



MEMORANDUM

Date: August 21, 2017
To: Jim Damrell and Tim Schaedler, Panattoni Development Company, Inc.
From: Ron Ramos and Ian Barnes, Fehr & Peers
Subject: **7777 Gateway Boulevard – Project Trip Assessment**

OK17-0195

This memorandum presents the results of a trip generation assessment for the proposed 7777 Gateway Boulevard development in Newark, California. The 7777 Gateway Boulevard development is located in an area known as the Gateway Industrial area; environmental documents for development in this area were prepared in the 1990s, with an addendum to the Final EIR for prepared in 1997, which included updated trip generation for the project area based on acreage of development. The 7777 Gateway Boulevard project represents 23.1 acres out of the 125.1 acres of development studied in the previous environmental documents. This memorandum compares the number of trips estimated for the 7777 Gateway Boulevard project to the number of trips assumed for the project site in the 1997 Addendum. This information will be used to determine what additional analysis, if any, may be required by the City of Newark prior to approval of the project.

PROJECT DESCRIPTION

The proposed project is located in Newark, California between Gateway Boulevard and Jarvis Avenue, approximately 0.35 miles northeast of the Gateway Boulevard/Jarvis Avenue intersection. The project site is zoned as special industrial; the uses surrounding the project site are primarily industrial and office uses. The project would consist of approximately 423,000 square feet of special industrial uses in three buildings, over a 23.1 acre area. Access to the site would be on Gateway Boulevard. The project site is currently vacant, but previously included office uses.

TRIP GENERATION

Trip generation estimates represent the number of vehicles that would likely access the project on an average weekday. **Table 1** summarizes the trip generation for the proposed project and the project site's share of the trips calculated in the 1997 EIR addendum. Data from the Institute of Transportation Engineers' (ITE) *Trip Generation Manual, 9th Edition* was used to estimate vehicle trip



generation for the proposed project. Based on the project description (a mix of manufacturing, office and warehousing uses), the project site is assumed to fall under the Industrial Park land use category (Land Use Code 130) for the purposes of trip generation calculations. This category is consistent with the land use assumed for the project site in the 1997 addendum to the Final EIR for the Gateway Industrial area.

TABLE 1 – PROJECT TRIP GENERATION ESTIMATES

Land Use	Quantity ¹	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
7777 Gateway Boulevard Project								
7777 Gateway Boulevard ²	23.1 acres	1,413	162	33	195	43	162	205
1997 Addendum to the Final EIR for the Gateway Industrial Area								
Total Study Area in 1997 Addendum ³	125.1 acres	7,869	1,035	227	1,262	275	1,036	1,311
Project Site in the 1997 Addendum ⁴	23.1 acres	1,453	192	42	234	51	191	242
Difference Between 7777 Gateway Boulevard Project and the Project Site in the 1997 Addendum Trips⁵		-40	-30	-9	-39	-8	-29	-37

Notes:

- Gross site area (includes buildings, parking, open space, etc.)
- ITE *Trip Generation Manual (9th Edition)* Land Use Code 130 (Industrial Park - Adj. Streets, 7-9 AM, 4-6 PM):
 Daily: $T = 61.17 * (X)$
 AM Peak Hour: $T = e^{0.78 \ln(X) + 2.82}$ (83% in, 17% out)
 PM Peak Hour: $T = e^{0.72 \ln(X) + 3.06}$ (21% in, 79% out)
 T = Number of trip ends, X = project site (gross) in acres
- Trips for study area in 1997 addendum from *Gateway Industrial Project Addendum to Final EIR, Table 1*
- Proportional trip generation for the project site assumed in the 1997 Addendum.
- Negative values indicate that the 7777 Gateway Boulevard trip generation is less the 1997 Addendum trip generation for the project site.

Source: Fehr & Peers, August 2017.

