOILS**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>GEOLOGY AND SOILS – <i>Would the project:</i></b>				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				X

<sup>20</sup> California Energy Commission, California Renewable Energy Overview and Programs. Available at: <https://www.energy.ca.gov/renewables/>. Accessed June 3, 2019.

i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?				X
iii) Seismic-related ground failure, including liquefaction?				X
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?				X
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?				X
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?				X
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?				X

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
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- a. (i) The ECR/C EIR found that the Area Plan would have a less than significant impact due to fault rupture because of the lack of active faults in the Area Plan area. The San Andreas Fault, located approximately two miles west of the Area Plan area, is the nearest active fault. Because ground rupture generally only occurs at the location of a fault, and no active faults are known to traverse the ECR/C area, the development would not be subject to a substantial risk of surface fault ruptures. The ECR/C EIR also indicated that any projects in the planning area would implement the California Building Code and Chapters 19.40 and 20.170 of the South San Francisco Municipal Code. Chapter 19.40 requires a preliminary soils report as part of the City's standard subdivision procedures. Chapter 20.170 requires all areas identified as seismic and geologic hazard areas in the City's General Plan to prepare a soils and geologic report prior to construction. (ECR/C EIR, p. 3.10-8).

The Civic Project SEIR concluded that because the project would be required to comply with the building standards in the California Building Code (contained in Title 24 of the California Code of Regulations), the project would have a less than significant impact due to fault rupture. (Civic Project SEIR, p. 3.5-7.)

The Project, being within the ECR/C Area Plan area, is not on an active fault and would comply with the California Building Code and Chapters 19.40 and 20.170 of the South San Francisco Municipal Code. In addition, a Preliminary Geotechnical Evaluation and Limited Environmental Sampling and Analysis was performed for the Project Site by Langan Engineering and Environmental Services, Inc. on May 1, 2019 (the "Geotechnical Evaluation"). The Geotechnical Evaluation did not highlight any concerns or considerations with respect to seismic risk and concluded that, from a geotechnical standpoint, the Project site could be developed as planned.<sup>21</sup>

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to fault rupture compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to fault rupture and no further review is necessary.

(ii, iii) The ECR/C EIR states that structures and infrastructure in the Area Plan area would likely experience at least one major earthquake during their functional lifetime. Building codes and construction standards established by the California Building Code and contained in Title 24 of the California Code of Regulations would protect against building collapse and major injury. Additionally, the ECR/C EIR found that the Area

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<sup>21</sup> Geotechnical Evaluation, p. 10.

Plan area has a high liquefaction potential. Liquefaction-induced ground failure can result in damage to underground utilities, shallow foundations, and paved areas. The ECR/C EIR noted that all projects in the Area Plan area would need to comply with the California Building Code as well as Chapters 15.08 and 19.40 of the City's Municipal Code. Chapter 15.08 adopts and amends the California Building Code. Chapter 19.40 requires a preliminary soils report using the City's standard subdivision procedure. The ECR/C EIR concluded that compliance with California Building Code and requirements in Chapters 15.08 and 19.40 of the Municipal Code would reduce seismic-related ground shaking and liquefaction to less than significant levels. (ECR/C EIR, pp. 3.10-8 to 3.10-9)

The Civic Project SEIR also noted that the area is susceptible to seismic activity and susceptible to liquefaction, and development would be required to comply with the California Building Code and the Municipal Code. Nevertheless, the Civic Project SEIR concluded that there could be potentially significant impacts that would be reduced to less than significant with implementation of Mitigation Measure 3.5.2, which requires the City to prepare a site-specific geotechnical report for the Civic Project site prior to construction. (Civic Project SEIR, p. 3.5-7 to 3.5-8.)

The Project would be required to comply with the California Building Code and City Municipal Code, and thus would prepare a site-specific geotechnical report in accordance with Municipal Code Chapter 19.40. The Project additionally proposes compliance with Civic Project SEIR Mitigations Measure 3.5.2 be required as a condition of approval for the Project to prevent significant impacts related to potential ground failure, including liquefaction. See the ECR/C EIR Mitigation Monitoring and Reporting Program.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to potential ground failure, including liquefaction, compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to potential ground failure, including liquefaction and no further review is necessary.

(iv.) The ECR/C EIR stated that the Area Plan area is "flatland" and potential slope hazards related to slope instability are minimal. (ECR/C EIR, p. 3.10-2.) The Civic Project SEIR came to the same conclusion. (Civic Project SEIR, p. 3.5-1.) The Project site, being located in the Area Plan area is "flatland." Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to landslides compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to landslides and no further review is necessary.

- b. The ECR/C EIR evaluated whether there is significant risk of development in the Area Plan area resulting in substantial soil erosion or loss of topsoil. The ECR/C EIR outlines policies required in the City's Municipal Code that require site-specific soil analysis and requirements of the National Pollutant Discharge Elimination System (NPDES) General Construction Permit, which requires the preparation of a Storm Water Pollution Prevention Plan ("SWPPP") to minimize the discharge of pollutants, including silt and sediment,

during construction. The ECR/C EIR determined that mandatory compliance with the City's Municipal Code and NPDES General Construction Permit requirements would reduce impacts from development in the Area Plan area due to soil erosion to less than significant levels. (ECR/C EIR, pp. 3.10-9–3.10-10.)

The Civic Project SEIR noted that development would disturb soil, but would be subject to the State's General Construction Permit and would be required to prepare an SWPPP. As the Civic Project SEIR noted, SWPPPs provide a schedule for the implementation and maintenance of erosion control measures and a description of erosion control practices, including appropriate design details and a time schedule. Additionally, Municipal Code Chapter 15.08 requires development projects to obtain grading permits from the City Engineer prior to excavation, grading, filling, clearing, or erosion control measures. The Civic Project SEIR concluded that compliance with applicable laws and regulations, including the requirement to prepare a soils report and a SWPPP that would include measures to control erosion during construction would prevent construction from having a significant impact on soil erosion and loss of topsoil. (Civic Project SEIR, pp. 3.5-8 to 3.5-9.)

The Project would remove the topsoil for the portion of the Project Site that would be excavated for the underground parking garage and also move soil around during other ground-disturbing activities. As discussed in the ECR/C EIRs, the Project must comply with City Municipal Code provisions that require site-specific soils analyses and with the NPDES General Construction Permit, which requires the implementation of an SWPPP that would include measures to control erosion and effectively manage runoff and retain sediment on-site during construction.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to soil erosion and top soil removal compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to soil erosion and top soil removal and no further review is necessary.

c., d. As described in the ECR/C EIR, due to the variability of soils in the planning area, it is possible that future development could be subject to soil expansion and settlement. The ECR/C EIR outlines provisions in the South San Francisco Municipal Code for development that require the preparation of a site-specific soil report as a way of reducing hazards related to expansive or unstable soils. The ECR/C EIR concluded that compliance with the City's Municipal Code would reduce impacts to a less than significant level. (ECR/C EIR, pp. 3.10-9–3.10-10.)

The Civic Project SEIR noted that the site there is not in an area where landslides have historically occurred and is relatively flat. That document noted that the area where the Civic Project would be located is known to have a high shrink-swell potential and the potential for soil settlement and has potential for unstable soils. The Civic Project SEIR found that implementation of Mitigation Measure 3.5.2, which requires the preparation of a geotechnical report and requires that any recommended building techniques be implemented in the project's construction plans, would reduce impacts to a less than significant level. (Civic Project SEIR, p. 3.5-9.)

Being adjacent, the Project is in an area that has soils similar to the Civic Project site. The Project must comply with City Municipal Code provisions that require site-specific soils analyses and with the NPDES General Construction Permit, which requires the implementation of an SWPPP. The Project additionally proposes compliance with Civic Project SEIR Mitigations Measure 3.5.2 be required as a condition of approval for the Project. A Preliminary Geotechnical Evaluation and Limited Environmental Sampling and Analysis was prepared by Langan on May 1, 2019 ("Geotechnical Evaluation"). The Geotechnical Evaluation determined that the threat of lateral spreading on the Project Site is low and that multiple layers within the Stream Deposits at each of the exploration points were susceptible to liquefaction and associated liquefaction-induced settlements.<sup>22</sup> Project construction also would not cause soil to become unstable or exacerbate the risk of landslides, lateral spreading, subsidence, liquefaction, or collapse. Accordingly, the Project would have no new or more significant impacts than disclosed in the ECR/C EIRs and no new mitigation is required. See the ECR/C EIR Mitigation Monitoring and Reporting Program.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to unstable and expansive soils compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to unstable and expansive soils and no further review is necessary.

- e. The ECR/C EIR did not evaluate Area Plan impacts from soils incapable of adequately supporting the use of septic tanks because the development in the Area Plan will be served by the City's municipal sewer system, and all future projects would be connected to this system. As such, the Area Plan was found to have no impact with respect to use of septic tanks.

The Project would not use septic tanks because it would be connected to the City's municipal sewer system, which has adequate capacity to serve the Project. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to the use of septic tanks compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in no impacts related to the use of septic tanks and no further review is necessary.

- f. The Area Plan notes that the University of California Museum of Paleontology has indicated that at least one locality where fossils have been found is located in the City, but it has not provided the exact location of where the Equus fossil was found in South San Francisco. (ECR/C EIR p. 3.4-3). It also notes, however, that the lithology of the fossil is identified as mudstone which is located in areas near the Bay and in the San Bruno Mountains (not near the Planning Area). (ECR/C EIR p. 3.4-3). It further notes that, due to the built out nature of the Planning Area, it is unlikely that the locality of the fossil is in the Planning Area. (ECR/C EIR p. 3.4-3). Because it is unlikely that there are unique paleontological resources in the Planning Area, it is also unlikely that there are unique paleontological resources in the Project area. Therefore, the Project

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<sup>22</sup> Geotechnical Evaluation, p. 8-9.

would result in no impacts related to unique paleontological resources and no further review is necessary.



