

CITY OF SOUTH SAN FRANCISCO
SOUTH SAN FRANCISCO
DOWNTOWN STATION AREA
SPECIFIC PLAN
Environmental Impact Report

SCH No. 2013102001

*Volume II: Final EIR (Changes to the Draft EIR
and Comments and Responses)*

Prepared for
City of South San Francisco
315 Maple Avenue
South San Francisco, California 94080

Prepared by
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December 2014

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CHAPTER 8 Introduction to the Final EIR

8.1 CEQA REQUIREMENTS

Before approving a project that may cause a significant environmental impact, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (Final EIR). The contents of a Final EIR are specified in CEQA Guidelines Section 15132, which states that:

The Final EIR shall consist of:

- (a) The Draft EIR or a revision of the Draft EIR.
- (b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- (d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the Lead Agency.

The City of South San Francisco as Lead Agency must also provide each public agency that commented on the Draft EIR with a copy of City's response to those comments at least 10 days before certifying the Final EIR. In addition, the City may also provide an opportunity for members of the public to review the Final EIR prior to certification, though this is not a requirement of CEQA.

8.2 PUBLIC REVIEW PROCESS

The Draft EIR for the South San Francisco Downtown Station Area Specific Plan Project (proposed project) was circulated for review and comment by the public, agencies, and organizations for a 45-day public review period that began on October 10, 2014, and concluded on November 24, 2014. In response to the Draft EIR, six written letters were received during the review period. In addition, comments were received at the public hearing before the Planning Commission on November 6, 2014.

8.3 CONTENTS AND ORGANIZATION OF THE FINAL EIR

This Final EIR is composed of two volumes. They are as follows:

Volume I **Draft EIR and Appendices**—This volume describes the existing environmental conditions in the project area and adjacent communities, and analyzes potential impacts on those conditions due to the proposed plan; identifies mitigation measures that could avoid or reduce the magnitude of significant impacts; evaluates cumulative impacts that would be caused by implementation of the proposed plan in combination with other past, present, and future projects or growth that could occur in the region; analyzes growth-inducing impacts; and provides a full evaluation of the alternatives to the proposed plan that could eliminate, reduce, or avoid project-related impacts. Text revisions to the Draft EIR resulting from corrections of minor errors

and/or clarification of items are identified in Volume II, as described below. The Draft EIR is incorporated by reference into the Final EIR.

This volume also includes supporting technical data used in the preparation of the Draft EIR. Included in this volume are:

- Appendix A (Notice of Preparation and NOP Comment Letters)
- Appendix B (Air Quality Data)
- Appendix C (Greenhouse Gas Emissions Data)
- Appendix D (Noise Data)
- Appendix E (Traffic Data)

Volume II Final EIR (Changes to the Draft EIR and Comments and Responses)—This volume contains an explanation of the format and content of the Final EIR; all text changes to the Draft EIR; a complete list of all persons, organizations, and public agencies that commented on the Draft EIR; copies of the comment letters received by the City of South San Francisco on the proposed project; the Lead Agency’s responses to these comments; and the mitigation monitoring and reporting program for the proposed project. As stated above, the Draft EIR is incorporated by reference into the Final EIR.

8.4 USE OF THE FINAL EIR

Pursuant to CEQA Guidelines Sections 15088(a) and 15088(b), the lead agency must evaluate comments on environmental and CEQA-related issues received from persons who reviewed the Draft EIR and must prepare written responses to each of these comments. The Final EIR allows the public and the City of South San Francisco an opportunity to review the response to comments, revisions to the Draft EIR, and other components of the EIR, prior to the City’s decision on the project. The Final EIR serves as the environmental document to support approval of the proposed project, either in whole or in part.

After completing the Final EIR, and before approving the project, the Lead Agency must make the following three certifications as required by CEQA Guidelines Section 15090:

- That the Final EIR has been completed in compliance with CEQA
- That the Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information in the Final EIR prior to approving the plan
- That the Final EIR reflects the Lead Agency’s independent judgment and analysis

Pursuant to CEQA Guidelines Section 15091(a), if an EIR that has been certified for a project identifies one or more significant environmental effects, the lead agency must adopt “Findings of Fact.” For each significant impact, the lead agency must make one of the following findings:

1. Changes or alterations have been required in, or incorporated into, the proposed plan which avoid or substantially lessen the significant environmental effect as identified in the EIR.

2. Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
3. Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or plan alternatives identified in the final EIR.

Each finding must be accompanied by a brief explanation of the rationale for the finding. In addition, pursuant to CEQA Guidelines Section 15091(d), the agency must adopt, in conjunction with the findings, a program for reporting on or monitoring the changes that it has either required in the plan or made a condition of approval to avoid or substantially lessen environmental effects. These measures must be fully enforceable through permit conditions, agreements, or other measures. This program is referred to as the Mitigation Monitoring and Reporting Program (MMRP).

Additionally, pursuant to CEQA Guidelines Section 15093(b), when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must state in writing its reasons for supporting the approved action. This document, known as the Statement of Overriding Considerations, is supported by substantial information in the record, which includes this Final EIR. Since the proposed plan could result in significant and unavoidable impacts and cumulative significant and unavoidable impacts, the City would be required to adopt a Statement of Overriding Considerations if it approves the plan as proposed.

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CHAPTER 9 Changes to the Draft EIR

Text changes are intended to clarify or correct information in the Draft EIR in response to comments received on the document, or as initiated by Lead Agency staff. Revisions are shown in Section 9.2 (Text Changes) as excerpts from the Draft EIR text, with a ~~line through~~ deleted text and a double underline beneath inserted text. In order to indicate the location in the Draft EIR where text has been changed, the reader is referred to the page number of the Draft EIR as published on May 15, 2014.

9.1 TEXT CHANGES

This section includes revisions to text, by Draft EIR section, that were initiated either by Lead Agency staff or in response to public comments. All changes appear in order of their location in the Draft EIR.

9.1.1 Chapter 2, Summary

Page 2-10, mitigation measure MM4.2-6 numbering change

MM4.2-~~65~~ Prior to issuance ...

9.1.2 Section 4.2, Air Quality

Page 4.2-28, first partial paragraph and mitigation measure MM4.2-6

... potentially significant. However, implementation of mitigation measure MM4.2-~~65~~ would reduce this impact to a *less-than-significant* level.

MM4.2-~~65~~ Prior to issuance ...

Page 4.2-30, first full paragraph

Odor impacts are localized in nature and cumulative projects would not combine to result in a cumulative odor impact because odors are limited to the area immediately surrounding its source. Similar to what is required for the proposed project in MM4.2-~~65~~, cumulative projects would be reviewed and compared to BAAQMD CEQA Guidelines and implement odor reducing recommendations as applicable. Therefore, the proposed project, in combination with other cumulative projects, would result in a less than significant cumulative impact associated with objectionable odors.

9.2 FIGURE CHANGES

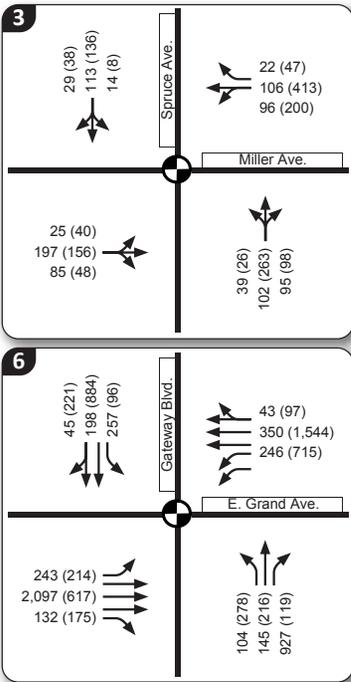
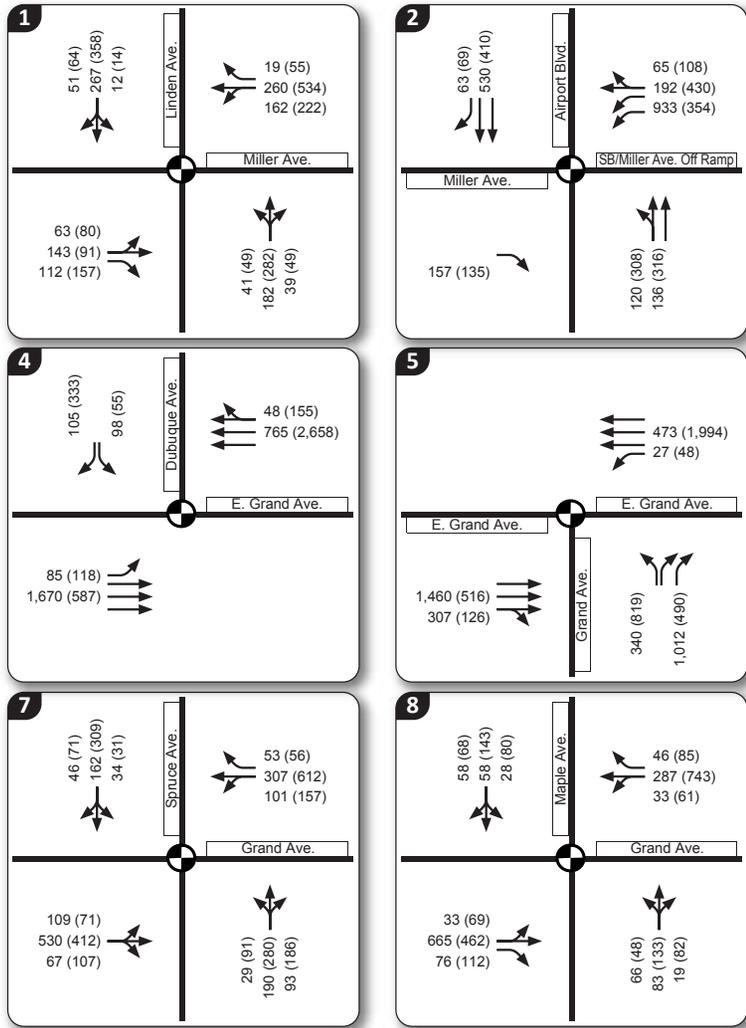
The following two Draft EIR figure titles were incorrect (the figures themselves were correct); the corrections are listed below, and the revised figures are included on the following pages:

- Figure 4.10-9A (Cumulative ~~No-Plus~~ Project Conditions Intersection Peak Hour Volumes) on Draft EIR p. 4.10-75

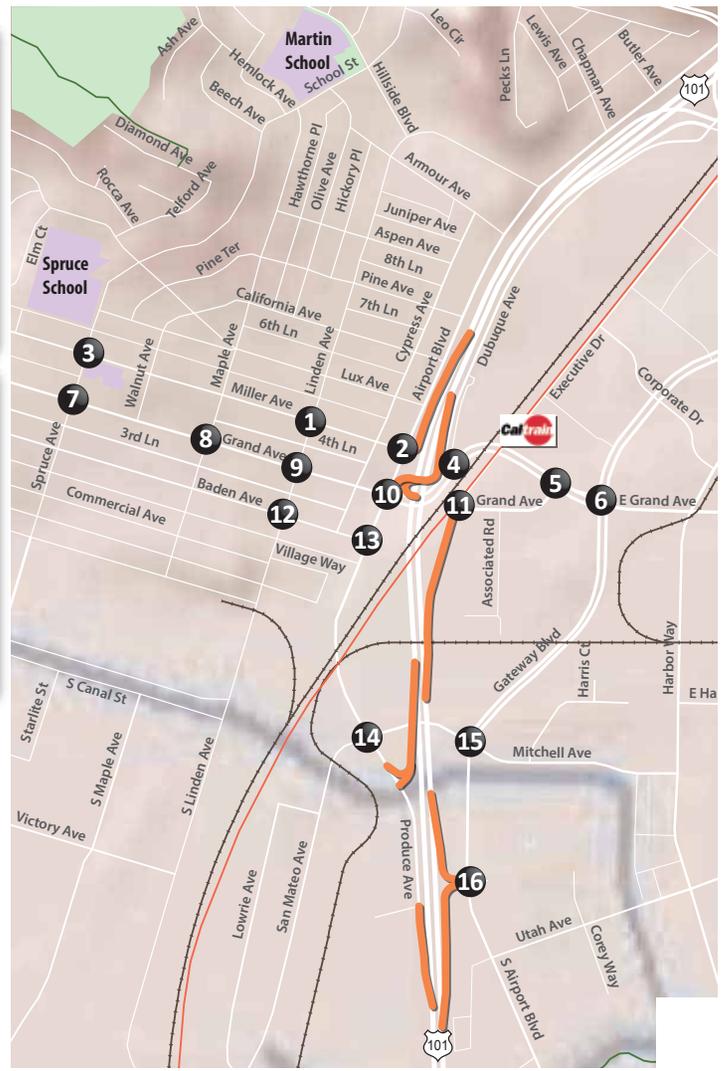
- Figure 4.10-9B (Cumulative ~~No-Plus~~ Project Conditions Intersection Peak Hour Volumes) on Draft EIR p. 4.10-77

9.3 APPENDIX CHANGES

There were no changes to Draft EIR appendices.

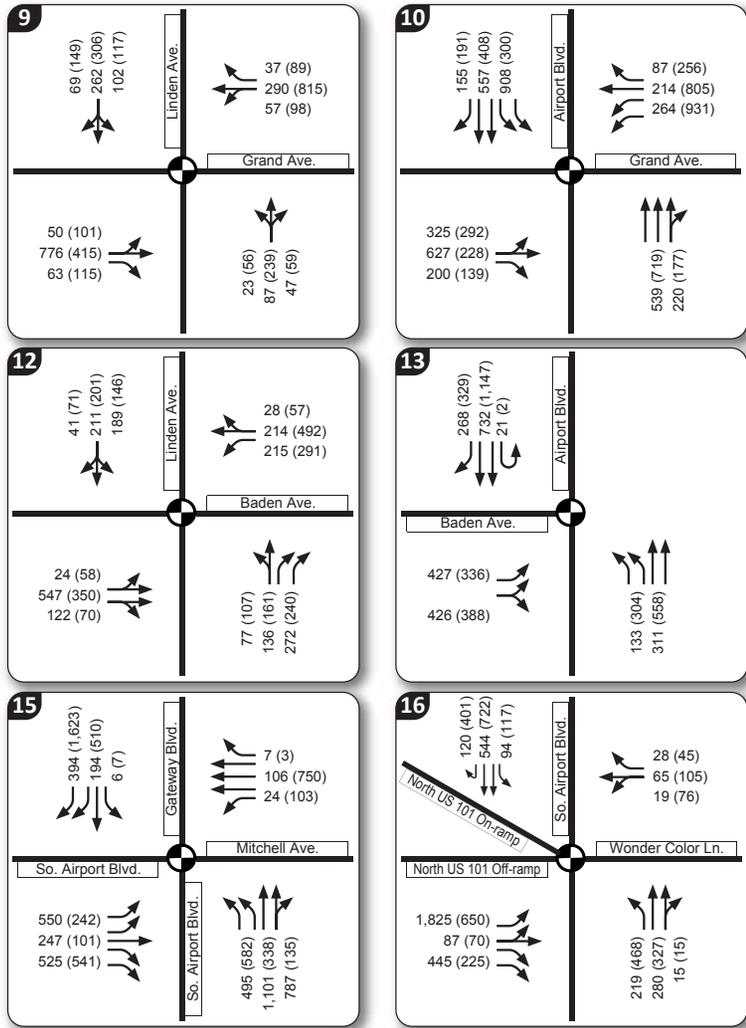


- KEY**
- XX (YY) AM (PM) Peak Hour Traffic Volumes
 - Signalized Intersection
 - Stop Sign
 - Study Intersection
 - Key Study Area Freeway Segments and Ramps

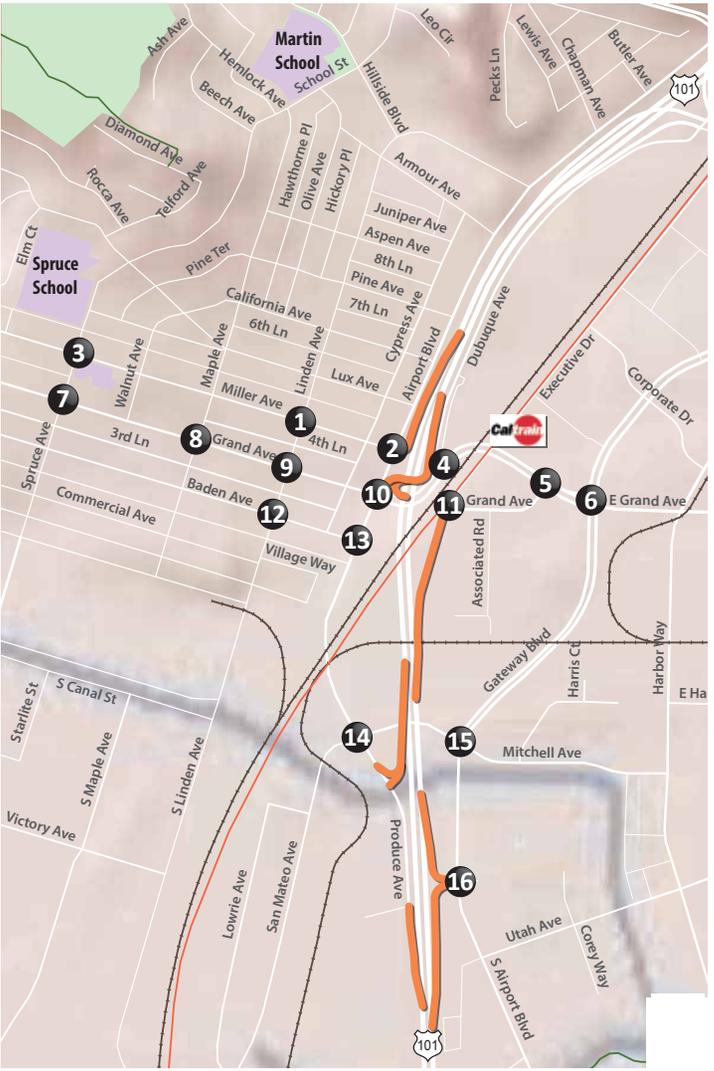


Source: Fehr & Peers, 2014.

Figure 4.10-9A Cumulative No-Plus Project Conditions Intersection Peak Hour Volumes [Revised]



- KEY**
- XX (YY) AM (PM) Peak Hour Traffic Volumes
 - Signalized Intersection
 - Stop Sign
 - Yield Sign
 - Study Intersection
 - Key Study Area Freeway Segments and Ramps



Source: Fehr & Peers, 2014.

Figure 4.10-9B Cumulative No-Plus Project Conditions Intersection Peak Hour Volumes [Revised]

CHAPTER 10 Comments and Responses

10.1 ORGANIZATION OF THE COMMENTS AND RESPONSES

This chapter of the Final Environmental Impact Report (Final EIR) contains all comments received on the Draft Environmental Impact Report (Draft EIR) during the public review period, as well as responses to each of these comments. Reasoned, factual responses have been provided to all comments received, with a particular emphasis on significant environmental and CEQA-related issues. Detailed responses have been provided where a comment raises a specific issue; however, a general response has been provided where the comment is relatively general. Although some letters may raise legal or planning issues, these comments do not always relate to significant environmental issues. In these instances, the comment has been noted, but no response has been provided. Generally, the responses to comments provide explanation or amplification of information contained in the Draft EIR.

A public hearing was held before the Planning Commission on November 6, 2014, at 7:00 p.m. One comment was made by a member of the public concerning historic preservation policies within the Plan. Additionally, two comments were made regarding the City’s anti-displacement strategy. Formal responses to these oral comments are provided below.

In total, six written comment letters regarding the Draft EIR were received from public agencies and organizations. Table 10-1 (Comments Received during the Draft EIR Public Review Period) provides a comprehensive list of comment letters in the order that they are presented in this section.

