

ADDENDUM TO THE
GENERAL PLAN UPDATE, ZONING CODE AMENDMENTS, AND
CLIMATE ACTION PLAN AND OTHER CEQA CONSIDERATIONS
PROGRAM ENVIRONMENTAL IMPACT REPORT
(SCH#2021020064)

FOR THE
SB1425 SOUTH SAN FRANCISCO
GENERAL PLAN AMENDMENT

Lead Agency:

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ORIGINAL ENVIRONMENTAL IMPACT REPORT CERTIFIED OCTOBER 17, 2022

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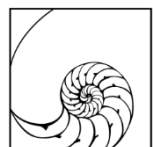


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EXECUTIVE SUMMARY

This document serves as an Addendum to the Environmental Impact Report for the *Shape SSF 2040 General Plan* (State Clearinghouse No. 2021020064), prepared in accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, specifically Section 15164. It includes an evaluation of a proposed General Plan Amendment, which would add a policy and actions to bring the General Plan into compliance with Senate Bill 1425 requirements related to open space planning. The proposed General Plan Amendment additions are procedural and programmatic in nature and relate to open space planning.

The proposed General Plan Amendment is programmatic and:

- Does not modify land use designations or allowable land uses;
- Does not increase development intensity, density, or capacity;
- Does not authorize the construction, expansion, or alteration of any residential or non-residential structures; and
- Does not directly result in any physical changes to the environment.

The proposed General Plan Amendment provides policy-level guidance only and would continue to rely on future discretionary approvals and project-level environmental review, as required, for any development proposals that may be considered in the future.

Based on the analysis contained in this Addendum, none of the conditions described in CEQA Guidelines Sections 15162 or 15163 that would require preparation of a Subsequent or Supplemental EIR have occurred. Specifically:

- No substantial changes to the project have been proposed that would require major revisions to the EIR;
- No substantial changes in circumstances have occurred; and
- No new information of substantial importance has become available that would result in new or more severe significant impacts.

Accordingly, an Addendum is the appropriate level of environmental documentation for the proposed General Plan policy and action updates.

This Addendum is not required to be circulated for public review pursuant to CEQA Guidelines Section 15164. The Addendum will be considered by the decision-making body together with the previously certified EIR as part of its consideration of the proposed General Plan Amendment.

INTRODUCTION AND PROJECT DESCRIPTION

ORGANIZATION

This document is organized in three sections as follows:

- Executive Summary – This section provides a quick reference summary of the document.
- Introduction and Project Description - This section introduces the document background and purpose and presents the project description.
- Environmental Analysis - This section analyzes the currently proposed General Plan Amendment in comparison to the analysis in the EIR and discusses the CEQA environmental topics and checklist questions with the potential to be changed from that previously assessed.
- Overall Conclusions - This section summarizes the conclusions of the analysis and makes CEQA conclusions.

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BACKGROUND AND PURPOSE

Shape SSF General Plan

The City's *2040 General Plan* (Shape SSF) was adopted in October 2022 and included amendments to the South San Francisco Zoning Code and Climate Action Plan. Prior to adopting Shape SSF, the City of South San Francisco certified the *General Plan Update, Zoning Code Amendments, and Climate Action Plan and Other CEQA Considerations Program Environmental Impact Report* (General Plan EIR, State Clearinghouse No. 2021020064). This General Plan EIR analyzed buildout of Shape SSF and identified mitigation measures to reduce potentially significant environmental impacts to a less-than-significant level where feasible.

SB1425

Senate Bill 1425 (SB1425) was passed on September 30, 2022, and requires every City and County in California to review and update their local open-space plan to include provisions that address access to open space for all residents, considers social, economic, and racial equity; climate resilience and other co-benefits of open space; and rewilding opportunities, such as preserving and expanding integrated networks of open space to support habitat, recreation, natural resources, and other beneficial uses.

Purpose: CEQA Addendum

The proposed General Plan Amendment (SB1425 GP Amendment) includes additions to Shape SSF Chapter 10: Abundant and Accessible Parks and Recreation policies and actions to address the requirements of SB1425, as well as references to these additions under goals in other chapters. The SB1425 GP Amendment is described in more detail under the Project Description below.

The purpose of this Addendum is to demonstrate that a subsequent environmental document is not required per Sections 15164 and 15162 of the CEQA Guidelines, as excerpted:

15164. Addendum to an EIR or Negative Declaration

- (a) The lead agency or responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.
- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.
- (c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.
- (d) The decision making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.
- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

15162. Subsequent EIRs and Negative Declarations

- (a) When an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
 - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
 - (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
 - (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.
 - (c) Once a project has been approved, the lead agency's role in project approval is completed, unless further discretionary approval on that project is required. Information appearing after an approval does not require reopening of that approval. If after the project is approved, any of the conditions described in subdivision (a) occurs, a subsequent EIR or negative declaration shall only be prepared by the public agency which grants the next discretionary approval for the project, if any. In this situation no other responsible agency shall grant an approval for the project until the subsequent EIR has been certified or subsequent negative declaration adopted.
 - (d) A subsequent EIR or subsequent negative declaration shall be given the same notice and public review as required under Section 15087 or Section 15072. A subsequent EIR or negative declaration shall state where the previous document is available and can be reviewed.

The conclusions related to Sections 15164 and 15162 are discussed in the environmental analysis section of this document.

PROJECT DESCRIPTION

The project is a proposed amendment to Shape SSF to update the policies and actions of Chapter 10: Abundant and Accessible Parks and Recreation in order to comply with SB1425 requirements to address climate resilience and rewilding opportunities in a general plan's open space element.

The proposed SB1425 GP Amendment adds the following new policy and actions to provide guidance for future actions of the City when utilizing open space, as well as updates throughout Shape SSF to reference the new policy and actions. Proposed text additions are underlined.

Goal PR-3: South San Francisco maintains a network of open spaces that provide recreational opportunities and are managed to encourage healthy ecosystems, improve air and water quality, and adapt to a changing climate.

Policy PR-3.4: Incorporate open space considerations into climate resiliency planning. Incorporate the strategic use of open spaces into climate resilience planning and hazard mitigation strategies.

Action PR-3.4.1: Develop nature-based solutions (using nature, or nature-based habitats) within open space areas. Develop and implement nature-based solutions within open space areas to mitigate climate hazards, enhance ecological function, and improve community well-being.

Action PR-3.4.2: Prioritize natural open spaces. Prioritize the restoration and expansion of natural open spaces, such as wetlands, riparian corridors, and urban forests, to enhance flood control, reduce urban heat island effects, improve air quality, and sequester carbon.

Action PR-3.4.3: Consider emergency management and operations in open space planning. Ensure that open space planning considers the potential for open space areas to function as emergency staging areas, evacuation routes, and community resource centers during climate-related events.