## VIII. GREENHOUSE GAS EMISSIONS

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>GREENHOUSE GAS EMISSIONS.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?				X
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

- a. To determine if the Area Plan would generate greenhouse gas (GHG) emissions that may have a significant impact on the environment, the ECR/C EIR examined (1) whether implementation of the Area Plan would decrease GHG emissions by 2020 and 2030 from the City's 2005 baseline inventory ("Analysis 1") and (2) comply with BAAQMD's project-level service population threshold, which is 4.6 metric tons (MT) CO<sub>2</sub>e per year per service population, where service population is residents and employees ("Analysis 2"). With respect to Analysis 1 and Analysis 2, baseline inventory emissions were 604,988 MT and 9.8 MT per capita. Analysis 1 accounted for the following state and local programs: Renewable Portfolios Standard, assuming energy providers will achieve a 26 percent renewable portfolio by 2020; Low-Carbon Fuel Standard, assuming a 6.6 percent reduction in emissions from the City's transportation sector compared to 2005; Pavley Phase 1 and 2, assuming a 14 percent reduction in emissions from the City's transportation sector compared to 2005; and the City's Construction and Waste Ordinance, assuming that emissions from construction and demolition wastes would stay constant through 2030. In addition, Analysis 1 and Analysis 2 accounted for the following Area Plan measures that would reduce GHG emissions: local serving retail within half-mile of a project, and 100 percent increase in the diversity of land uses, design, and density; a 15 percent reduction from 2005 levels was applied to the GHG emissions generated from City's transportation sector. Under Analysis 1, the ECR/C EIR concluded that the Area Plan would decrease emissions from the baseline inventory, with 2020 emissions falling to 566,541 MT and 7.3 MT per capita. But 2030 emissions would rise to 639,511 MT, although per capita emissions, at 8.3 MT would be less than the baseline inventory. Under Analysis 2, the ECR/C EIR showed that Area Plan emissions in both 2020 and 2030 would be 4.6 MT CO<sub>2</sub>e per year per service population. The ECR/C EIR concluded that even though total emissions would increase slightly by 2030 from baseline conditions, because emissions associated with the Area Plan would not exceed BAAQMD's service population threshold, emissions were less than

cumulatively considerable.

The Civic Project SEIR did not recalculate emissions for the entire Area Plan area. As noted in that EIR, there have been a few regulatory changes since publication of the ECR/C EIR. First, the City adopted a Climate Action Plan (CAP), which includes goals, policies, and programs to reduce GHG emissions, adapt to climate change, and support the goals of AB 32 and SB 375. In addition, the state has enacted Senate Bill (SB) 32, which codified the goal to reduce GHG emissions 40 percent by 2030 first articulated in Executive Order B-30-15. SB 32 states that the intent is for the legislature and appropriate agencies to adopt complementary policies that ensure the long-term emissions reductions advance specified criteria. CARB has updated the state Scoping Plan to reflect the requirements of SB 32. The state also enacted SB 350, which updates the Renewable Portfolio Standard (RPS) to require the amount of electricity generated and sold by utilities to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. That bill also made other revisions to the RPS program and to certain other requirements on public utilities and publicly owned electric utilities. Additionally, the state amended Title 24 to require more energy efficiency from new development. Finally, the Association of Bay Area Governments ("ABAG") adopted an updated Sustainable Communities Strategy ("SCS")/Regional Transportation Plan ("RTP") (known as Plan Bay Area). These regulatory changes will help the state and the City continue to decrease GHG emissions and therefore do not result in any new or more significant impacts than accounted for in the ECR/C EIR analysis.

The Project implements the Area Plan and this is within the scope of development analyzed in the ECR/C EIR. For this reason, the Project would not result in new or more significant impacts than discussed in the ECR/C EIR and no new mitigation is required. In addition, the Air Quality Assessment found the annual GHG emissions resulting from operation of the Project were predicted to be 5,375 MT of CO<sub>2</sub>e for the year 2030 and the service population emissions for the year 2030 would be 2.3.<sup>23</sup> The Air Quality Assessment went on to note that "[t]he 2030 emissions increase does exceed the 2030 bright-line threshold of 660 MT CO<sub>2</sub>e/year but does not exceed the 2030 service population emissions 'Substantial Progress' efficiency metric of 2.8 MT CO<sub>2</sub>e/year/service population. To be considered significant, the project must exceed both the GHG significance threshold in metric tons per year and the service population significance threshold. This project does not exceed both thresholds."<sup>24</sup> As such, the Assessment finds, the Project would have a less-than-significant impact regarding GHG emissions.<sup>25</sup>

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, and the Air Quality Assessment found that its impacts to GHG emissions would be less-than-significant, the Project would not result in any new or more significant impacts related to GHG emissions compared to those analyzed in the EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to GHG emissions and no further review is necessary.

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<sup>23</sup> Air Quality Assessment, p. 27.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

- b. The ECR/C EIR noted that in 2011, the City did not have a CAP, but was working to develop one. Therefore the ECR/C EIR analyzed the Area Plan's consistency with AB 32 and Bay Area 2010 Clean Air Plan. The ECR/C EIR concluded that the Area Plan would not conflict with AB 32 or the Clean Air Plan. Regarding AB 32, the ECR/C EIR found that the City's GHG emissions will be reduced to below current levels as a result of State mandates and further reduced as a result of implementing the Area Plan and that these reductions would assist California in achieving its reduction goal. Regarding the Clean Air Plan, the ECR/C EIR found that the Area Plan and the City's General Plan policies conform to the control strategies included in the Bay Area 2010 Clean Air Plan and therefore the Area Plan is consistent with the 2010 Bay Area Clean Air Plan control measures. For these reasons, the ECR/C EIR concluded that impacts would be less than significant. (ECR/C EIR, p. 3.3-43.)

The Civic Project SEIR analyzed the Area Plan's consistency with the City's CAP and the current version of Plan Bay Area. The CAP contains separate policy provisions addressing the increase of pedestrian, bicycle, and private shuttle systems. The Civic Project SEIR noted that consistent with the CAP, the Area Plan is a transit-oriented development in support of the South San Francisco BART station. The CAP contains environmental sustainability related policy provisions in the categories of land use and mixed-use development, open space, efficient and alternative transportation, transportation demand management, and parking that promotes transit. The Area Plan would provide moderate- to high-density housing in locations within convenient walking distance of employment centers, shopping centers, and transit routes. As such, the Area Plan would result in improved access to local and regional transit services, and promote alternative means of transportation through increased access to pedestrian and bicycle facilities and is consistent with the CAP. Plan Bay Area is ABAG's plan to achieve a 7 percent per capita reduction in GHG emissions from cars and light-duty trucks compared to 2005 vehicle emissions by 2020 and a 15 percent per capita reduction by 2035. Plan Bay Area contains funding priorities for individual transportation projects and transportation and land use strategies that help the region achieve state GHG emissions reduction targets and federal Clean Air Act requirements. The Civic Project SEIR notes that the Area Plan area is characterized as an Urbanized Area in Plan Bay Area, as opposed to a Priority Conservation Area, and is surrounded by lands identified as Urbanized Area. Therefore, ABAG predicts urban growth will occur in the Area Plan area. Development of the Area Plan area is consistent with Plan Bay Area's goal to encourage mixed-use development and development in proximity to transit options.

The Project is consistent with the Area Plan's planning strategy to encourage mixed-use development near transit. The Project is mixed-use development in close proximity to bicycle paths, bus stops, and less than one mile from the South San Francisco BART station. Accordingly, the Project would have no new or more significant impacts related to plan consistency than disclosed in the ECR/C EIRs and no new mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, the Project would not result in any new or more significant impacts related to conflict with an applicable plan adopted to reduce GHG emissions compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to conflict with an applicable

plan adopted to reduce GHG emissions and no further review is necessary.

**I. C. HAZARDS AND HAZARDOUS MATERIALS**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>VIII. HAZARDS AND HAZARDOUS MATERIALS.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				X
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?				X
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
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?				X
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?				X

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?				X

- a, b. The ECR/C EIR concluded there would be no impacts related to hazardous materials use, including uses near schools, because the land use designations and zoning would limit development to commercial and residential uses. No hazardous materials handlers (e.g., auto repair/vehicle service) would be permitted by the Area Plan and associated zoning as a future commercial land use. The ECR/C EIR thus concluded that the Area Plan would have no impact related to creating a significant hazard through the routine transport, use, or disposal of hazardous materials or by a reasonably foreseeable upset or accident. (ECR/C EIR, pp. 3.12-15–3.12-16.)

The Civic Project SEIR noted that demolition and construction activities would require the temporary transport, handling, use, storage, and disposal of common products used in construction equipment such as gasoline, diesel fuel, oils, and construction materials such as solvents, asphalt, glues and cements, and paints. That EIR also found that uses allowed by the Area Plan would involve the routine use of common items such as cleaning and maintenance products, but would not involve uses that handle large quantities of hazardous materials or industrial uses that would pose a substantial adverse risk to people and the environment. The Civic Project SEIR found that numerous existing regulations at the federal, state, and local levels would minimize potential hazards to the public and the environment from the improper handling or accidental release of hazardous materials, including compliance with the State's Construction General Permit and SWPPP requirements. Accordingly, it concluded that impacts would be less than significant. (Civic Project SEIR, p. 3.7-7.)