Table 10-1 Comments Received during the Draft EIR Public Review Period					
No.	Commenter/Organization	Commenter Code	Date	Page Where Comment Begins	Page Where Response Begins
ORAL COMMENTS					
1	Eric Gavila	EG	11/6/2014	—	10-2
2	Commenter #2	C2	11/6/2014	—	10-2
3	Commenter #3	C3	11/6/2014	—	10-3
WRITTEN COMMENTS					
1	San Francisco International Airport	SFO	10/17/2014	10-4	10-5
2	Caltrain	CTR	11/21/2014	10-6	10-11
3	Department of Transportation	DOT	11/21/2014	10-12	10-14
4	San Mateo County Union Community Alliance	UCA	11/24/2014	10-15	10-19
5	Sierra Club Loma Prieta Chapter	SC	11/24/2014	10-23	10-34
6	County of San Mateo Health System	SMCH	n.d.	10-47	10-51

The following sections contain summaries of the oral comments and responses to those comments (Section 10.2) and the original comment letters, which have been bracketed to isolate the individual

comments, each followed by responses to the individual, bracketed comments within that letter (Section 10.3). As noted above, and stated in CEQA Guidelines Sections 15088(a) and 15088(b), comments that raise significant environmental issues are provided with responses. Comments that are outside of the scope of CEQA review do not merit a response, but are included within this Final EIR and will be considered by the South San Francisco Planning Commission and City Council prior to taking action on this Final EIR and the proposed project. In some cases, a response may refer the reader to a previous response, if that previous response substantively addressed the same issues.

10.2 ORAL COMMENTS AND RESPONSES ON THE DRAFT EIR

■ Eric Gavila (EG), November 6, 2014

Response EG-1

The comment concerns historical preservation policies included in the Specific Plan. As noted on Draft EIR p. 4.3-12, implementation of the Specific Plan would not change any of the existing regulations governing historic resources and it is unlikely that any future development under the Specific Plan would be proposed on sites where designated historic resources are presently located. The plan recognizes that Grand Avenue is the historic core for the City and that it includes buildings of architectural interest. The Specific Plan emphasizes retaining the unique historic character of this historic core and that new development in this area shall respect this character. The Land Use and Urban Design chapter includes Guiding Principle 7, which calls for focusing public investments in the historic core of the City, along Grand Avenue from Airport to Spruce, and on adjoining streets—the Pedestrian Zone—to create an attractive pedestrian environment to support businesses Downtown. In addition, the Specific Plan further emphasizes retention of historically significant buildings wherever possible and includes design guidelines that would protect the existing historical character of the Downtown area. Therefore, implementation of the Specific Plan would require future development projects to be aesthetically compatible with the existing character of the historic district and would visually support the existing historic buildings, which would still allow for potential formal designation as a Historic District. Further, implementation of mitigation measure MM4.3-1 would require a qualified professional to conduct site-specific historical resource evaluations for future developments within the study area that would demolish or otherwise physically affect buildings or structures 45 years old or older or would otherwise affect their historic setting.

■ Commenter #2 (C2), November 6, 2014

Response C2

This comment pertains to the City's anti-displacement strategies. It is the City's intention to keep and provide an inventory of deed-restricted affordable housing options to lower-income households. This will be updated in the Preservation Strategies listed on Draft EIR p. 4.7-12. In addition, the Downtown Station Area Specific Plan (DSASP) includes a new policy, LU-10, to support regional or local efforts to understand impacts. Policy LU-10 reads as follows: "Support regional and local efforts to examine displacement of affordable housing and lower-income households and consider programs to address

identified housing needs.” Similar language would also be included in the Housing Element update to address affordable housing. Also, refer to Response SMCH-6.

■ **Commenter #3 (C3), November 6, 2014**

Response C3

This comment pertains to the City’s anti-displacement strategies. Refer to Responses C2 and SMCH-6.

10.3 WRITTEN COMMENTS AND RESPONSES ON THE DRAFT EIR

10.3.1 San Francisco International Airport (SFO), October 17, 2014

■ Comments by SFO



San Francisco International Airport

October 17, 2014

Ms. Catherine Barber
City of South San Francisco
Department of Economic and Community Development – Planning Division
P.O. Box 711
315 Maple Avenue
South San Francisco, California 94083

RECEIVED
OCT 22 2014
PLANNING DEPT.

Subject: *Draft Environmental Impact Report for Downtown Area Station Specific Plan – City of South San Francisco*

Dear Ms. Barber:

SFO-1 ■ Thank you for notifying San Francisco International Airport (SFO or the Airport) of the availability of the Draft Environmental Impact Report (Draft EIR) for Downtown Station Area Specific Plan. We appreciate this opportunity to coordinate with the City of South San Francisco (the City) in considering and evaluating potential land use compatibility issues that this and similar projects may pose.

As described in the Draft EIR, the proposed Downtown Station Area Specific Plan, defined by a 0.5-mile radius around the Downtown Caltrain Station, located north of Airport Boulevard and Grand Avenue, would over the lifetime of the plan accommodate a net increase of approximately 1,435 dwelling units, 0.8 million square feet of commercial uses, 21,000 square feet of industrial uses, and 1.2 million square feet of new office/research and development uses. The highest building heights are limited to 85 - 120 feet above ground level in the Retail Focus and Office R&D Land Use Designations located east of Highway 101, in the area bounded by East Grand Avenue, Gateway Boulevard and South Airport Boulevard.

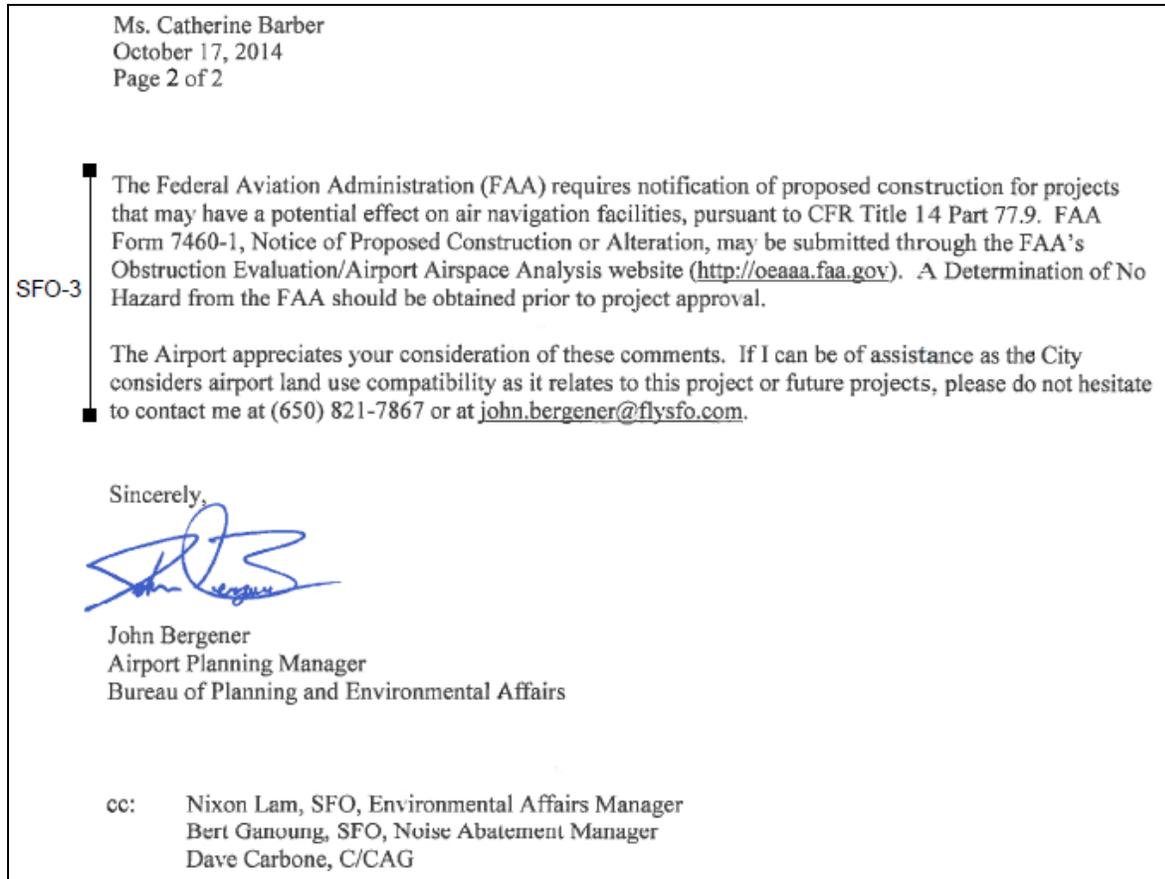
The project site is located within Airport Influence Area B, as defined in the Airport Land Use Compatibility Plan (ALUCP) for SFO, adopted by the City/County Association of Governments of San Mateo County (C/CAG) in November 2012. Proposed projects within Airport Influence Area B are subject to the ALUCP's policies for noise compatibility, safety compatibility, and airspace protection. This is supported by South San Francisco General Plan Land Use Policy 2-I-22, which states: "Require that all future development conforms to the relevant height, aircraft noise, and safety policies and compatibility criteria contained in the most recently adopted version of the San Mateo County Comprehensive Airport Land Use Plan for the environs of San Francisco International Airport."

SFO-2 ■ A preliminary airport land use compatibility analysis indicates that the project as proposed would not pose incompatibilities with respect to airspace protection, noise, or safety. The proposed project is situated outside of the Airport's CNEL 65 dB noise contour. Additionally, the Project is not situated within a runway end safety zone. Proposed building heights would not penetrate critical airspace surfaces.

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

EDWIN M. LEE MAYOR	LARRY MAZZOLA PRESIDENT	LINDA S. CRAYTON VICE PRESIDENT	ELEANOR JOHNS	RICHARD J. GUGGENHIME	PETER A. STERN	JOHN L. MARTIN AIRPORT DIRECTOR
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Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com



■ Responses to SFO

Response SFO-1

This comment contains introductory and summary material and requires no specific response.

Response SFO-2

This comment states that a preliminary airport land use compatibility analysis indicates that the project would not result in incompatibilities with airport uses and confirms the project area is outside the airport's CNEL 65dB noise contour and runway end safety zone. Accordingly, the comment is noted, but no response is necessary as the comment does not raise issues that require changes to the Draft EIR's analysis or conclusions.

Response SFO-3

Comment is acknowledged. All development projects pursuant to the Specific Plan would comply with FAA requirements.

10.3.2 Caltrain (CTR), November 21, 2014

■ Comments by CTR



CTR
BOARD OF DIRECTORS 2014
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PERRY WOODWARD
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MICHAEL J. SCANLON
EXECUTIVE DIRECTOR

November 21, 2014

Ms. Catherine Barber
City of South San Francisco
PO Box 711
315 Maple Avenue,
South San Francisco, CA 94083

Re: South San Francisco Downtown Station Area Specific Plan Draft Environmental Impact Report

Dear Ms. Barber:

■ Thank you for providing The Peninsula Corridor Joint Powers Board (Caltrain) the opportunity to comment on the South San Francisco Downtown Station Area Specific Plan Draft Environmental Impact Report (DEIR). Caltrain enthusiastically supports the City's vision for a vibrant, transit supportive downtown and is particularly excited to work with the City to achieve the plan's objectives of improved pedestrian and bicycle connections to the Caltrain station.

CTR-1 We are pleased to see that the Specific Plan identifies and supports the City and Caltrain's ongoing efforts to improve the South San Francisco Caltrain station through the elimination of the holdout rule, extension of platforms and the improvement of station access through the construction of a pedestrian and bicycle underpass linking South San Francisco's Downtown with development to the east of US-101 and the Caltrain right of way (ROW). Caltrain looks forward to continuing to work with the City of South San Francisco to identify funding sources and deliver this important project.

Similarly, Caltrain anticipates providing assistance and detailed input on future designs and project-level environmental clearances for individual projects that impact Caltrain facilities or services. We particularly look forward to close coordination on any proposed projects that impinge on or cross the Caltrain ROW such as the proposed Railroad Avenue extension or the Colma Creek Canal East-West Bikeway.

CTR-2 ■ As the DEIR acknowledges, the Caltrain Modernization Program is preparing to deliver the Peninsula Corridor Electrification Project (PCEP), a suite of infrastructure and service improvements that will electrify the Caltrain ROW and provide enhanced commuter rail services between San Francisco and San Jose. Caltrain released the Draft Environmental Impact Report for the PCEP in February of 2014 and received comments from the City of South San Francisco on April 29, 2014 (attached). One of the proposed project elements described in the DEIR is a traction power sub-station to be located at one of three potential sites in South San Francisco. ▼ One of these sites, "Option 1" falls within the Specific Plan Area.

PENINSULA CORRIDOR JOINT POWERS BOARD
1250 San Carlos Ave. - P.O. Box 3006
San Carlos, CA 94070-1306 650.508.6269

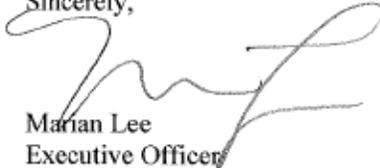
CTR-2
cont.

Per the City's request, Caltrain will work diligently to ensure that "Option 1" (should it be selected) be designed in a manner that does not preclude any of the circulation improvements included in the Downtown Station Area Specific Plan. However, we request that the City ensure that the program-level environmental analysis for the Specific Plan accommodate the potential that this option could be selected.

CTR-3

If you have any questions regarding our comments please do not hesitate to contact me at (650)-622-7843 or leem@samtrans.com.

Sincerely,



Marian Lee
Executive Officer
Caltrain Modernization Program

Copy: Chuck Harvey
Liria Larano
Hilda Lafebre
Stacy Cocke
Sebastian Petty

Attachment (1)

PENINSULA CORRIDOR JOINT POWERS BOARD
1250 San Carlos Ave. - P.O. Box 3006
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DEPARTMENT OF ECONOMIC
AND COMMUNITY DEVELOPMENT
PLANNING DIVISION
(850) 877-8535
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Peninsula Joint Powers Board
Attn: Stacy Cocke, Senior Planner
1250 San Carlos Ave
P.O. Box 3006
San Carlos, CA 94070-1306

April 29, 2014

Subject: City of South San Francisco Comments regarding Peninsula Corridor Electrification Project – Draft Environmental Impact Report

Dear Ms. Cocke,

The City of South San Francisco appreciates the opportunity to provide the following comments in response to the Draft EIR for the Peninsula Corridor Electrification Project.

The Caltrain line is located in close proximity to South San Francisco's downtown area and East of 101 area, but is difficult to access from both areas, especially by alternative transportation modes, including pedestrians and bicyclists. The City has been working with Caltrain to reconfigure the SSF Caltrain station by lengthening the station platforms to the south so that the station provides direct access to the station from Downtown and from the East of 101 employment areas. To support these efforts, the City received a MTC/ABAG Station Area and Land Use Planning grant to prepare a Downtown Station Area Specific Plan to provide a comprehensive analysis of constraints and opportunities for the area. This plan is currently in draft form, but the underlying vision is to revitalize the downtown area and promote new residential, mixed-use and employment uses proximate to the station area. The Caltrain Modernization program could compliment these efforts by providing an improved commuter service, but the City does have concerns related to specific aspects of the project discussed in the DEIR.

Traction Power Substation Siting

Traction Power Substation 1 (TPS1) is proposed to be located in South San Francisco, and three potential sites are identified. These sites are the same as those discussed in the 2009 Caltrain Electrification Environmental Assessment, but changes have occurred in the intervening years that affect the viability of each site.

TPS1 Option 1 (adjacent to PG&E Substation)

As stated in the EIR, this location has a land use designation and zoning designation of Business Commercial. This site is also included within the overall SSF Downtown Station Area Specific Plan. Specifically, the site is included in the proposed "Eastern Neighborhood", which is envisioned as a high density employment district with primarily Office and Research & Development uses.

The PG&E Electrical Substation is currently located in this area as well, and the City understands that the traction power substation is intended to be located in close proximity to the PG&E substation. We support this site alternative if TPS1 can be repositioned in such a way as to not preclude installation of necessary circulation improvements, as depicted below.

315 MAPLE AVENUE • P.O. BOX 711 • SOUTH SAN FRANCISCO, CA 94083

City of South San Francisco Comments – Caltrain Electrification Project Draft EIR
Page 2 of 3



Draft SSF Downtown Station Area Specific Plan – Proposed Land Use Map

TPS1 Option 2 (on Harbor Way)

This location has a land use designation and zoning designation of Business and Technology Park. Starting on page 3.10-17, line 35, the following description is given for the general surroundings of the site:

“Although the TPS would not be compatible with the Business and Technology Park designation, the existing land uses are more industrial and warehouse in nature. These uses include rental car parking lots, storage facilities, distribution centers, truck storage areas, and an electrical substation. Some smaller office buildings are located within the area.”

As can be seen in the aerial photo below, the description that existing land uses are more industrial and warehouse in nature is misleading; immediately adjacent to the north of the site and across Harbor Way to the east and northeast is a large R&D/Office campus. As stated in the analysis, the proposed land use would be allowed subject to a Conditional Use Permit.



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City of South San Francisco Comments – Caltrain Electrification Project Draft EIR
Page 3 of 3

TPS1 Option 3 (127 West Harris)

This location has a land use designation of Business Commercial and a zoning designation of Freeway Commercial (FC). As stated in the EIR, FC does not allow major utilities. However, the paragraph on page 3.10-18, lines 4-15 states that Option 2 is within FC Zoning, while it is actually Option 3.

The SSF Planning Division has received an application to develop a 128-room hotel on this property; an environmental document is currently being drafted per CEQA guidelines, and the City foresees entitlement hearings before the Planning Commission occurring in the Summer of 2014. We have alerted Caltrain staff to this development, and are recommending that a new alternative site for TPS1 be located. One alternative site to consider is the northern portion of the existing SSF Caltrain station property; this site was considered as an alternative site (ATF-1C) as part of the 2004 EA/DEIR. With the proposed SSF Caltrain Station improvements moving the station platform further to the south, this site would be bounded by Dubuque Avenue and US Highway 101 to the west, commercial uses to the north, parking for the station to the south, and would be directly adjacent to the Caltrain right-of-way to the east, allowing for a more direct connection to the overhead contact system.

Underground Duct Banks connecting TPS1 to Caltrain ROW

The DEIR indicates that the most likely location of proposed underground duct banks to connect the traction power substation to the Caltrain ROW is along the abandoned railroad corridor in the East of 101 area. The City of South San Francisco’s General Plan has identified this corridor as an important future east-west transportation connection, extending Railroad Ave from South Linden Ave to East Grand Ave, including 4 travel lanes, a bicycle/pedestrian path, and linear open space. Any utility infrastructure in this corridor should be designed so as not to preclude implementation of any future connectivity improvements. The placement of TPS1 at the former ATF-1C site identified in the 2004 EA/DEIR would remove the need to use the abandoned railroad corridor, as that site would be directly adjacent to the Caltrain ROW.

Tree Removal

Section 3.3 - Biological Resources estimates that 77 trees will be removed and 152 trees will be pruned within South San Francisco. Appendix F “Tree Inventory and Canopy Assessment”, Attachment 1 “Tree Protection Requirements by Jurisdiction” includes a table with each jurisdiction’s requirements related to tree protection. Following are the proposed revisions to South San Francisco’s column, displayed in ~~strikeout~~/underline format:

Jurisdiction	Definition of Protected Tree	Removal Permit needed?	Pruning permit needed?	Replacement requirement	Recommended replacement for trees to be removed in PCEP
South SF (Municipal Code Chapter 132.30)	Protected = 15.3” DBH and larger at 54” height.	Yes for Protected tree	Not stated - <u>Yes for Protected tree</u>	Not stated <u>Three 24”-box trees or two 36”-box trees for each protected tree removed</u>	Inside ROW: 1:1 for all trees Outside ROW 2:1 (<u>36” box</u>) for protected tree 1:1 for non-protected tree

Thank you for your consideration of these comments; we look forward to your response in the Final EIR. If you have any additional questions, please contact me at (650) 877-8535 or billy.gross@ssf.net.

Sincerely,



Billy Gross
Associate Planner

315 MAPLE AVEUE • P.O. BOX 711 • SOUTH SAN FRANCISCO, CA 94083

■ Responses to CTR

Response CTR-1

This comment contains introductory material and requires no specific response.

Response CTR-2

This comment discusses the Caltrain Modernization Program and the Peninsula Corridor Electrification Project and states that one of the proposed traction power sub-station locations falls within the Specific Plan area. The Specific Plan would not preclude this option. Caltrain and the City will continue to work together and collaborate to ensure that both plans may continue as planned.

Response CTR-3

This comment contains closing materials and requires no specific response.