Action PR-3.4.4: Engage with tribal communities to incorporate indigenous land stewardship practices into climate resilience and rewilding strategies.

Action PR-3.4.5: Assess the use of open space and native and fire resilient plant communities in fire prevention planning. Assess the role of open space in mitigating wildfire risk, and include open space management in wildfire prevention planning.

Action PR-3.4.6: Use open space areas as adaptable floodable spaces. Design and manage open space areas, particularly those adjacent to the San Francisco Bay and Colma Creek, to function as adaptable floodable spaces.

Action PR-3.4.7: Identify rewilding opportunities in the built and natural environments, particularly in the areas along Colma Creek, along the San Francisco Bay, and around and between Sign Hill and San Bruno Mountain. As a part of land use and open space planning, identify rewilding opportunities in both the built and natural environments to foster biodiversity and healthy ecosystems, benefiting humans, animals, and plants, and to mitigate the impacts of new development.

For related policies and implementation actions related to open space, open space management, and ecology, see Goals LU-8, CR-1, CR-2, CR-5, ES-1, ES-2, ES-3, and ES-5.

The following edits would also be made to provide internal consistency and connection within Shape SSF. Proposed text additions are underlined.

Goal LU-8: A network of attractive, pedestrian-oriented, human-scale and sustainable, climate-adapted and well-landscaped streets and civic spaces throughout the city for all ages and abilities.

For related policies and implementation actions related to open space management, see Goal PR-3.

Goal CR-1: The City proactively advances community resilience and is prepared for hazards, including climate disruption.

For related policies and implementation actions related to open space and climate resiliency planning, see Goal PR-3.

Goal CR-2: A resilient community that protects existing and future development and people from sea level rise and flooding.

For related policies and implementation actions related to open space management, sea level rise, and flooding, see Goal PR-3.

Goal CR-5: The City minimizes the risk to life and property from wildfire in South San Francisco.

For related policies and implementation actions related to open space and wildfire management, see Goal PR-3.

ENVIRONMENTAL ANALYSIS

INTRODUCTION

The proposed SB1425 GP Amendment, specifically the added policy and associated actions pursuant to SB1425, was assessed to determine whether implementation would result in any new significant environmental impacts or a substantial increase in the severity of previously identified impacts. This environmental analysis evaluates the proposed amendment in accordance with CEQA Guidelines Section 15164 to consider whether the changes would introduce new or substantially worsened environmental effects beyond those analyzed in the General Plan EIR.

AESTHETICS

The General Plan EIR concluded that while Shape SSF could result in the alteration of unique public views of the city, the San Francisco Bay, and local landmarks from major thoroughfares (including scenic highways) and hillside open spaces (Impacts AES-1 and AES-2), the potential for environmental impacts would be limited to less-than-significant levels by the fact that development would primarily occur on already-developed parcels and would comply with relevant policies and requirements related to the protection of visual resources. Relevant to open space policies, Shape SSF Policy PR-3.2 requires the City to limit the construction of facilities in open space areas and to design necessary improvements—such as fire roads, access roads, and parking facilities—to minimize environmental impacts and maintain the visual qualities of open space areas. While the currently proposed policy and actions are indirectly related to improvements in open space areas, they would not change the requirement for consistency with aesthetics-related policies and consideration of related potential environmental effects if/when such improvements are proposed, so would not change the identified Shape SSF impacts related to views of open spaces. As such, the proposed amendments would not have the potential to affect scenic vistas or scenic highways beyond those previously analyzed in the General Plan EIR.

The General Plan EIR also concluded that while development would result in changes to visual character, South San Francisco is an urbanized area and anticipated changes would not conflict with applicable zoning and other regulations governing scenic quality (Impact AES-3). In addition to limiting construction in open spaces under Policy PR-3.2, the General Plan EIR determined that actions contained in the City's Climate Action Plan (CAP) related to tree cover and Colma Creek would also reduce potential impacts on the City's visual character. Specifically, Action CS 3.1 would enhance Colma Creek as an ecological corridor by creating transitional habitat zones to build resilience and ecosystem services and Action CS 2.1 would expand the tree canopy consistent with the goals of the Urban Forest Master Plan, which would improve the visual character of the City. While the proposed policy and actions are potentially related to improvements along Colma Creek and to the tree canopy, they would not conflict with implementation of the CAP Actions or change the requirement for consideration of related potential environmental effects if/when such improvements are proposed, and therefore would not change the identified Shape SSF impact related to visual character.

The currently proposed open space policy and actions do not directly have the potential to result in increased light and glare; however, if resultant open space improvements do have components that could result in light or glare, the General Plan EIR (Impact AES-4) conclusion – that with compliance with applicable Municipal Code and Zoning Ordinance (SSFMC) lighting standards and design review procedures, light and glare impacts would be less than significant – would be applicable.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would remain consistent with the conclusions of the General Plan EIR that with implementation of identified Shape SSF policies and actions, potential aesthetic impacts would be less than significant. The proposed amendment would not result in new significant aesthetic impacts and would not substantially increase the severity of previously identified impacts in the General Plan EIR. Aesthetics impacts would remain unchanged, and no additional environmental analysis is required.

AGRICULTURE AND FORESTRY RESOURCES

The General Plan EIR concluded that South San Francisco is an urban environment and no existing agriculture or forestry land use activities occur. No portion of the Shape SSF planning area is designated as relevant for agriculture or forestry resources by the City of South San Francisco or by the State of California. As such, construction and operation pursuant to Shape SSF would not result in the conversion of Prime Farmland or Farmland of Statewide Importance to nonagricultural uses, nor would it conflict with any zoning for agricultural use or a Williamson Act Contract, or any zoning for forestland or timberland and would not result in loss or conversion of forestland to non-forest uses. Therefore, there is no potential for Shape SSF to result in impacts related to agriculture and forestry resources, and the proposed policy and actions have no potential to change that conclusion.

Therefore, given the substantial evidence above, there are no significant agricultural or forestry resources in South San Francisco and the proposed SB1425 GP Amendment would result in no substantial changes to the Agricultural and Forestry Resources analysis or conclusions of the General Plan EIR.

AIR QUALITY

The General Plan EIR concluded that while Shape SSF and related policies and actions were consistent with and supportive of the primary goals and air quality control measures of the regional Bay Area Clean Air Plan, because it could result in a greater relative increase in driving than in population (a specific criteria under this regional plan because it leads to increased vehicular emissions), conflict with the plan was identified as a significant and unavoidable impact (Impact AIR-1). The currently proposed policy and actions are limited in scope to considerations related to open space areas, as they do not have the potential to conflict with primary goals and actions of the Bay Area Clean Air Plan, and specifically would be supportive of Control Measure NW2 (Urban Tree Planting) by promoting the expansion and restoration of the urban forest. The proposed SB1425 GP Amendment is not tied to new development projects, and therefore does not directly have the potential to result in increases in driving (measured as vehicles miles traveled or “VMT”) or changes in population, and therefore would not worsen the identified significant and unavoidable impact related to conflict with the Bay Area Clean Air Plan.

