CHAPTER 5
Variants

Commented [PJ(466]: Jeanie to review noise and AQ new text in this chapter after I review the DEIR noise and AQ sections.

Commented [SY467R466]: ESA: this appears to be an internal note for EP. In any case, the AQ and noise write ups have been updated to reflect the latest analyses.

The project sponsor (Reservoir Community Partners LLC) has requested that this subsequent environmental impact report (SEIR) include an environmental analysis of variants to the Developer's Proposed Option. Variants are variations of the proposed project at the same project site, with the same objectives, background, and development controls, but with a specific variation that may or may not reduce environmental impacts. Therefore, this chapter describes and analyzes the associated environmental impacts for the following four variants to the proposed project:

- **Variant 1, Aboveground Public Parking**, would locate the 750-space public parking garage above grade on Blocks A and B, with residential units wrapped around the garage.
- **Variant 2, South Street Alignment and Aboveground Public Parking at North End of Site**, would shift South Street to the southernmost portion of the site and locate the 750-space public parking garage above grade on Block G, with residential units wrapped around the garage.
- **Variant 3, Assumes Pedestrians and Bicycles Would Not Access the Site via San Ramon Way**.
- **Variant 4, North Street Extension**, would shift the offsite north access road from Frida Kahlo Way to align with the project site's North Street.

These variants modify limited features or aspects of the project, unlike the alternatives to the project (described and analyzed in SEIR Chapter 6, Alternatives), which analyze different approaches to developing the project site to address significant impacts that would result from the project. All four variants are being considered by Reservoir Community Partners LLC for the Developer's Proposed Option, while Variant 4 is the only variant under consideration for the Additional Housing Option. Each variant would be available for selection, including potentially a combination of variants, by the project sponsor and decision makers as part of an approval action.

For some environmental topics, the impacts under a variant would be the same as those of the proposed project. However, in some cases, the impacts of the proposed project under a particular variant would differ somewhat from the impacts identified for the proposed project in SEIR Chapter 3, Environmental Setting, Impacts, and Mitigation Measures, and in SEIR Appendix B, Initial Study. Unless otherwise stated, all mitigation and improvement measures described in Chapter 3 and in the initial study that would be required to reduce impacts associated with the proposed project would also be applicable to each of the variants.

5.A Variant 1: Aboveground Public Parking

5.A.1 Description

Variant 1 would not include changes to the land use program, intensity of development, or street configuration for the Developer's Proposed Option. Under this variant, the 750-space multilevel public parking garage would be constructed above grade instead of below grade on Blocks A and B and would be wrapped by housing. As a result, some building components at Blocks A and B would be taller than the Developer's Proposed Option. However, as shown in **Figure 5-1, Variant 1 Site Plan and Height Ranges**, the maximum height (seven stories) would not change between the Developer's Proposed Option and Variant 1; rather, under this variant, it is anticipated that the entirety of Blocks A and B would be built to a height of seven stories (78 feet). As with the Developer's Proposed Option, vehicle access to the public parking garage under this variant would be from South Street (see **Figure 5-2, Variant 1 Parking Facilities Plan**).

Under Variant 1, demolition of the berm, grading, excavation, construction of site infrastructure, and vertical construction activities would have the same phases and timing as the Developer's Proposed Option. The variant would not change aspects of the Developer's Proposed Option related to demolition, site preparation, and the construction of the internal circulation, open space, or other improvements. However, the cut and fill for Variant 1 would require a net import of approximately 9,000 cubic yards of soil. The haul truck trips under Variant 1 would be approximately 15 percent of the 56,000 cubic yards for the Developer's Proposed Option. No additional construction beyond what is assumed for the Developer's Proposed Option would be required. Under this variant, the project footprint would not be altered, and no additional excavation would be necessary.~~The excavation to a depth of approximately 20 feet assumed for the below grade public parking garage for the Developer's Proposed Option would not occur under this variant. Therefore, Variant 1 would reduce the overall excavation onsite by approximately 56,000 cubic yards, as well as the associated off haul trips during construction.~~

5.A.2 Impact Analysis

Environmental Topics Not Requiring Further Analysis under Variant 1

Under this variant, the 750-space multilevel public parking garage would be constructed above grade instead of below grade on Blocks A and B and would be wrapped by housing. Although some building components at Blocks A and B would be taller than the Developer's Proposed Option, the overall site plan, mix of land uses, and intensity of development would be the same as the Developer's Proposed Option. Therefore, land use and land use planning impacts would be unchanged from those of the Sponsor's Proposed Option and would be less than significant.

Variant 1 and the Developer's Proposed Option would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space). Variant 1 would not change the number of residential units or space allocation of the retail and community facilities/childcare uses. As a result, the number of onsite residents, employees, and construction-related employees would be the same for Variant 1 and the Developer's Proposed Option, as would the conclusions

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Commented [WW(470]: Global: is there a reason we can't include portions or all of the transportation and circulation, noise, and air quality impact analysis under these headings for the variants?

Commented [SY471R470]: ESA: We could, but it might end up confusing the reader (similar to if we included portions of AQ, Noise, TR in the initial study vs. the SEIR).

regarding less-than-significant impacts associated with population and housing. Impacts on public services, utilities and service systems, and recreation, which are based largely on the increased demand associated with population and housing growth, would be the same under Variant 1 and the Developer's Proposed Option.

Figure 5-1 Variant 1 Site Plan and Height Ranges

Commented [PJ(472]: Add the word 'height' after number, e.g., "Maximum 35' height."

Commented [SY473R472]: ESA: Global figure edits made by VMW.

Figure 5-2 Variant 1 Parking Facilities Plan

This variant would have similar construction phases and timing as the Developer's Proposed Option and would require similar construction activities. Although this variant would not require excavation for a below-grade public parking garage, the entire site would still require grading and ground disturbance. Therefore, Variant 1 would not result in any meaningful difference in potential physical environmental impacts related to cultural resources, biological resources, geology and soils, hydrology and water quality, and hazards and hazardous materials because the impact analysis in SEIR Appendix B, Initial Study, considers surface and subsurface impacts across the project site, and the analysis, mitigation measures, and conclusions would be the same.