10.3.3 Department of Transportation (DOT), November 21, 2014

■ Comments by DOT

Nov 21 2014 5:32PM HP LASERJET FAX

DOT

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 4
P.O. BOX 23660, MS-10D
OAKLAND, CA 94623-0660
PHONE (510) 286-6053
FAX (510) 286-5559
TTY 711
<http://www.dot.ca.gov/dist4/>



November 21, 2014

SMGen077
SCH# 2013102001

Ms. Susy Kalkin
Planning Division
City of South San Francisco
P.O. Box 711
South San Francisco, CA 94083

Dear Ms. Kalkin:

South San Francisco Downtown Station Area Plan – Draft Environmental Impact Report

DOT-1 ■ Thank you for continuing to include the California Department of Transportation (Caltrans) in the environmental review process for the above project. The following comments are based on the Draft Environmental Impact Report (DEIR).

DOT-2 ■ We recommend the City include a Travel Demand Management (TDM) section to the Circulation and Parking section of the DEIR. These TDM measures could include lower parking ratios, car-sharing programs, bicycle parking and showers for employees, and providing transit passes to residents and employees, among others. For information about parking ratios, see the Metropolitan Transportation Commission (MTC) report *Reforming Parking Policies to Support Smart Growth* or visit the MTC parking webpage:
■ http://www.mtc.ca.gov/planning/smart_growth/parking/.

DOT-3 ■ **Fair Share Fees**
There are ongoing projects to improve freeway performance at the intersections (I/S) of US-101 auxiliary lanes/Oyster Point to the Harney Way, and the US-101/Produce Avenue IS modification project. Please provide the dollar amount of fair share fees that will be contributed to these freeway improvement projects to mitigate development impacts.

DOT-4 ■ **Forecasting**
DEIR, Figure 4.10-9 A & B: Cumulative No Project Conditions, Intersection Peak Hour Volumes label, should be renamed Cumulative with Project Conditions, Intersection Peak Hour Volumes.

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Nov 21 2014 5:32PM HP LASERJET FAX

P. 2

Ms. Susy Kalkin/South San Francisco
November 21, 2014
Page 2

DOT-5

ENCROACHMENT PERMIT

Please be advised that any work or traffic control that encroaches onto the state right of way (ROW) requires an encroachment permit that is issued by Caltrans. To apply, a completed encroachment permit application, environmental documentation, and five (5) sets of plans clearly indicating the state ROW must be submitted to: Office of Permits, California Department of Transportation, District 4, P.O. Box 23660, Oakland, CA 94623-0660. Traffic-related mitigation measures should be incorporated into the construction plans during the encroachment permit process. See the following website link for more information:
<http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Please feel free to call or email Sandra Finegan at (510) 622-1644 or sandra_finegan@dot.ca.gov with any questions regarding this letter.

Sincerely,



ERIK ALM, AICP
District Branch Chief
Local Development – Intergovernmental Review

c: State Clearinghouse

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

■ Responses to DOT

Response DOT-1

This comment contains introductory material and no specific response is required.

Response DOT-2

Comment noted. The Plan already takes into account several TDM measures that help to reduce auto mode share by using the mixed use trip generation methodology known as Plan+ (Table 4.10-9 [Specific Plan Trip Generation]). The City may choose one or several additional Transportation Demand Management (TDM) strategies to help reduce VMT. However, a comprehensive TDM plan is outside of the scope of this EIR. The City currently has in place a TDM Ordinance that would continue to apply to all new development generating in excess of 100 average daily trips. A modified TDM plan tailored to the Plan Area may be considered after the Specific Plan is approved.

Response DOT-3

Fair Share Fees to help mitigate development impacts may be established but must be agreed upon between the City and Caltrans. For example, the East of 101 Plan established a TIP/fee program where fees are assessed on a project basis, based on total number of trips generated by the development. Funds typically are not designated for specific improvements, but rather are collected into a common improvements pool which may be used to fund projects within the TIP. All development under the Specific Plan would be required to pay fair share fees proportionate to the size of the development. However, specific dollar amounts are not yet known.

Response DOT-4

Figure 4.10-9A and Figure 4.10-9B were incorrectly labeled Cumulative No Project Conditions (rather than Cumulative Plus Project Conditions) in the print version of the Draft EIR. The corrected figures are included in EIR Chapter 9 (Changes to the Draft EIR).

Response DOT-5

This comment requests that an encroachment permit be obtained for any work or traffic control encroaching on the state right-of-way. All development under the Specific Plan will comply with this requirement.

10.3.4 San Mateo County Union Community Alliance (UCA), November 24, 2014

■ Comments by UCA



SAN MATEO COUNTY UNION COMMUNITY ALLIANCE
1155 Chess Drive, Suite 200 Foster City, CA 94404
Serving Workers and their Families

UCA

November 24, 2014

Susy Kalkin, Chief Planner
City of South San Francisco, Planning Division
315 Maple Avenue
South San Francisco, CA 94080
(Via e-mail) Susy.Kalkin@ssf.net

Re: Downtown Station Area Plan Comments to Draft EIR

Dear Ms. Kalkin:

UCA-1 Please consider the following comments in response to the Draft EIR. The San Mateo County Union Community Alliance has been following the planning process that led to the Draft Station Area Plan currently being considered by the City Council and this Draft EIR. We have facilitated public participation in this planning process by community-based and advocacy organizations, labor unions, youth groups seniors and concerned residents and businesses. The comments that follow reflect input from a broad group of stakeholders who are committed to planning for a South City downtown that will benefit all who live and work there.

1. Construction impacts and mitigations

UCA-2 The Draft EIR In Section 4.4-22 notes that, “[b]ecause GHGs remain in the atmosphere for years, even the temporary emissions from construction activities would be cumulatively considerable without the implementation the BAAQMD recommended BMPs, the General Plan policies, and CAP policies to reduce construction-related GHG emissions.” In MM4.4-1 the Draft EIR recommends mitigation measures including the use of local materials. These mitigation measures should be included in the Downtown Station Area Plan (SAP). In addition to these mitigation measures, the SAP should also include: the use of local construction workers (which is already referenced in the Downtown Station Area Plan), and payment of all construction workers Area Standard Wages and benefits.

Both the use of local apprentices and the payment of area standard wages will reduce the vehicle miles travelled (VMT) by construction workers to the job sites, since workers who are paid area standard wages will be able to live closer to the job sites. Including these as mitigation measures under Section 4.4-22 will strengthen the City’s with respect to potential emissions from construction activities.

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1

UCA-3

Likewise draft EIR Section 5.2.1 reads “Short-Term Employment Generation: Development pursuant to the Specific Plan would generate some short-term, construction-related employment opportunities during construction activities. Given the ample supply of construction workers in the regional work force of the Bay Area, which is the area from which the workers would be drawn, and the recent economic downturn resulting in additional workforce, the proposed project would not be considered growth-inducing from a short-term employment perspective.” This finding that the supply of construction workers will come from the regional workforce is not likely unless the SAP requires that projects pay Area Standard Wages. In the absence of wage standards, developers may attempt to cut construction costs by bringing lower cost construction employees from other states. This practice will both impact the VMT estimates used in the EIR and will undermine Section 5.3 findings of no substantial impact.

2. Long term employment and housing

UCA-4

In Section 5.2.1 the draft EIR finds as many as 2,400 or more new long-term jobs added to the City. While the EIR suggests that there is ample housing stock to accommodate these new residents, the EIR has not done any analysis of the likely wages of these new jobs or of the affordability of new housing stock to accommodate these workers. Without a analysis of the jobs/housing “fit” it is impossible to determine whether the new workers will be able to afford to live in the housing units proposed under the SAP. To address this issue, the SAP should designate a percentage of the housing as affordable (to be defined as % of income). The plan should also require all projects to do an assessment of the wages rates for all occupations so that ongoing analysis of the jobs/housing fit can be evaluated over the life of the SAP.

UCA-5

The Draft EIR SAP considers the housing and displacement impacts of the SAP based on a proposed increase of approximately 1,400 dwelling units. As noted in our original Scoping letter, feedback at the Community Workshop held the evening of September 17, 2013 suggested that the public in attendance strongly support of increased downtown densification [beyond 1,400] so long as the heights on Grand Avenue were stepped down from parallel corridors. The EIR Alternatives Assessed did not include one with higher increases in housing units. Without this analysis, the City Council is without critical information necessary to inform their decision-making around the details of the SAP.

UCA-6

Section 4.7-2 finds that the development “will not displace substantial numbers of people or existing housing, necessitating the construction of replacement housing elsewhere.” But this analysis does not consider displacement as a result of rising

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2

UCA-6
cont.

home prices or rents. Any displacement of existing residents would have environmental impacts¹ and significant social and economic effects.

UCA-7

CEQA requires analysis of direct and indirect impacts, including impacting resulting from social and economic consequences of this project. The DEIR must therefore evaluate the physical, environmental, and health consequences associated with economic displacement. For example, among other steps, the DEIR should model displacement and identify likely trends in displacement, including areas likely to face pressure, number of households affected, the communities expected to absorb these households, and the local and quantity of resulting demand for addition housing needs. Similarly, the Downtown SAP is likely to cause displacement of residents through increased rents and evictions, which clearly have adverse effects, including on human health², that makes displacement a significant impact.

UCA-8

The DEIR also refers to the Plan's "Affordable Housing and Anti-Displacement Strategy," to implement strategies to help mitigate and minimize the displacement of existing residents. However, some of the language included under "Preservation Strategies" on page 4.7-12 is vague and also inconsistent with the language included in the Plan. More specifically:

- (1) *Create a comprehensive inventory of existing rental housing in the study area offering affordable housing options to lower-income households.*
It is unclear how "rental housing" is defined (i.e. deed-restricted rental vs. non-deed-restricted rental, or both).
- (4) *Implement housing policy provisions to protect tenants and rental housing, and to promote a stable and diverse resident community.*
The only housing policy provisions the City currently has to protect tenants are relocation benefits and first right of return for publicly funded projects. These policies only apply to residents living in publicly funded project and provide assistance to residents *after* displacement has occurred. It is unclear whether residents living in privately owned rental units would benefit at all from these "housing policy provisions."

¹ See TransForm and California Housing Partnership Corporation (CHPC), Why Creating and Preserving Affordable Homes Near Transit is a Highly Effective Climate Protection Strategy (2014), available at <http://www.chpc.net/dnld/AffordableTODResearch051514.pdf>

² See City and County of San Francisco Department of Public Health, The Case for Housing Impacts Assessment: The Human Health and Social Impacts of Inadequate Housing and Their Consideration in CEQA Policy and Practice (May 2004), available at <http://www.sfthealthequity.org/component/jdownloads/finish/6-housing/136-the-case-for-housing-impacts-assessment/0?Itemid=101>, at 5-11 (noting that "[r]esidential displacement or the permanent loss of area affordable housing can be expected to lead to diverse health effects," including increased psychological and physiological stress, poverty, job loss, overcrowding, homelessness, segregation, and demand for transportation systems and social services, as well as decreased housing safety, indoor air quality, social support, and social cohesion)

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3. Transportation and Parking

UCA-9 ■ Section 4.10 of the Draft EIR considers the traffic implications of the SAP. This section of the EIR utilizes LOS standards. These standards are becoming obsolete, as new state legislation requires VMT as the appropriate measure of traffic impacts under CEQA. The Draft has failed to utilize these new measurements, which will mean that as large projects come through the approval process, or as changes to parts of the plan are proposed over time, the obsolete framework will impose a burden on staff time and cost, and incur legal doubts and vulnerabilities.

The prudent choice for a long-lasting plan is to start VMT analysis now. The policy impact of this measurement failure is that the mitigation measures proposed focus on improving routes for automobile travel, rather than focusing on improvements to public transportation, pedestrian and bicycle travel which would simultaneously reduce VMT, mitigate GHG emissions and bring the SAP into alignment with SB375 mandates, Plan Bay Area and the city's Climate Action Plan.

UCA-10 ■ Table 4.2-3 of the DEIR examines the Plan's consistency with Clean Air Plan Control Measures. The table specifies "parking assessment districts that use revenue from street parking to fund pedestrian and streetscape improvements" as an applicable implementation strategy, yet the concept is currently left out of the DSAP. Unless incorporated into the downtown plan, we do not agree with the statement that the "proposed project would be consistent with all applicable Clean Air Plan Control Measures and Implementation Actions". To encourage the best possible achievement of emission reduction requirements under the Clean Air Plan, we believe parking assessment districts should be incorporated into the DSAP.

UCA-11 ■ We appreciate your consideration of these comments and look forward to continued discussion with staff and the City Council as we work together towards the adoption and implementation of the SAP.

Sincerely,



The Rev. Kirsten Snow Spalding
Executive Director, San Mateo County Union Community Alliance

A 501(c)(3) community-based organization affiliated with the San Mateo County Central Labor Council and the San Mateo County Building and Construction Trades Council. For information contact (650) 341-771

4

■ Responses to UCA

Response UCA-1

This comment contains introductory material and requires no specific response.

Response UCA-2

This comment requests that the Specific Plan include the mitigation measures identified in the Draft EIR. All mitigation measures identified in the Draft EIR will be included in the Mitigation Monitoring and Reporting Program that will be adopted along with other project approvals. Further, CEQA does not require an analysis of socioeconomic effects of a proposed project, only an analysis of the actual physical effects on the environment (refer to CEQA Guidelines Section 15064(e)). It is speculative to state that the use of local apprentices and payment of area standard wages would reduce the vehicle miles traveled by construction workers to the job sites since they would be able to live closer to the job sites. Further, given the extensive transit opportunities available in the City, including these suggested requirements would likely make little, if any, difference in vehicle miles traveled (VMT). Accordingly, no nexus can be established between worker wages and VMT. However, it should be noted that the proposed Plan supports the use of a local workforce (Policy LU-1) and staff is proposing language revisions to LU-1 as follows:

Encourage the use of local workforce and local business sourcing for developments in the plan area that generates quality construction and service jobs with career pathways, that provide job training opportunities for the local workforce, and that pays fair wages so that money in wages and materials used in the construction of these developments is invested in the local economy.

Response UCA-3

Refer to Response UCA-2. As noted, the City supports the use of local labor. There is no established connection between payment of standard wages and short-term employment generation. It is speculative to assume that developers would bring in lower-cost workers from outside the area in the absence of wage standards. The Specific Plan would not be growth-inducing from a short-term employment perspective, as stated in the Draft EIR (p. 5-10).

Response UCA-4

The issue of wages of new jobs and affordability of housing stock is not relevant to an analysis of the physical effects on the environment as a result of the Specific Plan. CEQA does not require an analysis of socioeconomic effects of a proposed project, only an analysis of the actual physical effects on the environment (refer to CEQA Guidelines Section 15064(e)). The City is supportive of efforts to track changes in rental housing stock and affordability on a regional or local basis and suggests the following guiding principle.

Support regional and local efforts to examine displacement of affordable housing and lower-income households and consider programs to address identified housing needs.

Also refer to Responses C2 and SMCH-6.

Response UCA-5

The Draft EIR did not include an analysis of a higher-density alternative because CEQA requires that the alternatives analyzed in an EIR should reduce one or more impacts of the proposed project. In this case, while higher densities could reduce VMT further compared to the proposed Plan, a higher density in the Specific Plan area would likely result in greater impacts to Noise and would not substantially reduce GHG emissions, which have been determined to be less than significant in the Draft EIR with implementation of mitigation. In addition, higher densities would exceed General Plan population estimates to a greater extent than under the proposed Specific Plan, and while likely less than significant, could result in greater impacts compared to the proposed Plan for population-related resources such as public services and utilities. Therefore, it was eliminated from further consideration in the EIR.

Response UCA-6

Loss of affordable housing near transit would not significantly raise GHG emissions because, while transit ridership is indirectly related to income levels, with those of lower incomes historically tending to utilize available transit to a greater extent, the Specific Plan would include affordable housing and, given the convenience to available transit, would be expected to increase utilization of transit for all residents. Rising home prices and rents because of an improved living environment have no direct correlation to decrease in transit ridership. In a recent study by Reconnecting America prepared for the Metropolitan Transit Commission:¹

The potential demand for housing near transit is projected to nearly double by 2030, based on the underlying demographics of the Bay Area. The demographic groups fueling this demand are older and younger households that are often smaller than average, and nonwhite and recent immigrant households—all groups that have all chosen to locate near transit in the past.

In fact, the study found that the greatest increase in transit ridership is projected for users with incomes less than \$20,000 a year (113 percent).² It is also speculative to assume that rising home prices or rents would displace a substantial number of residents in a manner that would affect transit ridership. Displacement of residents, and its impact on ridership, constitutes a socioeconomic effect not required to be analyzed under CEQA. However, as noted by the EPA in case studies of TOD:

Transit-oriented development provides increased affordability. The American Public Transportation Association estimates that households that live near transit and use it can save \$9,499 a year on transportation compared to households that drive (www.apta.com). Research by the Center for Transit-Oriented Development shows that households living in walkable, mixed-use neighborhoods near transit spend about 16 percent less on transportation than households that live in conventional suburban development (www.reconnectingamerica.org).³

¹ Reconnecting America, *Financing Transit-Oriented Development in the San Francisco Bay Area, Policy Options and Strategies* (August 2008), http://www.mtc.ca.gov/planning/smart_growth/tod/Financing_TOD_in_SFBA.pdf (accessed 12/19/2014).

² Reconnecting America, *Financing Transit-Oriented Development in the San Francisco Bay Area, Policy Options and Strategies* (August 2008), http://www.mtc.ca.gov/planning/smart_growth/tod/Financing_TOD_in_SFBA.pdf (accessed 12/19/2014).

³ EPA, *Encouraging Transit Oriented Development Case Studies that Work*, <http://www.epa.gov/dced/pdf/phoenix-sgia-case-studies.pdf>. Accessed 12/19/2014.

Response UCA-7

CEQA requires an analysis of direct and indirect impacts, including impacts resulting from social and economic consequences. Displacement of persons or businesses would not be likely to result in physical environmental impacts, as it is assumed that most, if not all, displaced persons or businesses would relocate into existing buildings. This threshold is focused on displacement that requires the construction of new housing elsewhere, which would not occur in the dense, urban area that is the Bay Area. Human health and social impacts from increased rents and evictions would not be considered physical effects on the environment required to be analyzed under CEQA.

Response UCA-8

To address the comment regarding Preservation Strategies No. 1 and No. 4, refer to Response C2.

Response UCA-9

The new thresholds of significance for traffic impacts are currently in draft form and under review by the Governor's Office of Planning & Research (OPR) and have not yet been incorporated as CEQA thresholds. Replacement of LOS standards is not required until the Secretary of the Natural Resources Agency certifies the new guidelines (Public Resources Code Section 21099(b)(2)). Intersection LOS is the current policy adopted by the City of South San Francisco's General Plan, and City-adopted thresholds were used to determine significant impacts. CEQA Guidelines currently and will continue to give lead agencies discretion in choosing which metrics to study and what the thresholds of significance are. Guidelines for implementing Senate Bill 743 are still in draft form and have not yet been adopted, and the timing for adoption is still uncertain. Therefore, the level-of-service standards used in the Draft EIR are appropriate. All projects pursuant to the Specific Plan EIR will undergo individual CEQA review. When the new thresholds are formally adopted by OPR, future development projects pursuant to the Specific Plan EIR will be required to perform an analysis of traffic impacts utilizing the standards adopted at the time of analysis. Therefore, future analyses (depending on timing of adoption of the new guidelines) will utilize the VMT standards pursuant to Senate Bill 743. It should be noted that the Specific Plan includes numerous pedestrian and bicycle improvements, and is located adjacent to a transit station, which is consistent with reducing VMT, GHG emissions, and implementing the City's Climate Action Plan. The very nature of the plan would improve public transportation and pedestrian and bicycle travel in the immediate Plan Area.

Response UCA-10

The commenter requests that parking assessment districts be incorporated into the Specific Plan. Draft EIR Table 4.2-3 (Project Consistency with Clean Air Plan Control Measures) (p. 4.2-13) reviews project consistency with Clean Air Plan Control Measures and applicable implementation actions. The Draft EIR identifies a number of applicable implementation actions that have been incorporated into the plan, including innovative parking strategies, unbundled parking, car-sharing programs, and bike-sharing programs. Additionally, there is a Downtown Parking District currently established with the authority to use parking meter revenue for improvements in the district. The list of applicable implementation actions is a list of applicable mitigation measures and the Specific Plan includes many of these mitigation measures.

Response UCA-11

This comment contains closing material and no specific response is required.