The General Plan EIR concluded that while any construction activity would have the potential to generate dust and emissions from construction equipment and the resultant exposure of nearby sensitive receptors (Impacts AIR-2 and AIR-3), these impacts would be reduced to less than significant levels through implementation of Construction Best Management Practices to control fugitive dust (MM AIR-1a) and preparation of a health risk assessment for construction activities near sensitive receptors (MM AIR-1b). While the proposed policy and actions could indirectly result in improvements to open space areas requiring construction activities, such activities would be required to implement MM AIR-1a and MM AIR-1b if and when applicable, and the impacts related to construction emissions would remain less than significant, consistent with the conclusions of the General Plan EIR.

With respect to operational-period emissions, which primarily result from vehicular travel, indoor and outdoor maintenance and cleaning of development, and energy use, the General Plan EIR (Impact AIR-2) discussed anticipated overall increases in operational emissions, but noted that quantified thresholds would be applied to individual development projects and that conclusions related to Clean Air Plan consistency under Impact AIR-1 (discussed above) would be applicable to Shape SSF and would be significant and unavoidable due to a greater relative increase in VMT than in population. With regard to construction risks discussed above, any project with an operational source of health risk near sensitive receptors (Impact AIR-3) would need to implement MM AIR-1b to assess and reduce potential impacts. The currently proposed policy and actions are limited in scope to considerations related to use of open space areas, which would be supportive of applicable control measures of the Bay Area Clean Air Plan. Because the proposed SB1425 GP Amendment is not tied to new development projects, it would not directly have the potential to result in increases in VMT or changes in population, and therefore would not worsen the identified significant and unavoidable impact related to operational emissions.

The currently proposed open space policy and actions are limited in scope to considerations related to use of open space areas and do not directly have the potential to result in odor-related impacts. However, if resultant open space improvements do have components that could result in odors, the General Plan EIR (Impact AIR-4) conclusion would be applicable that, with compliance with applicable SSFMC performance standards and relevant Air District rules and regulations, odor impacts would be less than significant, consistent with the conclusions of the General Plan EIR.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant air quality impacts or a substantial increase in the severity of previously identified impacts. Air quality impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

BIOLOGICAL RESOURCES

Various special-status biological species can be found in and around South San Francisco, especially in the estuary habitats around San Francisco Bay and in parks within the City or in the surrounding hillsides, including San Bruno Mountain State Park. A few wildlife species, such as birds and bats, may find suitable nesting habitat within buildings and other human-made structures. Any construction activities and physical disturbance associated with development in areas with sensitive biological resources would have the potential to impact special-status species, but the General Plan EIR (Impact BIO-1) concluded that Shape SSF would have both direct and indirect beneficial effects for species by avoiding the most biologically sensitive areas, concentrating development in previously disturbed areas, requiring surveys, and by emphasizing avoidance, minimization, and mitigation of impacts to habitats through compliance with Shape SSF Policies (including ES-2.1, ES-2.2, ES-3.3, ES-6.1, ES-6.2, ES-6.3), State and federal regulations, the SSFMC (especially Chapter 20.170 which establishes an overlay district and rules for biologically sensitive areas), and MM BIO-1 requiring focused surveys for development with the potential to impact sensitive biological resources and compensation, if applicable. While the proposed policy and actions could be indirectly linked to improvements in areas containing sensitive biological resources, any construction or development projects would be required to implement MM BIO-1 if and when applicable, as well as other biologically-related policies if and when such improvements are proposed, and the impacts related to special-status species would remain less than significant, consistent with the conclusions of the General Plan EIR.

Under Impact BIO-2, the General Plan EIR acknowledged the biological sensitivity of streams, rivers, and estuaries (riparian habitat) and other sensitive natural communities in and around South San Francisco, which could be impacted by development, but concluded that with compliance with Shape SSF policies and CAP actions, State and federal regulations, and the SSFMC, the potential for environmental impacts would be limited to less-than-significant levels. Specifically, Shape SSF Policies ES-2.1, ES-3.1, ES-3.2, ES-3.3, ES-6.2, and ES-6.3 protect wetland habitats and associated riparian areas; CAP Action CS 3.1 promotes enhancement of Colma Creek as an ecological corridor, creating transitional habitat zones to build resilience and ecosystem services, which would assist in enhancing riparian habitat; and the SSFMC contains rules and regulations regarding development in areas with sensitive habitats. Any proposed activities that would divert or obstruct the natural flow or change the bed, channel, or bank of any lake or stream, must obtain a “Streambed Alteration Agreement” from the California Department of Fish and Wildlife, which may impose conditions to limit and fully mitigate impacts on fish and wildlife resources. While the proposed SB1425 GP Amendment is limited in scope to considerations for use of open space areas, it could be indirectly linked to disturbance in areas containing riparian and other sensitive communities, especially through actions prioritizing riparian restoration and floodable spaces. However, any resultant improvements would be consistent with applicable policies and regulations as detailed in the General Plan EIR, and would therefore not result in new or worsened Shape SSF impacts related to riparian and sensitive habitats.

The General Plan EIR determined that development near San Francisco Bay, creeks, or other wetlands could result in direct or indirect impacts on estuarine habitat and other sensitive aquatic communities (Impact BIO-3). However, these impacts would be reduced to less than significant levels through implementation of MM BIO-3, which requires identification and assessment of jurisdictional wetlands, as well as compliance with applicable federal and State regulations, the SSFMC provisions governing development in sensitive habitat areas, and relevant Shape SSF policies. Projects involving disturbance to wetlands or waters of the United States are subject to permitting under Section 404 of the Clean Water Act by the U.S. Army Corps of Engineers. In addition, Shape SSF Policies ES-2.1 and ES-2.2 establish development standards for construction near the Bay and Colma Creek, and Policy ES-7.1 calls for coordination with regional and local agencies to implement a comprehensive watershed management strategy. While the proposed policy and actions could be indirectly associated with improvements in or near wetlands or waters of the United States, any such improvements would be required to comply with MM BIO-3 and all applicable policies and regulations. Therefore, impacts related to wetlands and waters of the United States would remain less than significant, consistent with the conclusions of the General Plan EIR.