The Project includes residential uses and commercial uses (i.e., Market Hall and childcare), which do not handle large amounts of hazardous materials. As the Civic Project SEIR noted, construction would involve the use of hazardous materials, but those are regulated at the federal, state, and local levels to ensure that they are not mishandled.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to potential exposure of hazardous materials compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to potential exposure of hazardous materials and no further review is necessary.

- c. The ECR/C EIR noted that there are five schools within a quarter mile of the Planning Area: El Camino High

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School, Baden Continuation High School, Buri Elementary School, Urban Sprouts Pre-School and RW Drake Pre-School. The ECR/C EIR concluded that there would be no impact to these schools because no hazardous materials handlers are anticipated to be built under the Area Plan. (ECR/C EIR, p. 3.12-16.) The Civic Project SEIR also concluded that none of that project's activities or uses would result in hazardous air emissions within a quarter mile of the schools in the vicinity. (Civic Project SEIR, p. 3.7-7.)

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to potential exposure of hazardous materials within close proximity of schools compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to potential exposure of hazardous materials within close proximity of schools and no further review is necessary.

- d. The ECR/C EIR stated that the Area Plan area does not contain any sites listed on the Cortese List. (ECR/C EIR, p. 3.12-16.) The eastern portion of the Civic Project site contains two sites identified on the Cortese List, both of which are former underground fuel storage tank sites that are on the parcel which would remain developed with existing uses. The Civic Project SEIR required for the portion of the Civic Project site that has an existing ESA (see Civic Project SEIR, Appendix HAZ) that recommendations in the applicable ESA be implemented or an additional Phase II would be required prior to construction; and for those parcels that have no ESA that implementation of Mitigation Measures 3.7.2a and MM 3.7.2b would ensure that hazardous materials contamination, if any, is properly identified and managed in accordance with applicable regulations. The Civic Project SEIR concludes that these measures would reduce the Civic Project's impacts to less than significant with mitigation. (Civic Project SEIR, p. 3.7-8 to 3.7-9.)

A search of the State Waterboard's GeoTracker and Department of Toxic Substances Control's (DTSC's) EnviroStor databases<sup>26</sup> shows that the Project site is currently not located on a site identified on the Cortese List. A Phase I Environmental Site Assessment was prepared by Langan on November 27, 2018, for the Project site ("Langan ESA"). The Langan ESA found that the Project site was largely historically agricultural or vacant land. From approximately 1974 to 1998, during, a portion of the site was occupied by various commercial structures.<sup>27</sup> From approximately 1974 to at least 2009, another portion of the site appears to have been occupied by a parking lot.<sup>28</sup> The Langan ESA concluded that no previous site occupants were identified which suggest the potential for environmental concern and no recognized environmental conditions were identified in connection with the site.<sup>29</sup> As such, the Project Site is not a site included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and would have no new or more significant impacts related to this issue than disclosed in the ECR/C EIR and no new mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any

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<sup>26</sup> State Water Board's GeoTracker website accessed 12/03/18; DTSC's EnviroStor website accessed 12/03/18.

<sup>27</sup> Langan ESA, p. 19.

<sup>28</sup> *Id.*

<sup>29</sup> *Id.*

new or more significant impacts related to development on a Cortese-listed site compared to those analyzed in those EIRs. The Phase I ESA confirms the analyses of the ECR/C EIRs as to the Project site. Therefore, the Project would result in less than significant impacts related to potential exposure of hazardous materials within close proximity of schools and no further review is necessary.

- e. The ECR/C EIR noted that the Area Plan area is located north of San Francisco International Airport (SFO) and concluded that the Area Plan is consistent with 1996 Comprehensive Airport Land Use Plan (amended 1998). The ECR/C EIR noted that future development would need to adhere to the limits in the most recently adopted Comprehensive Airport Land Use Plan. It also mentioned that General Plan Policy 2-I-22, which requires that “all future development conforms with relevant height, aircraft noise, and safety policies and compatibility criteria contained in to the most recently adopted version of the San Mateo County Comprehensive Airport Land Use Plan for the environs of San Francisco International Airport,” reinforces that requirement. The ECR/C EIR was sent to SFO who responded that they had no comments concerning the Area Plan and that the height limits that comply with the FAA’s requirements. (ECR/C EIR, p. 3.12-16 and 3.12-17.) The Civic Project SEIR concluded that air hazards did not require evaluation. (Civic Project SEIR, p. 3.7-6.)

The Project is consistent with the development standards in the Area Plan and General Plan. There are no private airports within two miles. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to air hazards compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to air hazards and no further review is necessary.

- f. The ECR/C EIR states that the Area Plan would not block access to roadways or on-site emergency vehicle access and that new development under the Area Plan would not interfere with and would comply with all applicable emergency response or evacuation plans. The ECR/C EIR concluded that there would be no impact to emergency response or excavation plans. (ECR/C EIR, p. 3.12-17.) (Potential impacts from transportation are discussed in the Transportation Section, below.) The Civic Project SEIR did not disclose any new or different impacts. (Civic Project SEIR, p. 3.10-33.)

Phase I of the Oak Avenue extension, which will be completed as part of the Project, will connect Oak Avenue to Antoinette Lane. A bridge will be constructed over Colma Creek for this purpose. The right of way for a future Oak Avenue extension will be reserved on the Project site with pedestrian and bike improvements to be constructed on it in the near term. The Project, including the Phase I Oak Avenue extension and any later Oak Avenue extension will be designed to meet the City’s emergency vehicle access requirements in the Municipal Code. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to emergency access compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to emergency access and no further review is necessary.



- g. The ECR/C EIR states that there is no wildland fire risk in the vicinity of the Area Plan area, which is not within a fire hazard management unit and concludes that there would be no impact. (ECR/C EIR, p. 3.12-17.) The Civic Project SEIR notes that the area is completely urbanized and also concludes that there is no risk of wildland fires. (Civic Project SEIR, p. 3.7-6.)

The Project Site is located in an urban environment not adjacent to wildlands and, therefore, would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to wildland fire risk compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to wildland fire risk and no further review is necessary.

## **X. HYDROLOGY AND WATER QUALITY**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>HYDROLOGY AND WATER QUALITY.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?				X
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				X
i) result in substantial erosion or siltation on- or off-site?				
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?				
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?; or				
iv) impede or redirect flood flows?				

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				x
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				x

- a. The ECR/CEIR evaluated whether implementation of the Area Plan would result in a violation of any water quality standards or waste discharge requirements. The ECR/CEIR concluded that development permitted by the Area Plan would not result in a significant impact because all development would have to comply with the Construction General Permit, which requires development to provide permanent treatment for site runoff, prepare SWPPPs and Erosion Control Plans for construction related activities, and implement best management practices (BMPs) as part of its storm water management program. The ECR/CEIR further notes that future development will be subject to review and approval by the City Engineer and the City's Storm Water Coordinator prior to any grading or construction activities. The ECR/CEIR concluded that adherence to federal, state, and local laws protecting water quality would ensure that impacts from Area Plan development will be less than significant. (ECR/CEIR, pp. 3.11-10 to 3.11-11.)

The Civic Project SEIR analyzed whether the Civic Project would result in a violation of any water quality standards or waste discharge requirements as a result of construction activity, its operations, and whether it would contribute to a cumulative impact. It found that because the construction period contractors would be required to implement a SWPPP and BMPs in accordance with the Construction General Permit requirements, the Civic Project's construction would not result in any new or more severe impacts related to water quality or waste discharge during the construction period than had been analyzed in the ECR/CEIR. Further, it found that with compliance with the stormwater runoff reduction measures in Area Plan Policies UD-7 and DG-40, and with Municipal Code Chapter 14.04 (Stormwater Management and Discharge Control) and the San Mateo Countywide Water Pollution Prevention Program C.3 Stormwater Technical Guidance Manual, the Civic Project's operation would not result in any violations of water quality standards. (Civic Project SEIR, pp. 3.8-8 to 3.8-9.)

The Project will be subject to the federal, state, and local regulations listed above that ensure that both the construction of the Project and its operation will not cause a violation of any water quality standards or waste discharge requirements. The Project will involve a new stormwater connection, which will discharge to Colma Creek. This new connection to Colma Creek will be properly permitted. Because the Project is consistent with that which is analyzed in the ECR/CEIRs, it would not result in any new or more significant impacts related to water quality compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/CEIRs that would change their conclusions. Specifically, it is noted that the Phase 1 Oak Avenue extension will span Colma Creek and will

not involve the placement or construction of any structures in Colma Creek. As a result, the Phase 1 Oak Avenue extension will not have any hydrology impacts. Therefore, the Project would result in less than significant impacts related to water quality and no further review is necessary.

- b. The ECR/C EIR concluded that implementation of the Area Plan would have no impact on groundwater supplies or recharge. (ECR/C EIR, p. 3.11-10.) The Civic Project SEIR noted that there are no changed circumstances since certification of the ECR/C EIR in 2011 and there would be no impact relative to depletion of groundwater supply or recharge. (Civic Project SEIR, p. 3.8-7.)

Being on a largely undeveloped site, the Project would substantially alter the percentage of the Area Plan area that is impervious. However, the Project does not include a well, and will not utilize groundwater supplies. Instead the Project, like all other development within the Area Plan area will rely on water supplies from the California Water Company. Accordingly, the Project will not deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. Thus the Project would have no new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to groundwater supplies and recharge compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to groundwater supplies and recharge and no further review is necessary.