With respect to wind, Variant 1 would result in a four- to five-story change in building height, from two to three stories up to seven stories, at the western edge of Block B, facing West Street. This would be a step up in height greater than under the Developer's Proposed Option and potentially greater than under the Additional Housing Option, depending on the ultimate design of specific buildings. This exposed building wall would be 40 to 50 feet tall and would face into the prevailing westerly winds. This exposed building wall could result in somewhat greater winds at its base, and particularly at the southwest corner of the building, than would be the case under the two principal development options. However, the Blocks A and B building under this variant would not be considered to extend substantially above adjacent structures and would result in a seven-story building proximate to the existing five-story building at 1200 Ocean Avenue. Therefore, it would not be expected to result in pedestrian wind hazards, and therefore wind effects would be less than significant, as with both project options.

Concerning shadow, the increased building height under Variant 1, compared to the Developer's Proposed Option, would occur primarily at the western end of the Blocks A and B building. Because shadow would only reach Unity Plaza very late in the day in late spring and early summer when shadows are already near their maximum length, this variant would not substantially affect shadows cast on Unity Plaza. Other shadow cast under Variant 1 would be similar to that cast by the Developer's Proposed Option. Shadow effects would be less than significant, as with both project options.

Commented [PJ(474]: Revisit in ADEIR-2 after shadow discussion in initial study is updated.

Commented [SY475R474]: ESA: no changes to the shadow analysis conclusion.

All mitigation measures identified for the topics above under the Developer's Proposed Option would be applicable to this variant. Therefore, these environmental topics require no further analysis under Variant 1.

Transportation and Circulation

Demolition, excavation, site grading, and construction activities under Variant 1 would be conducted according to the same construction phases as under the Developer's Proposed Option. However, the excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under this variant. Therefore, Variant 1 would reduce the number of construction-related truck traffic compared to the Developer's Proposed Option. As discussed under Impact TR-1 for the Developer's Proposed Option, this variant would also use the same construction truck traffic routes (e.g., I-280 and Ocean Avenue and Frida Kahlo Way to access the project site). The phased impacts associated with construction-related traffic of the Developer's Proposed Option are described under Impact TR-1. Impact TR-1's impact analysis would be applicable to this variant because the amount of construction truck traffic specific to the

Commented [WE(476]: This is one of my comments from the transportation section – given that construction will be six to seven years – maybe we steer clear of temporary and just use phased?

Commented [SY477R476]: ESA: ok.

implementation of this variant would have the same ***less than significant*** conclusion. Thus, Improvement Measure I-TR-1, Construction Management Plan, p. **Error! Bookmark not defined.**, would apply to Variant 1, and construction-related impacts would be ***less than significant***.

Variant 1 would not result in substantial increases in operational VMT because it would have the same mix of land use types (i.e., residential, retail, childcare facility, community space, open space) and would not alter the development scenario for the Developer's Proposed Option. Therefore, Variant 1 would have a ***less-than-significant*** impact on VMT.

There would be no change to transit, pedestrian, bicycle, commercial or passenger loading, or emergency access effects from Variant 1 compared to the Developer's Proposed Option. Operational-related project-level and cumulative transportation and circulation impacts under Variant 1 would be substantially the same as those discussed for the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Thus, all operational-related mitigation measures and improvement measures identified for the Developer's Proposed Option would be applicable to Variant 1 (i.e., Mitigation Measure M-TR-61, Restripe Ocean Avenue/Lee Avenue to Provide Two Southbound Approach Lanes [under Impact TR-2], p. **Error! Bookmark not defined.**; Improvement Measure I-TR-2, Queue Abatement [under Impact TR-2, Impact TR-3, and Impact TR-4], p. **Error! Bookmark not defined.**; and Improvement Measure I-TR-3, Monitor Loading Activity and Implement Loading Strategies as Needed [under Impact TR-6], p. 3.B-101). Similar to the proposed project options, given the uncertainty regarding the ability of the existing Whole Foods loading demand to be accommodated and the presence of active loading dock management, and because implementation of the mitigation measure is the responsibility of the adjacent property owners and SFMTA, implementation cannot be guaranteed by the planning department. Therefore, similar to the proposed project options, secondary loading effects would be ***significant and unavoidable with mitigation***. The modifications to the parking program under this variant (i.e., above-grade parking instead of below-grade parking) would not result in any changes to the number/type of parking spaces provided or vehicular access or circulation patterns.

Based on the above, project-level and cumulative transportation and circulation impacts under Variant 1 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Implementation of the Variant 1 would not result in new or more -severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

Noise and Vibration

Demolition, excavation, site grading, and construction activities under Variant 1 would be conducted according to the same construction phases as under the Developer's Proposed Option. Therefore, this variant would result in the same amount of construction noise as the proposed project and Mitigation Measure M-NO-1, Construction Noise Control Measures, p. 3.C-32, would apply to Variant 1. Construction noise impacts to noise-sensitive receptors would be ***less-than significant and unavoidable with mitigation***.

As discussed under Impact NO-23, there would be significant noise impacts from trucks during the four-month peak construction period. However, that would be reduced to a less-than-

~~significant level with the implementation of Mitigation Measure M-NO-3, Relocate North Access RoadHaul Truck Trips Schedule, p. **Error! Bookmark not defined.**, by mov haul truck activity further away from scheduling peak activity when Archbishop Riordan High School so that incremental noise increases would be less than 5 dBA and less than significantis not is session. However,~~ the excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under this variant. Therefore, Variant 1 would reduce the number of construction-related truck trips and their associated roadside noise level increases compared to the Developer's Proposed Option. The reduction in haul trips associated with Variant 1 would be such that roadside traffic noise levels at the nearby sensitive receptors would not exceed 5 dBA over existing levels along the North Access Road. Therefore, Mitigation Measure M-NO-2~~3~~, p. 3.C-35, would not apply to Variant 1 and unlike the Developer's Proposed Option, impacts would be ***less than significant***.