10.3.5 Sierra Club Loma Prieta Chapter (SC), November 24, 2014

■ Comments by SC



**SIERRA
CLUB**

SC

Sierra Club Loma Prieta Chapter

Celebrating 81 Years of Protecting the Planet

3921 East Bayshore Road, Suite 204, Palo Alto, CA 94303
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TELEPHONE: (650) 390-8411 FAX: (650) 390-8497

November 24, 2014

City of South San Francisco
Economic and Community Development Department
315 Maple Avenue
South San Francisco, CA 94083

Attn: Ms. Susy Kalkin, Chief Planner, Honorable Mayor, Members of the City Council, Honorable Chair and Members of the Planning Commission, and Mr. Tony Rozzi.

RE: Sierra Club Loma Prieta Chapter's Review of the Downtown Station Area Specific Plan's Draft Environmental Impact Report (DEIR).

SC-1 The Sierra Club Loma Prieta Chapter's Sustainable Land Use Committee would like to comment on the Draft Environmental Impact Report (DEIR) for the Downtown Station Area Specific Plan (DSASP). Our comments on the DEIR include impacts within the project area as well as the surrounding environment and communities. We suggest recommendations regarding four sections of the DEIR, including: A) Air Quality, B) Greenhouse Gases, C) Land Use/Planning, and D) Transportation/Traffic.

The following comments are in respect to the potential impacts and mitigations proposed in the DEIR for the DSASP. Our comments are organized in the chronological order as written in the DEIR.

■ Thank you for considering our recommendations.

A. Air Quality

SC-2 The City of South San Francisco has done a commendable plan with density and charging for parking. We would like to suggest additional ways to improve on your efforts.

Require smart parking policies to reduce criteria pollutants:

Land uses to the west of US 101 are within the existing polluted envelope mentioned in Chapter 4 (page 4.2-1) of the environmental analysis for the DSASP. The envelope extends from El Camino Real to US 101, including pollutant blowback from the airport and Caltrain. The plan must require all developments to meet feasible reductions of criteria pollutants with required unbundled parking, parking cash-out, congestion-

Loma Prieta Chapter of the Sierra Club - 3921 East Bayshore Road #240, Palo Alto, CA 94303
650-390-8411 www.lomaprieta.sierraclub.org



1 | Page

SC-2
cont.

priced peripheral parking, and significantly reduced curbside parking. Use of peripheral parking will allow the district to increase land use diversity, intersection density, and destination density to maximize the use and safety of the pedestrian experience.

SC-3

Community Benefits District:

Revenue from parking must accrue to a Community Benefits District (CBD) to manage Transportation Demand Management (TDM) for Vehicle Miles Travelled (VMT) reduction and maintenance and operations of the CBD. Rental residents of lower income currently in the Station Area are expected to drive less and higher income residents tend to drive more. Considering this, the higher income residents attracted to the Station Area will displace these low-income residents, thus increasing the air quality impacts. The CBD should get impact fees which can offset these impacts, probably by using Land Value Capture, to ensure that functioning anti-displacement programs are in place. Using the Metropolitan Transportation Commission's (MTC) performance parameters for Transit Oriented Developments should enable requirements to prevent criteria pollutant side effects.¹ Another example of reducing criteria pollutants is the requirement of Residential Permit Parking. CBDs gain the support of groups that are negatively affected by air pollutants, therefore, reducing any opposition.

Strategies to reduce vehicle miles travelled (VMT):

Reducing VMTs reduces both greenhouse gases (GHG) as well as criteria pollutants. When we mention GHG in this section we include the criteria pollutants that impact air quality from greenhouse gas emission sources. The California Air Pollution Control Officers Association (CAPCOA) report is a good resource for assessing emission reductions from greenhouse gas mitigation measures.² The letter from the Health Department of San Mateo County to the SSF DSASP NOP also mentioned a variety of strategies that could be utilized to reduce pollutants.

SC-4

CEQA requires that you describe negative impacts, including cumulative impacts. Climate destabilization (i.e. climate change), in itself, is a negative impact that affects all communities and therefore makes it necessary to describe what would be required to avoid cumulative impacts from all projects (past, current, and future). That is to describe how the emissions could be reduced enough to achieve a science-based, climate-stabilizing set of targets.

We also suggest that the City require developers to utilize the expertise of transportation planning companies like Nelson Nygaard that have the capability and proven knowledge to develop plans, programs, procedures, and methodologies to ensure that air quality within the City and region will meet federal and state standards (reference to Table 4-2-9 of Air Quality Chapter in the DEIR).

Vehicle Miles Traveled per freeway lane-mile is strongly correlated with traffic congestion, a problem acknowledged with US101. In the context of Transit Oriented Development (TOD), increased transit

¹ Metropolitan Transportation Commission, Priority Development Area Planning Elements, http://www.mtc.ca.gov/planning/smart_growth/stations/Planning_Elements.pdf

² California Air Pollution Control Officers Association, 2010, Quantifying Greenhouse Gas Mitigation Measures, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, Chapter 6, chart 6-2, pg. 55



SC-4
cont.

utilization does not reduce congestion.³ Thus, short term strategies for air quality impact reduction should include strategies for —

- Improving the safety of pedestrian by reducing the number of congested roadways and intersections
- Increasing pedestrian priority intersections and improving the quality and quantity of recreation spaces by requiring privately-owned, public, open spaces (POPOS).
- Reducing the speed limit in the DSASP from 5-15 mph for traffic permitted pedestrian priority streets
- Include Sketch Planning as a required planning tool to allow projects under the plan to account for the benefits of bicycle and pedestrian mobility to reduce VMT and criteria pollutants.
- Providing for electric vehicles and the required infrastructure, while improving most criteria pollutants, noise, and GHG.

The California Clean Air Act and California Air Resource Board provide a number of incentives in this area including cap and trade dollars to reduce GHG and associated criteria pollutants. TDM contractors like Nelson Nygaard can design programs that meet multiple goals of the DSASP such as pedestrian safety and reduced criteria pollutants.

Congestion Pricing:

Long term strategies should include congestion pricing on US101 through SSF to reduce the large air quality impact from this source. Sending price signals is a known strategy for behavioral changes to improve the health of dense unit dwellers around the station. We recommend that SSF requests US EPA to put a carbon tax on airline travel. This tax revenue must be returned as a dividend to travelers who choose less polluting travel options like rail and reduce the number of flights impacting the air quality envelope of the DSASP (Reference to Table 4-2-6, Chapter on Air Quality, DEIR).

SC-5

Table 4.2-3 (Project Consistency with Clean Air Plan Control Measures) compares the proposed Specific Plan to the applicable Clean Air Plan Control Measures.

We recommend that the TCM E-2 (page 4.2-21) and MM 4.2-2 in the DEIR (page 4.2-15) must include the following mitigation measures to reduce motor vehicle travel:

- TCM E-2 and MM 4.2-2 must require feasible parking strategies that are enumerated by CAPCOA.⁴ The DSASP is known to have air quality problems. The solutions must be required, not encouraged to meet a reduced burden and must be paid for with impact fees in-lieu of unmet targets.

³ Thomas Reuben and 2013, Transit Utilization and Transit Congestion, http://reason.org/files/transit_utilization_traffic_congestion.pdf

⁴ California Air Pollution Control Officers Association, 2010, Quantifying Greenhouse Gas Mitigation Measures, <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>, Chapter 6, chart 6-2, pg. 55



SC-5 cont.	<ul style="list-style-type: none">• Implement unbundled parking and congestion priced parking that accumulates to the CBD.• Paid parking should be implemented in a way that everyone gets their fair share of the earnings. A report by City of San Diego’s Environmental Services discusses the concept of “Intelligent Parking,” solution that includes fair pricing of parking.⁵ Further, we also recommend charging the right price for curbside parking with parking increment financing accruing to the Community Benefit District. The document on “Cruising for Parking,” by Donald Shoup explains “cruising” as a source of congestion and pollution related to people looking for parking vacancies.⁶ In addition, we recommend that the mitigation measures include way-finding systems to eliminate people driving around looking for parking.
SC-6	<p>We recommend that mitigation measure <i>MM 4.2-2 for Impact 4.2-3</i> (page 4.2-22) include the following strategies to reduce criteria pollutants:</p> <p><u>Include monitoring and reporting:</u></p> <ul style="list-style-type: none">• The plan is 25 years. A yearly review of design elements impacts on air quality will allow the plan to be fine-tuned to achieve the mitigation targets.• Include feasible strategies to unbundle the cost of parking at work.
SC-7	<p><u>Five-minute Pedestrian Shed:</u></p> <p>We recommend that mitigation measures include a five minute pedestrian shed⁷ as a land use element. The focus in this element should be improving air quality from the land use circulation design, rather than what the TCM D-2 (page 4.2-14) proposes, which looks at funding access projects across unsafe and polluted environments. Implementing congestion pricing is another strategy to reduce criteria pollutants from the project’s lifetime emissions while enhancing pedestrian experience.</p>
SC-8	<p><u>Residential Parking Permit:</u></p> <p>Include a requirement for Residential Permit Parking (RPP) as a performance measures of the outcomes for Transit Oriented Development (TOD). RPP is currently a response to a complaint based system. By linking RPP to TOD performance proactive measures can be installed to facilitate other measures like charged parking and car share.</p>
SC-9	<p><u>Sketch Planning Tools:</u></p> <p>Include a requirement for the utilizing of sketch planning tools to allow projects under the plan to account for the benefits of bicycle and pedestrian mobility that is accommodated by the VMT reduction strategies reductions in criteria pollutants.</p>
SC-10	<p><u>Mitigation for outdoor noise:</u></p> <p>Noise in the urban environment is caused by the same fossil fuel sources that cause criteria pollutants. Noise causes the urban environment to be stressful. Including the measures above will reduce fossil fuels sources</p>

⁵ Mike Bullock and Jim Stewart, A Plan to Efficiently and Conveniently Unbundle Car Parking Costs, <http://www.sandiego.gov/environmental-services/pdf/sustainable/parkingcosts.pdf>
⁶ Cruising for Parking, <http://shoup.bol.ucla.edu/CruisingForParkingAccess.pdf>
⁷ Walkable Urban Design and Sustainable Placemaking: Frequently Asked Questions about Pedestrian Shed, http://pedshed.net/?page_id=5



SC-10
cont.

and make the urban environment tolerable. In addition, we recommend that mitigation includes a requirement for developments to insulate the habitable places from outdoor noise.

Note that the above recommendations will help the City to achieve other DSASP goals such as pedestrian safety, reduced Carbon Monoxide (CO), and Toxic Air Contaminants (TAC).

B. Greenhouse Gases

SC-11

The Greenhouse Gases section of the Draft Environmental Impact Report (DEIR) for the Downtown Station Area Specific Plan discusses the impacts and mitigation measures for greenhouse gas emissions generated through construction and operation activities. The City of South San Francisco's Climate Action Plan (CAP) includes emissions inventory for 2005 and emission reduction projections for 2020 and 2035. The CAP includes a reduction target of 15 percent below 2005 emissions by 2020 and 34 percent by 2035. The 2005 per service population emissions were 4.66 MT CO_{2e}, which would be reduced to 3.58 MT CO_{2e} by 2020 and 3.08 MT CO_{2e} by 2035.⁸ These CAP targets are included as the Operational thresholds for this analysis. The Inventory of emissions for South San Francisco states that energy use and transportation (primarily automobile usage) are the top two contributors of greenhouse gas emissions within the City.⁹ City must acknowledge greenhouse gas emissions will continue to rise if car commuters are given incentives such as free parking.

SC12

Need for annual monitoring of greenhouse gas emissions:

The Specific Plan project could result in significant impacts through construction activities such as redevelopment, new development, and construction demolition. The analysis assumes that 25 percent of the existing development is assumed to be demolished and reconstructed over the Plan's time period. Based on this assumption, it is challenging to predict accurately how much and what kind of development will take place.

Further, the Plan's DEIR does not discuss how greenhouse gas emissions reductions will be monitored or measured. Although the City states that mitigation measures will reduce the construction and operational impacts of this future development to less than significant, there will always be an element of uncertainty associated with future development. To assure that anticipated mitigation measures are effective, the DEIR should require that greenhouse gas emissions be monitored annually to record the progress in achieving the GHG reduction targets and adjustments be made if targets are not being reached.

SC-13

In addition, we recommend that the City consider hiring a Sustainability Manager, who would be responsible for driving the plan and calculating emissions reductions. This person would coordinate the efforts of the various City departments and also regional efforts with other cities and agencies.

⁸ City of South San Francisco, Economic and Community Development Department, "Chapter 4: Environmental Analysis, Section 4.4 Greenhouse Gas Emissions," South San Francisco Downtown Station Area Specific Plan EIR, October 2014, pg. 4.4-17-18.

⁹ City of South San Francisco, Economic and Community Development Department, "Chapter 4: Environmental Analysis, Section 4.4 Greenhouse Gas Emissions," South San Francisco Downtown Station Area Specific Plan EIR, October 2014, pg. 4.4-5.



SC-14 **Require use of green building materials and low impact development techniques:**
In addition to the mitigation measures for construction-related waste, we recommend that the mitigation measures *MM 4.4-6*, *MM 4.4-6-9* (page 4.4-25,26) include green building certification, use of sustainable building materials such as low GHG concrete,¹⁰ and low impact development techniques. California government recommends using green building materials. Their website explains the points to be considered while selecting products.¹¹

SC-15 **Include stormwater management practices as mitigation for sea level rise/flooding:**
The Plan's DEIR does not account for sea level rise on groundwater supply (reference page 4.11-9, Chapter on Greenhouse Gases, DEIR). Further, the DEIR does not mention the amount of impervious surface coverage within the City, which will contribute to the problem of flooding. We recommend that the DEIR must include the measure of impervious coverage within the City and include stormwater management practices such as permeable paving, bio-retention cells, and sustainable landscaping to mitigate impacts of sea level rise and flooding on water supply and quality.

SC-16 **Include parking-minimums, parking-free housing in smart parking policies:**
Operational impacts for the proposed Plan will potentially generate 3.77 MT CO₂e per service population, which will exceed the threshold of significance of 3.58 MT CO₂e per service population for 2020.¹² This is a potentially significant impact. The mitigation measure *MM 4.4-3* (page 4.4-24) includes smart parking policies. We recommend that "parking minimums," "parking cash-out," and "parking-free housing," be included as a part of smart parking policies. These strategies will further help in limiting automobile usage and resulting greenhouse gas emissions.

SC-17 **Sustainable Landscaping, rooftop gardens as alternatives to mitigate urban heat island:**
We recommend that mitigation measure *MM 4.4-7*, which addresses urban heat island issues and urban forest expansion, include and encourage strategies such as urban agriculture, rooftop vegetation (green roofs/roof gardens), and living walls (vegetation applied to a vertical surface such as walls) which can further help in reducing greenhouse gas emissions.

SC-18 **Behavioral Changes for promoting use of Transit:**
The *MM 4.4-8* (page 4.4-25) includes sharing information and educating community members about energy efficient behaviors and construction. However, it does not include any awareness programs regarding air quality impacts from transportation (specifically auto usage). We recommend that mitigation measure *MM 4.4-8* include educating communities about behavioral changes associated with driving and automobile use. This action would help in discouraging automobile usage and reducing greenhouse gas emissions.

¹⁰ National Railroad Construction and Maintenance (NRCMA), 2008, Concrete CO₂ Fact Sheet, <http://www.nrmca.org/greenconcrete/concrete%20co2%20fact%20sheet%20june%202008.pdf>

¹¹ CalRecycle, Sustainable Green Building: Green Building Materials, <http://www.calrecycle.ca.gov/greenbuilding/materials/#Resource>

¹² City of South San Francisco, Economic and Community Development Department, "Chapter 4: Environmental Analysis, Section 4.4 Greenhouse Gas Emissions," South San Francisco Downtown Station Area Specific Plan EIR, October 2014, pg. 4.4-23.



C. Land Use/ Planning

SC-19

We appreciate that the Station Area Plan focuses on redevelopment and intensification. In addition, we recommend that the DEIR include five-minute pedestrian shed as a land use element, under Guiding Principle 2 on page 4.5-8.

The focus should be a safe and clean land use design rather than TCM D-2, which looks at funding access projects across an unsafe and polluted environment. Linkages between pedestrian sheds should be through safe routes to school and transit. An overlay map showing Pedestrian Sheds should be added and speed limits in the area should be limited below 15 mph. Further, we suggest to include Transfer of Development Rights to increase intensification in the downtown while providing environmental services such as stormwater related flood reduction, water and drought resilience.

D. Transportation / Traffic

SC-20

The DEIR's methodology for measuring traffic congestion meets 2013 CEQA requirements, but is flawed in light of State law SB 743¹³ which mandates that CEQA Guidelines for Environmental Impact Reports be revised to change the way traffic impacts are studied.¹⁴ The DEIR studies traffic impacts for each intersection using Level of Service (LOS). Per SB 743, LOS will no longer be a valid approach to traffic impact studies. This is a DEIR for a 20 year or longer specific plan that will not be approved until 2015 and the Governor's Office of Planning and Research will be revising the CEQA Guidelines well in advance of the timeframe during which the Downtown Station Area Plan will be in effect. Therefore, this DEIR should be revised in anticipation that LOS will no longer be an acceptable metric and the DEIR's proposed mitigations for LOS are no longer valid.

Excerpts from Executive Summary of Senate Bill SB 743:

"On September 27, 2013, Governor Brown signed Senate Bill 743 (Steinberg, 2013). Among other things, SB 743 creates a process to change the way we analyze transportation impacts under the California Environmental Quality Act (Public Resources Code section 21000 and following) (CEQA). Currently, environmental review of transportation impacts focuses on the delay that vehicles experience at intersections and on roadway segments. That delay is often measured using a metric known as "level of service," or LOS. Mitigation for increased delay often involves increasing capacity (i.e. the width of a roadway or size of an intersection), which may increase auto use and emissions and discourage alternative forms of transportation. Under SB 743, the focus of transportation analysis will shift from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks and promotion of a mix of land uses".