As summarized in **Table 1**, the currently proposed 7777 Gateway Boulevard project would generate about 40 fewer daily, 39 fewer AM and 37 fewer PM peak hour trips than assumed in the 1997 Addendum for the Project site.

Please contact us Ron Ramos with questions or comments.

**Addendum to
Final EIR**

**Project:
Gateway Industrial**

**Lead Agency:
City of Newark**

May, 1997

ATTACHMENT A

**Addendum to
Final EIR**

**Project:
Gateway Industrial**

**Lead Agency:
City of Newark**

May, 1997

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1.0 Introduction

1.1 Purpose of this Addendum to an Environmental Impact Report

This document is an Addendum to an Environmental Impact Report, prepared pursuant to the California Environmental Quality Act of 1970 (CEQA), as amended. This Addendum amends and add updated information to the Gateway Environmental Impact Report, previously reviewed and certified by the Newark City Council (Resolution No. 6978, adopted December 1, 1994). The State Clearinghouse Number for the Gateway EIR is 94-063007. The Gateway project site is located in the City of Newark, Alameda County, California.

The underlying project for which the EIR has been prepared involves a 153-acre site upon which the applicant, Cargill Salt Company, proposed to construct a 137-acre mixed-use, high-tech industrial, office, warehouse and distribution complex to be known as the Gateway project. The project involved construction of a maximum of 91.79 acres of high-tech industrial uses, typically including office and research and development use, with the remainder of the site, 45.21 acres, used for warehousing and distribution type uses.

The project has since been approved by the City of Newark (Resolution No. 6978, adopted December 1, 1994).

Minor changes are now proposed for the Gateway project. This addendum is prepared to describe proposed changes and relate them to the setting, impacts and mitigation measures discussed in the Gateway EIR. Since the EIR was certified, market conditions have changed. It is now likely that most of the land within the Gateway project will be devoted to High Tech industrial uses, as allowed by the City's MT-1 Zoning District, with a substantial reduction if not elimination of warehouse and distribution uses. The purpose of this addendum is to determine whether or not such a reasonable foreseeable change in the mix of uses significantly alters the range or severity of impacts or mitigation measures.

Section 2.1 describes the proposed changes to the project more fully.

1.2 Addendum to Environmental Impact Reports

The Guidelines adopted to implement the California Environmental Quality Act (CEQA) allows lead agencies to prepare Addenda to Environmental Impact Reports (AEIRs). Specifically, Section 15164 of the Guidelines states that AEIRs may be prepared in any case where Guideline Section 15162 does not require preparation of a supplemental or subsequent EIR to analyze additional impacts that the change may cause. Guideline section 15162 requires preparation of a subsequent EIR under the following conditions:

- 1) Substantial changes are proposed that will require major revisions of the previous EIR to study new environmental effects or significant increases in severity of effects previous study;

- 2) Background circumstances have changed to a degree that require major revisions and also to deal with significant new effects or increases in severity;
- 3) New information discloses new or significantly more severe impacts originally addressed or that mitigation measures or alternatives previously rejected as infeasible might, in fact, be feasible;

The analysis contained in the following document will demonstrate that none of these conditions exist in this instance, so that the preparation of a subsequent or supplemental EIR apply in this case. For this reason, use of an Addendum is appropriate.

Excerpts from CEQA Guidelines (Sections 15162 and 15164) are attached to this document.

1.3 Previous EIR

The existing environmental setting, a full description of the original Gateway project, a listing of mitigation measures, an analysis of feasible alternatives and a summary of expected cumulative impacts are described in the Gateway EIR. Copies of this EIR are available for review at the City of Newark Development Services Department, 37101 Newark Boulevard, Newark, during normal business hours.

1.4 Lead Agency

The City of Newark is the lead agency for both the preparation of the approved Gateway EIR as well as for the AEIR, as defined by Section 21067 of CEQA. This means that the City of Newark is designated as the public agency which has the principal responsibility for approving or carrying out the proposed project and for assessing likely environmental effects of the proposal.

