Appendix IS

Initial Study

499 Forbes Boulevard Office Project

Initial Study

prepared by

City of South San Francisco
Planning Division
City Hall Annex, P.O. Box 711
South San Francisco, California 94083
Contact: Christopher Espiritu, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

May 2020

RINCON CONSULTANTS, INC.
Environmental Scientists | Planners | Engineers
rinconconsultants.com

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Appendices

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Abbreviations and Acronyms

AB	Assembly Bill
ABAG	Association of Bay Area Governments
AF	acre-feet
ALUCP	Airport Land Use Compatibility Plan
APN	Assessor's Parcel Number
AQMP	air quality management plan
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BMP	best management practices
BTP	Business Technology Park
Btu	British thermal units
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CFGC	California Fish and Game Code
CFP	California Fully Protected
CFR	Code of Federal Regulations
CH_4	methane
CHRIS	California Historical Resources Information System
CO	carbon monoxide
CO_2	carbon dioxide
CNEL	Community Noise Equivalent Level
CRHR	California Register of Historical Resources
CWA	Clean Water Act
dB	decibels
dBA	A-weighted sound pressure level

DOC	Department of Conservation
DOF	California Department of Finance
DTSC	Department of Toxic Substances Control
EDR	Environmental Data Resources, Inc.
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
FAR	Floor Area Ratio
FTA	Federal Transit Administration
GHG	greenhouse gases
HFC	hydrofluorocarbons
HMBP	Hazardous Materials Business Plan
HMCD	Hazardous Materials Compliance Division
IPCC	United Nations Intergovernmental Panel on Climate Change
ITE	Institute of Transportation Engineers
kBtu	thousand British thermal units
kWh	kilowatt-hours
Ldn	Day-Night Average (noise) Level
Leq	single steady A-weighted (noise) level
Lmax	highest root mean squared sound pressure level
Lmin	lowest root mean squared sound pressure level
LOS	level of service
LUST	Leaking Underground Storage Tanks
MBTA	Migratory Bird Treaty Act
mgd	million gallons per day
MMBtu	million British thermal units
MMcf	million cubic feet
MW	megawatts
N_2O	nitrous oxides
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
NO_2	nitrogen dioxide
NO_X	nitrogen oxides
NPDES	National Pollutant Discharge Elimination System

NRHR	National Register of Historic Places
O_3	ozone
Pb	lead
PCE	Peninsula Clean Energy
PG&E	Pacific Gas and Electric
PFC	perfluorocarbons
$PM_{2.5}$	particulate matter with a diameter of up to 2.5 microns
PM_{10}	particulate matter with a diameter of up to ten microns
R&D	research and development
ROG	reactive organic gases
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SFBAAB	San Francisco Bay Area Air Basin
SFO	San Francisco International Airport
SFPUC	San Francisco Public Utilities Commission
SMP	Site Management Plan
SMCWPPP	San Mateo Countywide Water Pollution Prevention Program
SF_6	sulfur hexafluoride
SO_2	sulfur dioxide
SSFFD	South San Francisco Fire Department
SSFMC	South San Francisco Municipal Code
SSFPD	South San Francisco Police Department
SSFSC	South San Francisco Scavenger Company, Inc.
SSFUSD	South San Francisco Unified School District
SSFWQCP	South San Francisco Water Quality Control Plant
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	California State Water Resources Control Board
TDM	Transportation Demand Management
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan

VMT	vehicle miles traveled
VdB	vibration decibels
WSCP	Water Shortage Contingency Plan

Initial Study

As the Lead Agency, the City of South San Francisco prepared this Initial Study for the 499 Forbes Boulevard Office Project in compliance with the California Environmental Quality Act (CEQA), CEQA Guidelines (California Code of Regulations [CCR] Section 15000 et. seq.), and the regulations and policies of the City of South San Francisco, California.

1. Project Title

499 Forbes Boulevard Office Project

2. Lead Agency Name and Address

City of South San Francisco
Planning Division
City Hall Annex
315 Maple Avenue
P.O. Box 711
South San Francisco, California 94083

3. Contact Person and Phone Number

Christopher Espiritu, Senior Planner
(650) 877-8535
Christopher.Espiritu@ssf.net

4. Project Sponsor's Name and Address

Aralon Properties
Colum Regan
482 Bryant Street
San Francisco, California 94107

5. Project Location

The project site is located at the northwest corner of the intersection of Forbes Boulevard and Allerton Avenue, at 499 Forbes Boulevard, South San Francisco. The site, which totals 2.96 acres (128,737 square feet), consists of one roughly rectangular parcel (Assessor's Parcel Number [APN] 015-082-040) and another long, thin parcel extending north from the main parcel and encompassing part of a decommissioned railroad track (APN to be determined). Figure 1 shows the regional location of the project site, Figure 2 provides an aerial image of the project site in its neighborhood context, and Figure 3 provides the proposed site plan.