- c. ECR/C EIR found that within the Area Plan area, the majority of the stormwater run-off is conveyed to a network of drain inlets and pipes that discharge to Colma Creek. The ECR/C EIR also found that the Area Plan area is largely developed with impermeable surfaces and the underlying soils are typically clays with low permeability and erosivity. It concluded that as buildout occurs, compliance with the Construction General Permit would require the preparation of SWPPPs, which would include BMPs, and Erosion Control Plans that would reduce potential erosion and/or siltation impacts to less than significant. (ECR/C EIR, p. 3.11-11.)

The Civic Project SEIR analyzed the impacts that could result from construction and operation of the Civic Project. It found that adherence to SWPPP and best management practices in accordance with the Construction General Permit requirements as described in the ECR/C EIR would ensure that construction activities would not result in any new or more severe impacts than previously identified related to construction runoff, changes in drainage patterns, or erosion. (Civic Project SEIR, pp. 3.8-8 to 3.8-9.)

The construction of the Project will result in a significant net increase in impervious area, however, this net increase was analyzed in the ECR/C EIR as the Area Plan contemplates redevelopment of the Project site. The Project will comply with all applicable federal, state and local rules and regulations including the preparation of a SWPPP and implementation of BMPs. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to alteration

of drainage patterns compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to alteration of drainage patterns and no further review is necessary.

The ECR/C EIR notes that future development will be subject to review and approval by the City Engineer and the City's Storm Water Coordinator, and will be required to submit a SWPPP and an Erosion Control Plan to the City Engineer and the Water Quality Control Division prior to any grading or construction activities. The ECR/C EIR found that by following the federal, state, and local laws, rules, and regulations, including the requirements contained within the Area Plan, development would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff or otherwise substantially degrade water quality at a significant level. (ECR/C EIR, pp. 3.11-11 to 3.11-12.)

The Civic Project SEIR found that while construction site runoff has the potential to contribute soil and pollutants from equipment and materials handling to Colma Creek, which could affect water quality, the implementation of SWPPP and BMPs in accordance with the Construction General Permit requirements would ensure that the potential construction impacts did not require any new mitigations and would remain less than significant. Further, it found that with compliance with the stormwater runoff reduction measures in Area Plan Policies UD-7 and DG-40, and with Municipal Code Chapter 14.04 (Stormwater Management and Discharge Control) and the San Mateo Countywide Water Pollution Prevention Program C.3 Stormwater Technical Guidance Manual, the Civic Project's operation would ensure that there would be no new or unidentified impact. (Civic Project SEIR, pp. 3.8-8 to 3.8-9.)

During construction and operation the Project will be subject to the federal, state, and local laws, rules and regulations regarding storm water discharge. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to polluted runoff compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to polluted runoff and no further review is necessary.

- d. The ECR/C EIR identifies the site in a Zone AE: High Risk Flood Area. The site maps have been updated since the ECR/C EIR and Parcel C remains in Zone AE. (FEMA Flood Map, 06081C0037E, 06081C0041E). Chapter 15.56 of the South San Francisco Municipal Code provides regulations regarding flood damage protection. The Municipal Code regulates the standards of construction, including the requirement to elevate to or above the base flood elevation for projects in a Zone AE, which must be certified by a civil engineer. The Project will comply with all requirements set forth in the Municipal Code. As such, it will not have any new or significant impacts as compared to those analyzed in the ECR/C EIRs. In addition, the Project team is working with a consultant who is currently performing modeling to confirm the 100-year flood elevations. Their analysis to date shows that the proposed buildings will be outside the 100-year flood elevation of Colma Creek. Once they complete their model, they will work with the City and submit their results to FEMA with the intent to get the FEMA map revised with a letter of map revision ("LOMR") such that the

Project is no longer shown to be impacted by the 100-year flood zone. As of the date of this Checklist, the draft LOMR has been submitted to FEMA and the Project team expects to receive the first round of FEMA comments within the next month or per FEMA response timelines. Upon receipt, and any revision, if necessary, the Project team will resubmit a revised LOMR based upon any FEMA comments. If the revised LOMR is acceptable to FEMA, it will be approved following FEMA's 90 day review period. As such, development and construction will be required to comply with applicable federal, state and local flood construction regulations. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to flood hazard risk compared to those analyzed in those EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to flood hazard risks and no further review is necessary.

- e. For the reasons discussed in (a) above, the Project would not interfere with the Municipal Code Chapter 14.04 or the San Mateo Countywide Water Pollution Prevention Program C.3 Stormwater Technical Guidance Manual. Further, the Project site is not located within an area subject to a sustainable groundwater management plan and the Project would not extract groundwater supplies. Therefore, the Project would result in no impacts related to obstruction of a water quality control plan and no further review is necessary.

## **XI. LAND USE AND PLANNING**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>LAND USE AND PLANNING.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				X

- a. The ECR/C EIR concludes that implementation of the Area Plan would reinforce, with no substantial change in, established community-wide land use patterns. The Area Plan would make areas within the Area Plan's boundaries more compatible with Station Area Transit Village development to the north and the South El Camino Real area to the south. The Area Plan allows high-intensity mixed-use development and multi-family residential development on El Camino Real and along Mission Road, as well as permit heights and densities similar to those allowed to the north and south of the Planning Area. The Area Plan would result in a corridor with more compatible land use and urban design patterns, resulting in a more cohesive community. The ECR/C EIR also finds that implementation of the Area Plan will improve connections to and continuity with surrounding communities, by increasing compatibility along El Camino Real, increasing opportunities for housing, and improving linkages. Therefore, the ECR/C EIR concluded that the Area Plan would have a less than significant impact on an established community. (ECR/C EIR, p. 3.9-7 to 3.9-8.) The Civic Project SEIR found that the Civic Project's change in land uses would not divide an existing community. (Civic Project SEIR, p. 3.0-3.)

The Project is consistent with the Area Plan land use designations that provide the basis of the ECR/C EIR and Civic Project SEIR conclusions. As identified previously, Phase 1 of the Oak Avenue extension will connect Oak Avenue to Antoinette Lane as part of the Project. The right of way for a future Oak Avenue extension that will ultimately connect to El Camino Real will be reserved on the Project site with pedestrian and bike improvements to be constructed on it in the near term. The pedestrian and bike improvements will encourage multi-modal transportation and foster community gathering. The right of way for the full Phase 2 Oak Avenue extension to El Camino Real will be reserved for construction at a later time. Because the Project is consistent with what was analyzed in the ECR/C EIRs, the Project would result in less than

significant impacts related to division of established communities and no further review is necessary.

- b. General Plan amendments for the Area Plan area were adopted concurrently with the Area Plan. These amendments ensure consistency between the Area Plan and General Plan. Amendments to the Zoning Ordinance also were adopted to include development standards that apply to the Area Plan area. (See ECR/C EIR, pp. E-2 to E-4, 3.9-9 to 3.9-10.)

The Civic Project updated the General Plan and Zoning Ordinance to allow for the proposed uses on the Civic Project site. The Civic Project SEIR noted that the Civic Project would follow all design guidelines and other regulations in the ECR/C Area Plan and the General Plan, and that construction activities would be required to comply with the provisions of the City's Zoning Ordinance. As such, the Civic Project SEIR concluded that the Civic Project would not be in conflict with existing City regulations, and would have no impact. (Civic Project SEIR, p. 3.0-3.)

The Project complies with all applicable ECR/C standards, guidelines, and regulations. The applicant will be requesting a Conditional Use Permit for construction of multi-family residential development and density, height and FAR increases, as allowed under the Area Plan's incentive program. The remaining entitlements are listed in Section 10 of the "Project Information" Section. No legislative amendments are required.

Overall density for this project will be consistent with the standards set forth in City Zoning Code. The proposed density across the entire site, Parcels B and C (or alternatively the proposed new Parcels 1, 2 and 3), combined, is 121 du/ac (800 units/6.60 acres). The proposed density by parcel is as follows:

Proposed Parcel 1 (Building C2) is 107 du/ac (158 units/1.48 ac)

Proposed Parcel 2 (Building C1) is 119 du/ac (408 units/3.43 ac)

Proposed Parcel 3 (Building B) is 138 du/ac (234 units/1.7 ac)

The ECR/C- RH zoning for both Parcels C and B (proposed parcels 1, 2 and 3) indicate the parcels are zoned High Density/Residential and allow a base maximum density of 120 du/ac per Table 20.270.004-1. Per Section 20.270.004(A) an additional 30 units per acre can be granted for the incorporation of Transportation Demand Management (TDM) measures or as deemed appropriate by the Chief Planner. A TDM plan has been submitted and currently meets the requirements set forth in Section 20.400. Another 30 units per acre of density may be granted per Section 20.390 bonus program for projects exhibiting high quality architecture, green building provisions, off-site improvements, affordable housing and/or other noted criteria. The Project includes over 3 acres of open space improvements for the public, including upgrades to bike and pedestrian trails, parks, child care, public art, playgrounds, fitness stations, and a Market Hall and connected plazas. Accordingly, the proposed project, with its 121 du/ac density is consistent with and well below the allowable bonus maximum density of 180 du/ac in the Zoning Code. The proposed parcels therefore conform with the more detailed implementing in the Zoning Code (as noted above).

The General and Area Plans indicate Parcel B has an allowed base maximum density of 80 du/ac with up to 110 du/ac with a TDM or quality design bonus. In addition to qualifying for the TDM and quality design bonuses for the reasons stated above, the applicant will apply the State Density Bonus to Parcel B to bring



its allowed density under the General and Area Plans up to 149 du/ac (110 x 1.35 (assuming a 35% bonus)). With the above noted density of 138 du/ac for the proposed project on Parcel B, it is consistent with the allowable maximum density. Applicant is requesting to build less (i.e. with a 25% bonus) than the 35% maximum allowable density under the California Density Bonus law. As noted above, the all proposed parcels, including Parcel B conform with the more detailed, implementing Zoning Code density.