Preparation of this EIR is in accord with CEQA, including all amendments thereto, and Guidelines for Implementation of the California Environmental Quality Act.

1.5 Mitigation Monitoring

CEQA requires preparation of a Mitigation Monitoring Program for any environmental document which contains mitigation measures. The mitigation monitoring plan prepared and adopted for the Gateway project is not affected by this addendum.

2.0 Project Description

2.1 Project Location

The proposed project is located in the northwest portion of Newark, California, within southern Alameda County. Exhibit 1 depicts the regional location of the project site.

Exhibit 2 shows the site in relation to the City of Newark and the City of Fremont and surrounding streets and highways. The site is located south of the Dumbarton Freeway (State Route 84), east of Thornton Avenue and north of Jarvis Avenue. The existing Bridgeway Center is immediately northeast of the project site.

Assessors Parcel Numbers assigned to the subject property by Alameda County include:

- 537-851-1-2
- 537-853-2
- 537-853-3
- 537-853-6
- 537-853-7

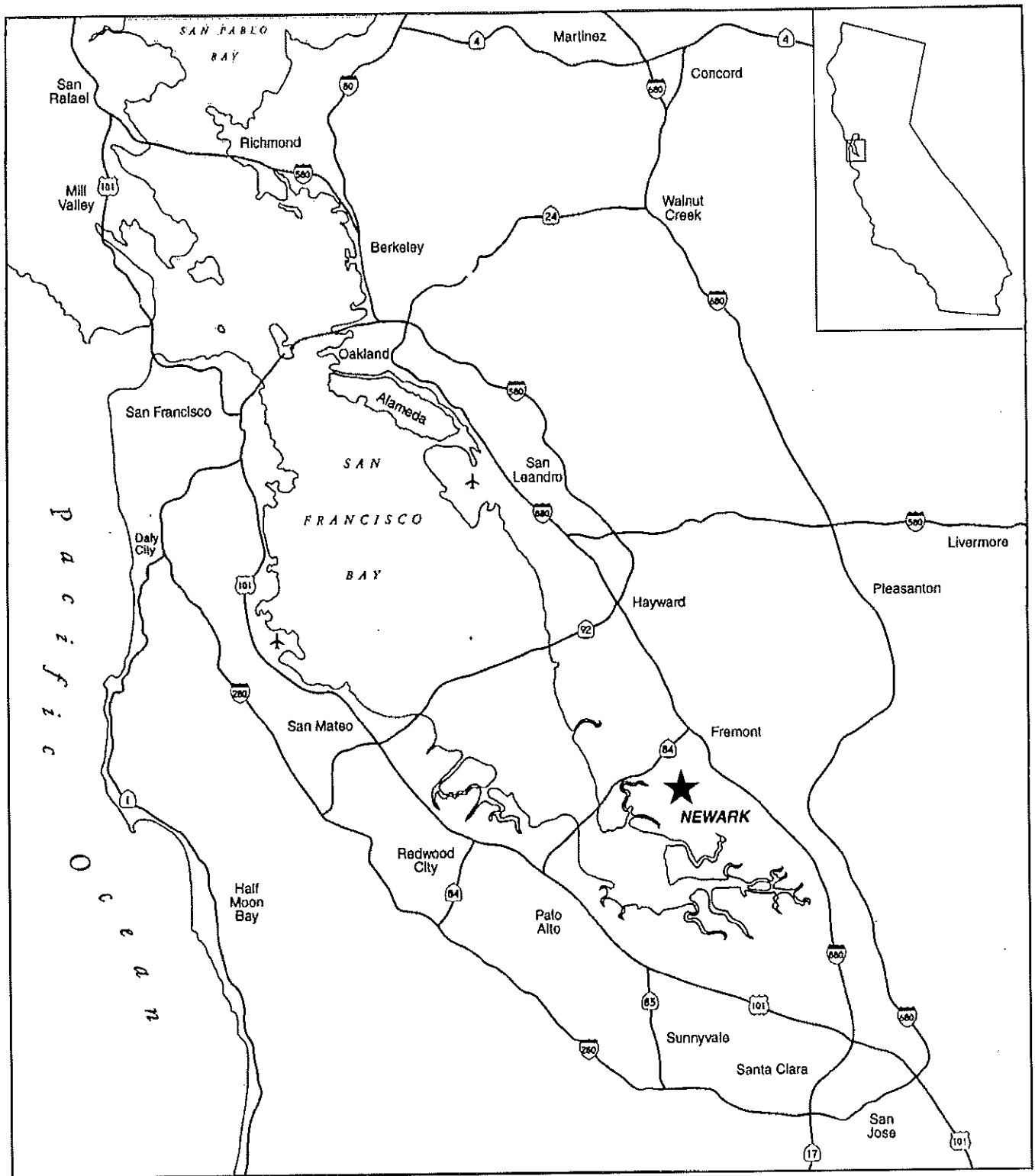
2.2 Project Description

The revised Gateway project consists of 125.1 acres of land, all currently owned by Cargill Salt Company. The applicant proposes to construct a mixed-use, high-tech industrial, office complex. Although the originally approved project consisted of 137 acres, the actual amount of development has decreased due to the elimination of the 10.15 portion of land located on the east side of Jarvis Boulevard and the fact that the wetland restoration portion of the project is 1.75 acres larger than originally described in the Gateway EIR.

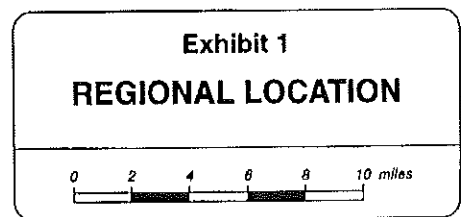
The Gateway project now will most likely be developed for High Tech Industrial uses on the site, 125.1 acres of land, with an anticipated reduction in future warehouse and industrial uses. This, the only change between the project as originally described and analyzed in the Gateway EIR and the project as currently envisioned concerns the types of use that will be undertaken inside buildings on the site, all of which are permitted uses under the provisions of the City's MT-1 Zoning District. The change in the prospective composition of the project responds to shifts in local and regional economic conditions.