With respect to wildlife movement and habitat connectivity, the General Plan EIR concluded that future development could potentially disrupt wildlife corridors through impacts to urban tree canopy or creek corridors (Impact BIO-4). This impact would be reduced to less than significant levels through biological surveillance and avoidance of sensitive habitats (MM BIO-1) and assessment of jurisdictional wetlands (MM BIO-3), as well as compliance with the SSFMC Section 20.170 (protection of sensitive habitats), SSFMC Chapter 13.30 (Tree Preservation) and adherence to Shape SSF policies. These policies collectively provide for the establishment of a connected open space network and linked wildlife corridors; protection and enhancement of wetlands, marshes, and riparian habitats; expansion and preservation of the urban tree canopy; removal of invasive species and use of native vegetation; and site-specific biological resource assessments for projects located in or near sensitive habitats, including areas near the Bay and within the San Bruno Mountain Habitat Conservation Plan (HCP) and Habitat Management Plan (HMP) areas. While the proposed policy and actions could be indirectly related to activities affecting wildlife corridors, such activities would be subject to the same mitigation measures

and regulatory requirements, and impacts to wildlife corridors would remain less than significant, consistent with the General Plan EIR.

The General Plan EIR also concluded that future development could involve removal of protected trees (Impact BIO-5). However, compliance with the City's Tree Preservation Ordinance (SSFMC Chapter 13.30), incorporated as a Standard Condition of Approval, would reduce this impact to less than significant levels. The ordinance requires permits for removal of protected trees and adequate replacement where removal is approved. While the proposed policy and actions could be indirectly involved with improvements that require tree removal, they would not alter or conflict with the City's tree protection requirements. Any activities would be required to comply with SSFMC Chapter 13.30 (Tree Preservation), if and when applicable and therefore would not change the General Plan EIR conclusions related to impacts on tree resources.

San Bruno Mountain State Park is governed by the San Bruno Mountain HCP and the San Bruno Mountain HMP. The General Plan EIR concluded that development within or adjacent to San Bruno Mountain State Park could conflict with the established conservation plans (Impact BIO-6), but that the impact would be less than significant with compliance with Shape SSF policies. Specifically, Policies ES-6.2 and ES-6.3 require site-specific biological resource assessments for projects located in or near sensitive habitats, including areas within the San Bruno Mountain HCP and HMP areas. While the proposed policy and actions could be indirectly associated with improvements in areas governed by these plans, they would not modify the requirement for consistency with conservation plan provisions or biological resource policies. Accordingly, the proposed amendment would not result in new or worsened impacts related to conflicts with adopted conservation plans.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant impacts to biological resources or a substantial increase in the severity of previously identified impacts. Biological resource impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

CULTURAL AND TRIBAL CULTURAL RESOURCES

The currently proposed SB1425 GP Amendment is limited in scope to considerations related to use of open space areas and would not directly result in the removal or modification of historical resources. However, while unlikely, if resultant open space improvements do have components that could result in destruction, alteration, or relocation of a historical resource, the General Plan EIR (Impact CUL-1) conclusion would be applicable: that with compliance with rules and regulations in the SSFMC and Shape SSF policies and actions related to the identification and protection of historical resources, impacts to those resources would be less than significant.

The General Plan EIR concluded that while any construction activity involving grading or excavation would have the potential to discover and disturb previously unknown archaeological resources, tribal cultural resources, or human remains (Impact CUL-2 through CUL-5), these impacts would be reduced to less than significant levels through compliance with Shape SSF Policies ES-10.1, ES-10.3, and ES-10.5 related to protecting discovered archaeological resources (formalized as Standard Condition: Protection of Archaeological Resources), Policy ES-11.1 requiring identification and preservation of tribal cultural resources, and compliance with Public Resources Code Section 5097 and California Health and Safety Code Section 7050.5 related to handling remains (formalized as Standard Condition: Protection of Human Remains). While the proposed policy and actions could indirectly result in improvements requiring grading or excavation, including along the Colma Creek corridor where there is a greater

potential for buried prehistoric archaeological resources to be present, such activities would be required to comply with Standard Condition: Protection of Archaeological Resources, if and when applicable, as well as applicable Shape SSF policies and state codes, and therefore the impacts related to accidental discovery of archaeological resources, tribal cultural resources, or human remains would remain less than significant, consistent with the conclusions of the General Plan EIR.

SB 18 require local agencies such as the City of South San Francisco to consult with California Native American tribes before amending a general plan. In compliance with state law, tribal contact letters were sent to local tribes in January 2026 pursuant to requirements of SB 18. City staff received one request for tribal consultation from the Indian Canyon Band of Costanoan Ohlone People and conducted consultation, per the requirements of SB18. The tribal consultation process resulted in the inclusion of the following action item in the General Plan Amendment regarding engagement with tribal communities:

Action PR-3.4.4: Engage with tribal communities to incorporate indigenous land stewardship practices into climate resilience and rewilding strategies.

The proposed SB1425 GP Amendment is limited in scope to considerations related to use of open space areas and does not have the potential to result in development outside the Shape SSF planning area already considered. General Plan EIR Impacts CUL-4 and CUL-5 address potential disturbance of tribal cultural resources and tribal sacred sites through Shape SSF Policies ES-11.2, which requires the inclusion of Native American history as part of the transformation of Colma Creek, and ES-11.3 requiring tribal consultation as part of the development review process. While the proposed policy and actions are potentially related to improvements to open space areas requiring site disturbance, including along Colma Creek, they would not conflict with or modify the requirements of Policies ES-11.2 and 11.3, if and when applicable, and the impacts related to tribal cultural resources would remain less than significant, consistent with the conclusions of the General Plan EIR.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would remain consistent with the conclusions of the General Plan EIR that with implementation of identified Shape SSF policies, standard conditions, and State regulations, potential impacts to cultural and tribal cultural resources would remain less than significant. The proposed SB1425 GP Amendment would not result in new significant impacts to cultural or tribal cultural resources and would not substantially increase the severity of previously identified impacts in the General Plan EIR. Cultural and tribal cultural resource impacts would remain unchanged, and no additional environmental analysis is required.

ENERGY

The General Plan EIR concluded that while any construction activity would involve the consumption of energy for construction equipment and worker vehicles (Impact ENER-1), the potential for environmental impacts would be limited to less-than-significant levels through compliance with Shape SSF policies and actions that aim to reduce air quality and greenhouse gas impacts, such as vehicle idling limits, and with the SSFMC, which promotes recycling of construction debris. While the proposed policy and actions could indirectly result in improvements to open space areas requiring construction activities, such activities would be limited in scale and would not result in substantial construction activity or energy consumption, and would be subject to all applicable Shape SSF policies and actions and requirements of the SSFMC, consistent with the conclusions of the General Plan EIR.

In regard to operational energy consumption, the General Plan EIR determined that new development would increase energy use through the consumption of natural gas and electricity for building heating and power, lighting, and water conveyance, and indirectly for the pumping, treatment, and conveyance of water for buildings, landscaping, and many other end uses, but that with compliance with energy efficiency and use reduction measures found in Shape SSF policies and actions, CAP actions, SSFMC, which adopts the California Green Building Code and California Energy Code, and State regulations, the potential for environmental impacts would be limited to less-than-significant levels. These operational energy considerations are primarily associated with buildings, infrastructure, and vehicle use and are not applicable to the proposed open space policy and actions, which would not introduce new development or operational energy demands, and would therefore have no effect on the General Plan EIR's conclusion of a less than significant impact in regard to operational energy use.