Figure 1 Regional Location

Imagery provided by Esri and its licensors © 2019.

Project Location

N

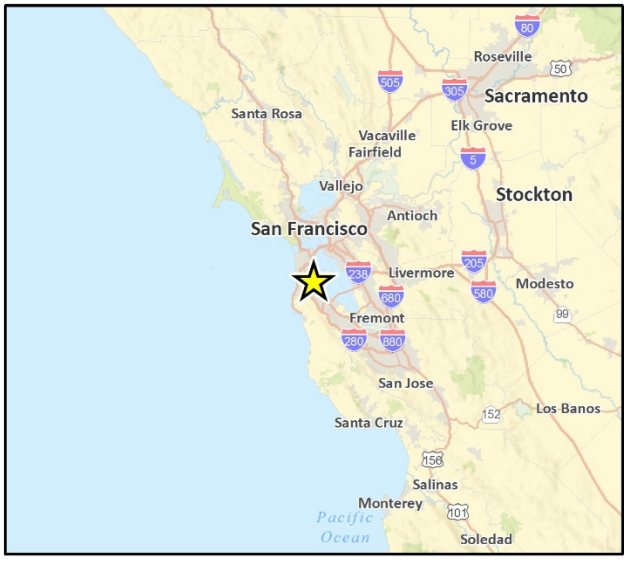

Figure 2 Project Location

Imagery provided by Microsoft Bing and its licensors © 2019.

Fig 2 Project Location

Figure 3 Proposed Site Plan

Source: Woods Bagot, 2020.

6. General Plan Designation

The South San Francisco General Plan designates the project site as Business and Technology Park. According to the General Plan "this designation accommodates campus-like environments for corporate headquarters, research and development facilities, and offices. Permitted uses include incubator-research facilities, testing, repairing, packaging, publishing and printing, marinas, shoreline-oriented recreation, and offices, and research and development facilities. Warehousing and distribution facilities and retail are permitted as ancillary uses only. All development is subject to high design and landscape standards" (City of South San Francisco 1999).

7. Zoning

The project site is zoned Business Technology Park (BTP). According to South San Francisco Municipal Code Section 20.110.001, the BTP zoning district "is intended for business and professional offices, visitor service establishments, and retail uses with an emphasis on larger and regional-serving uses west of 101. A wide range of nonresidential uses are appropriate including administrative, financial, business, professional, medical and public offices and visitor-oriented and regional commercial activities such as warehouse clubs and other large-format retail uses."

8. Surrounding Land Uses and Setting

The project site is near the eastern edge of South San Francisco, at the northwest corner of the intersection of Forbes Boulevard and Allerton Avenue. The surrounding neighborhood includes all non-residential uses, including several buildings occupied by Genentech, a biotechnology company, and office, manufacturing, and warehouse buildings for other commercial businesses. Offices, warehouses, and distribution centers for food packaging companies occur north of the project site, across the railroad tracks. A large surface parking lot and bus station serving Genentech abuts the project site to the east, and the office and warehouses for a food distribution company abut the project site to the west. A vacant lot is south of the project site, directly across Forbes Boulevard. To the northeast of the project site, approximately 0.2 mile away, is a U.S. Department of Agriculture Animal and Plant Health Inspection building. The project site is approximately 0.5 mile west of San Francisco Bay.

The project site is developed with an unoccupied one-story, manufacturing and warehouse structure, a concrete surface parking lot, minimal landscaping around the perimeter of the site, and a decommissioned railroad track. The site is generally flat and almost entirely paved, with limited landscaping along its perimeter.

9. Project Description

The project would involve the construction of two new structures, a five-story, 128,737 square-foot office structure and a five-story, 97,859 square-foot parking structure with 308 parking spaces. The existing one-story structure would be demolished as a part of project implementation. The new office structure would be approximately 85 feet in height and would occupy the same general footprint as the demolished structure. The parking structure would be 60 feet in height. Additional surface parking spaces (14 stalls) would be located at the western edge of the project site, and

bicycle parking would be provided throughout the project site. Landscaped area would account for approximately 42,819 square feet of the project site and would be located mainly along the perimeter, between the two new structures, and at the rear of the site. A terraced outdoor seating area would be located at the northwest corner of the site, near the existing rail line.

The project would involve improvement of the existing railroad tracks as part of the City's Rails-to-Trails program, for which an approximately 1,500-linear foot, or 0.28-mile, segment of existing railroad track would be converted to a bicycle and pedestrian trail. The trail would be adjacent to the project site and would extend northeast, where it would terminate at Forbes Boulevard. The railroad right-of-way (APN to be determined) would be merged with the parcel for 499 Forbes (APN 015-082-040). A connection would be made between the newly built trail and an outdoor amenity space at the northwest corner of the site.