"SB 743 requires the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines (Title 14 of the California Code of Regulations sections and following) to provide an alternative to level of service for evaluating transportation impacts. The alternative criteria must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." (New Public Resources Code Section 21099(b)(1).) Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

¹³ Excerpts from Executive Summary of Senate Bill SB 743

¹⁴ Excerpt from draft of changes to the CEQA Guidelines implementing SB 743



SC-20 cont.	<p><u>Excerpt from draft of changes to the CEQA Guidelines implementing SB 743. (Emphasis in bold by Sierra Club):</u></p> <p>“Subdivision (b) (1) also gives examples of projects that might have a less than significant impact with respect to vehicle miles traveled. For example, projects that locate in areas served by transit, where vehicle miles traveled is generally known to be low, may be considered to have a less than significant impact. (See, e.g., California Air Pollution Control Officers Association, “Quantifying Greenhouse Gas Mitigation Measures,” (August 2010). Further, projects that are shown to decrease vehicle miles traveled, as compared to existing conditions, may be considered to have a less than significant impact. Such projects might include, for example, the addition of a grocery store to an existing neighborhood that enables existing residents to drive shorter distances. Notably, in describing these factors, the Guidelines use the word “may” to signal that a lead agency should still consider substantial evidence indicating that a project may still have significant vehicle miles traveled impacts. For example, the addition of regional serving retail to a neighborhood may draw customers from far beyond a single neighborhood, and therefore might actually increase vehicle miles traveled overall. Similarly, a project located near transit, but that also includes a significant amount of parking might indicate that the project may still generate significant vehicle travel”.</p>
SC-21	<p>The DEIR itself points out the flaw of placing auto-centric LOS above all other modes of transportation (Refer to page 4.10-63 – 4.10.64):</p> <p>Public Transit: The DEIR studies the future traffic impact of increased transit use on transit facilities capacity, but not on how much increased transit use will reduce the overall vehicle miles traveled (VMT). The DEIR should include a realistic estimate on how much increased transit use will reduce VMT. The DEIR should include the estimated net greenhouse gas emissions (GHG) expected in the area of this Downtown Plan where walking, biking and transit use are encouraged.</p>
SC-22	<p>Pedestrian Facilities: The DEIR states enhanced pedestrian access should minimize potential conflicts with autos, but the proposed mitigations (added turn lanes) based on LOS at intersections #6, #9, #12, #14, and #15 would increase pedestrian crossing distance, thus be a negative impact. The DEIR says this conflict is unavoidable, but it is unavoidable only if the DEIR places LOS above pedestrian priority and safety. These intersections should not be changed to the detriment of pedestrian safety to accommodate LOS of auto use.</p>
SC-23	<p>Bicycle Facilities: The DEIR says that bike facilities have less than significant impact, but does not state the positive impacts. It does not acknowledge that bike facilities and designated bike routes encourage people to use bikes rather than drive which offsets VMT and GHG emissions.</p>
SC-24	<p>The current Transportation section of the DEIR should be totally redone in anticipation of the soon to be revised CEQA guidelines. We suggest the revised version should include the following:</p> <p>Traffic impacts: The DEIR should not use Level of Service (LOS) to determine traffic impacts. The DEIR traffic impact study should analyze mode share for all four mobility modes – walking, bikes, transit, and autos in order to determine the impacts these modes will have on auto vehicle miles traveled (VMT), and overall impact on environmental, health, and safety of the people who use them. It should not study the potential traffic impacts on specific intersections (LOS) which places the efficiency of auto use above all other modes. Every person who walks, bikes, or uses transit to move from place to place is one person who is not using a personal automobile. Thus VMT, traffic congestion, pollution, and GHG emissions are reduced and individual health is improved.</p>



- SC-25 **Pedestrian safety:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, the environmental, health, and safety benefits that will come from the Downtown Plan's emphasis on pedestrian convenience as a primary design criteria, with bicycles and transit next, and autos last.
- SC-26 **Street trees and landscaping:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, the benefits of street trees and landscaping for sequestration of GHG, reduction of air pollution, and shading to reduce the urban heat island effect where heat builds up from paving, buildings, and autos.
- SC-27 **Improved bus stops:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, the impacts on bus ridership based on bus stop locations and design. Bus stops in convenient locations, which include benches or seats in rain-protected shelters with nighttime illumination will attract the maximum number of riders, thus reducing GHG emissions and VMT.
- SC-28 **Free Transit Passes:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, the impacts on transit ridership when every tenant (residential and commercial) is provided with a free transit pass for the first five years or more of tenancy to encourage transit use. The more people ride mass transit, the fewer vehicles are on the roads and VMT, air pollution and GHG emissions are reduced. This helps meet BAAQMD air quality standards. This requirement is being implemented in many cities as part of their CAP in order to meet state law mandates for Air Quality goals.
- SC-29 **Bicycle master plan:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, the mode share of bicycle use and its impact on circulation and traffic within the Downtown Plan which lays out new bike lanes and routes. More people will choose to ride bikes if there are clearly designated and connected bike routes throughout the downtown, thus reducing VMT.
- SC-30 **Bike Parking:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, the impacts on bicycle use based on the number and type (secure or insecure) of bike parking spots provided for residents, public, and guest parking throughout the downtown. Every bike used, removes one person from driving their car thus reducing air pollution and GHG emissions.
- SC-31 **Bike share:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, how bike share at the Caltrain station and within the downtown can increase bike use and reduce air pollution, VMT and GHG emissions.
- SC-32 **Shuttles and car share:** The DEIR should include, as a potential mitigation for auto air pollution and GHG emissions, how public or employee shuttle stops and car-share parking can help commuters make the "last mile" connection to their place of work or home without using a car. These alternative modes of mobility reduce air pollution, VMT, and GHG emissions and can help the city meet its Climate Action Plan obligations.



SC-33 **Housing Density:** The DEIR should study, as a potential mitigation for auto air pollution and GHG emissions, how increased housing density close to transit allows workers to get to work and shopping without use of a car which reduces VMT, air pollution and GHG emissions. The more dense and diverse the uses in an area, the more people will choose to walk rather than drive.

SC-34 **Reduced Parking:** The DEIR should study the impacts if parking ratios in downtown are reduced and the monies saved used to build more retail, commercial and residential space to locate more basic services within a five minute walking distance of residents. What is the impact if the number of parking spaces per unit is reduced to one car per unit or less with the money saved by constructing less parking used to build additional housing and retail units and to support related community benefits such as child care and green space? A lower parking ratio paired with unbundled parking and easy access to transit can encourage residents to limit their car ownership to one car or less and to use alternative means of mobility in lieu of driving. This can reduce VMT, air pollution, and GHG emissions. The Sierra Club's White paper on *Recommendations for Housing Affordability, Reduced Parking Cost and Congestion* is a good reference for strategies for reducing parking.¹⁵ The impacts of each of these strategies should be studied to determine how much they might contribute to reducing VMT, air pollution and GHG emissions, thus aiding the city in meeting its CAP goals.

SC-35 **Unbundled parking:** Include an analysis of how unbundled parking in residential developments can reduce VMT, air pollution and GHG emission, and make units more affordable for those who do not drive and prefer not to own a car. Unbundled parking is a useful strategy to reduce auto use and help make housing more affordable. Unbundled parking can provide a real incentive for residents to consider alternative modes of transportation by reflecting the true cost of parking thus reducing auto traffic congestion and VMT.

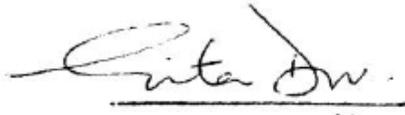
SC-36 **Congestion pricing:** Analyze how traffic congestion can be reduced if the owners of a development or the city establish a Congestion Management Association (CMA) and a congestion pricing program in the downtown to help even out parking and driving demand at different times of the day. This would decrease traffic congestion in the downtown and reduce VMT and GHG emissions.

¹⁵ Sierra Club's White Paper: *Recommendations for Housing Affordability, Reduced Parking Cost and Congestion* for further strategies for reducing parking, <http://www.lomapieta.sierraclub.org/sustain/guidelines>

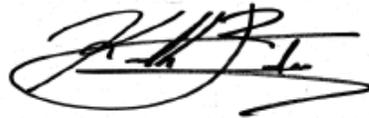


■ **Conclusion**
SC-37 We would like to commend the City for its successes in 2014 and appreciate all the work that is being done.
■ Thank You,

(Sierra Club Loma Prieta Chapter)



Gita Dev
Sustainable Land Use Committee, Chair



Kenneth Rosales
Conservation Programs Coordinator



Gladwyn D'Souza
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■ Responses to SC

Response SC-1

This comment contains introductory material and requires no specific response.

Response SC-2

This commenter states that the Plan should require smart parking policies to reduce criteria pollutants through reducing vehicle miles traveled (VMT). Specific Plan Section 5 (Circulation and Parking) contains guiding principles and policies to encourage rideshare, transit, cycling and walking trips. New and improved bicycle and pedestrian improvements are proposed throughout the area, including a new Grand Avenue Extension that would provide direct pedestrian and bicycle access to the Caltrain station. The plan implements and builds on the City's Bicycle Master Plan. The Specific Plan also includes policies to work with employers to develop shuttle connections and expand transit in the study area.

Feasible and cost-effective mitigation has been included in the Draft EIR to reduce air quality impacts. Mitigation measure MM4.2-2 includes the following:

Operational emissions and mitigation reductions will be quantified prior to issuance of the building permit to demonstrate that adequate measures have been identified to reduce project emissions. The recommended measures include, but are not limited to, any of the following:

1. Increase on-street parking fees.
2. Daily parking charge for employees.
3. Provide a parking "cash-out" incentive for employees who use alternative transportation to commute.
4. Provide subsidized or free transit passes to employees.
5. Encourage alternative compressed work schedules and telecommuting.
6. Provide a ridesharing program.

As noted in the Draft EIR, mitigation measures would not reduce the impact on air quality to less than significant. The Specific Plan already includes smart parking strategies such as payment of in-lieu fees, shared parking, parking minimums and maximums, unbundled parking, and car sharing to encourage reduction in VMT, and thus reductions in criteria air pollutants. The commenter suggests that the plan should include congestion-priced peripheral parking to maximize land use diversity and enhance pedestrian safety and convenience. The Specific Plan incorporates a "complete streets" approach that prioritizes creation of a truly multimodal transportation system. In that approach, driving is not a necessity but an option, and the mobility and parking needs of existing and future residents and employees are accommodated. Four transit strategies are planned or proposed to improve transit service through Downtown in the short, medium, and long term. As noted, the Specific Plan includes extensive bicycle and pedestrian improvements to improve safety in the area. Pedestrian improvements would include a pedestrian priority area on Grand Avenue where curb cuts would be prohibited, limiting vehicular access points on several streets, and pedestrian-only pathways. The Specific Plan identifies Strategy C-8, which provides for pedestrian priority on Tamarack, Second, Third, and Fourth Lanes. Guiding Principle 38 is included in the Specific Plan to ensure that a walkable environment and new streets are created in the Eastern Neighborhood with new development.

As noted in the Specific Plan, the provision and management of parking within a transit-oriented development area is closely tied to the success of transit and of creating a welcoming pedestrian and bicycle environment. Strategies for providing parking must complement the land use strategies and the availability of transit. With regard to congestion pricing for peripheral parking, the Specific Plan includes parking pricing strategies as outlined in Guiding Principle 4.3 and Implementing Policy P-3: “Parking restrictions, time limits and fees may be adjusted to match parking demand and to encourage parking turnover ...” Additionally, as noted elsewhere in this document, the City intends to undertake a more in-depth analysis of public parking facilities with the dual aims of right-sizing the amount and price of these resources and promoting alternative mode use.

As the Specific Plan as proposed already includes numerous parking and other strategies to reduce VMT (and criteria pollutants), it is not necessary to implement the suggested mitigation.

Response SC-3

The commenter requests that a Community Benefits District (CBD) be established to manage Transportation Demand Management (TDM) and reduce air quality impacts and suggests establishing residential permit parking. This suggestion is infeasible as mitigation and cannot be adopted at this time. While the City has an economic strategy to look at forming a Business Improvement District (BID), it does not have independent ability to impose because either a BID or CBD requires consent of a majority of property owners. As noted on Specific Plan p. 7.8, there are two primary challenges in establishing Assessment Districts, particularly for already developed areas. The first challenge is that total property taxes can only rise a certain amount before new development is disadvantaged relative to properties not subject to an assessment. The second challenge is that assessment districts require a majority vote of property owners weighted by property value to pass. In an area with numerous small properties and extensive residential development the prospect of a tax increase may be difficult to pass. In addition, the City would be required to establish a non-profit organization to manage the CBD. The Specific Plan implementation section (p. 3) identifies ongoing economic development efforts, including review of the feasibility of a Downtown BID, with revenue used for a variety of services in the Downtown. The City cannot compel establishment of an assessment district. Other potential funding sources that could be utilized to implement the policies of the Specific Plan are identified in Specific Plan Chapter 7.

The East of 101 Plan established a TIP/fee program where fees are assessed on a project basis, based on total number of trips generated by the development. Funds typically are not designated for specific improvements but rather are collected into a common improvements pool, which may be used to fund projects within the TIP, which could include TDM. All development under the Specific Plan would be required to pay fair share fees proportionate to the size of the development. The Specific Plan contains multiple strategies to reduce VMT and, therefore, air quality emissions.

Residential permit parking programs are implemented to protect existing residential neighborhoods from overflow parking impacts from adjacent development activities. As the Specific Plan area consists of high-density, mixed-use TOD that balances available street parking between commercial patrons, visitors, and residents, residential permit parking would not be applicable. However, the City may consider implementation of a residential parking permit program within areas adjacent to the study area if it is determined in the future that there is a need for such a program.

The commenter further asserts that higher-income residents attracted to the station area will displace low-income residents, increasing air quality impacts, which is speculative. These comments do not raise issues that require changes to the Draft EIR's analysis or conclusions. Refer to Response SC-2, which addresses the City's anti-displacement strategies.

Response SC-4

This comment outlines a variety of strategies for reducing VMT and criteria air pollutants/GHG emissions. The Specific Plan includes numerous strategies to reduce VMT and air quality impacts. The following outlines the strategies suggested in Comment SC-4, and applicable Specific Plan strategies:

- Improving safety of pedestrians by reducing the number of congested roadways and intersections. The Specific Plan includes Guiding Principle 31 to focus the most intensive street improvements in the Pedestrian Priority Zone to provide a welcoming and attractive pedestrian environment. Additionally, Policy C-4 supports directing regional through traffic away from Grand Avenue and local residential streets, and Guiding Principle 39 & C-19 support new truck restrictions to direct nonessential trips away from the Downtown area which would reduce congestion and improve safety.
- Increasing pedestrian priority intersections and improving the quality and quantity of recreation spaces by requiring privately owned, public, open spaces (POPOS). The Specific Plan and Zoning identify pedestrian-priority zones throughout the Plan area and also include requirements for POPOS on lots greater than 15,000 sf in the Eastern Neighborhood (see Section 20.280.007K)
- Reducing speed limits in pedestrian-priority zones by 5-15 mph. This strategy is infeasible. The speed limits within the Plan Area Pedestrian-Priority Zones are presently 25 mph on streets and 15 mph on Lanes/Alleys, consistent with California Department of Motor Vehicle guidelines, with the exception of Airport Boulevard, which is a Major Arterial. The proposed mitigation is infeasible, since the City's Municipal Code stipulates speed limits for all City streets (SSFMC Chapter 11.68), in accordance with the Vehicle Code and with the procedures outlined by the Department of Motor Vehicles.
- Include Sketch Planning as a required planning tool. Refer to Response SC-9.
- Providing for electric vehicles and related infrastructure. The City is committed to expanding the use of alternative-fuel vehicles, as outlined in the City's Climate Action Plan Measure 2.1, Actions 1-5.

In addition to the mitigation measures outlined for reducing air quality impacts, additional mitigation measures as outlined in Section 4.4 (Greenhouse Gas Emissions) include multiple strategies and requirements to reduce emissions, such as:

MM4.4-2 Support Expansion of Public and Private Transit Programs to Reduce Employee Commutes (1.2). *Employers within the study area shall subscribe to the South San Francisco TDM Ordinance such that a minimum of 25 percent of all employees are included. The South San Francisco TDM Ordinance requires that all nonresidential developments producing 100 average trips per day or more meet a 28 percent non-drive-alone peak hour requirement with fees assessed for noncompliance.*

MM4.4-3 Reduce Dependence on Autos through Smart Parking Policies (1.3). *This measure would implement Smart Parking Policies, such as shared parking, to reduce available parking by 10 percent.*

The Draft EIR analyzes all GHG impacts, which are cumulative by the very nature of GHG emissions. The commenter suggests that the City require developers to utilize the expertise of transportation planning companies such as Nelson Nygaard and further recommends short-term air quality reduction strategies. Mitigation has been included in the Draft EIR to reduce air quality and GHG impacts. If additional mitigation is deemed feasible and appropriate for subsequent individual projects, it would be considered in the project-level environmental analysis that would be required. Also refer to Response SC-2.

Response SC-5

This comment requests inclusion of congestion pricing on US-101 through the City as well as unbundled and congestion-priced parking to reduce air quality impacts, with increased revenue accruing to a CBD. The Specific Plan contains provisions for unbundled and congestion-priced parking. However, as noted in Response SC-3 above, the City cannot ensure implementation of a CBD. As noted in the Draft EIR, impacts to air quality would remain significant despite implementation of mitigation.

Specific strategies to reduce VMT would be at the discretion of the City. Any plan, program, procedures, or methodologies to ensure air quality meets all standards may be developed after the plan is adopted. It should be noted that any individual non-residential projects in the study area expected to generate in excess of 100 average daily trips would be required to prepare a TDM program. All of these suggested measures are currently outlined in the City's TDM program requirements. Refer to Response SC-2.

Response SC-6

The commenter requests that the City provide a yearly review of design element impacts on air quality over the life of the Specific Plan.

As noted on Draft EIR p. 4.2-21:

The BAAQMD recommends mitigation measures for reducing operational emissions of criteria air pollutant in its CEQA Guidelines. The recommended mitigation measures focus on land use strategies to reduce vehicle trips, including a mix of land uses, providing retail uses near residences, transit service, and bicycle and pedestrian facilities. These measures have already been incorporated into the plan and are accounted for in the traffic analysis for the project. The BAAQMD also recommends measures that cannot be implemented at a program level, but are available as options for future individual development projects to reduce particulate matter emissions. Mitigation measure MM4.2-2 recommends implementation of these recommendations as necessary to reduce individual project emissions to below a significant level.

The suggested mitigation would not be required to reduce impacts to GHG emissions to less than significant, which is already accomplished by the inclusion of mitigation measures MM4.4-1 through MM4.4-10, as identified in the Draft EIR. The Draft EIR concludes that air quality impacts with respect to air quality violations would potentially remain significant because it cannot be demonstrated with certainty at this time that all projects would implement the measures listed in MM4.2-2 to reduce impacts to a less-than-significant level. However, as demonstrated in Table 4.2-8 (Operational Daily Maximum Emissions—Proposed Project), plan-level emissions are not projected to result in a significant net increase in any pollutant except PM₁₀. Additionally, as demonstrated in Table 4.2-9 (Mitigated Maximum Daily Operational Emissions) implementation of BAAQMD recommended mitigation measures would

reduce projected plan-level worst-case operational emissions of PM₁₀ to a less-than-significant level. The Specific Plan, as noted, contains strategies for unbundled parking related to residential development and shared parking opportunities for mixed-use developments, recognizing that the off-peak use of residents can be balanced with the predominant daytime use by commercial employees. The existing TDM requirements for commercial development provide for parking cash-out as an additional measure and TDM programs would be required for all projects generating more than 100 average daily trips, as applicable. During the design review process when individual project plans are submitted, the City considers consistency with General Plan policies regarding air quality; in addition, the mitigation monitoring program for the proposed Plan will require monitoring of future projects under the Specific Plan to assure compliance with air quality regulations and the City's Climate Action Plan (CAP). If additional project reduction measures are deemed feasible and appropriate for subsequent individual projects, they would be considered in the project-level environmental analysis that would be required. Therefore, because individual projects would be required to demonstrate compliance with air quality regulations and standard BAAQMD mitigation measures would reasonably reduce plan-wide emissions to below emissions significance criteria, implementation of the proposed Plan would not result in a cumulatively considerable net increase of any criteria pollutant. Therefore, yearly review of impacts would not be required.

Response SC-7

The commenter suggests that a 5-minute pedestrian shed be included as a land use element. The intention of TOD is to provide living, working, and shopping opportunities close to transit. One element of the Specific Plan's vision is to create walkable neighborhoods, in essence providing uses that are within a five-minute walking distance of residences, businesses, and transit. Therefore, the suggested mitigation would be redundant, since it is inherent in the Specific Plan. However, as noted in the Draft EIR (p. 4.2-22), criteria pollutants may not be reduced to less than significant for individual projects. The Specific Plan contains BAAQMD-recommended mitigation measures to reduce criteria pollutants.

Response SC-8

The commenter requests that a requirement for residential permit parking be included as a performance measure of the outcomes for TOD. Refer to Response SC-3 with regard to residential permit parking.

Response SC-9

The commenter requests that a requirement to use sketch planning tools be included to allow projects to account for the benefit of bicycle and pedestrian mobility that is accommodated by the VMT-reduction strategies. Bicycle and pedestrian trips accommodated by the VMT-reduction strategies assumed as part of the Specific Plan were already accounted for through the use of the mixed use trip generation methodology known as Plan+ (Table 4.10-9 [Specific Plan Trip Generation]). Rural and growing areas are most likely to apply sketch-planning software tools or methodologies as opposed to complex travel demand models.⁴ In addition, estimates provided by sketch planning tools are generalized and dependent on the data aggregation and other assumptions that were made. The City currently utilizes the C/CAG (San Mateo County) Travel Demand Model to calculate VMT. Therefore, a requirement to use sketch

⁴ <http://www.mdt.mt.gov/research/toolkit/m1/tatools/tat/sp.shtml>.

planning tools would not be feasible or appropriate in the context of TOD in a dense urban area. During the design review process when individual project plans are submitted, the City considers consistency with General Plan policies regarding air quality; in addition, the mitigation monitoring program for the proposed Plan will require monitoring of future projects under the Specific Plan to assure compliance with then-current air quality regulations and consistency with the City's CAP.

Response SC-10

The commenter requests that mitigation be included to require future developments to insulate habitable places from outdoor noise. All development in the City would be required to comply with the Municipal Code and the General Plan Noise element with regard to noise requirements. Feasible and cost-effective mitigation has been included in the Draft EIR to reduce noise impacts (specifically MM4.6-1 through MM4.6-3). Further mitigation is not required to reduce noise impacts to less than significant. If further reduction measures are deemed feasible and appropriate for subsequent individual projects, they would be considered in the project-level environmental analysis that would be required. The remainder of the comment concerning the City's goals for pedestrian safety, reduced carbon monoxide, and reduced toxic air contaminants is noted and will be forwarded to the decision-makers for their consideration. Also refer to Response SC-2.