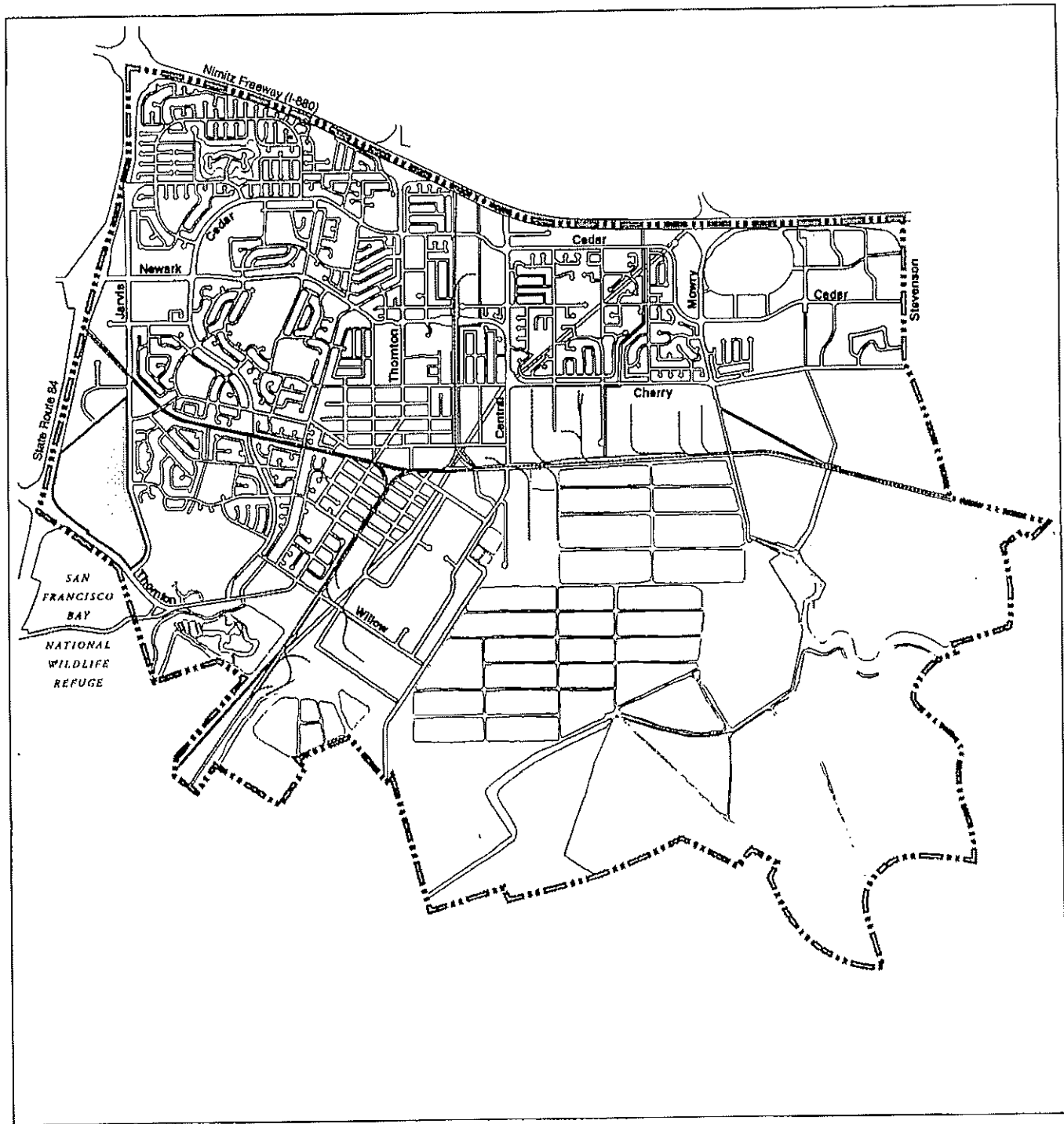
2.3 Project Objectives

Objectives to be achieved through approval and construction of the project are included in the Gateway EIR and are not proposed for change by this Addendum.