Variant 1 would have the same mix of land use types (i.e., residential, retail, childcare facility, community space, open space), same trip generation, and stationary equipment and would result in the same operational noise impacts. Therefore, Mitigation Measure M-NO-~~5~~4, Stationary Equipment Noise Controls, p. 3.C-40, would apply to Variant 1. Impacts associated with stationary noise equipment would be ***less than significant with mitigation***. Based on the above, project-level and cumulative noise impacts under Variant 1 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.C, Noise). Implementation of the Variant 1 would not result in new or ~~more~~ more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

Air Quality

Demolition, excavation, site grading, and construction activities under Variant 1 would be conducted according to the same construction phases as under the Developer's Proposed Option. However, the excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under this variant. Therefore, Variant 1 would reduce the number of construction-related truck trips and their associated criteria pollutant and TAC emissions compared to the Developer's Proposed Option. As discussed under Impact AQ-2a and Impact AQ-2b, pp. 3.D-45 and 3.D-56, respectively, construction-related emissions of NOx for the Developer's Proposed Option would exceed significance thresholds in 2022 and 2024. Therefore, this would be a significant impact. The exceedances are driven by off-road construction equipment and vendor trucks. For example, in 2024, off-road construction equipment and vendor trips represent approximately 36 percent and 46 percent of total unmitigated NOx emissions, respectively, for the Developer's Proposed Option. Haul trucks only represent 15 percent of total NOx emissions in 2024 for the Developer's Proposed Option. Therefore, the reduction in haul truck emissions associated with Variant 1 are not anticipated to reduce NOx to below the thresholds of significance. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Variant 1 (i.e., Mitigation Measures M-AQ-2a, Construction Emissions Minimization, p. 3.D-49; M-AQ-2b, Low-VOC Architectural Coatings, p. 3.D-50; M-AQ-2c~~f~~, Offset Construction and Operational Emissions, p. 3.D-61; M-AQ-~~2e~~2d, Diesel Backup Generator Specifications, p. 3.D-57; M-AQ-~~2d~~2e, Promote Use of Green Consumer Products, p. 3.D-63; M-AQ-~~2e~~2f~~;~~ and Additional Mobile Source Control Measures,

Commented [PJ(478]: Global to this chapter: see sponsor's comment that this MM is infeasible.

Commented [WW(479R478]: Just a global comment in general to carry forward any comments or edits regarding analysis, significance conclusions, and mitigation/improvement measures to this section.

Commented [CS480R478]: Updated with revised Mitigation Strategy.

Commented [PJ(481]: Confirm these percentages after updating the AQ section.

ESA: they are the same.

p. 3.D-64~~; and M-AQ-2f, Offset Construction and Operational Emissions, p. 3.D-36~~). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation***.

Field Code Changed

With regard to exposure of sensitive receptors to substantial pollutant concentrations associated with project-related TAC emissions, construction-related TAC emissions would be the same as under the Developer's Proposed Option with the exception of haul truck TAC emissions. Operational TAC emissions and exposure would be identical to the Developer's Proposed Option. However, lifetime excess cancer risks are driven by off-road construction equipment, which represents over 90 percent of total construction-related lifetime excess cancer risk and average annual $PM_{2.5}$ concentrations at the MEISR locations. As discussed under Impact AQ-4, p. 3.D-81, for receptors currently located in the APEZ, the excess cancer risk impact on offsite receptors under the Developer's Proposed Option would be significant and unavoidable with mitigation. Because haul trucks represent a small percentage of total DPM emissions and associated cancer risk, the reduction in haul truck emissions associated with Variant 1 are not anticipated to reduce DPM emissions and cancer risks to below the thresholds of significance. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Variant 1 (i.e., Mitigation Measures M-AQ-2a, p. 3.D-49; M-AQ-~~2c~~2d, p. 3.D-57; and M-AQ-4, Install MERV 13 Filters at the Daycare Facility, p. 3.D-86). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation***.

Variant 1 would not result in substantial increases in operational criteria pollutant or TAC emissions because it would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space), same trip generation and a would not result in new or different operational emissions sources than those analyzed under the Developer's Proposed Option.

Based on the above, project-level and cumulative air quality impacts under Variant 1 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.D, Air Quality). Implementation of the Variant 1 would not result in new or ~~more~~ more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

5.B Variant 2: South Street Alignment and Aboveground Public Parking at North End of Site

5.B.1 Description

Variant 2 would have the same mix of land uses, square footages, and construction and operational characteristics as the Developer's Proposed Option, except the 750-space multilevel public parking garage would be constructed aboveground on Block G towards the north end of the site and would be wrapped by housing. South Street would be shifted south and occupy SFPUC's 80-foot-wide strip of land located along the southern edge of the site and south of Blocks A and B. As a result of this change in configuration, Blocks A, C, and D would have slightly different footprints. The maximum height (seven stories) would not change between the Developer's Proposed Option and Variant 2.

As with the Developer's Proposed Option, vehicle access to parking on Block G would be from North Street under Variant 2. Because of the South Street alignment under this variant, vehicle access to parking on Block A would be from the north side of South Street instead of the south side under the Developer's Proposed Option (see **Figure 5-3, Variant 2 Site Plan and Parking Facilities Plan**).

Commented [PJ(482]: Residential parking in figure adds up to 561; shouldn't it total 560 to be consistent with Figures 5-2 and 2-10?

Commented [SY483R482]: ESA: corrected

Under Variant 2, demolition of the berm, grading, excavation, construction of site infrastructure, and vertical construction activities would have the same phases and timing as the Developer's Proposed Option. The variant would not change aspects of the Developer's Proposed Option related to demolition, excavation, site preparation, and the construction of the internal circulation, open space, or other improvements. The cut-and-fill excavation to a depth of approximately 20 feet assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under this variant. However, the cut and fill for Variant 2 would require a net import of approximately 9,000 cubic yards of soil. The haul truck trips under Variant 2 would be approximately 15 percent of the 56,000 cubic yards for the Developer's Proposed Option. No additional construction beyond what is assumed for the Developer's Proposed Option would be required. Under this variant, the project footprint would not be altered, and no additional excavation would be necessary.