Under Impact ENER-2, the General Plan EIR concluded that with compliance with the CAP Actions, Shape SSF policies and actions, and adherence to the development standards in the SSFMC, new development would not conflict with or obstruct State or local plans for renewable energy or energy efficiency. The proposed open space policy and actions are limited in scope and would not involve energy production, distribution, or substantial energy consumption. Accordingly, they would not conflict with State or local energy plans and would not result in new or worsened energy impacts beyond those evaluated in the General Plan EIR.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would remain consistent with the conclusions of the General Plan EIR that with implementation of identified Shape SSF policies and actions and compliance with City and State regulations, potential energy impacts would be less than significant. The proposed amendment would not result in new significant energy impacts and would not substantially increase the severity of previously identified impacts in the General Plan EIR. Impacts related to energy would remain unchanged, and no additional environmental analysis is required.

GEOLOGY AND SOILS

The General Plan EIR concluded that development could occur in areas subject to seismic hazards, unstable or expansive soils, or soils unsuitable for septic systems (Impacts GEO-1, GEO-3, GEO-4, and GEO-5). However, compliance with applicable Shape SSF policies and actions, the California Building Code and SSFMC design and construction standards, and SSFMC site assessment, grading, and drainage requirements would reduce these impacts to less than significant levels. These provisions are intended to protect public safety and minimize risks to life and property. The currently proposed open space policy and actions do not alter the types or locations of development evaluated in the General Plan EIR and do not introduce new uses that would increase exposure to geologic or soil-related hazards, including the need for septic systems or the construction of structures or infrastructure that could pose risks to life or property. Further, the proposed policy and actions would not modify or conflict with existing requirements for consistency with soil- and seismic hazard-related policies or the evaluation of potential geologic hazards under the SSFMC. With respect to landslide hazards, Shape SSF Policy CR-4.3 discourages development on steep slopes exceeding 30 percent and requires hillside development to follow natural contours to the greatest extent feasible, while SSFMC Section 20.310.002 establishes grading and drainage standards for development on slopes or within 100 feet of a water body. The proposed open space policy and actions would not modify these requirements or otherwise increase the potential for landslide-related impacts. Accordingly, with continued application of existing policies, standards, and regulations, impacts related to seismic hazards, unstable and expansive soils, landslides,

and septic system suitability would remain less than significant, consistent with the conclusions of the General Plan EIR.

Under Impact GEO-2, the General Plan EIR concluded that construction activities could result in soil erosion or loss of topsoil. However, compliance with the National Pollutant Discharge Elimination System (NPDES) permit program for projects disturbing one acre or more, the California Building Code, applicable provisions of the SSFMC, and Shape SSF policies intended to minimize erosion and topsoil loss would reduce these impacts to less than significant levels. Relevant to open space areas, Shape SSF Policy CR-4.3 requires minimal grading for hillside development, and Policy ES-7.3 requires new development and redevelopment to comply with federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, infiltration, peak flow reduction, and trash capture. In addition, SSFMC Section 14.04.180 requires implementation of Best Management Practices at construction sites to control erosion, sediment, and stormwater runoff throughout all phases of construction until sites are stabilized through landscaping or permanent erosion control measures. Projects subject to NPDES permitting are also required to prepare and implement a Storm Water Pollution Prevention Program (SWPPP), which includes site characterization, erosion and sediment control measures, runoff water quality monitoring, waste management procedures, non-stormwater discharge controls, and inspection and maintenance requirements, including pre- and post-storm inspections to identify and address potential stormwater discharges. The proposed policy and actions would not alter or exempt compliance with these existing regulatory requirements. While the proposed policy and actions could indirectly result in improvements to open space areas requiring construction activities, such activities would be required to comply with applicable NPDES permit requirements, SSFMC provisions, and Shape SSF policies designed to reduce runoff, if and when applicable, and the impacts related to erosion and loss of topsoil would remain less than significant, consistent with the conclusions of the General Plan EIR.

The Colma Formation and Merced Formation underlie portions of South San Francisco and are known to contain paleontological resources with high sensitivity and discovery potential. However, in addition, the General Plan EIR concluded that any construction activity involving grading or excavation would have the potential to discover and disturb previously unknown paleontological resources (Impact GEO-6). This impact would be reduced to less than significant levels through compliance with Public Resources Code 5097.5, which protects paleontological resources upon inadvertent discovery, formalized as Standard Condition: Protection of Paleontological Resources, and paleontological monitoring of all proposed excavations within the Merced Formation and Colma Formation (MM GEO-6). The proposed SB1425 GP Amendment would not modify or eliminate these existing requirements. While the proposed policy and actions could indirectly result in improvements to open space areas requiring construction activities, including within the Merced Formation and Colma Formation, such activities would be required to comply with Standard Condition: Protection of Paleontological Resources, and implement MM GEO-6, if and when applicable, and the impacts related to paleontological resources would remain less than significant, consistent with the conclusions of the General Plan EIR.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant geological impacts or a substantial increase in the severity of previously identified impacts. Geological impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

GREENHOUSE GAS EMISSIONS

The General Plan EIR concluded that construction activities would generate greenhouse gas (GHG) emissions from sources such as heavy-duty construction equipment, worker commute trips, material delivery, and hauling (Impact GHG-1). However, these emissions would be reduced to less than significant levels through implementation of Construction Best Management Practices required under Impact AIR-2, SSFMC requirements to recycle construction debris, and Shape SSF actions and policies designed to address GHG emissions during construction, such as anti-idling measures. While the proposed policy and actions could indirectly result in improvements to open space areas requiring construction activities, such activities would be required to implement relevant anti-idling limits and, where applicable, construction debris recycling. Accordingly, impacts related to construction-period GHG emissions would remain less than significant, consistent with the conclusions of the General Plan EIR.

With respect to operational-period GHG emissions, the General Plan EIR determined that new development and associated population and employment growth would increase emissions from vehicle travel, building energy use, solid waste generation, wastewater treatment, and water consumption. Compliance with applicable CAP actions and Shape SSF policies aimed at reducing GHG emissions would limit these impacts to less than significant levels. The proposed open space policy and update would not result in new buildings, increased energy consumption, or additional VMT, and therefore most operational GHG-related Shape SSF policies and CAP actions applicable to development are not relevant. However, certain policies and actions—such as Shape SSF Policy CR-6.3, which promotes adaptation measures to reduce urban heat island effects, and Policy CP-7.2 and CAP Action CS-2.1, which support expansion of the urban forest canopy—are consistent with the intent of the proposed policy and actions. The proposed policy and actions are limited in scope to considerations of the use of open space and would not conflict with these policies or actions or alter the requirement for evaluation of GHG impacts if and when future improvements are proposed. Accordingly, the proposed amendment would not result in new or worsened GHG impacts beyond those identified in the General Plan EIR.