Moreover, Table D in the Background section shows the total remaining overall capacity under the ECR/C Area Plan, taking into consideration the projects approved in the ECR/C Area Plan area since the certification of the ECR/C EIR. In addition to not exceeding the overall capacity in the ECR/C Area Plan, there are also no other residential units going forward in the Plan Area aside from the Project and the SummerHill project at 988 El Camino Real. As such, in considering the remaining capacity under the Area Plan, the proposed Project would have no new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

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 Area Plan area. (ECR/C EIR, p. 3.1204; Civic Project SEIR, p. 3.0-4.)

The Project site is within the Area Plan area, and thus not subject to any habitat conservation plan. Because the Project is consistent with that which is analyzed in the ECR/C EIRs, it would not result in any new or more significant impacts related to habitat conservation plans compared to those analyzed in those EIRs. No changes have occurred and no new information has been made available since certification of the ECR/C EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to habitat conservation plans and no further review is necessary.

## **XII. MINERAL RESOURCES**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>MINERAL RESOURCES.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the State?				X
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?				X

- a, b. The ECR/C EIR found the Area Plan area does not contain any mineral resources within its limits, and concluded that the implementation of the ECR/C Area Plan would result in less-than-significant impacts related to such resources. (ECR/C EIR, p. 3.12-4.) According to the South San Francisco General Plan, no areas in the City are designated as having significant mineral resources. The Civic Project SEIR also concludes that that project would result in no impacts related to mineral resources. (Civic Project SEIR, p. 3.0-4.)

Because there are no mineral resource areas in the Area Plan area, the Project will not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State or 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.

The Project is consistent with that which is analyzed in the ECR/C EIR, and as such would not result in any new or more significant impacts related to mineral resources compared to those analyzed in the ECR/C EIR. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in no impacts related to mineral resources and no further review is necessary.

### **XIII. NOISE**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>NOISE.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				X
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

- a. The ECR/C EIR concluded that construction activities associated with the project could substantially increase ambient noise levels at noise-sensitive locations, which could result in potentially significant, but temporary, impacts to sensitive receptors. However, compliance with the limitations on construction activity and associated noise standards established in Title 8 of the South San Francisco Municipal Code, including limiting the hours during which such construction activity may occur, would ensure that construction noise impacts were less than significant (ECR/C EIR, p. 3.5-15). The ECR/C EIR concluded that the plan could increase noise over existing conditions due to traffic volume increases. Noise was calculated to increase by less than 3 dB over existing conditions by 2030. This increase would not be noticeable, and therefore the ECR/C EIR concluded the impact would be less than significant (ECR/C EIR, p. 3.5-16).

The Civic Center EIR did not include any information that would alter the conclusions of the ECR/C EIR with respect to noise and no other changes in circumstances have occurred.

The Project is consistent with the Area Plan, the ALUCP, the General Plan, and the Municipal Code, and is required to continue to comply with these documents. This ensures that the Project will not expose persons to or generate noise levels in excess of applicable standards. In addition to the above, the Noise and Vibration Assessment performed for the Project (the "Noise Assessment")<sup>30</sup> found that, with the implementation of these controls, the increase in ambient noise levels due to construction would be temporary and less-than-significant.<sup>31</sup> On the same note, and for the reasons outlined above, the Noise Assessment found that the Project would result in less-than-significant impacts with respect to a permanent noise level increase.<sup>32</sup> The Project would have no new or more significant impacts than disclosed in the ECR/C EIR and no mitigation is required.

The Project is consistent with that which is analyzed in the ECR/C EIR, and as such would not result in any new or more significant impacts related to a substantial increase in ambient noise levels compared to those analyzed in the ECR/C EIR in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in less-than-significant impacts related to a substantial increase in ambient noise levels and no further review is necessary.

- b. The ECR/C EIR found that the risk of Area Plan development causing an impact is less than significant because new development would have to adhere to Section 20.300.010 of the Zoning Ordinance which contains performance standards regarding vibrations. This portion of the municipal code includes a provision requiring that "no vibration shall be produced that is transmitted through the ground and is discernible without the aid of instruments by a reasonable person at the lot lines of the site. Vibrations from temporary construction, demolition, and vehicles that enter and leave the subject parcel (e.g., construction equipment, trains, trucks, etc.) are exempt from this standard." (City Code § 20.300.010 (F).) The Civic Project SEIR did not find changed circumstances related to vibration.

The Project would consist of apartments above ground-level retail and commercial spaces and associated parking. None of these uses will generate ground-borne vibrations and ground-borne noise. During construction, the Project will generate ground-borne vibrations and noise, but the vibrations will be temporary and exempted by the City's Municipal Code as disclosed and analyzed in the ECR/C EIRs. The Project is compliant with both the Area Plan's and the Municipal Code's requirements and would not produce impacts beyond those disclosed and analyzed in the ECR/C EIRs. In addition, the Noise Assessment found that, with the implementation of the following measures, which shall be incorporated as Project

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<sup>30</sup> Public Utilities Commission Mixed-Use Development Noise and Vibration Assessment performed by Illingworth & Rodkin, Inc., dated June 10, 2019.

<sup>31</sup> *Id.* at p. 23-24.

<sup>32</sup> *Id.* at p. 28.

conditions of approval where vibration levels due to construction activities would exceed acceptable levels, any potential impact would be reduced to a less-than-significant level:

- Comply with the construction noise ordinance to limit hours of exposure. The City's Municipal Code allows construction activities between the hours of 8:00 a.m. and 8:00 p.m. Monday through Friday, from 9:00 a.m. to 8:00 p.m. on Saturdays, and between 10:00 a.m. and 6:00 p.m. on Sundays and holidays.
- The project contractor shall avoid using vibratory rollers and packers near sensitive areas, such as the northern property line and near the existing BART buildings, whenever possible.
- Prohibit the use of heavy vibration-generating construction equipment, such as vibratory rollers or clam shovel drops, within 20 feet of any adjacent sensitive land use, where feasible.
- The contractor shall alert heavy equipment operators to the close proximity of the adjacent structures so they can exercise extra care.
- The contractor shall retain a qualified firm to conduct a pre- and post-construction cosmetic crack survey of the buildings adjacent to the southern and western boundaries and shall repair any additional cosmetic cracking.<sup>33</sup>

The Project is consistent with that which is analyzed in the ECR/C EIR, and as such would not result in any new or more significant impacts related to groundborne excess vibration or noise compared to those analyzed in the ECR/C EIR. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, with the implementation of the measure discussed above, the Project would result in less-than-significant impacts related to groundborne excess vibration or noise and no further review is necessary.

- c. The ECR/C EIR found that per the San Francisco International Comprehensive Airport Land Use Plan (the "CALUP"), the 2001 Noise Exposure Map (NEM) indicates that a small portion in the southwest corner of the Area Plan area is in between the 60-65 dB and CNEL 65 dB areas, but notes that no noise/land use compatibility standards apply within those noise contours (ECR/C EIR, p. 3.5-10). For this reason, implementation of the Area Plan would have no impact.

The Civic Project SEIR found that as analyzed in the ECR/C EIR, there are no private airports in the vicinity of the Civic Project site and there had been no changes in circumstances that would affect the ECR/C EIR's analysis.

San Francisco International Airport ("SFO") is the closest public or private airstrip to the Project Site. The Project is approximately 2.5 miles from the airport. Examination of the current and 2019 Noise Contour Maps published by the airport indicates that the Project Site is outside of the current and future 65 dB CNEL contour<sup>34</sup>. Further, the Project is consistent with the Area Plan and the analysis contained within

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<sup>33</sup> *Id.* at p. 45.

<sup>34</sup> 2014 SFO Noise Exposure Map accessed on 6/5/19: [https://media.flysfo.com/media/sfo/noise-abatement/sfo\\_p150\\_2014-nem-36x24-](https://media.flysfo.com/media/sfo/noise-abatement/sfo_p150_2014-nem-36x24-3403645.1)

the ECR/C EIRs. In addition, the Noise Assessment similarly noted that the Project is more than 2 miles away from SFO and is outside of the noise contours shown in the CALUP. As such, it determined that excessive noise levels from an airport was a less-than-significant impact. Based on the foregoing, the Project would have no new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

The Project is consistent with that which is analyzed in the ECR/C EIR, and as such would not result in any new or more significant impacts related to excessive noise in the vicinity of a private airstrip, 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 compared to those analyzed in the ECR/C EIR in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the ECR/C EIR that would change its conclusions, as confirmed by the Civic Project SEIR. Therefore, the Project would result in less-than-significant impacts related to excessive noise in the vicinity of a private airstrip, 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 and no further review is necessary.

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[plot-signed\\_ada.pdf](#); and 2019 SFO Noise Exposure Map accessed on 6/5/19: [https://media.flysfo.com/media/sfo/noise-abatement/sfo\\_p150\\_2019-nem-36x24-plot-signed\\_ada.pdf](https://media.flysfo.com/media/sfo/noise-abatement/sfo_p150_2019-nem-36x24-plot-signed_ada.pdf)

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#### **XIV. POPULATION AND HOUSING**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>POPULATION AND HOUSING.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

- a. The ECR/C EIR estimated the population in the Area Plan area to be 400. It found that with the Area Plan, the population would grow to approximately 4,800. Although the population in the Area Plan area was projected to increase substantially, the Area Plan was not considered growth inducing, as it would accommodate almost half of the growth projected for the City by ABAG. Additionally, because the Area Plan area is located near public transit and has available land, it was determined that the additional growth induced by the plan would be a redistribution of growth from other areas of the City, and not growth on top of what was projected by ABAG (ECR/C EIR, pp. 5-1 to 5-2). The Civic Project SEIR found that the proposed modifications to the Area Plan would not induce population growth above what was analyzed in the ECR/C EIR. It found that because the Civic Project would not increase population over what was analyzed in the ECR/C EIR, the project would have a less than significant impact.