Response SC-11

The commenter states that the City must acknowledge that GHG emissions will continue to rise if car commuters are given incentives such as free parking. This is speculative and uncertain, as multiple other factors also contribute to increased (or reduced) GHG emissions. The comment does not raise issues that require changes to the analysis or conclusions in the Draft EIR. Also, refer to Response SC-2.

Response SC-12

It is acknowledged that it is difficult to predict accurately how much and what kind of development will take place pursuant to the Specific Plan. The City has made a reasonable determination of the anticipated level and type of development that could occur under the Specific Plan based on community input and economic analyses. GHG emissions would be monitored pursuant to the CAP, which provides strategies and policies to continue to reduce GHG emissions. Also, refer to Response SC-2.

Response SC-13

The commenter requests that the City hire a Sustainability Manager responsible for driving the Climate Action Plan and calculating emissions reductions. This comment does not raise an issue that requires changes to the Draft EIR's analysis or conclusions. As noted, GHG emissions would be monitored pursuant to the Climate Action Plan. Feasible and cost-effective mitigation has been included in the Draft EIR to reduce GHG impacts to less than significant, although air quality impacts would remain significant despite implementation of mitigation. Refer to Response SC-2. No funding currently exists to hire a Sustainability Manager, and this mitigation would be infeasible at this time but could be considered at a future date should funding sources become available. However, the comment will be forwarded to the decision-makers for their consideration prior to taking action on the proposed Plan.

Response SC-14

The commenter requests that mitigation measures MM4.4-6 through MM4.4-9 include requirements for green building certification, use of sustainable building materials, and low impact development techniques. Mitigation measure MM4.4-6 requires that all new development within the study area shall, at a minimum, comply with the CALGreen Tier 1 standards and exceed 2013 Title 24 by a minimum of 10 percent. Mitigation measure MM4.4-9 requires that the development within the study area shall include the use of solar panels such that a minimum of 35,000 square feet of nonresidential land use roof space is converted to solar panels, 205 residential units are equipped with solar hot water heaters, and the electricity of an additional 75 dwelling units is offset by solar panel arrays associated with the new residential development. Therefore, mitigation measures already provide for utilization of green building techniques. Further mitigation as suggested by the commenter would not be required to reduce the impact related to GHG emissions to less than significant.

Response SC-15

The commenter requests that the Draft EIR should include stormwater management practices as mitigation for sea level rise/flooding and further states that the amount of impervious surface in the City has not been included in the Draft EIR. The impact of the proposed plan on flooding was addressed in the Initial Study prepared for the project, and found that impacts related to flooding would be less than significant. The City's Standard Development Conditions address both stormwater conveyance and quality. "Minor" lines are required to accommodate a 10-year design storm with initial time of concentration of 5 minutes with open channel flow conditions so that they are not surcharged. "Major" trunk lines are required to accommodate a 25-year design storm under the same design conditions. Public lines are required to be within public streets or within drainage easements a minimum of 10 feet wide for a single pipe or 15 feet wide for two pipes. They are required to be a minimum of 12 inches in diameter and Class III or better reinforced gasketed concrete pipe, or HDPE (minimum SDR 26) pipe. Per FEMA requirements, new development must be constructed with building finished floors at least 1 foot above the reference Federal Emergency Management Agency (FEMA) base flood elevation (which is adjusted periodically for anticipated sea level rise). As noted in the Specific Plan (Chapter 5), there are not currently any regions of concern for flooding impacts within the plan area. The Five-Year Capital Improvement Program (CIP) for the City, adopted in June 2013, indicates that the City anticipates funding a Storm Drain Master Plan project in coming years. The project will evaluate the entire city storm drain system, identify any deficiencies, define a range of possible solutions, and propose financing and recommendations for future CIP plans. The suggested mitigation would not be required to reduce impacts related to sea level rise.

Response SC-16

The commenter requests that the plan include parking minimums and parking-free housing in smart parking policies. The Specific Plan contains multiple smart parking strategies to reduce VMT and GHG emissions, including parking minimums and maximums, and mitigation measures are identified in the Draft EIR to reduce the impacts related to GHG emissions to less than significant. Further mitigation as suggested by the commenter would not be required to reduce the impact related to GHG emissions to less than significant. Refer to Response SC-2.

Response SC-17

The commenter requests that sustainable landscaping and rooftop gardens should be included in mitigation measure MM4.4-7 to address urban heat island impacts. Mitigation measure MM4.4-7 requires that, at a minimum, 322,000 square feet of all new nonresidential development and 75 new residential units shall address heat island effect issues by using high albedo surfaces and technologies identified in the voluntary CALGreen Standards. This is in addition to the requirements of all new development to plant trees in accordance with South San Francisco Municipal Code Chapters 13.30 and 20.300 with placement used to maximize building shading. The Specific Plan contains strategies to encourage green building techniques and landscape and streetscape requirements. The suggested mitigation would not be required to reduce impacts related to urban heat island effects to less than significant, which is already accomplished by the inclusion of the identified mitigation measures in the Draft EIR.

Response SC-18

The commenter suggests that mitigation measure MM4.4-8 should include awareness programs regarding air quality impacts from transportation (specifically auto usage) and recommends including educating communities about behavioral changes associated with driving and automobile use. The list of potential areas of education identified in mitigation measure MM4.4-8 is not all-inclusive. The suggested mitigation would not be required to reduce impacts to GHG emissions to less than significant, which is already accomplished by the inclusion of the identified mitigation measures in the Draft EIR. Opportunities for additional educational awareness that are deemed feasible and appropriate for subsequent individual projects would be considered in the project-level environmental analysis that would be required.

Response SC-19

The commenter recommends that a five-minute pedestrian shed be included as a land use element. The commenter also requests that Transfer of Development Rights be included to promote intensification of land uses in the Downtown while providing environmental services such as flood reduction, water and drought resilience. Transfer of development rights is included in individual project development agreements rather than on a program level. The Specific Plan provides for intensification of land use in the study area along with concomitant changes in the Downtown core to balance development. The impact on land use was determined in the Draft EIR to be less than significant, and consistent with General Plan policies. The suggested mitigation would not be required to reduce impacts on land use to less than significant. With regard to the 5-minute pedestrian shed, refer to Response SC-7.

Response SC-20

The commenter states that the transportation analysis in the Draft EIR is not consistent with Senate Bill (SB) 743, which mandates that the CEQA Guidelines for environmental analysis of transportation impacts be revised. Utilization of intersection LOS to determine traffic impacts is the current policy adopted by the City of South San Francisco's General Plan, and City-adopted thresholds were used to determine significant impacts. The CEQA Guidelines currently and will continue to give lead agencies discretion in choosing which metrics to study and what the thresholds of significance are (Public Resources Code [PRC] Section 21099(b)(4)). OPR Guidelines relating to SB 743 are still in draft form

and have not yet been adopted, and the timing for adoption is still uncertain. Also refer to Response UCA-9.

Response SC-21

The commenter states that the Draft EIR failed to disclose how much increased transit use would reduce the overall VMT. The EIR accounted for an increase in transit trips and the associated decrease in auto trips by using the mixed use trip generation methodology known as Plan+ (Table 4.10-9 [Specific Plan Trip Generation]). The EIR was written in compliance with current CEQA guidelines, which do not require reporting VMT reductions for increased transit usage. Refer also to Response UCA-9. The Draft EIR includes GHG emissions estimates as a result of implementation of the Specific Plan, including increased transit usage. Refer to Section 4.4 (Greenhouse Gas Emissions), Table 4.4-4 (Specific Plan Emissions), p. 4.4-24.

Response SC-22

As noted in the Draft EIR, implementation of mitigation at identified intersections (#6, #9, #12, #14, and #15) would potentially increase crossing distance for pedestrians, create greater pedestrian exposure, and increase delay to pedestrians. Pedestrian and bicycle impacts would be considered significant if the proposed project would alter existing facilities with a negative impact on pedestrians or is inconsistent with adopted plans and programs. While implementation of the identified mitigation would increase delay for pedestrians, it would not result in a significant safety hazard. The additional crossing time was identified as a significant and unavoidable impact in the Draft EIR simply on the basis of pedestrian convenience and would require adoption of overriding considerations.

Response SC-23

This comment does not raise any issues that require changes to the Draft EIR's analysis or conclusions. The bicycle and pedestrian improvements that are part of the plan would provide benefit in providing alternatives modes of transportation to the auto as noted by the commenter.

Response SC-24

Intersection LOS is the current policy adopted by the City of South San Francisco's General Plan, and City-adopted thresholds were used to determine significant impacts. CEQA Guidelines currently and will continue to give lead agencies discretion in choosing which metrics to study and what the thresholds of significance are (PRC Section 21099(b)(4)). OPR Guidelines for SB 743 are still in draft form and have not yet been adopted, and the timing for adoption is still uncertain. It is not required by CEQA to completely redo the traffic impact analysis utilizing different methodology. As future projects are developed pursuant to the Specific Plan, individual project traffic assessments would utilize the thresholds of significance in effect at that time.

Further, the EIR considers the reduction in auto mode share to account for increased pedestrian/bicycle/transit mode shares by using the mixed-use trip generation methodology known as Plan+ (Table 4.10-9 [Specific Plan Trip Generation]). Potential impacts to pedestrians, bicycles, transit, and autos are studied in the EIR (Section 4.10.4 [Impacts and Mitigation Measures]).

Response SC-25

The commenter states that the Draft EIR should include as a potential mitigation measure for auto pollution and GHG emissions the environmental health and safety benefits that would result from the Specific Plan's emphasis on pedestrian convenience as a design element first, followed by bicycle, and autos last. The Specific Plan includes pedestrian and bicycle improvements that would be expected to reduce VMT and GHG emissions, as noted above, which would result in overall health and safety benefits to the community, in addition to the fact that the Specific Plan focuses on TOD. These benefits would not be considered mitigation, but project features beneficial to the community.

Response SC-26

With regard to street trees and landscaping, refer to Response SC-17.

Response SC-27

The comment notes that transit improvements such as bus stop design and amenities should be included as potential mitigations to attract the maximum number of riders, thus reducing GHG emissions and VMT. Transit improvements are included in the Specific Plan, and include bus stops where they have been determined appropriate, which would be constructed according to all applicable City design standards. Bus stops have been and will continue to be designed to provide the maximum benefit to the community. Bus stop design and amenities may improve the overall experience for transit riders but will likely not impact overall transit mode share or auto mode share and, therefore, is not an effective mitigation measure to be considered at this time. Impact on bus ridership as a result of bus stop location and design is not a CEQA issue. However, the comment is noted and will be forwarded to the decision-makers.

Response SC-28

The commenter states that the Draft EIR should include the provision of free transit passes for every tenant for the first 5 years of tenancy to encourage transit use. Transit subsidies are identified as a potential measure in the City's TDM Plan and are also identified in the draft Specific Plan zoning as an incentive for a density or floor-area ratio bonus. This mitigation would be burdensome for the City to enforce and is, therefore, rejected as infeasible, as the City has not adopted fee resolution by which to impose such a development fee.

Response SC-29

The comment states that the Draft EIR should include the mode share of bicycle use and its impact on circulation and traffic. The Specific Plan implements and builds on the City's Bicycle Master Plan. Bicycle mode share for the Specific Plan area was accounted for and included in auto trip reductions as part of the mixed-use trip generation methodology known as Plan+ (Table 4.10-9 [Specific Plan Trip Generation]). The improvements identified in the Specific Plan are expected to result in increased bicycle use and reduction in VMT. As part of the Downtown Specific Plan review, the City is considering a new policy on wayfinding to more effectively manage travel on Grand Avenue and adjacent streets to provide visitors with parking information for short-term and long-term parking and connections to transit. Wayfinding signage could also provide information for pedestrian and bicycle routes and networks with

attention paid to major destinations, and include mileage or estimated times to encourage these modes of travel. These improvements would be implemented on a project-by-project basis as well as through public facilities projects. Although these improvements are expected to improve the bicycle experience, additional improvements are not anticipated to substantially affect bicycle mode share or auto mode share and, therefore, are not considered to be an effective mitigation measure at this time.

Response SC-30

The comment notes that bicycle parking improvements should be included as potential mitigations. Refer to Response SC-29. The Plan includes substantial improvements to bicycle circulation and bicycle parking in the study area. As noted on Specific Plan p. 4.14, proposed off-street bicycle parking requirements are outlined in the zoning code. Secure long-term bicycle parking facilities are recommended for multifamily housing (without private garage/storage units), civic, educational, and commercial land uses, with requirements based on number of bedrooms, number of employees or total square feet of development. Short-term bicycle parking spaces are recommended for civic, educational and commercial land uses, with requirements based on total square feet or expected number of visitors (such as theater visitors or number of students). Short-term bicycle parking may be clustered to serve multiple businesses as availability of space allows. For example, on-street bicycle corals may provide enough parking for several businesses on one block. Since specific bicycle parking locations cannot be identified until new development projects are proposed and approved, bicycle parking would be included on a project-by-project basis as provided for in the Specific Plan. Although these improvements are expected to improve the bicycle experience, additional improvements are not anticipated to substantially affect bicycle mode share or auto mode share and, therefore, are not considered to be an effective mitigation measure at this time.

Response SC-31

The comment notes that bike share should be included as a potential mitigation. As noted on Specific Plan p. 4.14, as MTC expands its bicycle share program, the City of South San Francisco should work with MTC and local employers (particularly east of US-101) to determine if a local bike share system could be viable. A bike share system in South San Francisco would require a substantial planning effort to analyze the cost-benefit relationship, the expected ridership demand, potential pod locations, maintenance considerations, potential route connectivity, public outreach, and potential coordination with Bay Area Bike Share. A bike share system is considered infeasible at this time due to a lack of planning and lack of funding. A bike share system exclusively for South San Francisco may be considered at a future date if substantial interest and funding exist, but no funding currently exists for such a program.

Response SC-32

The comment notes that transit improvements such as employee shuttles or car share should be included as potential mitigations. The Specific Plan includes several policies in support of transit enhancements, shuttles and car share programs, as noted on Specific Plan p. 4.13. Policy P-9 states that the City should encourage car sharing programs by working directly with a car share company to bring the program into

the Specific Plan area. Preferential on-street parking for car share vehicles, and coordination with major employers such as Genentech, may help support this program.

Concurrent with the Downtown Station Area planning effort, the City of South San Francisco is undertaking a number of separate economic development efforts, many of which will assist in the implementation of the Specific Plan. In addition to the Downtown Station Area planning effort, planned and ongoing economic development efforts in South San Francisco include investigating the feasibility of implementing a free shuttle service between the businesses and hotels east of US-101 and Downtown.

Specific employee shuttle and car-share programs would be considered as new development projects are proposed. The suggested mitigation is not necessary to keep GHG emissions below significance thresholds and to meet CAP obligations. The suggested project-specific improvements are, therefore, not considered to be an effective plan-level mitigation measure at this time.

Response SC-33

The commenter states that the Draft EIR should study as a potential mitigation for air pollution and GHG emissions how increased housing density close to transit allows workers to get to work and shopping without use of a car. The proposed plan is a transit-oriented plan with increased housing density adjacent to the Caltrain station. The Specific Plan already provides for the mitigation suggested by the commenter and encourages mixed-use development such that residents can access work and shopping without driving. The Draft EIR studies the TOD plan. Therefore, it would not be necessary to implement the suggested mitigation.

Response SC-34

A comprehensive downtown parking study could be beneficial to the City in many ways; however, it is outside of the scope of this EIR and not necessary for the CEQA analysis of the Specific Plan. A Parking Study could be completed separately to complement this Specific Plan. The City has recently applied for a grant from C/CAG to complete a comprehensive study of public parking resources within the plan area. If successful in obtaining funding, the City will undertake the study. This comment also recommends that the City reduce parking ratios in the Downtown and, therefore, fund additional housing, commercial uses, or public benefits. There is no established nexus between reduced parking ratios and monies saved for other development. The Specific Plan and related zoning provide for reduced parking as well as parking maximums and other transit-supportive strategies.

Response SC-35

The Specific Plan includes provisions for unbundled parking and congestion pricing and has been accounted for in the Draft EIR analysis. Refer to Response SC-3. No funding currently exists for a study to compare the effects of unbundled parking on VMT, air pollution, GHG emissions, and housing affordability. Therefore, additional analysis associated with unbundled parking is considered infeasible at this time. Also refer to Response SC-2.

Response SC-36

The Specific Plan includes provisions for unbundled parking and congestion pricing, as well as parking time limits, restrictions, and fee adjustments, and these elements have been considered in the Draft EIR analysis. It should be noted that the City already has a Parking Place Commission that is tasked with this type of management. An analysis of the impact of congestion pricing on traffic congestion, VMT, air pollution, and GHG emissions could be beneficial to the City; however, it is outside the scope of this EIR and not necessary for the CEQA analysis of the Specific Plan. No funding currently exists for a study to compare the effects of congestion pricing on traffic congestion, VMT, air pollution, and GHG emissions. Therefore, additional analysis associated with congestion pricing is considered infeasible at this time. Refer to Response SC-3.

Response SC-37

This comment contains closing material and requires no specific response.

10.3.6 Comments by County of San Mateo Health System (SMCH), Undated

■ Comments by SMCH



COUNTY OF SAN MATEO
HEALTH SYSTEM



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City of South San Francisco, Planning Division
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Re: Comment letter for City of South San Francisco's Draft Environmental Impact Assessment Report (DEIR) for the South San Francisco Downtown Station Area Specific Plan

Dear Ms. Kalkin,

■ We appreciate the opportunity to comment on the City of South San Francisco's Draft Environmental Impact Report (DEIR) for the South San Francisco Downtown Station Area Specific Plan.

SMCH-1

■ The San Mateo County Health System recognizes that while we focus on treating the flood of chronic diseases, we must also change the environments in which people live to prevent them from getting sick in the first place. Our program works collaboratively with agencies, individuals, communities and organizations across the County to implement strategies to reduce and prevent obesity and chronic diseases by creating healthy places that make the healthy choice, the easy choice. To make this a reality, people must live in safe, affordable, walkable, bikeable, transit-rich communities.

SMCH-2

■ The Downtown Station Area Specific plan takes strong steps in this direction, with strategies such as dense, mixed-use, transit-oriented development, and enhanced bicycle and pedestrian connectivity. These important steps could be strengthened by addressing the following issues in the Recreation and Population/Housing Chapters of the DEIR and the Downtown Station Area Specific Plan:

■ **Parks and Recreation**

SMCH-3

■ The substantial increases in population and employment¹ proposed by the plan pose potentially significantly impacts through the increased use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated. The City must address these impacts as "potentially significant impacts" rather than "less than significant" as currently categorized in the DEIR and should incorporate mitigation measures to address these 'potentially significant impacts'. The City should also include specific provisions within the Downtown Station Area Specific Plan to meet the General Plan standards for new park development.

¹ The downtown area is expected to add up to 4,248 new residents and provide an estimated 2,400 new jobs.



Project Impacts

The Recreation Section of the DEIR fails to correctly evaluate the consistency of the proposed plan and the City's General Plan. The General Plan identifies a standard of 3 acres of new *Community Parks* (which include sports facilities, courts, swimming pools, recreational building, etc.) or *Neighborhood Parks* (which are designed for unorganized and unsupervised recreation activities and include play equipment, open turf areas and picnic tables)² parks per 1,000 new residents and .5 acres per 1,000 new employees. The DEIR and Plan do not provide adequate Community and Neighborhood park space to meet this standard. Specifically:

1. The DEIR incorrectly interprets General Plan standards, conflating total open space with Community and Neighborhood park space.

- a. There are only 1.2 acres of Community and Neighborhood parkland per 1,000 people within the city, and nearly none (.22 acres) within the Downtown Station Area Specific Plan study area.
- b. To meet the General Plan Standards, and provide for the physical activity and recreational needs of up to 4,248 new residents and 2,400 new employees, the City would need to make significant additions in community and neighborhood park space.
- c. The plan does not identify any new Community and Neighborhood parks to serve families and children. Instead it suggests several paved plazas, pedestrian-friendly green streets, private open space and potentially a linear park. While these types of facilities can help activate public spaces, encourage physical activity, and cultivate community cohesion, they serve different needs and do not meet the General Plan standards for Community and Neighborhood parks, as defined on pages 183 and 184 of the General Plan.
- d. Without new Community and Neighborhood parks, the additional residents and employees added by the plan are likely to cause increased use of the .22 acres of existing Neighborhood and Community parks, such that substantial physical deterioration of these facilities would occur or be accelerated.