5.B.2 Impact Analysis

Environmental Topics Not Requiring Further Analysis under Variant 2

Variant 2 and the Developer's Proposed Option would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space). Variant 2 would not change the number of residential units or space allocation of the retail and community facilities/child-care uses. As a result, the number of onsite residents, employees, and construction-related employees would be the same for Variant 2 and the Developer's Proposed Option, as would the conclusions regarding less-than-significant impacts associated with population and housing. Impacts on public services, utilities and service systems, and recreation, which are based largely on the increased demand associated with population and housing growth, would be the same under Variant 2 and the Developer's Proposed Option.

Figure 5-3 Variant 2 Site Plan and Parking Facilities Plan

This variant would have the same construction phases and timing as the Developer's Proposed Option and would require similar construction activities. Construction related to the public parking garage would occur during Phase 2, as under the Developer's Proposed Option, except it would be at the north end of the site. Although this variant would not require excavation for a below-grade public parking garage, the entire site would still require grading and ground disturbance. Therefore, Variant 2 would not result in any meaningful difference in potential physical environmental impacts related to cultural resources, biological resources, geology and soils, hydrology and water quality, and hazards and hazardous materials because the impact analysis in SEIR Appendix B, Initial Study, considers surface and subsurface impacts across the project site and the analysis, mitigation measures, and conclusions would be the same.

Wind effects of Variant 2 would be essentially the same as those of the Developer's Proposed Option because building heights would be the same. Although the configurations of Blocks A and C, and to a lesser extent, Block D, would vary from those under the Developer's Proposed Option, these changes would result in only incremental changes in pedestrian winds. In particular, Block C would present less of its building façade directly into the prevailing westerly winds, thereby likely resulting in incrementally better pedestrian wind conditions around the base of the building. The change in Block A configuration would affect the trailing edge of the building relative to the prevailing winds, and would not substantially affect pedestrian wind conditions. As with both project options, no wind hazards would be anticipated, and wind effects would be less than significant.

Shadow on Unity Plaza would be unchanged compared to that with the Developer's Proposed Option because project shadow on the plaza would be entirely the result of the project's southerly and southeasterly building facades and corners, and these would not change under Variant 2. Other shadow cast under Variant 2 would be similar to that cast by the Developer's Proposed Option. As with both project options, shadow effects would be less than significant.

All mitigation measures identified for the topics above under the Developer's Proposed Option would be applicable to this variant. Therefore, these environmental topics require no further analysis under Variant 2.

Transportation and Circulation

Demolition, excavation, site grading, and construction activities under Variant 2 would be conducted according to the same construction phases as under the Developer's Proposed Option. Excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur. Construction-related truck trips for the import of soil would be less than the truck trips associated with the soils export for the Developer's Proposed Option. As discussed under Impact TR-1 for the Developer's Proposed Option, this variant would use the same construction truck traffic routes (e.g., I-280 and Ocean Avenue and Frida Kahlo Way to access the project site). The phased and less-than-significant impacts associated with construction-related traffic of the Developer's Proposed Option are described under Impact TR-1. Impact TR-1's analysis would be applicable to this variant because the amount of construction truck traffic specific to the implementation of this variant would have the same *less than significant* conclusion.

~~Thus, Improvement Measure I-TR-1, p. **Error! Bookmark not defined.**, would apply to Variant 2 and construction-related impacts would be ***less than significant.***~~

Variant 2 would not result in substantial increases in operational VMT because it would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space) and would not alter the development scenario for the Developer's Proposed Option. Therefore, Variant 2 would have a ***less-than-significant*** impact on VMT.

The proposed modifications to the parking program under this variant (i.e., relocating the garage from the south end of the site to the north end of the site) would not result in any changes to the number/type of parking spaces provided, and as with the Developer's Proposed Option, vehicle access to parking on Block G would be from North Street under Variant 2. The relocation of the proposed public parking garage to the north end of the site would change circulation patterns for people parking in the garage. For example, people accessing the public parking on Block G would need to walk through the project site, or along Frida Kahlo Way, to access the retail and commercial uses at the south end of the site and along Ocean Avenue.

Under Variant 2, vehicle access to parking on Block A would be from the north side of South Street. Vehicle access to parking on Block A would be located on the opposite end of the block from the proposed on-street passenger loading area near the proposed entrance to the childcare facility, thereby reducing potential for conflicts between vehicles and people conducting drop-off/pick-up. However, as shown in Figure 5-3, p. 5-10, the proposed driveway is located near the intersection of South Street and Lee Avenue, increasing potential for vehicle queues to spill back and affect operations at the nearby intersection compared to the Developer's Proposed Option. Given the conceptual site plan and street network within the project site, the proposed variant street network design would be subject to more detailed design review, and the proposed driveway should be located to provide adequate sight distance for drivers, people walking, and bicyclists while accommodating the expected vehicle queue without spilling back onto South Street or Lee Avenue.

Overall, these site access and circulation changes under Variant 2 would not change transit, pedestrian, bicycle, commercial or passenger loading, or emergency access effects. Operational-related project-level and cumulative transportation and circulation impacts under Variant 2 would be substantially the same as those discussed for the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Thus, all operational-related mitigation measures and improvement measures identified for the Developer's Proposed Option would be applicable to Variant 2 (i.e., Mitigation Measure M-TR-6~~1~~, p. 3.B-114~~; Improvement Measure I-TR-2, p. **Error! Bookmark not defined.**; and Improvement Measure I-TR-3, p. **Error! Bookmark not defined.**~~). Similar to the proposed project options, given the uncertainty regarding the ability of the existing loading demand to be accommodated and the presence of active loading dock management, and because implementation of the mitigation measure is the responsibility of the adjacent property owners and SFMTA, implementation cannot be guaranteed by the planning department. Therefore, similar to the proposed project options, secondary loading effects would be ***significant and unavoidable with mitigation*** under Variant 2. The modifications to the parking program under this variant (i.e., above-grade parking instead of below-grade parking) would not result in

any changes to the number/type of parking spaces provided or vehicular access or circulation patterns.