The Project would construct 800 residential units, 158 of which will be affordable to low-income households, above active ground-floor uses, including retail and commercial spaces, and under-ground parking. This is consistent with the Area Plan, General Plan, and the City's Municipal Code, which together control the population growth in the City through the regulations contained within them. The Area Plan plans for approximately 1,455 additional residential units and approximately 298,400 additional square feet of non-residential development. The Project is a small portion of this planned increase and is consistent

with the density and intensity the Area Plan envisioned on the Project Site. Thus, the Project would have no new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to population growth compared to those analyzed in the previous EIRs in accordance with the criteria under Section 15162. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to population growth and no further review is necessary.

- b. The ECR/C EIR found that it was possible for residential uses to convert to high density or mixed uses. Any loss of housing units due to conversion of residential uses to high density or mixed uses would be offset because of the significant increase of the total number of dwelling units allowed under the Area Plan in the Area Plan area. Therefore, ECR/C EIR concluded the Area Plan would have a less than significant impact.

The Project Site is currently vacant. There is no housing on the site. The Project would not displace any existing housing or people in the Area Plan area and thus would not alter the conclusions of the ECR/C EIR. The Project is consistent with the Area Plan as well as the analysis of the ECR/C EIRs. The Project would have no new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to displacement compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less-than-significant impacts related to displacement and no further review is necessary.



**XV. PUBLIC SERVICES**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>PUBLIC SERVICES.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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?				X
Police protection?				X
Schools?				X
Parks? (Note: impacts to parks are analyzed in the Recreation Section)				X
Other public facilities? (Note: impacts to water supply, wastewater, and landfill capacity are analyzed in the Utilities and Service Systems Section)				X

**Fire and Police**

The ECR/C EIR found that the population increase from development allowed under the Area Plan would not put the City over the National Fire Protection Association's standard of one firefighter per 1,000 residents at full buildout, taking into consideration current fire station staffing levels. The ECR/C EIR concluded that the Area Plan had a less than significant impact on fire services. (ECR/C EIR, p. 31.7-17.) The

ECR/C EIR found that population at full buildout of the Area Plan area would require the addition of 4 police officers based on the standard of 1.5 police officers per 1,000 residents, but that these additional police officers would not require the construction of new facilities. The ECR/C EIR concluded that the Area Plan had a less than significant impact on police services. The Civic Project SEIR noted that the Civic Project would change the land use designation in a portion of the Area Plan area and that this change would allow additional housing to be developed. The Civic Project SEIR concluded, however, that the change would not result in a population that would exceed the population analyzed in the ECR/C EIR and therefore the ECR/C EIR's "no impact" conclusion remained accurate. There have been no changes in circumstances that would alter the "no impact" conclusion.

The Project is consistent with the Area Plan and its construction will not result in additional residents or employees beyond what was analyzed in the ECR/C EIRs. Therefore, the Project would have no new or more significant impact on fire and police services and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to fire and police protection compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in no impacts related to fire and police protection and no further review is necessary.

#### Schools and Parks

The ECR/C EIR concluded that the schools had sufficient capacity to accommodate the projected new students and that all new residential development would pay state-required school impact fees, resulting in less than significant impacts on school facilities. The Civic Center EIR noted that the Civic Project would allow more housing than the original Area Plan, but concluded that because the Civic Project would not increase the population beyond that considered in the Area Plan the ECR/C EIR conclusions remained valid. There have been no changes in circumstances that would alter the ECR/C EIRs' conclusions.

The Project's proposed development is consistent with the Area Plan and the Project would be required to pay the Schools Facilities Impact Fee. Therefore the Project would have no new or more significant impact on schools facilities than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to schools and parks compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts related to schools and parks and no further review is necessary.

**XVI. RECREATION**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>RECREATION.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X

a, b. As described in the ECR/C EIR, while the Area Plan would increase population in the City, the planned increase in parkland within and near the Area Plan area would accommodate the recreational needs of future Area Plan residents and employees. The new parks planned as part of the Area Plan and under the General Plan will limit the physical deterioration of existing parkland. Therefore, the ECR/C EIR concluded that the Area Plan would have a less than significant impact on recreational resources (ECR/C EIR, p. 3.6- 4).

The Civic Project noted that it would include public parkland and open space and also would not increase the Area Plan's projected population beyond what was contemplated by the ECR/C EIR and therefore would have no impact on recreational resources. There have been no changes in circumstances that would alter the conclusions in the ECR/C EIRs.

The Project is adding 800 units, or approximately 2,310.4<sup>35</sup> people using 3.04 persons per household<sup>36</sup> as was used in the ECR/C EIR (p. 4.2). The Project includes recreation facilities for its residents, decreasing

<sup>35</sup> 800 x .95 (see note below) = 760; 760 x 3.04 = 2,316.48.

<sup>36</sup> Households are calculated in the ECR/C EIR as 95% of the total housing units, assuming a 5% vacancy rate (p. 4.2).

the need for residents to use parkland for recreational needs (impacts from the construction of these facilities is accounted for in other sections of this document). In addition, the City has adopted the Parkland Acquisition and Park Construction Fee pursuant to the authority of the Mitigation Fee Act and the Project will pay applicable park fees. This increase in demand on park land is accounted for in the ECR/C EIR because the Project's density is consistent with that allowed by the Area Plan and Zoning Code. Because the Project will pay applicable park fees, in addition to including recreation facilities for its residents, the Project would have no new or more significant impacts to recreational resources than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to recreation compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts to recreation and no further review is necessary.

## **XVII. TRANSPORTATION/TRAFFIC**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>TRANSPORTATION/TRAFFIC.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?				X

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?				X

- a, b. The ECR/C EIR analyzed twelve intersections and four freeway segments. The ECR/C EIR's findings with respect to intersection level-of-service impacts are summarized in Table TRA-1:

**TABLE TRA-1**  
**ECR/C INTERSECTION TRANSPORTATION IMPACTS**

<b>Intersection</b>	<b>ECR/C EIR Existing Plus Project Impact Conclusions</b>	<b>ECR/C EIR Cumulative Impact Conclusions</b>
1. El Camino Real/Hickey Boulevard	Less than significant with mitigation (Policy C-6 of the proposed plan to modify signal operations to include an eastbound right turn overlap phase would improve LOS in 2010 Existing plus Project to LOS C)	Cumulatively significant, project contribution less than significant with mitigation
2. El Camino Real/McLellan Boulevard	Less than significant	Significant and unavoidable – mitigation involved the construction of a third southbound lane along El Camino Real
3. El Camino Real/Arroyo Drive/Oak Extension	Less than significant	Less than significant with mitigation
4. El Camino Real/Chestnut Avenue	Less than significant	Significant and unavoidable – mitigation involved the construction of a second eastbound right turn lane and a second eastbound left turn lane
5. El Camino Real/Orange Avenue	Less than significant	Significant and unavoidable – the construction of a second westbound right turn lane would require the taking of property from a private business.
6. Mission Road/Grand Avenue	Less than significant	Less than significant with mitigation
7. Chestnut Avenue/Grand Avenue	Less than significant	Less than significant
8. Mission Road/Oak Avenue	Less than significant	Significant and unavoidable – the construction of additional travel lanes would require additional right of way, which makes the mitigation infeasible.

9. Mission Road/Chestnut	Less than significant	Significant and unavoidable
10. Junipero Serra Boulevard/Arroyo Drive (Worst Approach)	No impact. No project trips are being added to this intersection; therefore, there is no impact at this intersection as a result of the proposed plan.	No impact. No project trips are being added to this intersection; therefore, there is no impact at this intersection as a result of the proposed Plan.
11. Westborough Boulevard/I-280 SB Off-Ramp	Less than significant	Cumulatively significant, project contribution less than significant.
12. Westborough Boulevard/I-280 NB On-Ramp/Junipero Serra Boulevard	Less than significant with mitigation	Cumulatively significant, project contribution less than significant with improvements

The ECR/C EIR found that the Area Plan would have less than significant impacts with mitigation incorporated under existing plus project conditions. The mitigation involved the restriping of streets to improve the level of service, which the ECR/C EIR found to be feasible (ECR/C EIR, p. 3.1-25). The ECR/C EIR found impacts on freeway segments to be less than significant under the existing plus project scenario, because all freeway segments would continue to operate at an acceptable level of service (*id.*, p. 3.1-33). Under the 2030 cumulative conditions plus project scenario, the ECR/C EIR concluded that the Area Plan would have multiple impacts, some of which could be mitigated and others that were significant and unavoidable. These conclusions are summarized in Table TRA-1, above. The City Council determined that certain traffic impacts could not be avoided and no other feasible mitigations or alternatives would avoid or lessen the impacts. Consequently, the City adopted a Statement of Overriding Considerations for the ECR/C EIR that determined the Area Plan's benefits outweighed the traffic impacts.