Under Impact GHG-2, the General Plan concluded that Shape SSF and the CAP were consistent with Federal, State, and local statutes related to GHG emissions, and that with compliance with the CAP Actions, Shape SSF policies and actions, and adherence to the development standards in the SSFMC, new development would not conflict with any adopted plan, policy, or regulation for reduction of GHG emissions. The proposed policy and actions are limited in scope to open space considerations and as discussed above, would be consistent with applicable Shape SSF policies and CAP actions, and would not conflict with any adopted plans policies intended to reduce GHG emissions. Accordingly, impacts related to plan consistency for GHG reduction would remain less than significant, consistent with the conclusions of the General Plan EIR.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant GHG impacts or a substantial increase in the severity of previously identified impacts. GHG impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

HAZARDS AND HAZARDOUS MATERIALS

Hazardous materials impacts could result from commercially available materials such as fuels, solvents, and paints; contaminated soil or groundwater during construction activities; the release of hazardous building materials such as lead or asbestos during demolition of existing structures; or through the

operations of industrial, technological, or other businesses. The General Plan EIR concluded that new development could increase the risks of routine transport, use, or disposal (Impact HAZ-1) or accidental upset (Impact HAZ-2), hazardous emissions within a quarter mile of a school (Impact HAZ-3), or development on a site included on the Cortese list (Impact HAZ-4), but that with compliance with mandatory regulations for hazardous materials adopted by the U.S. Environmental Protection Agency, Occupational Safety and Health Administration, U.S. Department of Transportation, California Department of Toxic Substances Control, California Department of Transportation, California Highway Patrol, local Certified Unified Program Agency, and Bay Area Air District would reduce these impacts to less than significant levels. The currently proposed policy and actions are limited in scope to considerations related to use of open space areas and do not directly have the potential to result in hazardous material-related impacts. However, if resultant open space improvements do have components that could result in the use, transport, disposal or upset of hazardous materials, emissions near a school, or development on a site listed on the Cortese list, such activities would be required to comply with all regulations as detailed in the General Plan EIR if and when applicable, and the impacts related to hazardous materials would remain less than significant, consistent with the conclusions of the General Plan EIR.

The currently proposed open space policy and actions are limited in scope to considerations related to use of open space areas and are not tied to new development projects, and therefore would not directly result in people working or residing in areas within a Safety Compatibility Zone for the San Francisco International Airport Land Use Compatibility Plan (Impact HAZ-5) or an increased demand for emergency response services or evacuation routes (Impact HAZ-6). The SB1425 GP Amendment would have no effect on the General Plan EIR conclusions of a less than significant impact related to safety hazards from proximity to an airport or emergency response and evacuation.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant hazardous materials or hazards impacts or a substantial increase in the severity of previously identified impacts. Hazardous materials and hazards impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

HYDROLOGY AND WATER QUALITY

The General Plan EIR determined that with compliance with mandatory NPDES permit requirements, adherence to the SSFMC, and implementation of Shape SSF and CAP policies and actions that protect water quality, impacts from new development on surface water and groundwater quality (Impact HYD-1), groundwater supply and recharge (Impact HYD-2), altered drainage patterns (Impact HYD-3), and conflict with a water quality or groundwater management plan (Impact HYD-5) would be less than significant. Relevant to open space policies, construction that disturbs one or more acres of soil must obtain coverage under the NPDES's Construction General Permit and must file a SWPPP which includes site characterization, erosion and sediment control measures, runoff water quality monitoring, waste management procedures, non-stormwater discharge controls, and inspection and maintenance requirements, including pre- and post-storm inspections to identify and address potential stormwater discharges. Shape SSF Policy ES-7.3 requires new development and redevelopment to comply with federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, infiltration, peak flow reduction, and trash capture. In addition, SSFMC Section 14.04.180 requires implementation of Best Management Practices at construction sites to control erosion, sediment, and stormwater runoff throughout all phases of construction until sites are stabilized through landscaping or permanent erosion control measures. Policy ES-2.1 requires the City to protect and

expand existing marsh and wetland habitat to improve water quality. Policies ES-2.2 and ES-3.3 require the City to maintain standards for new construction adjacent to the San Francisco Bay and Colma Creek, such as maintaining (or increasing) building setbacks to support habitat areas and constructing bioswales or similar features to treat runoff. CAP Actions CS 2.1 (expansion of the canopy cover) and CS 3.1 (enhancing Colma Creek as an ecological corridor) would also assist in protecting water quality, maximizing groundwater stormwater infiltration, and minimizing flood hazards. SSFMC Sections 14.04.132 and 14.04.133 requires all new development projects to minimize disturbance of natural water bodies and drainage systems, protect slopes and channels, and conserve natural areas, including existing trees, other vegetation, and soils. SSFMC Section 20.180.005 includes standards for the Flood Plain/Sea Level Rise (SLR) Overlay District including a bay access buffer, creek access buffers, using living vegetation and natural materials for levees and sea walls, employing low-impact stormwater runoff techniques, retaining 100 percent of drainage from impervious surfacing on-site, using a minimum of 80 percent native species in landscaping, requiring no net new impervious areas, and requiring the installation of fencing during construction to protect riparian areas. These regulations will assist in protecting water quality during construction. SSFMC Section 20.300.007 includes a number of requirements for new construction or rehabilitated landscapes, including the preparation of a soil management report and grading design plan to reduce runoff. SSFMC Section 20.310.002 includes grading and drainage requirements for all projects throughout the city, including submittal of a grading plan for any grading on a site with a natural slope of 15 percent or greater, and slope stabilization to control against erosion, which will also assist in protecting water quality during construction. While the proposed SB1425 GP Amendment is limited in scope to considerations for use of open space areas, it could be indirectly linked to construction activities that would lead to potential runoff or disturbance in floodable areas, especially through actions prioritizing riparian restoration and flood adaptations near Colma Creek or the Bay; however, any resultant improvements would be consistent with applicable policies and regulations as detailed in the General Plan EIR, and would therefore not result in new or worsened Shape SSF impacts related to water quality, groundwater recharge, alterations to drainage, or conflict with a water quality plan.