Based on the above, project-level and cumulative transportation and circulation impacts under Variant 2 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Implementation of Variant 2 would not result in new or more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

Noise and Vibration

Demolition, excavation, site grading, and construction activities under Variant 2 would be conducted according to the same construction phases as under the Developer's Proposed Option. Because South Street would be shifted to occupy SFPUC's 80-foot-wide right-of-way located along the southern edge of the site, construction would occur closer to the sensitive receptors located at 1100–1150 Ocean Avenue. Therefore, construction noise impacts at this receptor would be increased to the same level as those predicted to occur at sensitive receptors along Plymouth Avenue to the west of the project site. Therefore, this variant would result in the same amount of construction noise as the proposed project and Mitigation Measure M-NO-1, p. 3.C-32, would apply to Variant 1, although the number of receptors exposed to the maximum predicted noise level would be increased. Construction noise impacts to noise-sensitive receptors would be ***less than significant and unavoidable with mitigation***.

As discussed under Impact NO-3, there would be significant noise impacts from trucks during the four-month peak period that would be reduced to a less-than-significant level with the implementation of Mitigation Measure M-NO-2, Relocate North Access Road, p. 3.C-35, by scheduling peak activity when Archbishop Riordan High School is not is session. However, the excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under this variant. The construction-related truck trips associated with soil import would be substantially less than the truck trips associated with the soil export under the Developer's Proposed Option. Therefore, Variant 2 would reduce the number of construction-related truck trips and their associated roadside noise level increases compared to the Developer's Proposed Option. The reduction in haul trips associated with Variant 2 would be such that roadside traffic noise levels at the nearby sensitive receptors would not exceed 5 dBA over existing levels along the North Access Road. Therefore, Mitigation Measure M-NO-3 would not apply to Variant 2 and unlike the Developer's Proposed Option, impacts would be ***less than significant***.

Variant 2 would have the same mix of land use types (i.e., residential, retail, childcare facility, community space, open space), same trip generation, and stationary equipment and would result in the same operational noise impacts. Therefore, Mitigation Measure M-NO-4, p. 3.C-40, would apply to Variant 2. Impacts associated with stationary noise equipment would be ***less than significant with mitigation***. Based on the above, project-level and cumulative noise impacts under Variant 2 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.C, Noise). Implementation of the Variant 2 would not result in new or more severe

impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

Air Quality

Demolition, excavation, site grading, and construction activities under Variant 2 would be conducted according to the same construction phases as under the Developer's Proposed Option. However, the excavation assumed for the below-grade public parking garage for the Developer's Proposed Option would not occur under this variant. Construction-related truck trips for soil import would be less than the Developer's Proposed Option. Therefore, Variant 2 would reduce the number of construction-related truck trips and their associated criteria pollutant and TAC emissions compared to the Developer's Proposed Option. As discussed under Impact AQ-2a, p. 3.D-45, construction-related emissions of NOx for the Developer's Proposed Option would exceed significance thresholds in 2022 and 2024. Therefore, this would be a significant impact. The exceedances are driven by off-road construction equipment and vendor trucks. For example, in 2024, off-road construction equipment and vendor trips represent approximately 36 percent and 46 percent of total unmitigated NOx emissions, respectively, for the Developer's Proposed Option. Haul trucks only represent 15 percent of total NOx emissions in 2024 for the Developer's Proposed Option. Therefore, the reduction in haul truck emissions associated with Variant 2 are not anticipated to reduce NOx to below the thresholds of significance. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Variant 2 (i.e., Mitigation Measures M-AQ-2a, p. 3.D-49; M-AQ-2b, p. 3.D-50; M-AQ-2c, p. 3.D-61; M-AQ-~~2e~~2d, p. 3.D-57; M-AQ-~~2d~~2e, p. 3.D-63; and M-AQ-~~2e~~2f, p. 3.D-64~~; and M-AQ-2f, p. 3.D-36~~). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation***.

Commented [PJ(484]: Confirm percentages.

ESA: they are the same.

With regard to exposure of sensitive receptors to substantial pollutant concentrations associated with project-related TAC emissions, construction-related TAC emissions would be the same as under the Developer's Proposed Option with the exception of haul truck TAC emissions. Operational TAC emissions and exposure would be identical to the Developer's Proposed Option. However, lifetime excess cancer risks are driven by off-road construction equipment, which represents over 90 percent of total construction-related lifetime excess cancer risk and average annual $PM_{2.5}$ concentrations at the MEISR locations. As discussed under Impact AQ-4, p. 3.D-81, for receptors currently located in the APEZ, the excess cancer risk impact on offsite receptors under the Developer's Proposed Option would be significant and unavoidable with mitigation. Because haul trucks represent a small percentage of total DPM emissions and associated cancer risk, the reduction in haul truck emissions associated with Variant 2 are not anticipated to reduce DPM emissions and cancer risks to below the thresholds of significance. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Variant 2 (i.e., Mitigation Measures M-AQ-2a, p. 3.D-49; M-AQ-~~2e~~2d, p. 3.D-57; and M-AQ-4, p. 3.D-86). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation***.

Variant 2 would not result in substantial increases in operational criteria pollutant or TAC emissions because it would have the same mix of land use types (i.e., residential, retail, community

facilities/child care, open space), same trip generation and a would not result in new or different operational emissions sources than those analyzed under the Developer's Proposed Option.