CITY OF NEWARK
GATEWAY PROJECT








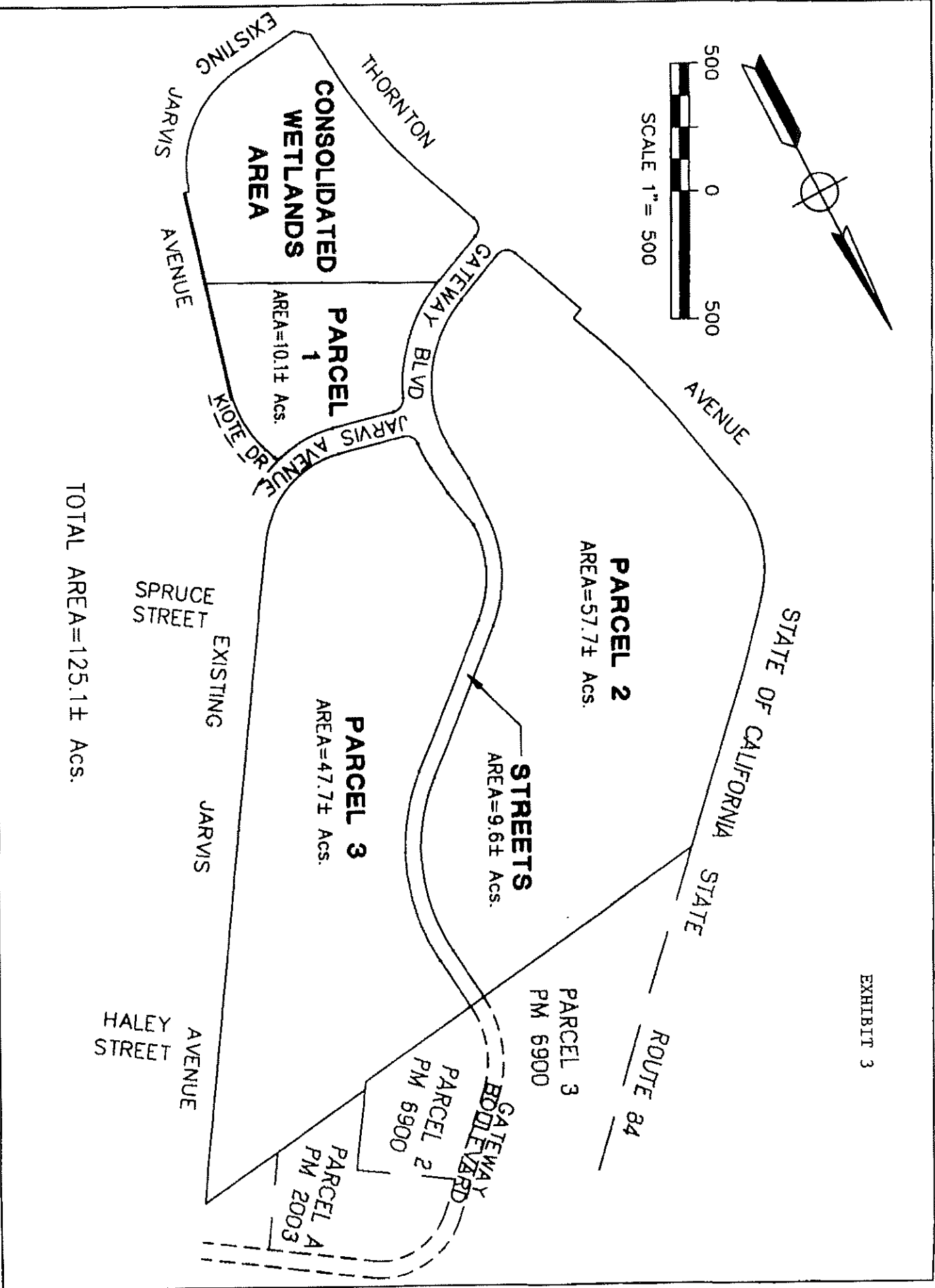
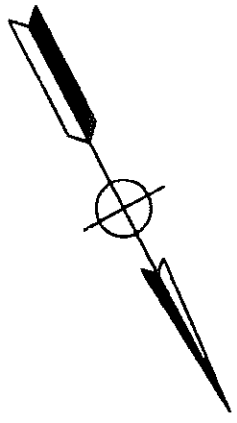
**CITY OF NEWARK
GATEWAY PROJECT**



**Exhibit 2
SITE CONTEXT**

 Newark City Limit
 Proposed Site





3.0 Environmental Analysis

This section of the Addendum identifies specific environmental areas which may be affected as a result of the changed Gateway project and any changes from the original Gateway EIR. The EIR examines all of the environmental topic areas identified in the previous EIR. Each impact area is discussed individually in subsections 3.1 through 3.18, as follows:

- 3.1 Earth
- 3.2 Air Quality
- 3.3 Water
- 3.4 Biological Resources
- 3.5 Noise
- 3.6 Light and Glare
- 3.7 Land Use
- 3.8 Natural Resources
- 3.9 Risk of Upset
- 3.10 Population, Housing and Socioeconomics
- 3.11 Transportation and Circulation
- 3.12 Public Services
- 3.13 Energy
- 3.14 Utilities
- 3.15 Human Health
- 3.16 Aesthetics
- 3.17 Recreation
- 3.18 Cultural Resources

3.1 Earth

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.1 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to soil conditions, topographic and geologic features, site grading and potential for erosion and seismic hazards.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will not alter site grading requirements, modify the potential for erosion, affect existing topographic conditions or affect seismic risk.