The Civic Project SEIR analyzed level of service impacts at the same intersections and on the same freeway segments as analyzed in the ECR/C EIR. The Civic Project SEIR concluded that the Civic Project would result in significant impacts at Intersections 1, 4, and 12, but impacts could be reduced to less than significant with mitigation. The Civic Project would have no project-level impacts at the other study intersections or on freeway segments. In the cumulative scenario plus project scenario, the Civic Project would make a cumulative considerable contribution to cumulative impacts at Intersections 1, 2, 4, 5, and 8. These impacts could be reduced to less than cumulatively considerable with mitigation. The Civic Project would make a less than cumulatively considerable contribution to the other study intersections and freeway segments. The cumulative analysis considered project trips associated with implementation of the Area Plan.

For Intersection 4, the Civic Project SEIR concluded that Mitigation Measure 3.10.6c would be required under the cumulative plus project scenario:

The City shall optimize the traffic signal cycle length in both the AM and PM peak hours.  
The City shall also modify traffic signal operations at the intersection of El Camino Real

and Chestnut Avenue to include a right turn overlap phase for vehicles traveling eastbound on Chestnut Avenue. If feasible within the existing right-of-way, the City shall also add an eastbound left turn lane from Chestnut Avenue to El Camino Real.

Mitigation Measure 3.10.6c includes the requirements of Mitigation Measure 3.10.1b, which requires the Civic Project to modify the signal timing to optimize the cycle length at the intersection of El Camino Real and Chestnut Avenue. It also includes additional recommendations, including adding an eastbound left turn lane. Even though the City was uncertain whether an eastbound left turn lane could be added, the Civic Project SEIR concludes that project impacts would be less than cumulatively considerable because General Plan Policy 4.2-G-14 allows for LOS E or LOS F if there is no practical and feasible way to mitigate the impact and if the proposed uses are of clear and overall public benefit. The Civic Project SEIR concludes that the Civic Project has an overall public benefit and therefore, even if the intersection would continue to operate at LOS F or LOS E, the City would not consider it a significant impact. There have been no changes in circumstances that would alter the level-of-service impact conclusions of the ECR/C EIRs.

The following mitigations will be required by the applicant prior to final certificate of occupancy if they have not already been completed as part of the City of South San Francisco's sponsored Community Civic Campus project:

- Mitigation Measure 3.10.1a: The City shall add an eastbound right turn overlap phase for vehicles going eastbound on Hickey Boulevard and making a right turn onto southbound El Camino Real.
- Mitigation Measure 3.10.1b: The City shall modify the signal timing, as outlined in the TIA, to optimize the cycle length at the intersection of El Camino Real and Chestnut Avenue.
- Mitigation Measure 3.10.1d: The City shall modify the signal timing to optimize the cycle length in the AM and PM periods at the intersection of Westborough Boulevard/I-280 NB On-Ramp/Junipero Serra Boulevard. The City shall also restripe the southbound approach on Junipero Serra Boulevard to one left through lane, one shared through/left turn lane, one through turn lane, and one right turn lane. The City shall also add an eastbound left turn lane and a westbound left turn lane along Westborough Boulevard.
- Mitigation Measure 3.10.6b: The City shall modify the signal timing at the intersection of El Camino Real and McLellan Drive to remove split phasing and optimize the cycle length in the AM peak hour. The City shall also restripe the eastbound approach on McLellan Drive to one left turn lane and one shared through/right turn lane and restripe the westbound approach on McLellan Drive to one left turn lane, one shared through/right turn lane, and one right turn lane.
- Mitigation Measure 3.10.6c: The City shall optimize the traffic signal cycle length in both the AM and PM peak hours. The City shall also modify traffic signal operations at the intersection of El Camino Real and Chestnut Avenue to include a right turn overlap phase for vehicles traveling eastbound on Chestnut Avenue. If feasible within the existing right-of-way, the City shall also add



an eastbound left turn lane from Chestnut Avenue to El Camino Real.

- Mitigation Measure 3.10.6d: The City shall modify the southbound lane geometry on El Camino Real to include a southbound left turn lane.
- Mitigation Measure 3.10.6e: The City shall restripe the eastbound approach of Oak Avenue to be one left turn lane and one shared through/right turn lane. The City shall restripe the westbound approach of Oak Avenue to be one left turn lane and one shared through/right turn lane. The City shall also construct a two-way left turn lane along Mission Road.

The Project is consistent with the development contemplated and analyzed in the ECR/C EIRs. Specifically, new pedestrian connections to Centennial Trail are consistent with Area Plan policies such as TCMB-2 (“The proposed Plan includes the following station access improvements...Increased east-west pedestrian and bicycle connectivity between El Camino Real, Mission Road and Centennial Way to encourage use of the trail’s direct access to the BART station”); US-13 (“Create an open space and trail extension of Centennial Way along the BART right-of-way from Chestnut Avenue to Colma Creek, just north of the Oak Avenue extension. Establish the portion between Chestnut Avenue and Oak Avenue as a pedestrian district”) and UD-16 (“Provide a diverse range of amenities and activities throughout park spaces in the Planning Area, including passive and active recreation areas; urban plazas with landscaping, paving, benches, and trees; and linkages along Centennial Way to access bike and pedestrian trails”).

To ensure that the Project would not create new or more substantial impacts than disclosed in the Program EIR, a traffic consultant prepared a transportation impact analysis assessment (the “Traffic Assessment”)<sup>37</sup> for the Project

The Traffic Assessment shows that the Project could have a potentially significant impact at the intersection of Mission Road and Oak Avenue, but that implementation of Civic Project SEIR Mitigation Measure 3.10.6e would reduce the impact to less than significant.<sup>38</sup> It is anticipated that the City would perform the restriping as required by the Civic Project SEIR for that project. Nevertheless, to ensure that the signal optimization occurs by the time this Project is constructed, the conditions of approval for the Project would require the Project sponsor to work with the City to accomplish the restriping prior to occupancy of the Project if it has not already been accomplished. With this existing mitigation measure from the SEIR, the Project would not have any significant level of service impacts and has no new or more significant impacts than disclosed and analyzed in the ECR/C EIRs and no new mitigation is required. In addition, the Traffic Assessment finds that the Project is within the scope of development analyzed in the ECR/C EIR and remains consistent with the CMP and therefore would not create new or more significant impacts to freeway segments than discussed in the ECR/C EIRs and no new mitigation is required.<sup>39</sup>

Additionally, at the request of the City, Kimley Horn, Planning and Design Engineering Consultants<sup>40</sup>, reviewed the Project for consistency with the ECR/C EIRs. The Kimley Horn analysis identified that the Project is proposing a net increase of 244 residential units and 9,799 SF of commercial use to Blocks A, B, and C as compared to the assumptions in the ECR/C EIRs. However, the Project does not result in an overall

increase in trip generation within the Area Plan when development on other blocks within the Area Plan are considered. Intersection #2 (El Camino Real and McLellan Boulevard) and Intersection #8 (Mission Road and Oak Avenue) do not create significant impacts as under Cumulative conditions with the 2019 Specific Plan SFPUC Update since the project implements improvements to those intersections. With the

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<sup>37</sup> CEQA Transportation Impact Analysis Assessment for the SFPUC Site prepared by Fehr & Peers, dated December 5, 2018.

<sup>38</sup> *Id.*

<sup>39</sup> *Id.*

<sup>40</sup> El Camino Real / Chestnut Plan Area 2019 Update Traffic Study prepared by Kimley Horn, dated October 10, 2019

improvements, both intersections operate acceptably.<sup>41</sup> Further, under both the existing and cumulative scenarios, there are no new significant impacts with prior mitigation from the earlier EIRs and Project improvements incorporated.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to conflict with an approved traffic plan compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts relating to conflict with an approved traffic plan and no further review is necessary.

- c, d. The ECR/C EIR concluded that development of the Area Plan area would not increase hazards due to a design feature or incompatible uses and instead would increase the design quality of the Area Plan area through policies and design guidelines in the Plan, including the policies promoting active frontages along certain streets and streetscape improvements such as public plazas and pedestrian connections. The ECR/C EIR also found that the Area Plan would not change emergency vehicle access routes, which would remain adequate to serve the Area Plan area.

The Civic Project SEIR concluded that project also would not increase hazards due to a design feature. The project did not change Area Plan policies and design guidelines, and would follow applicable policies to ensure compliance with the General Plan, resulting in less than significant impacts. There have been changes in circumstances that would alter the ECR/C EIRs' impact conclusion.

The Traffic Assessment confirmed that the Project would have no new or greater impacts on the surrounding roadway system than discussed in the ECR/C EIRs.<sup>42</sup> The Project does not propose incompatible uses or offsite roadway alterations or alterations that would make the existing, adequate emergency access inadequate. Additionally, the Project would pay the City's Public Safety Impact Fee that funds improvements to infrastructure or public services necessitated by new development to ensure adequate emergency access. The Project would not substantially increase hazards due to a design feature or use with incompatible vehicles such as farm equipment and would not result in inadequate emergency vehicle access. Thus the Project would not result in any new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to hazards due to a design feature or emergency vehicle access compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts relating to hazards due to a design feature or emergency vehicle access and no further review is necessary.

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<sup>41</sup> Id., Table 3.

<sup>42</sup> Id.



**XVIII. UTILITIES AND SERVICES SYSTEMS**

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>UTILITIES AND SERVICES SYSTEMS.</b> <i>Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:</i>				
a) Require or result in the construction of new water or wastewater treatment or distribution facilities, or expansion of existing facilities, the construction of which could cause significant environmental effects?				X
b) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?				X
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?				X
d) Be served by a landfill with insufficient permitted capacity to accommodate the project's solid waste disposal needs?				X
e) Fail to comply with federal, state, and local statutes and regulations related to solid waste?				X

- a. On pages 3.7-20, the ECR/C EIR found that based on discussions with California Water Service (CWS), the existing water distribution system is generally in good condition and should be able to support the Area Plan's proposed development without the need for major repairs or upgrades to the existing system, although minor upgrades could be required. The Civic Project SEIR confirmed that no improvements to

infrastructure beyond what was identified and analyzed in the ECR/C EIR would be required to serve the Area Plan area. Thus there are no changes in circumstances that would alter the ECR/C EIR's conclusions.