Based on the above, project-level and cumulative air quality impacts under Variant 2 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.D, Air Quality). Implementation of the Variant 2 would not result in new or more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

5.C Variant 3: Assumes Pedestrians and Bicycles Would Not Access the Site via San Ramon Way

5.C.1 Description

Under Variant 3, there would be no pedestrian or bicycle facilities connecting the project site to San Ramon Way. The site plan, building footprints, building heights, and construction characteristics would be the same as the Developer's Proposed Option. No additional construction beyond what is assumed for the project would be required.

5.C.2 Impact Analysis

Environmental Topics Not Requiring Further Analysis under Variant 3

Variant 3 would not change the site plan, mix of land uses, building footprints, building heights, residential unit counts, or the space allocation of uses of the Developer's Proposed Option. The construction activities, equipment, phasing, and durations for Variant 3 would be the same as the Developer's Proposed Option. Therefore, the physical environmental effects and conclusions related to construction and operation of this variant would be substantially be the same as those identified for the Developer's Proposed Option for the following: population and housing, cultural resources, tribal cultural resources, noise, air quality, greenhouse gas (GHG) emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, and hazards and hazardous materials. All mitigation measures identified for these topics for the Developer's Proposed Option would be applicable to Variant 3.

Land Use and Land Use Planning

Similar to the Developer's Proposed Option, Variant 3 would extend a network of pedestrian and bicycle facilities through the project site except at San Ramon Way. Variant 3 could conflict with portions of Balboa Park Station Area Plan ~~O~~objective 5.1 and ~~P~~policy 5.1.1 regarding the creation of new public open spaces. Policy 5.1.1 includes design guidelines for the open space at the Balboa Reservoir site. With respect to adjacent areas, the design guidelines in ~~P~~policy 5.1.1 states: "[d]evelop clearly marked access gates, pedestrian pathways, and visual site lines aligned with the streets of adjoining neighborhoods" and "[p]ay careful attention to the design of edges between the open space and surrounding neighborhoods as well as Riordan High School. It is important to provide access into the park from the surrounding neighborhoods while respecting the privacy of adjacent homes. Trees and shrubs should be planted to provide a buffer between the houses that abut the reservoir site to the west. Entrances to the park should align with existing streets for direct pedestrian access and to extend clear views into the park from public streets."

Currently, there is no direct pedestrian or vehicular access to the project site from the south or west. Thus, the lack of access from the west under Variant 3 would be similar to existing conditions. Not including pedestrian and bicycle access at San Ramon Way could potentially conflict with ~~P~~policy 5.1.1 as this variant would not provide connectivity between the project site's open space and neighborhood to the west. However, conflicts between a proposed project and adopted plans,

policies, and regulations do not, in and of themselves, indicate a significant effect on the environment within the context of CEQA. The decision makers will consider other potential inconsistencies with the general plan (of which the area plan is a part) when deciding to approve or disapprove a proposed project. The staff reports and approval motions prepared for the decision makers as part of the entitlements approval process will include a comprehensive project analysis and findings regarding the consistency of the proposed project with applicable plans, policies, and regulations independent of the environmental review process. To the extent that physical environmental impacts may result from such inconsistencies, these impacts are analyzed in the EIR and initial study. Circulation impacts resulting from no pedestrian and bicycle access at San Ramon Way under Variant 3 are analyzed in the following "Transportation and Circulation" section.

Transportation and Circulation

Demolition, excavation, site grading, and construction activities under Variant 3 would be conducted according to the same construction phases as under the Developer's Proposed Option. Therefore, this variant would result in the same ***less than significant*** construction-related impacts~~. Improvement Measure I-TR-1, p. **Error! Bookmark not defined.**, would apply to Variant 3 and construction-related impacts would be ***less than significant***~~.

Variant 3 would not result in substantial increases in operational VMT because it would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space) and would not alter the development scenario for the Developer's Proposed Option. Therefore, Variant 3 would have a ***less-than-significant*** impact on VMT.

Pedestrian and bicycle access to the site is not currently provided via San Ramon Way. Compared to the Developer's Proposed Option, the proposed modifications to site access for people walking and biking (i.e., removing pedestrian and bicycle access at San Ramon Way) would limit access and connectivity for people walking and ~~biking~~bicycling to and from the site. Removing pedestrian and bicycle access at San Ramon Way would result in circuitous routing and longer travel distances for people to (or through) the site from the west. Variant 3 would also result in an increased number of people walking and bicycling~~iking~~ to the site along Plymouth, Brighton, or Lee avenues, which serve higher volumes of vehicle traffic. Under Variant 3, bicycle and pedestrian access and connectivity to and through the site would be limited and walking and bicycling~~iking~~ to areas west of the site would be less convenient than under the Developer's Proposed Option, but not change the existing condition.

Overall, these site access and circulation changes would not change transit, pedestrian, bicycle, commercial or passenger loading, or emergency access effects from Variant 3. Operational-related project-level and cumulative transportation and circulation impacts under Variant 3 would be substantially the same as those discussed for the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Thus, all operational-related mitigation measures and improvement measures identified for the Developer's Proposed Option would be applicable to Variant 3 (i.e., Mitigation Measure M-TR-6~~1~~, p. 3.B-73~~; Improvement Measure I-TR-2, p. **Error! Bookmark not defined.**; and Improvement Measure I-TR-3, p. **Error! Bookmark not defined.**~~). Similar to the proposed project options, given the uncertainty regarding the ability of the existing

Whole Foods loading demand to be accommodated and the presence of active loading dock management, and because implementation of the mitigation measure is the responsibility of the adjacent property owners and SFMTA, implementation cannot be guaranteed by the planning department. Therefore, similar to the proposed project options, secondary loading effects would be ***significant and unavoidable with mitigation*** under Variant 3.

Based on the above, project-level and cumulative transportation and circulation impacts under Variant 3 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Implementation of Variant 3 would not result in new or more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

5.D Variant 4: North Street Extension

5.D.1 Description

Variant 4 would be applicable to both project options. The Developer's Proposed Option and the Additional Housing Option would have the same configuration under this variant, except North Street would be extended through the east basin site and would connect to Frida Kahlo Way. Under this variant both project options would have the same mix of land uses, square footages, and construction and operational characteristics. Vehicle, bicycle, and pedestrian circulation to and from the site would not change, except instead of the access road along the north side of the east basin, the North Street Extension would provide east–west access from Frida Kahlo Way, as shown in **Figure 5-4, Variant 4 Site Plan**.