3.2 Air

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.2 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to air resources, including emission of short and long term air pollutants, objectionable odors or alteration of air movement.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Also, the amount of vehicular traffic anticipated to be associated with the project (further described in Sec. 3.11), will not exceed the daily or peak hour amount of traffic analyzed in the previous Gateway EIR, so that there will be no significant vehicular-related emissions.

Therefore, the proposed change will not alter short or long term air emissions, creation of odor or existing air movements within the area.

3.3 Water

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.1 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to water resources, including changes in the direction courses, changes in storm water runoff and drainage, flooding potential, wetlands and other waters of the United States and the reduction in public water supplies.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site, the amount of landscaping or the amount of impervious surfaces.

Therefore, the proposed change will not alter site grading requirements, modify the potential for erosion, affect existing topographic conditions or affect seismic risk.

3.4 Biological Resources

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.4 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to biological resources, including plant or animal life.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on plant or animal species, including changes in the diversity of species, introduction of new species into an area, animal migration patterns, deterioration of fish or wildlife habitat areas or changes to agricultural crops.

3.5. Noise

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.5 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to noise impacts.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Based on the traffic analysis performed for the proposed change in land use mix by TJKM Associates, transportation consultants, the change may serve to reduce vehicular noise on surrounding properties, since it is anticipated that fewer truck trips would be generated (reference Section 3.11).

Therefore, the proposed change will not increase noise levels over that discussed in the Gateway EIR

3.6 Light and Glare

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.6 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to light and glare impacts

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site or proposed site lighting. Therefore, the proposed change will have no effect on anticipated spill over of light and glare beyond project boundaries.

3.7. Land Use

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.7 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to land use, including substantial changes to site land use, impacts to surrounding properties and consistency with local land use regulatory plans.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on land use.

3.8 Natural Resources

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.8 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to natural resources.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on natural resources.

3.9 Risk of Upset

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.9 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to the risk of upset, including the possibility of explosion, release of potentially hazardous materials or any other similar public health risk, including possible interference with emergency evacuation plans.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Specific uses within buildings will be regulated by the City of Newark Zoning Ordinance and applicable fire and building codes. Therefore, the proposed change will have no effect on the risk of upset.

3.10 Population, Housing and Socioeconomics

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.10 of the Gateway EIR) will not change any the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to socioeconomics, including substantial changes to city population, employment and related socioeconomic conditions.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Based on standard per square foot employee generation rates contained in the Gateway EIR, the revised project could generate an additional 800 High Tech employees at full project build out. However, this additional number of employees will not be significant for two reasons. First, based on the traffic analysis prepared for the revised project, the additional number of employees will not have a significant effect on traffic or circulation impacts. Secondly, the actual number of total jobs in Newark is less than the number anticipated in the adopted General Plan Environmental Impact Report. The 1992 General Plan EIR noted that there would be approximately 20,420 jobs in Newark by the year 1995 and 31,945 jobs by 2007. The Association of Bay Area Governments (ABAG) documents in Projections '96 that there were

14,560 jobs in Newark in 1995 and 19,820 jobs in 2010. Therefore, the total number of jobs in the community will be less than the General Plan EIR anticipated, even with the proposed change to the land use mix in the Gateway project.

3.11 Transportation and Circulation

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.11 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to transportation and circulation, including vehicular traffic, parking, bicycle, air or train modes of travel.

The proposed project change will concern activities to be conducted within enclosed buildings on the site. To verify that there will no significant impacts related to transportation and circulation, an analysis has been completed of the proposed land use change by the firm of TJKM Associates.