The currently proposed open space policy and actions are limited in scope to considerations related to use of open space areas and would not directly result in the presence of hazardous materials such that there would be a risk of release of pollutants due to inundation by flood, seiche, or tsunami; however, while unlikely, if resultant open space improvements do have components that could result in such a risk, the General Plan EIR (Impact HYD-4) conclusion would be applicable, that with compliance with rules and regulations in the SSFMC and Shape SSF policies and actions related to flood hazards and the storage and use of hazardous materials, impacts would be less than significant.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant hydrological or water quality impacts or a substantial increase in the severity of previously identified impacts. Hydrology and water quality impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

LAND USE AND PLANNING

Implementation of Shape SSF would result in additional residential and nonresidential development primarily through infill and redevelopment within established areas of the City. The General Plan EIR concluded that new development would have a less than significant impact on division of an existing community (Impact LAND-1), as development would be guided by Shape SSF policies and actions, and CAP actions, and would comply with SSFMC requirements and standards that promote connectivity

through complete streets, multimodal transportation, pedestrian and bicycle access, transit-oriented development, and coordinated infrastructure planning. The currently proposed policy and actions are limited in scope to considerations related to open space areas, and would not directly result in any physical development. The SB1425 GP Amendment does not have the potential to divide an existing community, and therefore would not change the General Plan EIR conclusions related to this impact.

The General Plan EIR determined that new development under Shape SSF would have a less than significant impact on conflict with applicable land use plans, policies, or regulations (Impact LUP-1), as it would be required to demonstrate consistency with Shape SSF, the CAP, and the SSFMC, as well as applicable federal, State, regional, and local plans and regulations, including regional growth strategies, airport land use compatibility requirements, and utility right-of-way protections. The currently proposed policy and actions are limited in scope to considerations related to open space areas and would not directly result in any physical development. The SB1425 GP Amendment does not have the potential to conflict with any land use plans, policies, or regulations, and therefore would not change the General Plan EIR conclusions related to this impact.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant land use impacts or a substantial increase in the severity of previously identified impacts. Land use impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

NOISE AND VIBRATION

The General Plan EIR concluded that while any construction activity would have the potential to generate noise and vibration from construction equipment (Impacts NOI-1 and NOI-2), these impacts would be reduced to less than significant levels through the requirements of SSFMC Section 8.32.050, which regulates the time when construction can occur (formalized as Standard Condition: Construction Noise), SSFMC Section 20.300.009, which requires a vibration impact analysis for certain construction activities near sensitive receptors and historic structures, and Shape SSF policies and actions, which reinforce these requirements. While the proposed policy and actions could indirectly result in improvements to open space areas requiring construction activities, such activities would be required to comply with policies and regulations as detailed in the General Plan EIR if and when applicable, and the impacts related to construction noise and vibration would remain less than significant, consistent with the conclusions of the General Plan EIR.

The currently proposed open space policy and actions are limited in scope to considerations related to use of open space areas and are not tied to new development projects, and therefore would not directly result in increases in traffic noise, or permanent stationary noise source such as loading docks and mechanical equipment (Impact NOI-1), increases in vibration from rail activity (Impact NOI-2) or in people working or residing in areas with excessive airport noise (Impact NOI-3). The SB1425 GP Amendment are limited in scope to considerations related to use of open space areas and would have no effect on the General Plan EIR conclusions of a less than significant impact or alter the requirements for mitigation related to operational noise or excessive noise levels from airport activity.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant noise or vibration impacts or a substantial increase in the severity of previously identified impacts. Noise and vibration impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

POPULATION AND HOUSING

While new development under the Shape SSF would result in new employment opportunities and an increase in population, the General Plan EIR determined that the impact on unplanned growth would be less than significant, as Shape SSF and the SSFMC guide the location, type, and intensity of development to ensure growth is planned and orderly. General Plan policies and actions address housing, employment, and subarea-specific growth, and provide mechanisms to prevent unplanned direct or indirect population increases. The currently proposed policy and actions are limited in scope to considerations related to open space areas and would not directly or indirectly result in an increase in employment or population, and therefore would not change the General Plan EIR conclusions related to this impact.

The General Plan EIR concluded that while new residential and non-residential development would be constructed, the impact on displacement of existing housing would be less than significant, as all development applications would be reviewed for consistency with SSFMC regulations, and Shape SSF policies and actions, which ensure that existing housing is protected and new development is appropriately sited. The currently proposed policy and actions are limited in scope to considerations related to open space areas and would not directly result in any physical development that could displace existing housing, and therefore would not change the General Plan EIR conclusions related to this impact.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant impacts related to population or housing or a substantial increase in the severity of previously identified impacts. Population and housing impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

PUBLIC SERVICES AND RECREATION

New growth under Shape SSF would result in an increase in new residential and non-residential development and in the City's population, resulting in increased demand for fire protection services, police services, schools, libraries, and other public facilities (Impacts PUB-1 through PUB-5). While this increased demand may result in the need for new or physically altered facilities, the General Plan EIR determined that these impacts would be less than significant, as the construction of new or altered facilities would be required to undergo review by the City for compliance with the SSFMC, with the appropriate level of environmental review. The currently proposed open space policy and actions are not tied to new development projects and would not result in direct or indirect population growth or related demand for public services. The SB1425 GP Amendment would not change the General Plan EIR conclusions related to this impact.

The General Plan EIR concluded that while an increase in population may result in an increased use of existing parks (Impact REC-1), with compliance with Shape SSF policies and actions that ensure that parks and recreational facilities keep pace with new development, the potential for environmental impacts would be limited to less-than-significant levels. The currently proposed policy and actions are limited in scope to considerations related to open space areas and would not directly or indirectly result in population growth that would lead to increased use of existing recreational facilities, and therefore would not change the General Plan EIR conclusions related to this impact.

New parks, improved open spaces, and pedestrian and bicycle connections primarily east of US-101 and along the transit corridors may result from implementation of Shape SSF, which also identifies planned

and proposed parks and open spaces throughout the City. Development of these new parks and facilities may have the potential to result in environmental impacts (Impact REC-2), however, the General Plan EIR determined that with compliance with project-level environmental review and SSFMC requirements the impact would be less than significant. While the proposed policy and actions would not directly result in any physical development of new parks or open space, they could be indirectly linked to improvements in areas used for recreation. Any construction or development projects would be required to comply with the SSFMC and undergo project-level environmental review if/when such improvements are proposed, and the impacts related to new parks and recreational facilities would remain less than significant, consistent with the conclusions of the General Plan EIR.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant impacts related to public services or recreation or a substantial increase in the severity of previously identified impacts. Public services and recreation impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

TRANSPORTATION

The currently proposed open space policy and actions are limited in scope to considerations related to use of open space areas and are not tied to new development projects, and therefore would not directly result in increases in driving (measured as VMT). The SB1425 GP Amendment would not worsen the General Plan EIR (Impact TRANS-1) conclusion of a significant and unavoidable impact related to VMT or alter the requirements for mitigation.