Poor and limited quantity of parkland and recreational facilities will cause adverse impacts on the health of the current and future residents living in the Downtown Station Area Specific Plan Area. Limited physical activity opportunities will worsen the health outcomes for a community that is already suffering from high rates of obesity, diabetes and cardiovascular diseases and low fitness levels among children. The City should include specific provisions to meet the City's standards for community and neighborhood parks and recreational facilities and address these policies in the DEIR.

Population/Housing

The changes proposed in the Downtown Station Area Specific Plan pose potentially significant impacts through displacement of a substantial number of people living within the study area (Section 4.7 of the DEIR). The City must address these as potentially significant impacts rather than less-than-significant impacts, as they are currently categorized in the DEIR. In addition, the city should:

- Ensure consistency between the DEIR and the Downtown Station Area Specific Plan
- Include specific policy provisions or mitigation strategies to:
 - Protect tenants from displacement in non-deed restricted housing through Rent Stabilization and Just Cause Evictions policies
 - Preserve and support production of affordable units i.e. No Net Loss Policy for Affordable Housing, Right to Return policy for displaced residents, Housing Impact Fees, Land banking, Affordable Housing Overlay, etc. *(A more robust list can be provided upon request)*
- Monitor and track indicators of residents' vulnerabilities and current patterns of displacement. *(A list of indicators and data sources can be provided upon request)*

² South San Francisco General Plan: Parks, Recreation and Open Space Element, Page 183-185

SMCH-4

SMCH-5

SMCH-5 cont.

- Consider and include an effective small business retention strategy in the final plan and address in the DEIR. *(A list of strategies can be provided upon request)*

Project Impacts

SMCH-6

The Population/Housing Section of the DEIR that analyzes the potential displacement of people or housing does not correctly evaluate the high displacement risk faced by existing residents from implementation of this plan. Specifically the Downtown Station Area Specific Plan and the DEIR are deficient in the following ways:

1. The DEIR's conclusions that the plan does not induce potentially significant displacement impacts are inconsistent with both the Downtown Station Area Specific Plan's and the Affordable Housing and Anti-Displacement Strategy's own findings.
 - a. The Downtown Station Area Specific Plan notes that the type of physical changes to the environment proposed by the plan (detailed on pages 7.2 through 7.3 and 7.5 through 7.7 of the draft Downtown Station Area Plan) are associated "with an increase in property values", "an upward pressure on rents and "increasing economic pressures on small businesses" as the area becomes more desirable". This "creates the potential for both direct and indirect displacement of existing residents" (Page 7.4).
 - b. The South San Francisco Downtown Station Area Specific Plan's *Affordable Housing and Anti-Displacement Strategy* also states that the risk of displacement of existing residents tends to be high in areas where a large number of households live in rental housing that is not deed-restricted.
 - i. 79% of households in the downtown are renters.
 - ii. There are only two small deed-restricted residential rental properties in the Plan Area with a total of 26 affordable units.
1. The DEIR fails to consider the displacement risk within the Station Area due to increasing housing prices and rental costs in the future which can make existing and future units unaffordable for low-income households.
 - The South San Francisco Downtown Station Area Specific Plan's *Affordable Housing and Anti-Displacement Strategy* found that: a) the plan area is already facing significant affordability and overcrowding related issues, b) there is significant risk of rent increases for non-deed restricted units, and c) decreased affordability of home sale prices, if housing demand increases in the plan area.
 - Market-rate rents already exceed the affordability threshold by \$800 for households earning 50% of area median income (AMI).
 - Only 2% of single family homes and 14% of condominiums are affordable to households earning 50 % of AMI—or nearly 45% of the plan area population.
 - 58% of lower-income plan area renter households and 54% of lower-income plan area owner households paid more than 30% of household income on housing costs.
2. The housing affordability preservation strategies listed in the DEIR fall short of protecting against or preventing displacement of existing residents. The DEIR findings that the proposed Downtown Station Area Specific Plan would not displace substantial numbers of people are erroneous.
 - The DEIR states that the inclusion of policies and strategies to "implement housing policy provisions to protect tenants and rental housing, and to promote a stable and diverse resident community" will help minimize the displacement of existing tenants through the loss of affordable housing. These include, a) preservation strategies like inventory and monitoring of affordable housing units and outreach to provide adequate relocation resources, and b) density bonuses for affordable housing to accommodate any residents displaced and higher density developments to support affordable units lost in the redevelopment area.

SMCH-7

SMCH-7 cont.

Yet, policies considered to be most effective in protecting existing residents from involuntary displacement and preserving housing affordability are absent from the plan. These include:

- Policies to protect tenants from displacement in non-deed restricted housing through Rent Stabilization and Just Cause Evictions policies
- Policies to support preservation and production of affordable units, i.e. No Net Loss Policy for Affordable Housing, Right to Return policy for displaced residents, Housing Impact Fees, Land banking, etc.

SMCH-8

3. The DEIR and the plan do not incorporate or address mechanisms to mitigate the displacement of small businesses

- While the Affordable Housing and Displacement Strategy suggests several mechanisms to mitigate the displacement of small businesses—such as a commercial corridor revitalization strategy, business improvement district, or main street preservation program—these mechanisms are not in fact anti-displacement strategies without clear retention policies, and are not fleshed out in the draft plan or the DEIR. We encourage the City to include an effective small business retention program or set of strategies in the final plan and the DEIR.

SMCH-9

As investment in downtown South San Francisco makes the area more desirable, the displacement of long-term residents from their communities can become a critical issue. Involuntary displacement can disrupt social support systems and childhood learning, create stress and contribute to poor health outcomes for residents. Therefore, creating healthy places requires us to address and mitigate the potential for displacement and implement strategies to support development without displacement. These strategies include **protection** of existing residents, **preservation** of housing at all affordability levels and **production** of new housing units at a diversity of affordability levels. We continue to encourage your open process for **participation** of community members and leaders in identifying challenges and solutions related to displacement potential.

SMCH-10

Thank you again for the opportunity to comment on the City of South San Francisco’s Downtown Station Area Specific Plan DEIR and Downtown Station Area Specific Plan. We’d like to foster a strong relationship with the City and support you in your efforts to a build healthy and equitable community. We would welcome the opportunity to provide more detail or support. We have mapping, research and data expertise, as well as policy development and implementation related to building healthy, equitable communities. We have a number of team members that are trained planners, some of which have worked as local planners for years. We can also offer communication support, as issues of displacement in particular can be difficult to communicate.

Please contact Jasneet Sharma, Senior Community Health Planner at jsharma@smcgov.org or 650.573.2208 for questions or additional information.

Sincerely,



Sara T. Mayer
Director of Public Health, Policy and Planning

■ Responses to SMCH

Response SMCH-1

This comment contains introductory information and no specific response is required.

Response SMCH-2

This comment contains introductory information and opinion and no specific response is required.

Response SMCH-3

The Draft EIR correctly identifies the impacts on recreation from development under the Specific Plan. Refer to Response SMCH-4.

Response SMCH-4

It should be noted that inconsistency with one or more policies in the General Plan does not constitute a significant impact by itself. It is possible for projects to be generally consistent with the General Plan but inconsistent with a specific policy. As the Study Area is essentially built out, the opportunities for development of additional parks is limited. The General Plan itself recognizes this limitation: “While new parkland should generally conform to size and service area standards outlined in Table 5.1-2, because opportunities for new parkland are extremely limited, size and service area adherence is not required.” South San Francisco General Plan, Chapter 5, p. 186.

As noted in the Draft EIR (pp. 4.9-8 to 4.9-9), in general, it is expected that existing facilities serving the study area would satisfy most if not all of the park and open space needs generated by the Specific Plan. More specifically, Orange Memorial Park and Centennial Way, along with 218 total acres of parks and open space, averaging 3.4 acres per 1,000 residents, provides a wide range of regional facilities available for the residents of the City. In addition to Orange Memorial Park and Centennial Way, there are a wide variety of City, County, educational, and private recreational facilities within the City, as detailed in Table 4.9-1 (Existing Park Acreage). As the commenter notes, the City would have to make significant additions in community and neighborhood park space to be consistent with General Plan park standards. In addition, the proposed plan identifies pedestrian and bikeway improvements which offer opportunities for recreation. Further, the Draft EIR (p. 4.9-9) expects future developers will be required to provide new parks and open space or pay in-lieu fees to meet the needs generated by new development.

The increased use of neighborhood and regional parks and recreational facilities due to development under the proposed plan would not be substantial, as the estimated population increase of 4,248 at Specific Plan build-out represents only 6.25 percent of total City population and 0.6 percent of San Mateo County population. In addition, according to the employment growth forecast presented in Table 4.7-5 (Current and Future Employment: City of South San Francisco and the ABAG Region, 2005–2025), the number of workers in South San Francisco is projected to grow by 11,300 employees between 2005 and 2025, representing an average annual increase of 1.34 percent, or about 565 workers per year. In comparison, employment in the ABAG region is projected to grow by 1,009,500 workers between 2005 and 2025, with an estimated average annual increase of 1.5 percent or about 50,475

workers per year. The General Plan proposes several new parks to meet the needs of new residents and employees, as well as linear parks along old railroad spurs and above the underground BART tracks, such as Centennial Way Trail, which was completed in May 2009. While some of these proposals recognize direction established in the City's PROS Master Plan, others are located to maximize opportunities resulting from change in redevelopment. These direct and indirect population increases would not be considered substantial enough to cause substantial deterioration in park and recreational facilities.

Response SMCH-5

The identification of the impact on population/housing as set forth in the Draft EIR is correctly less than significant. Refer to Response C2 and SMCH-6 regarding anti-displacement.

Response SMCH-6

Refer to Response C2. As noted in Draft EIR Section 4.7 (Population/Housing), most of the development in the study area is expected to occur on vacant or underutilized parcels in commercial areas and at the opportunity sites identified in the Specific Plan, with little or no redevelopment occurring on parcels occupied by residential units. However, there remains the possibility, although unlikely, that in the process of implementing the Specific Plan, demolition of existing buildings and displacement of residents may be necessary as a part of redevelopment under the Specific Plan. The Specific Plan also includes an Affordable Housing and Anti-Displacement Strategy intended to ensure provision of adequate affordable housing in the study area. The Affordable Housing and Anti-Displacement Strategy includes Preservation, Funding, and Land Use, Zoning, and Regulatory Strategies in addition to a 20 to 25 percent density bonus for affordable and senior housing, which would encourage residential development that could accommodate any residents displaced by redevelopment in the study area. Furthermore, the City is supportive of efforts to track changes in rental housing stock and affordability on a regional or local basis and suggests the following guiding principle:

Support regional and local efforts to examine displacement of affordable housing and lower-income households and consider programs to address identified housing needs.

Implementation of the Specific Plan would not displace significant numbers of residents or residential units necessitating construction of replacement housing elsewhere. Most new development would occur on commercial or vacant sites. Additionally, the Specific Plan would accommodate higher density residential development so that could support any affordable housing units lost through redevelopment in the study area. With the following anti-displacement policies, the City believes the proposed measures are adequate to address this concern. Therefore, the proposed Specific Plan would not displace substantial numbers of people or existing housing units necessitating the construction of replacement housing elsewhere. This impact would be less than significant, and no mitigation is required.

Response SMCH-7

Refer to Response SMCH-6.

Response SMCH-8

The City appreciates the comment. However, the issue of small business retention is not relevant to an analysis of the physical effects on the environment as a result of the Specific Plan. CEQA does not

require an analysis of socioeconomic effects of a proposed project, only an analysis of the actual physical effects on the environment (refer to CEQA Guidelines Section 15064(e)).

Response SMCH-9

Refer to Response UCA-4.

Response SMCH-10

This comment contains closing information and requires no specific response.

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CHAPTER 11 **Mitigation Monitoring and Reporting Program**

11.1 INTRODUCTION

The Final Environmental Impact Report for the South San Francisco Downtown Station Area Specific Plan Project (State Clearinghouse No. 2013102001 identified mitigation measures to reduce the adverse effects of the proposed project in the areas of air quality, biological resources, cultural resources, greenhouse gas emissions, hazards and hazardous materials, noise, public services, recreation, and transportation/traffic.

The California Environmental Quality Act (CEQA) requires that agencies adopting environmental impact reports ascertain that feasible mitigation measures are implemented, subsequent to project approval. Specifically, the lead or responsible agency must adopt a reporting or monitoring program for mitigation measures incorporated into a project or imposed as conditions of approval. The program must be designed to ensure compliance during applicable project timing, e.g. design, construction, or operation (Public Resources Code Section 21081.6).

The Mitigation Monitoring and Reporting Program (MMRP) will be used by City of South San Francisco staff responsible for ensuring compliance with mitigation measures associated with the proposed Plan. Monitoring will consist of review of appropriate documentation, such as plans or reports prepared by the party responsible for implementation or by field observation of the mitigation measure during implementation.

11.2 MITIGATION MONITORING AND REPORTING PROGRAM MATRIX

Table 11-1 (Mitigation Monitoring and Reporting Program Matrix) identifies the mitigation measures by resource area. The table also provides the specific mitigation monitoring requirements, including implementation documentation, monitoring activity, timing and responsible monitoring party. Verification of compliance with each measure is to be indicated by signature of the mitigation monitor, together with date of verification.

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
AIR QUALITY				
<p>MM4.2-1 Construction emissions for all future development under the Specific Plan shall be quantified prior to the start of construction. For projects where construction emissions are anticipated to exceed the most recent City-adopted thresholds, in addition to the BAAQMD Basic Construction Mitigation Measures, construction activities shall implement the BAAQMD Additional Construction Mitigation Measures to reduce construction emissions of criteria air pollutants to below significance criteria. Mitigation reductions shall be quantified prior to the start of construction to demonstrate that adequate measures have been identified to reduce project emissions. The Additional Construction Mitigation Measures include the following:</p> <ol style="list-style-type: none"> 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. Wind breaks 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. 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 1 percent. 9. Minimizing the idling time of diesel powered construction equipment to two 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 NO_x reduction and 45 percent PM reduction compared to the most recent California ARB 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 	Verification of construction plan	Prior to issuance of grading permit	Developer	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
<p>products, add-on devices such as particulate filters, and/or other options as such become available.</p> <p>11. Use low-ROG coatings beyond the local requirements (i.e., Regulation 8, Rule 3: Architectural Coatings).</p> <p>12. All construction equipment, diesel trucks, and generators shall be equipped with Best Available Control Technology for emission reductions of NO_x and PM.</p> <p>13. All contractors shall use equipment that meets California ARB's most recent certification standard for off-road heavy-duty diesel engines.</p>				
<p>MM4.2-2 Prior to issuance of a building permit for future development projects under the Specific Plan, the applicant shall demonstrate implementation of recommended BAAQMD operational mitigation measures as necessary to reduce operational emissions of criteria air pollutants to below significance criteria. Operational emissions and mitigation reductions will be quantified prior to issuance of the building permit to demonstrate that adequate measures have been identified to reduce project emissions. The recommended measures include, but are not limited to, any of the following:</p> <ol style="list-style-type: none"> 1. Increase on-street parking fees. 2. Daily parking charge for employees. 3. Provide a parking "cash-out" incentive for employees who use alternative transportation to commute. 4. Provide subsidized or free transit passes to employees. 5. Encourage alternative compressed work schedules and telecommuting. 6. Provide a ridesharing program. 	Verification of construction plan	Prior to issuance of grading permit	Developer	Department of Economic and Community Development
<p>MM4.2-3 <i>Siting Sensitive Receptors near Potential TAC Source.</i> A Health Risk Assessment (HRA) shall be prepared by a qualified air quality professional for development of a project that would introduce new sensitive receptors in the study area within the siting distance for any use listed in ARB Air Quality and Land Use Handbook Table 1-1 (reproduced here as Table 4.2-11 [Recommendations on Siting New Sensitive Land Uses]). Sensitive receptors include day care centers, schools, retirement homes, hospitals, medical patients in residential homes, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Such a project shall not be considered for approval until an HRA has been completed and approved by the City. The methodology for the HRA shall follow the Office of Environmental Health Hazard Assessment and BAAQMD guidelines for the preparation of HRAs. If a potentially significant health risk is identified, the HRA shall identify appropriate measures to reduce the potential health risk to below a significant level or the sensitive receptor shall be sited in another location.</p>	Preparation and approval of Health Risk Assessment	Prior to issuance of grading permit	Developer	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix					
<i>Mitigation Measure</i>		<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
Table 4.2-11 Recommendations on Siting New Sensitive Land Uses					
<i>Source Category</i>	<i>Advisory Recommendations</i>				
Freeways and High-Traffic Roads	Avoid siting new sensitive land uses within 500 feet of a freeway, urban roads with 100,000 vehicles/day, or rural roads with 50,000 vehicles/day.				
Distribution Centers	Avoid siting new sensitive land uses within 1,000 feet of a distribution center (that accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units (TRUs) per day, or where TRU unit operations exceed 300 hours per week) Take into account the configuration of existing distribution centers and avoid locating residences and other new sensitive land uses near entry and exit points.				
Rail Yards	Avoid siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yard. Within 1 mile of a rail yard, consider possible siting limitations and mitigation approaches.				
Ports	Avoid siting new sensitive land uses immediately downwind of ports in the most heavily impacted zones. Consult local air districts or the ARB on the status of pending analyses of health risks.				
Refineries	Avoid siting new sensitive land uses immediately downwind of petroleum refineries. Consult local air districts or the ARB on the status of pending analyses of health risks.				
Chrome Platers	Avoid siting new sensitive land uses within 1,000 feet of a chrome plater.				
Dry Cleaners Using Perchloroethylene	Avoid siting new sensitive land uses within 300 feet of any dry cleaning operation. For operations with two or more machines provide 500 feet. For operations with three or more machines consult with the local air district. Do not site new sensitive land uses in the same building with perchloroethylene dry cleaning operations.				