The North Street Extension would displace approximately 110 spaces at City College's surface parking lot on the east basin. The loss of the parking spaces would be offset by relocating surface parking spaces to the area currently occupied by the access road at the north end of the east basin. Under Variant 4, the existing east–west access road connecting the west basin to Frida Kahlo Way would be closed off and would require relocating the traffic signal currently at the access road/Frida Kahlo Way intersection south to the new North Street/Frida Kahlo Way intersection. Under Variant 4, the Lee Avenue/North Street intersection would be controlled by a stop sign.

The North Street Extension would include a 10.5-foot-wide vehicle travel lane in each direction, a 5-foot-wide bicycle facility, and 6.5-foot-wide sidewalks on both sides of the street. An 8-foot-wide parking lane would be provided on one or both sides of the street, providing more on-street curb spaces than the proposed project options. The North Street Extension right-of-way would be approximately 72 feet wide. The sidewalks would be buffered from vehicular traffic by a 4-foot-wide planting strip and 2-foot-wide courtesy strip. As with the proposed project options, the street network designs would be required to undergo detailed design and review to ensure that they are designed to meet city design standards. The street designs would be subject to approval by SFMTA, San Francisco Department of Public Works, and the San Francisco Fire Department, along with other city agencies, to ensure that the streets are designed consistent with city policies and design standards. The interior streets would also be regulated by SFMTA with regard to loading and parking spaces.

No additional construction beyond what is assumed for the project would be required. Under Variant 4, the project footprint for both options would not be altered, and no additional height or excavation would be necessary.

Commented [WE(485]: Comment from SFMTA (M. Hunter):
North street extension will provide more on-street curb space with the parking lane on one or both sides, this curb will be regulated

Comment from L White: ESA, please explain that in this text.

Commented [SY486R485]: ESA: done

Commented [WE(487]: Wouldn't the entire project now encompass that driveway coming out of City College under this proposal? Is the signal going to have protected left arrows for cars coming out of the City College driveway and then also for the cars coming out of the North Access Road? What is the proposed signal configuration?

Commented [SY488R487]: ESA: Based on additional follow up during 4/11 and 4/18 calls, and email correspondence between EP/SFMTA, SFMTA if ok with assuming that the signal would be relocated. Also per Kittelson, the signal design doesn't affect the analysis for the variant and these details can be addressed later.

Figure 5-4 Variant 4 Site Plan

5.D.2 Impact Analysis

Environmental Topics Not Requiring Further Analysis under Variant 4

Variant 4 would not change the site plan, mix of land uses, building footprints, building heights, residential unit counts, or the space allocation of uses of either proposed project option. The construction activities, equipment, phasing, and durations for Variant 4 would be the same as for both proposed project options. Therefore, the physical environmental effects and conclusions related to construction and operation of the of this variant would substantially be the same as those identified for both the Developer's Proposed Option and the Additional Housing Option for the following: land use and land use planning, population and housing, cultural resources, noise, air quality, GHG emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, geology and soils, hydrology and water quality, and hazards and hazardous materials. All mitigation measures identified for these topics under both proposed project options would be applicable to Variant 4.

Transportation and Circulation

Demolition, excavation, site grading, and construction activities under Variant 4 would be conducted according to the same construction phases as under the Developer's Proposed Option. As discussed under Impact TR-1 for the Developer's Proposed Option, this variant would use the same construction truck traffic routes (e.g., I-280 and Ocean Avenue and Frida Kahlo Way to access the project site). The phased ~~temporary~~ and less-than-significant impacts associated with construction-related traffic of the Developer's Proposed Option are described under Impact TR-1. Impact TR-1's ~~and that impact~~ analysis would be applicable to this variant because the amount of construction truck traffic specific to the implementation of this variant would result in the same ***less than significant*** ~~not lead to a different~~ conclusion. ~~Thus, Improvement Measure I-TR-1, p. **Error! Bookmark not defined.**, would apply to Variant 4 and construction-related impacts would be ***less than significant.***~~

Variant 4 would not result in substantial increases in operational VMT because it would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space) and would not alter the development scenario for the Developer's Proposed Option. Therefore, Variant 4 would have a ***less-than-significant*** impact on VMT.

Under Variant 4, east–west vehicle, bicycle, and pedestrian access to the site from Frida Kahlo Way would be provided by the North Street Extension. The traffic signal would be relocated from the current North Access Road and Frida Kahlo Way intersection to the new North Street Extension/Frida Kahlo Way/Cloud Circle (North) intersection. The North Street Extension would provide a direct connection between the project site and Cloud Circle and City College campus. The relocation would provide an opportunity to lengthen the northbound left-turn pocket on Frida Kahlo Way, which is currently limited by the KEEP CLEAR markings at the Frida Kahlo Way and Cloud Circle (N) intersection. Based on observations conducted during the weekday a.m. peak period at the North Access Road and Frida Kahlo Way intersection, the northbound left-turn pocket was seen to regularly exceed capacity with vehicles waiting multiple cycles to turn left into the east basin surface parking lot, and occasionally spilling back and blocking the adjacent

Commented [WE(489]: What kind of signal is going to put at this location? Right now, going toward Riordan on Frida Kahlo Way has a left turn protected arrow into the reservoir. Is there going to be protected left turn arrows for vehicles turning left onto Frida Kahlo from both the reservoir and City College? Right now, coming out of City College, there is just a stop sign?

Commented [JF490R489]: Kittelson: The signal will be relocated and this four-legged intersection will be signal controlled.