The General Plan EIR concluded that while the population growth planned under Shape SSF would result in increased use of bicycle and pedestrian facilities (Impact TRANS-2), compliance with Shape SSF policies and actions and CAP actions that improve the pedestrian and bicycle network and increase bicycle and pedestrian travel, as well as SSFMC rules and regulations to increase alternate modes of travel through Transportation Demand Management (TDM) program requirements, would ensure that new development would not conflict with a program, plan, ordinance, or policy of the circulation system regarding bicycle and pedestrian facilities, not reduce the safety of such facilities, and the impact would be less than significant. While the proposed policy and actions could indirectly result in additional bicycle and pedestrian facilities such as new trails, any such improvements would be consistent with applicable policies and regulations as detailed in the General Plan EIR, and would therefore not result in new or worsened Shape SSF impacts related to pedestrian or bicycle circulation.

The currently proposed open space policy and actions are limited in scope to considerations related to use of open space areas and are not tied to new development projects, and therefore would not directly result in increases in or conflict with the use of transit (Impact TRANS-3), or result in changes in roadways or the transportation network that could increase hazards (Impact TRANS-4) or impede emergency access (Impact TRANS-5). The SB1425 GP Amendment would have no effect on the General Plan EIR conclusions of a less than significant impact related to transit facilities, design hazards, or emergency access or alter the requirements for mitigation related to freeway offramp queue improvements.

UTILITIES AND SERVICE SYSTEMS

New growth under Shape SSF would result in an increase in new residential and non-residential development and in the City's population, resulting in increased demand for utilities and service systems. The General Plan EIR determined that no new or expanded water, wastewater treatment or

stormwater drainage, electric power, natural gas or telecommunications facilities would be required (Impacts UTIL-1 and UTIL-3) to meet this increased demand and that impacts related to increased water use (UTIL-2), and increased solid waste production (UTIL-4) would be less than significant with requirements in the SSFMC, CAP actions and in CALGreen measures to increase water efficiency and decrease demand, and in federal, State, and local statutes and regulations related to solid waste, including the California Health and Safety Code, California Code of Regulations, California Public Resources Code, Shape SSF policies and actions, and the SSFMC. The proposed policy and actions are limited in scope to considerations related to use of open space areas and are not tied to new development projects, and therefore do not directly have the potential to result in increased demand for utilities and service systems. Potential improvements pursuant to the updated policies and actions would not change the identified Shape SSF impacts related to the provision of utilities and service systems.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would remain consistent with the conclusions of the General Plan EIR that potential utility and service system impacts would be less than significant. The proposed amendment would not result in new significant utility or service system impacts and would not substantially increase the severity of previously identified impacts in the General Plan EIR, and no additional environmental analysis is required.

WILDFIRE

The General Plan EIR acknowledges that while no areas within the City limits are located within a Moderate, High, or Very High Fire Hazard Severity Zones (FHSZs), portions of South San Francisco are adjacent to lands designated as Moderate or High FHSZs within a State Responsibility Area - particularly near San Bruno Mountain State Park and Sign Hill Park. Future development could occur adjacent to these areas and could expose people or structures, either directly or indirectly, to a risk of loss, injury, or death involving wildland fires (Impact WILD-1), affect adopted emergency response plans or emergency evacuation plans (Impact WILD-2), or expose people or structures to wildfire spread (Impact WILD-3); however the General Plan EIR concluded that, with compliance with applicable Shape SSF policies and actions, County and City emergency planning requirements, State regulations, and the SSFMC, the potential for impacts related to risk to people or structures from wildfire, emergency response, evacuation and wildfire spread would be limited to less-than-significant levels. Shape SSF policies strengthen emergency management coordination, require maintenance and communication of evacuation routes, promote community preparedness, and implement wildfire hazard reduction measures on public lands, including Sign Hill. Development is also subject to compliance with the California Fire Code, the San Mateo County Local Hazard Mitigation Plan and Emergency Operations Plan, and SSFMC requirements that ensure adequate emergency access, defensible space, and ongoing fire safety measures. Emergency evacuation routes are planned to accommodate buildout of Shape SSF and include major freeways and alternative arterials, supported by public notification systems. The proposed open space policy and action are limited in scope to considerations related to use of open space areas and would not result directly in any physical structures that could be at risk from wildland fires or obstruct emergency response or evacuation routes, nor would they result in increased population or density, and would therefore not increase the impact of risk of injury or death. Any changes made to open space pursuant to the SB1425 GP Amendment would be required to comply with any applicable Municipal or California Fire Code regulations, emergency plan, and Shape SSF policies and actions. The impacts related to risk of loss, injury, or death involving wildland fires, adopted emergency response plans or emergency evacuation plans, wildfire spread would remain less than significant, consistent with the conclusions of the General Plan EIR.

Shape SSF does not propose the installation or maintenance of infrastructure, including roads, fuel breaks, emergency water sources, power lines, or other utilities within an FHSZ, nor does it propose land use designation changes in the vicinity of San Bruno Mountain State Park or Sign Hill Park. The General Plan EIR determined that no development pursuant to Shape SSF would occur in the areas adjacent to San Bruno Mountain State Park or Sign Hill Park such that there would be an increase in risk of infrastructure that exacerbates fire risk (Impact WILD-4) or of flooding or landslides due to post-fire instability or drainage changes (WILD-5) beyond existing conditions. In addition, all new development projects would be subject to review by the Police and Fire Departments, Municipal Code requirements and Shape SSF policies and actions related to development on unstable geologic soils and controlling stormwater during and after construction, and these impacts would be less than significant, and therefore, these impacts would be less than significant. While the proposed SB1425 GP Amendment is limited in scope to considerations for use of open space areas, it could be indirectly linked to physical changes made in open spaces in the vicinity of Sign Hill Park or San Bruno Mountain State Park; however, any resultant improvements would be consistent with applicable policies and regulations as detailed in the General Plan EIR, and would therefore not result in new or worsened Shape SSF impacts related to infrastructure wildfire risk or post fire flooding or landslides.

Therefore, given the substantial evidence above, the proposed SB1425 GP Amendment would not result in new significant impacts related to wildfires or a substantial increase in the severity of previously identified impacts. Wildfire impact conclusions in the General Plan EIR would remain unchanged, and no additional environmental analysis is required.

OVERALL CONCLUSIONS

Given the substantial evidence presented in this document, the proposed SB1425 GP Amendment would not require subsequent analysis per CEQA Guidelines Section 15162, as confirmed by the following statements:

- (1) The proposed policy and actions would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) There are no changes in circumstances that would result in the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and
- (3) There is no new information resulting in a new significant effect not discussed in new significant environmental effects, a substantial increase in the severity of previously identified significant effects, or a change in the feasibility (or acceptance) of mitigation measures.

The proposed open space policy and actions would be considered a minor technical change per CEQA Guidelines Section 15164, as it would not change environmental conclusions. Therefore, this Addendum, in combination with the General Plan EIR, is the appropriate CEQA document for the proposed SB1425 GP Amendment. No additional CEQA analysis or documentation is required to make a decision on the proposed changes to Shape SSF related to the SB1425 GP Amendment.