Table 11-1 Mitigation Monitoring and Reporting Program Matrix					
Mitigation Measure		Action Required	Mitigation Timing	Responsible Party	Monitoring Agency or Party
Gasoline Dispensing Facilities	Avoid siting new sensitive land uses within 300 feet of a large gas station (defined as a facility with a throughput of 3.6 million gallons per year or greater). A 50-foot separation is recommended for typical gas dispensing facilities.				
<p>SOURCE: California Air Resources Board, <i>Air Quality and Land Use Handbook: A Community Health Perspective</i> (April 2005).</p> <p>These recommendations are advisory. Land use agencies have to balance other considerations, including housing and transportation needs, economic development priorities, and other quality of life issues.</p> <p>Recommendations are based primarily on data showing that the air pollution exposures addressed here (i.e., localized) can be reduced as much as 80% with the recommended separation.</p> <p>The relative risk for these categories varies greatly. To determine the actual risk near a particular facility, a site-specific analysis would be required. Risk from diesel PM will decrease over time as cleaner technology phases in.</p> <p>These recommendations are designed to fill a gap where information about existing facilities may not be readily available and are not designed to substitute for more specific information if it exists. The recommended distances take into account other factors in addition to the available health risk data.</p> <p>Site-specific project design improvements may help reduce air pollution exposures and should also be considered when siting new sensitive land uses.</p> <p>This table does not imply that mixed residential and commercial development in general is incompatible. Rather it focuses on known problems like dry cleaners using perchloroethylene that can be addressed with reasonable preventative actions.</p>					

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
<p>MM4.2-4 <i>Siting of New Toxic Air Contaminant Sources Near Sensitive Receptors.</i> Prior to approval of any project that includes potential sources of significant TAC emissions that is not subject to a BAAQMD permit, that is proposed in a close proximity to a sensitive receptor, a Health Risk Assessment (HRA) shall be prepared by a qualified air quality professional. The land uses listed in ARB Air Quality and Land Use Handbook Table 1-1 (reproduced above as Table 4.2-11 [Recommendations on Siting New Sensitive Land Uses]), shall be considered potentially significant sources of TAC emissions. Such a proposed project will be considered in close proximity to a sensitive receptor if it would be located within the siting distance outline for the use in Table 1-1 of the ARB Air Quality and Land Use Handbook. Sensitive receptors include day care centers, schools, retirement homes, hospitals, medical patients in residential homes, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Such a project shall not be considered for approval until an HRA has been completed and approved by the City. The methodology for the HRA shall follow the Office of Environmental Health Hazard Assessment and BAAQMD guidelines for the preparation of HRAs. If a potentially significant health risk is identified, the HRA shall identify appropriate measures to reduce the potential health risk to below a significant level, or the proposed facility shall be sited in another location.</p>	Preparation and approval of Health Risk Assessment	Prior to issuance of first building permit	Developer	Department of Economic and Community Development
<p>MM4.2-5 Prior to issuance of a certificate of occupancy for new industrial land uses identified in the BAAQMD CEQA Guidelines or ARB Air Quality and Land Use Handbook as a typical source of odors, the applicant shall demonstrate implementation of best management practices to minimize odors. Best management practices vary by industrial type. In all cases, exhaust vents should be located as far from sensitive receptors as possible. Best management practices recommended by the BAAQMD in the CEQA Guidelines shall be implemented as applicable, and may include the following:</p> <ul style="list-style-type: none"> ■ Vapor Recovery Systems ■ Injection of masking odorants into process streams ■ Thermal oxidation ■ Carbon absorption ■ Scrubbers ■ Catalytic oxidation 	Verification of implementation of best management practices to control odors	Prior to issuance of certificate of occupancy	Developer	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
CULTURAL RESOURCES				
<p>MM4.3-1 Prior to development activities that would demolish or otherwise physically affect buildings or structures 45 years old or older, the project applicant shall retain a cultural resource professional who meets the Secretary of the Interior’s Professional Qualifications Standards for Architectural History to determine if the project would cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. The investigation shall include, as determined appropriate by the cultural resource professional and the City of South San Francisco, the appropriate archival research, including, if necessary, an updated records search of the Northwest Information Center (NWIC) of the California Historical Resources Information System and a pedestrian survey of the proposed development area to determine if any significant historic-period resources would be adversely affected by the proposed development. The results of the investigation shall be documented in a technical report or memorandum that identifies and evaluates any historical resources within the development area and includes recommendations and methods for eliminating or reducing impacts on historical resources. The technical report or memorandum shall be submitted to the City of South San Francisco for approval. As determined necessary by the City, environmental documentation (e.g., CEQA documentation) prepared for future development within the project site shall reference or incorporate the findings and recommendations of the technical report or memorandum. The project applicant shall be responsible for implementing methods for eliminating or reducing impacts on historical resources identified in the technical report or memorandum.</p>	Historic resource evaluation and report	Plan check	Developer	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
<p>MM4.3-2 Prior to any earth-disturbing activities (e.g., excavation, trenching, grading) that could encounter previously undisturbed soils, the project applicant shall retain a City approved archaeologist to determine if the project could result in a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5. The results of the cultural resources investigation shall be documented in a technical report or memorandum that identifies and evaluates any archaeological resources within the development area and includes recommendations and methods for avoiding impacts on archaeological resources or reducing impacts to a less-than-significant level. The technical report or memorandum shall be submitted to the City of South San Francisco for approval. The project applicant shall be responsible for implementing methods for avoiding or reducing impacts on archaeological resources identified in the technical report or memorandum. Projects under the Specific Plan that would not encounter previously undisturbed soils and would therefore not be required to retain an archaeologist shall demonstrate non-disturbance to the City through the appropriate construction plans or geotechnical studies prior to any earth-disturbing activities. Projects that would include any earth disturbance (disturbed or undisturbed soils) shall comply with mitigation measure MM4.3-3.</p>	<p>Archaeological resource evaluation and report</p>	<p>Prior to issuance of first building permit</p>	<p>Developer</p>	<p>Department of Economic and Community Development</p>
<p>MM4.3-3 If evidence of an archaeological site or other suspected historical resource as defined by CEQA Guidelines Section 15064.5, are discovered during any project-related earth-disturbing activities (including projects that would not encounter undisturbed soils), all earth-disturbing activity within 100 feet of the find shall be halted and the City of South San Francisco shall be notified. The project applicant shall retain a City-approved archaeologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through methods determined adequate by the archaeologist as approved by the City.</p>	<p>Cessation of construction activities and archaeological investigation</p>	<p>Ongoing during construction</p>	<p>Developer/contractor</p>	<p>Department of Economic and Community Development</p>
<p>MM4.3-4 Prior to start of construction, all construction personnel involved in ground-disturbing activities and the supervision of such activities will undergo worker environmental awareness training. The archaeological resources training components will be presented by a City-approved cultural resources consultant. The training will describe the types of archaeological resources that may be found in the proposed study area and how to recognize such resources; the protocols to be followed if archaeological resources are found, including communication protocols; and the laws relevant to the protection of archaeological resources and the associated penalties for breaking these laws. Additionally, prior to construction, City-approved archaeological resources consultants will meet with the applicant's grading and excavation contractors to provide comments and suggestions concerning monitoring plans and to discuss excavation and grading plans.</p>	<p>Verification of worker environmental awareness training</p>	<p>Prior to commencement of construction activities</p>	<p>Developer/contractor</p>	<p>Department of Economic and Community Development</p>

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
<p>MM4.3-5 Prior to any earth-disturbing activities (e.g., excavation, trenching, grading) that could encounter undisturbed soils, the project applicant shall retain a professional paleontologist to determine if the project could directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. The results of the investigation shall be documented in a technical report or memorandum that identifies the paleontological sensitivity of the development area and includes recommendations and methods for avoiding or reducing impacts to a less-than-significant level for paleontological resources or unique geologic features. The technical report or memorandum shall be submitted to the City for approval. The project applicant shall be responsible for implementing methods for avoiding or reducing impacts on paleontological resources or unique geologic features identified in the technical report or memorandum. Projects that would not encounter undisturbed soils and would therefore not be required to retain a paleontologist shall demonstrate non-disturbance to the City through the appropriate construction plans or geotechnical studies prior to any earth-disturbing activities. Projects that would include any earth disturbance (disturbed or undisturbed soils) shall comply with mitigation measure MM4.3-6.</p>	<p>Paleontological investigation and report</p>	<p>Prior to issuance of first building permit</p>	<p>Developer</p>	<p>Department of Economic and Community Development</p>
<p>MM4.3-6 Should paleontological resources (i.e., fossil remains) or unique geologic features be identified at a particular site during project construction, construction shall cease within 100 feet of the find and the City of South San Francisco shall be notified. The project applicant shall retain a City approved paleontologist to assess the significance of the find. Impacts to any significant resources shall be mitigated to a less-than-significant level through methods determined adequate by the paleontologist, and as approved by the City.</p> <p>In considering any suggested mitigation proposed by the consulting paleontologist, the City of South San Francisco staff shall determine whether avoidance is necessary and feasible in light of factors such as the nature of the find, project design, costs, applicable regulations, policies and land use assumptions, and other considerations. If avoidance is unnecessary or infeasible, other appropriate measures (e.g., monitoring and/or data recovery) shall be instituted.</p>	<p>Cessation of construction and paleontological investigation</p>	<p>Ongoing during construction</p>	<p>Developer/contractor</p>	<p>Department of Economic and Community Development</p>

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
GREENHOUSE GAS EMISSIONS				
<p>MM4.4-1 All construction projects shall incorporate, to the greatest extent feasible, the most recent Best Management Practices for Greenhouse Gas Emissions as indicated by the BAAQMD.⁵ Best Management Practices to reduce GHG emissions during construction may include, but are not limited to:</p> <ul style="list-style-type: none"> ■ Use of alternative-fueled (e.g., biodiesel, electric) construction vehicles/equipment of at least 15 percent of the fleet ■ Using local building materials of at least 10 percent ■ Recycle at least 50 percent of construction waste or demolition materials 	Verification of GHG best management practices	Prior to issuance of first building permit	Developer	Department of Economic and Community Development
<p>MM4.4-2 <i>Support Expansion of Public and Private Transit Programs to Reduce Employee Commutes (1.2).</i> Employers within the study area shall subscribe to the South San Francisco TDM Ordinance such that a minimum of 25 percent of all employees are included. The South San Francisco TDM Ordinance requires that all nonresidential developments producing 100 average trips per day or more meet a 28 percent non-drive-alone peak hour requirement with fees assessed for noncompliance.</p>	Verification of compliance with TDM ordinance	Prior to issuance of certificate of occupancy	Developer	Department of Economic and Community Development
<p>MM4.4-3 <i>Reduce Dependence on Autos through Smart Parking Policies (1.3).</i> This measure would implement Smart Parking Policies, such as shared parking, to reduce available parking by 10 percent.</p>	Implementation of Smart Parking Policies	Plan check	Developer	Department of Economic and Community Development
<p>MM4.4-4 <i>Expand the Use of Alternative-Fuel Vehicles (2.1).</i> Nonresidential and residential land uses can encourage the use of alternative-fueled vehicles by providing charging stations. In support of this measure, development within the study area shall ensure that a minimum of 60 electric vehicle chargers are installed within nonresidential land uses and within the residential units electric charging capabilities are available for a minimum of 200 vehicles.</p>	Verification of inclusion of charging stations	Plan check	Developer	Department of Economic and Community Development
<p>MM4.4-5 <i>Reduce Emissions from Off-Road Vehicles and Equipment (2.2).</i> In support of this measure, development within the study area shall ensure that a minimum of 25 percent of all lawnmowers and leaf blowers acquired/used within the study area would be electric. This requires that there be sufficient electrical outlets outside of all residential and nonresidential units to encourage the use of non-gas-fueled lawn maintenance equipment.</p>	Verification of electrical plans	Plan check	Developer	Department of Economic and Community Development

⁵ Above BMPs are subject to change over time. Bay Area Air Quality Management District will post updates to this list at www.baaqmd.gov.

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
MM4.4-6 <i>Maximize Energy Efficiency in the Built Environment through Standards and the Plan Review Process (3.1).</i> All new development within the study area shall, at a minimum, comply with the CALGreen Tier 1 standards and exceed 2013 Title 24 by a minimum of 10 percent.	Verification of compliance	Plan check	Developer	Department of Economic and Community Development
MM4.4-7 <i>Address Heat Island Issues and Expand the Urban Forest (3.4).</i> At a minimum, 322,000 square feet of all new nonresidential development and 75 new residential units shall address heat island effect issues by using high albedo surfaces and technologies identified in the voluntary CALGreen Standards. This is in addition to the requirements of all new development to plant trees in accordance with Zoning Code Chapter 13.30 with placement used to maximize building shading.	Verification of compliance	Plan check	Developer	Department of Economic and Community Development
MM4.4-8 <i>Promote Energy Information Sharing and Educate the Community about Energy-Efficient Behaviors and Construction (3.5).</i> Develop as part of the Specific Plan an educational information packet that will be distributed to residential and nonresidential land owners. These information packets shall detail potential behavioral changes that can be instituted to save energy, such as unplugging appliances, air-drying clothes, and daylighting strategies.	Verification of compliance	Prior to issuance of certificate of occupancy	Developer	Department of Economic and Community Development
MM4.4-9 <i>Energy Reduction (4.1).</i> In addition to complying with MM4.4-6, the development within the study area shall include the use of solar panels such that a minimum of 35,000 square feet of nonresidential land use roof space is converted to solar panels, 205 residential units are equipped with solar hot water heaters, and the electricity of an additional 75 dwelling units is offset by solar panel arrays associated with the new residential development.	Verification of compliance	Plan check	Developer	Department of Economic and Community Development
MM4.4-10 <i>Water Reduction (6.1).</i> Nonresidential and residential land uses shall reduce per capita water consumption by 40 gallons per day. Measures to be implemented to reduce water consumption may include, but are not limited to: <ul style="list-style-type: none"> ■ Limiting turf area in commercial and multi-family projects ■ Restricting hours of irrigation to between 3:00 AM and 2 hours after sunrise (suggestion to be included in the energy information saving package) ■ Installing irrigation controllers with rain sensors ■ Landscaping with native, water-efficient plants ■ Installing drip irrigation systems ■ Reducing impervious surfaces ■ Installing high-efficiency, water-saving appliances 	Verification of compliance	Plan check	Developer	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
NOISE				
MM4.6-1 HVAC Mechanical Equipment Shielding. Prior to the approval of building permits for non-residential development, the applicant shall submit a design plan for the project demonstrating that the noise level from operation of mechanical equipment will not exceed the exterior noise level limits for a designated receiving land use category as specified in Noise Ordinance Section 8.32.030. Noise control measures may include, but are not limited to, the selection of quiet equipment, equipment setbacks, silencers, and/or acoustical louvers.	Verification of compliance	Plan check	Developer	Department of Economic and Community Development
MM4.6-2 Site-Specific Acoustic Analysis—Nonresidential Development. Prior to the approval of building permits for new non-residential land uses where exterior noise level exceeds 70 dBA CNEL, an acoustical analysis shall be performed to determine appropriate noise reduction measures such that exterior noise levels shall be reduced to be below 70 dBA CNEL, unless a higher noise compatibility threshold (up to 75 dBA CNEL) has been determined appropriate by the City of South San Francisco. The analysis shall detail the measures that will be implemented to ensure exterior noise levels are compatible with the proposed use. Measures that may be implemented to ensure appropriate noise levels include, but are not limited to, setbacks to separate the proposed nonresidential structure from the adjacent roadway, or construction of noise barriers on site.	Completion and approval of acoustical analysis	Plan check	Developer	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
<p>MM4.6-3 Site-Specific Acoustic Analysis—Multifamily Residences. Prior to the approval of building permits for the following uses, an acoustical analysis shall be performed to ensure that interior noise levels due to exterior noise sources shall be below 45 dBA CNEL:</p> <ul style="list-style-type: none"> ■ Multifamily residences where exterior noise levels exceed 65 dBA CNEL or where noise contours identified in the General Plan Noise Element project a CNEL between 65 and 70 dBA ■ Multifamily residential units that are located within the same building as commercial development ■ Multifamily residential units located near a structure requiring an HVAC system ■ Building plans shall be available during design review and shall demonstrate the accurate calculation of noise attenuation for habitable rooms. For these areas, it may be necessary for the windows to be able to remain closed to ensure that interior noise levels meet the interior standard of 45 dBA CNEL. Consequently, based on the results of the interior acoustical analysis, the design for buildings in these areas may need to include a ventilation or air conditioning system to provide a habitable interior environment with the windows closed. Additionally, for new multifamily residences on properties where train horns and railroad crossing warning signals are audible, the acoustical analysis shall ensure that interior noise levels during crossing events do not exceed the Interior Noise Standards in Noise Ordinance Section 8.32.040. 	Completion and approval of acoustical analysis	Plan check	Developer	Department of Economic and Community Development
<p>MM4.6-4 Construction Vibration. For all construction activities within the study area, the construction contractor shall implement the following measures during construction:</p> <ol style="list-style-type: none"> a. The construction contractor shall provide, at least three weeks prior to the start of construction activities, written notification to all residential units and nonresidential tenants within 115 feet of the construction site informing them of the estimated start date and duration of vibration-generating construction activities. b. Stationary sources, such as temporary generators, shall be located as far from off-site receptors as possible. c. Trucks shall be prohibited from idling along streets serving the construction site. 	Verification of compliance	Prior to issuance of first building permit	Developer/contractor	Department of Economic and Community Development

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
MM4.6-5 <i>Rail Line Groundborne Vibration.</i> Implement the current FTA and Federal Railroad Administration (FRA) guidelines, where appropriate, to limit the extent of exposure that sensitive uses may have to groundborne vibration from trains. Specifically, Category 1 uses (vibration-sensitive equipment) within 300 feet from the rail line, Category 2 uses (residences and buildings where people normally sleep) within 200 feet, and Category 3 uses (institutional land uses) within 155 feet of the rail line shall require a site-specific groundborne vibration analysis conducted by a qualified groundborne vibration specialist in accordance with the current FTA and FRA guidelines prior to obtaining a building permit. Vibration control measures deemed appropriate by the site-specific groundborne vibration analysis to meet 65 VdB, 72 VdB, and 75 VdB respectively for Category 1, Category 2, and Category 3 uses, shall be implemented by the project applicant and approved by the City prior to receiving a building permit.	Completion and approval of groundborne vibration analysis	Prior to issuance of first building permit	Developer	Department of Economic and Community Development
TRANSPORTATION/TRAFFIC				
MM4.10-1 A signal timing adjustment to redistribute green time to better serve future vehicle volumes would reduce delay at the intersection, and improve operations at #1 Miller Avenue/Linden Avenue. This would cause the intersection to operate at an acceptable LOS D in the PM peak hour.	Completion of timing adjustment	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-2 Convert one westbound through lane to a second westbound left-turn lane, and retime and optimize the traffic signal at E. Grand Avenue/Gateway Boulevard.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-3 Modify the eastbound approach to include one left-turn pocket and one through-right shared lane, and retime and optimize the traffic signal at Grand Avenue/Airport Boulevard to reallocate green time.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-4 Add a southbound left-turn pocket by removing existing parking and retime and optimize the traffic signal at Baden Avenue/Linden Avenue to reallocate green time to better serve future volumes.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
MM4.10-5 Modify the westbound approach to add a left-turn pocket, modifying the approach to include three left-turn lanes, one through lane, and one right-turn lane, and optimize the traffic signal at San Mateo Avenue/Airport Boulevard to reallocate green time to better serve future volumes.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-6 Include an additional westbound through lane, add a second southbound right-turn pocket, and retime and optimize the traffic signal at South Airport Boulevard/Gateway Boulevard to reallocate green time to better serve future traffic volumes.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-7 A signal timing adjustment to redistribute green time to better serve future vehicle volumes would reduce queuing at the southbound right-turn movement. This would cause the intersection to operate at an acceptable LOS D and with acceptable queue lengths during the PM peak hour.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-8 Add a second off-ramp lane from northbound US-101 at Grand Avenue/Poletti Way to increase capacity of the off-ramp to serve future demand.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-9 Repurpose the eastbound and westbound approaches to include one left-turn pocket and one through-right shared lane, and retime and optimize the traffic signals at Miller Avenue/Linden Avenue. This lane modification would not require any additional right-of-way.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-10 A signal timing adjustment to optimize cycle length and redistribute green time to better serve future vehicle volumes would reduce delay at the intersection, and improve operations at this intersection.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-11 A signal timing adjustment to redistribute green time to better serve future vehicle volumes would reduce delay at the intersection, and improve operations at this intersection. This would cause the intersection to operate at an acceptable LOS D during the PM peak hour.				

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
MM4.10-12 Construct an additional northbound right-turn lane, southbound left-turn lane, southbound right-turn pocket, and retime and optimize the traffic signals at E. Grand Avenue/Gateway Boulevard.				
MM4.10-13 Convert the westbound approach to include one left-turn lane and one through-right shared lane.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-14 Modify the eastbound and westbound approach to each have one left-turn pocket and one through-right shared lane, and retime and optimize the traffic signals at Grand Avenue/Linden Avenue.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-15 Modify the eastbound approach to include one left-turn pocket, one through lane, and one right-turn pocket, and retime and optimize the traffic signals at Grand Avenue/Airport Boulevard. This lane modification and signal timing adjustment would reduce vehicle delay at the intersection, and improve operations at #10 Grand Avenue/Airport Boulevard.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-16 Retime and optimize the traffic signals at Baden Avenue/Linden Avenue.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-17 Construct an additional westbound left-turn lane, provide a northbound right-turn pocket, and retime and optimize the traffic signals at San Mateo Avenue/Airport Boulevard.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works
MM4.10-18 Construct an additional northbound left-turn lane, and retime and optimize the traffic signals at So. Airport Boulevard/Gateway Boulevard.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works

Table 11-1 Mitigation Monitoring and Reporting Program Matrix				
<i>Mitigation Measure</i>	<i>Action Required</i>	<i>Mitigation Timing</i>	<i>Responsible Party</i>	<i>Monitoring Agency or Party</i>
MM4.10-19 Modify the eastbound approach to include two left-turn lanes, one through-left shared lane, and one right-turn lane, and retime and optimize the traffic signal at US-101 NB/So. Airport Boulevard Off Ramp/So. Airport Boulevard to reallocate green time to better serve future volumes.	Completion of street improvements	Prior to issuance of certificate of occupancy for project triggering unacceptable delay	Developer	Department of Public Works

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