Based on additional follow up during 4/11 and 4/18 calls, and email correspondence between EP/SFMTA, SFMTA is ok with assuming that the signal would be relocated with specific details regarding signal timing/phasing/coordination can be addressed later.

northbound travel lane on Frida Kahlo Way. Given the conceptual site plan, the variant's proposed intersection relocation would be subject to undergo ~~more~~ more detailed design review and the proposed intersection geometry (i.e., northbound left-turn pocket length) and signal timing should be designed to accommodate the expected vehicle queue without spilling back into the adjacent travel lane on Frida Kahlo Way.

Overall, these site access and circulation changes would not change transit, pedestrian, bicycle, commercial or passenger loading, or emergency access effects from Variant 4. Operational-related project-level and cumulative transportation and circulation impacts under Variant 4 would be substantially the same as those discussed for the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Thus, all operational-related mitigation measures and improvement measures identified for the Developer's Proposed Option would be applicable to Variant 4 (i.e., Mitigation Measure M-TR-6~~1~~, p. 3.B-73 ~~; Improvement Measure I-TR-2, p. **Error! Bookmark not defined.**; and Improvement Measure I-TR-3, p. **Error! Bookmark not defined.**~~). The proposed modifications to the parking program under this variant (i.e., relocation of approximately 110 spaces at City College's surface parking lot) would not result in any changes to the number/type of parking spaces provided. Additional on-street parking will be provided on one or both sides of the North Street extension.

Commented [WE(491]: But you're changing the signal timing potentially?

Commented [JF492R491]: Kittelson: SFMTA would review any signal design plans and it is most likely that the signal would be coordination and operate with the same cycle length as other signals along the corridor. This would minimize any potential effect on vehicle progression along FKW.

Based on the above, project-level and cumulative transportation and circulation impacts under Variant 4 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.B, Transportation and Circulation). Implementation of Variant 4 would not result in new or ~~more~~ more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

Noise and Vibration

Commented [WW(493]: If this is built early during construction, would this reduce impacts from construction truck trips accessing the site?

Demolition, excavation, site grading, and construction activities under Variant 4 would be conducted according to the same construction phases as under the Developer's Proposed Option and would have the same impacts as identified in Impacts NO-1~~,~~ and NO-2~~, and NO-3~~ as discussed for the Developer's Proposed Option. As discussed under Impact NO-2, there would be significant and unavoidable noise impacts from trucks during the four-month peak construction period even with the implementation of Mitigation Measure M-NO-2, Relocate North Access Road, p. 3.C-35~~,~~. If construction of the North Street Extension were to occur prior to Phase 0 under Variant 4, it could be used as a haul truck route similar to what is currently proposed as Mitigation Measure M-NO-2 and potentially preclude the need for this mitigation measure. However, to ensure that the North Street extension is constructed first, Mitigation Measure M-NO-2 would be required. Therefore, Mitigation Measures M-NO-1, p. 3.C-32, and M-NO-2~~3~~, p. 3.C-35, would apply to Variant 4.

Variant 4 would not result in substantial increases in operational noise because it would have the same mix of land use types (i.e., residential, retail, childcare facility, community space, open space), same trip generation, and stationary equipment and a would not result in new or different operational noise sources than those analyzed under the Developer's Proposed Option. Therefore, Mitigation Measure M-NO-4~~5~~, p. 3.C-40, would apply to Variant 4. This variant would, however, construct a new street extension approximately 200 feet south of Archbishop Riordan High School

and 400 feet north of the City College Multi-Use Building. These distances and the limited traffic volumes that would potentially use this roadway extension would be sufficient that these school uses would still be within the normally acceptable land use category for classroom uses (up to 65 Ldn).

Based on the above, project-level and cumulative transportation and circulation impacts under Variant 4 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.C, Noise). Implementation of Variant 4 would not result in new or ~~more~~ more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

Air Quality

Demolition, excavation, site grading, and construction activities under Variant 4 would be conducted according to the same construction phases as under the Developer's Proposed Option and would have the same impacts as identified in Impacts AQ-1 through AQ-6 and C-AQ-1 through C-AQ-2 as discussed for the Developer's Proposed Option. As discussed under Impact AQ-2a, p. 3.D-45, construction-related emissions of NOx for the Developer's Proposed Option would exceed significance thresholds in 2022 and 2024. Therefore, this would be a significant impact. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Variant 4 (i.e., Mitigation Measures M-AQ-2a, p. 3.D-49; M-AQ-2b, p. 3.D-50; M-AQ-2c, p. 3.D-61; M-AQ-~~2c~~2d, p. 3.D-57; M-AQ-~~2d~~2e, p. 3.D-63; and M-AQ-~~2e,~~f p. 3.D-64~~; and M-AQ-2f, p. 3.D-36~~). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation***.

With regard to exposure of sensitive receptors to substantial pollutant concentrations associated with project-related TAC emissions, construction-related TAC emissions would be the same as under the Developer's Proposed Option. Operational TAC emissions and exposure would be identical to the Developer's Proposed Option. As discussed under Impact AQ-4, p. 3.D-81, for receptors currently located in the APEZ, the excess cancer risk impact on offsite receptors under the Developer's Proposed Option would be significant and unavoidable with mitigation. Thus, all construction-related and operational-related mitigation measures identified for the Developer's Proposed Option would be applicable to Variant 3 (i.e., Mitigation Measure M-AQ-2a, p. 3.D-49; Mitigation Measure M-AQ-~~2c~~2d, p. 3.D-57; and Mitigation Measure M-AQ-4, p. 3.D-86). Similar to the proposed project, this impact would be ***significant and unavoidable with mitigation***.

Variant 4 would not result in substantial increases in operational criteria pollutant or TAC emissions because it would have the same mix of land use types (i.e., residential, retail, community facilities/child care, open space), same trip generation and a would not result in new or different operational emissions sources than those analyzed under the Developer's Proposed Option.

Based on the above, project-level and cumulative air quality impacts under Variant 3 would be similar to those identified under the Developer's Proposed Option (see SEIR Section 3.D, Air Quality). Implementation of the Variant 4 would not result in new or ~~more~~ more severe impacts, would not change the analysis or conclusions in that section, and no new mitigation measures would be required.

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