As the Area Plan was found to have a less than significant impact, and the Proposed Project is consistent with the Area Plan, the Project will not require the construction of significant water facilities that would have a significant impact. In addition, a Water Supply Assessment was conducted for the Project by EKI Environment & Water, Inc. on May 24, 2019 ("WSA"). The WSA found that sufficient water supply is available to Cal Water to meet all future demands in the Project area as well as those associated with the Project.<sup>43</sup> As such, the Proposed Project would have no new or more significant impacts than disclosed in the ECR/C EIR and no mitigation is required.

The ECR/C EIR stated that the planning area is largely covered with impermeable surfaces. As noted in the Area Plan, the existing and future storm drain system discharges into the Colma Creek canal, and an increase in stormwater flows and accompanying major infrastructure improvements is not anticipated. The ECR/C EIR noted that the addition of the community park, as well as other open spaces, would likely improve runoff in the area. It also noted that future projects would be subject to incentives and guidelines to include plazas and open spaces with permeable surfaces in project design to potentially decrease on-site stormwater runoff. The ECR/C EIR concluded that with implementation of these measures, the capacity of the storm drain system would not be exceeded, and impacts would be less than significant.

The Civic EIR found that changes to the Area Plan would not result in new increases not previously anticipated. The EIR also noted that development in the Area Plan area would be required to implement stormwater runoff reduction measures as directed under Area Plan Policy DG-40 and in compliance with the Provision C.3 of the San Mateo Countywide Water Pollution Prevention Program Technical Guidance Manual. There are no changes in circumstances that would change the conclusions in the ECR/C EIRs.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to the construction of new water or wastewater facilities compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts relating to the construction of new water or wastewater facilities and no further review is necessary.

- b. The ECR/C EIR stated that the population growth associated with the Area Plan (a combination of residential and nonresidential) uses would increase the demand for water in the CWS area, but such growth would be within the Urban Water Management Plan (UWMP) projections. The ECR/C EIR concluded that the development contemplated by the Area Plan would not require additional water supply in excess of the supply contemplated by the UWMP.

The Civic Project SEIR noted that Cal Water's South San Francisco District (the City's water supplier) had adopted a new UWMP in 2016 (the "2015 UWMP"). As the Civic Project SEIR notes, the 2015 UWMP

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<sup>43</sup> WSA, p. 26.

concluded that the South San Francisco District has sufficient water supply during years under normal conditions, but during one-year or multiyear droughts, shortfalls of up to 20 percent or more are projected. Under such conditions, Cal Water will implement its Water Shortage Contingency Plan. In recent drought years, customers were asked to reduce their demand by 8 percent as specified by the State Water Resources Control Board. The South San Francisco District exceeded this amount (20 percent reduction based on June 2015 to March 2016 totals). Cal Water is also working toward increasing the water supply portfolio for the South San Francisco District (Cal Water 2016).

As noted above, the WSA found that sufficient water resources exist to serve the Project. Further, the Project consists of uses that are not particularly water-intensive and that are consistent with the development allowed by the Area Plan. Thus the Project would have no new or more significant impacts than disclosed by the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to sufficient water supplies compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts to sufficient water supplies and no further review is necessary.

- c. As described in the ECR/C EIR, all wastewater produced in South San Francisco is treated at the City's Water Quality Control Plant (WQCP), which also treats water from San Bruno. As further described in the ECR/C EIR, the plant is permitted by the San Francisco Bay Regional Water Quality Control Board (RWQCB) and, has an average dry weather flow (ADWF) design capacity of 13 mgd. In its analysis on Page 3.7-21, the ECR/C EIR found that implementation of the Area Plan (i.e., buildout under the Area Plan) would have less-than-significant impacts on wastewater treatment facilities and that no mitigation would be required because there is adequate wastewater treatment capacity to accommodate the proposed development. The WQCP complies with the requirements of the Regional Water Quality Control Board and therefore there would be no exceedance of wastewater treatment requirements.

According to the SEIR, in 2016, there is still sufficient permitted influent capacity at the WQCP to treat effluent from Area Plan development. Accordingly, no changes in circumstances have occurred that would alter the ECR/C EIR's assessment that there is sufficient wastewater treatment capacity to serve the development contemplated by the Area Plan, including the Project, as well as existing development.

As the Project is consistent with the Area Plan, it will not cause an excess in wastewater beyond that which the existing facilities can treat. The WQCP complies with the requirements of the Regional Water Quality Control Board and because the Project's wastes would be treated at that facility, its wastes would be treated in compliance with the Regional Water Quality Control Board requirements. Further, the Project would pay the City's sewer capacity fee, which helps to offset impacts on sewer capacity from new development projects. Accordingly, there are no new or more significant impacts than disclosed in the ECR/C EIRs and no mitigation is required.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to sufficient wastewater capacity compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts to sufficient wastewater capacity and no further review is necessary.

- d, e. The ECR/C EIR evaluated whether future development under the proposed Plan will be served by a landfill with adequate permitted capacity and would not fail to fully comply with federal, state, and local statutes and regulations related to solid waste on page 3.7-22. The ECR/C EIR found that buildout consistent with the Area Plan's development standards would not necessitate any mitigations as there is adequate capacity at Ox Mountain to accommodate the solid waste needs of development permitted by the Area Plan while maintaining compliance with federal, state, and local statutes and regulations related to solid waste. The ECR/C EIR also noted that diversion rates would likely continue, resulting in less solid waste that would need to be landfilled, and that General Plan policies addressed the need for solid waste reduction. The ECR/C EIR concluded impacts were less than significant.

The Civic Project SEIR confirmed that there remains adequate capacity at Ox Mountain to accommodate solid waste from buildout of the Area Plan. It also noted that solid waste requiring landfill disposal would be reduced compared to 2011 with continued implementation of the City's recycling programs and state mandates for increased diversion and enactment of legislation requiring additional increases in diversion (e.g., AB 341 and AB1826). Thus there are no changes in circumstances that would result in new or more severe impacts.

The Project is consistent with the Area Plan and will not result in landfill waste beyond that contemplated in the ECR/C EIR. Thus, the Project will not result in new or more significant impacts related to landfills than disclosed in the ECR/C EIRs and no mitigation is required. In addition, solid waste will be disposed of in the manner outlined in the ECR/C EIRs and as required by law. As such, the Project will not result in new or more significant impacts related to compliance with federal, state, and local regulations governing the disposal of solid waste.

Because the Project is consistent with that which is analyzed in the ECR/C EIR and the Civic Project SEIR, it would not result in any new or more significant impacts related to landfill capacity or compliance with regulations governing disposal of solid waste compared to those analyzed in the previous EIRs. No changes have occurred and no new information has been made available since certification of the previous EIRs that would change their conclusions. Therefore, the Project would result in less than significant impacts to landfill capacity or compliance with regulations governing disposal of solid waste and no further review is necessary.

## **XX. WILDFIRE**



	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Than Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>WILDFIRE.</b> <i>If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:</i>				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
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?				X
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				X
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?				X

The Project site is not located in or near state responsibility lands for fire management or lands classified as very high fire hazard severity zones. Therefore, this topic is not applicable to the Project.

## XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Significant and Unavoidable Impact, greater than identified in the EIRs	Significant and Unavoidable Impact, consistent with the EIRs	Less Significant Impact with Mitigation Measures, consistent with the EIRs	No Impact or Less Than Significant Impact, consistent with the EIRs
<b>MANDATORY FINDINGS OF SIGNIFICANCE.</b> Compared to the assumptions, analysis and conclusions presented in the certified ECR/C EIRs, would the Project:				
a) Does the project have the potential to substantially 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?				X
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)?				X
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				X

a. Based on the preceding discussion and the ECR/C EIRs prepared for the Area Plan, it has been determined

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that the Project is consistent with the analysis of the ECR/C EIRs and would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory.

- b. According to CEQA Guidelines Section 15355, "Cumulative impacts refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." "Cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. The potential cumulative impacts of the Project have been considered for each environmental topic evaluated above. Given the relatively short-term nature of the Project's construction schedule, and the fact that it would serve an existing community within an urbanized area consistent with the adopted Area Plan, the Project will not have any cumulatively considerable impacts that are different or more significant than those as disclosed in the ECR/CEIRs
- c. The Project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly, as analyzed in the ECR/C EIRs.

## **Conclusions**

As discussed, the Environmental Checklist confirms that 1) the Project does not exceed the environmental impacts analyzed in the ECR/C EIRs in accordance with the criteria under Section 15162, 2) that no new impacts have been identified, and 3) no new mitigation measures are required. As detailed in the analysis presented above, the Project would not result in greater impacts than were identified for the ECR/C EIRs. No new impacts have been identified and no new mitigation measures are required.

## References

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17. Water Supply Assessment for the South San Francisco SFPUC Site prepared by EKI Environment & Water, Inc. on May 24, 2019
18. Public Utilities Commission Mixed-Use Development Noise and Vibration Assessment prepared by Illingworth & Rodkin, Inc. on June 10, 2019
19. Shadow Study prepared by BAR Architects on June 10, 2019
20. Transportation Demand Management (TDM) Plan prepared by Fehr & Peers on June 20, 2019.
21. El Camino Real/Chestnut Plan 2019 Update Traffic Study prepared by Kimley Horn on October 10, 2019.

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