Based on standard vehicle trip generation rates published in *Trip Generation* (Fifth Edition, Institute of Traffic Engineers, 1991), the previous project (mixed industrial and warehouse) was expected to generate 8,309 total daily trips, 1,373 during the a.m. peak hour and 1,358 during the p.m. peak hour. As now proposed to include all High Tech industrial, the project is expected to generate 7,869 daily trips, 1,262 during the a.m. peak and 1,311 during the p.m. peak hour. With the change in project land use mix, the proposed project would result in an anticipated decrease of 440 trips per day, 111 during the a.m. peak and 47 during the p.m. peak hour. Although the change in use could result in the types of activities that generate larger number of trips, the overall reduction in daily trips is attributable to the fact that project acreage is now smaller than originally studied.

However, the analysis also notes that the in/out distribution of daily trips differs between industrial park and warehouse type uses. Industrial parks have higher morning (a.m.) inbound rates and evening (p.m.) outbound rates than warehouse uses. This difference results in the projection that the modified project would generate 19 more outbound trips during the p.m. peak hour than would the existing project. This increase is less than 2% of the evening trips and is therefore not considered significant. The proposed industrial project results in reductions in all other peak hour conditions as well as total daily trips.

A summary comparison between the original and modified project is found on Table 1.

One potential benefit of the proposed change would be a reduction in the amount of heavy trucks using the site. Published analysis (Tardi and Balbach "Truck Generation Characteristics of Non-Residential Land Use, *ITE Journal*, 7/94) indicates that Industrial Park uses generate 30 to 40% fewer daily trips by four- and five-axle trucks than warehouse uses. However, truck use by small delivery trucks and vans are very similar between the two types of uses.

The proposed change will therefore have no significant effect on traffic or circulation impacts.

3.12 Public Services

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.12 of the Gateway EIR) will not change the environmental setting, the environmental analysis,

environmental impacts or mitigation measures related to public services, including changes to police, fire, schools and parks.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on provision of public services.

3.13 Energy

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.13 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to energy resources, including the need for electrical and natural gas.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site or the amount of energy needed to construct and operate such buildings. Therefore, the proposed change will have no effect regarding consumption of energy.

3.14 Utilities

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.14 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to utilities, including water, sewer, drainage and solid waste facilities.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site, including the need for utility services. Therefore, the proposed change will have no effect on utilities.

3.15 Human Health

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.15 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to human health.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on health factors.

3.16 Aesthetics

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.16 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to aesthetics, including blockage of views and creation of offensive views to the public.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site nor the streetscape frontage treatment along Jarvis and Thornton Avenues. Therefore, the proposed change will have no effect on aesthetic factors.

3.17 Recreation

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.17 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to recreation, including increased demand for parkland and recreation programs.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on recreation factors.

3.18 Cultural Resources

The proposed change in the type of permitted use from that analyzed in the Gateway EIR (Section 4.18 of the Gateway EIR) will not change the environmental setting, the environmental analysis, environmental impacts or mitigation measures related to cultural resources, including archeological, paleontological, cultural or historic resources.

The proposed project change will only concern activities to be conducted within enclosed buildings on the site. The proposed change will not materially affect the number, size, or shape of buildings likely to be built on the Gateway site. Therefore, the proposed change will have no effect on cultural factors.

Excerpt From CEQA Guidelines Regarding EIR Addendums and Supplemental EIRs

15163. Supplement to an EIR.

(a) The lead or responsible agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if:

(1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and

(2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

(b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.

(c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.

(d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.

(e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

15164. Addendum to an EIR or Negative Declaration.

(a) The lead agency or a responsible agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.

(b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary.

(c) An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration.

(d) The decision-making body shall consider the addendum with the final EIR or adopted negative declaration prior to making a decision on the project.

(e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.