Vehicle access to the project site would be provided via a single, 26-foot-wide drive aisle and curb cut from Forbes Boulevard. The project would also involve modification to an existing roadway median on Forbes Boulevard for a new left turn lane. The project sponsor has submitted applications for design review, a conditional use permit, tentative parcel map, and transportation demand management plan.

For the purposes of this analysis, the project is assumed to be an office structure. The EIR will discuss alternative uses of the project site.

10. Other Public Agencies Whose Approval Is Required

The City of South San Francisco is the only public agency with discretionary authority to approve this project.

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1?

The City has not received any requests from California Native American tribes to be notified of proposed projects in the city, pursuant to Public Resources Code (PRC) Section 21080.3.1.

Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Less than Significant with Mitigation Incorporated" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry Resources	☐	Air Quality
■	Biological Resources	■	Cultural Resources	☐	Energy
■	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards and Hazardous Materials
☐	Hydrology/Water Quality	☐	Land Use/Planning	☐	Mineral Resources
☐	Noise	☐	Population/Housing	☐	Public Services
☐	Recreation	■	Transportation	☐	Tribal Cultural Resources
☐	Utilities/Service Systems	☐	Wildfire	■	Mandatory Findings of Significance

Determination

Based on this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

■ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "less than significant with mitigation incorporated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potential significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	Date
Printed Name	Title

Environmental Checklist

1 Aesthetics

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	■	☐
b. Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	■
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	■	☐
d. Create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?	☐	☐	■	☐

Setting

The project site is in an urbanized area in the City of South San Francisco's BTP zone, and is bordered by an abandoned railroad tracks overgrown with vegetation to the north, a parking and bus lot for Genentech to the east, Forbes Boulevard to the south, and a meat packing company to the west. The site is currently unoccupied, with a vacant existing structure, a small accessory structure that was used for mechanical equipment storage, and landscaped area. The parking area associated with these uses is situated on the western portion of the site.

Regulatory Setting

South San Francisco General Plan

The following policies are specific to the aesthetics of buildings associated with the BTP land use designation and apply to the proposed project (City of South San Francisco 1999).

Goal 3.5-G-2. Promote campus-style biotechnology, high-technology, and research and development uses.

Policy 3.5-I-4. Unless otherwise stipulated in a specific plan, allow building heights in the East of 101 area to the maximum limits permissible under Federal Aviation Regulations Part 77.

Policy 3.5-I-7. Prepare signage and streetscape plan for the areas designated as Business Commercial and Business and Technology Park on the General Plan Diagram, treating the entire area as one large campus, with unified signage and orchestrated streetscapes that make wayfinding easy and pleasant.

East of 101 Area Plan

Development in the East of 101 Area is subject to the Design Element Goals and Policies set forth in the East of 101 Area Plan. Design goals applicable to the project are as follows.

Goal 5.1. Promote high quality site, architectural, and landscape design that increases a sense of identity in the East of 101 Area.

Goal 5.2. Improve the streetscape quality of the East of 101 Area through plantings of street trees and provision of entry monuments.

Goal 5.3. Protect visually significant features of the East of 101 Area, including views of the Bay and San Bruno Mountain.

Goal 5.4. Minimize the intrusion of unsightly elements such as unattractive signage, overhead utility lines, chain link fences, barbed wire, and unscreened loading and service areas in the East of 101 Area.

Goal 5.5. Promote public access to views of the San Francisco Bay and to the Bay Trail.

Goal 5.6. Improve the visual quality of the East of 101 Area as seen from Highway 101, and the visual experience of motorists on Highway 101 along the perimeter of the Area.

Impact Analysis

a. Would the project have a substantial adverse effect on a scenic vista?

San Bruno Mountain State and County Park is located north of the project site, and views of the mountaintop are available from Forbes Boulevard. The project involves the construction of a new, five-story structure, 100 feet in height, and a four-story parking structure, 60 feet in height, which would replace the existing one-story structure and surface parking lot.

Current conditions with the existing structures on the site and those surrounding the site limit views of San Bruno Mountain. The project would increase the massing and intensity of development on the project site compared to existing conditions, but views of San Bruno Mountain would remain approximately the same. Project implementation would continue to limit public views from Forbes Boulevard, but it would not increase the impact currently in place from the existing development. Project implementation would have a less than significant impact on a scenic vista. This impact will not be discussed in the Environmental Impact Report (EIR).

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The nearest designated state scenic highway is Interstate (I-) 280 (California Department of Transportation 2019), which stretches from the Santa Clara County line to the northern city limit of San Bruno. The scenic corridor of I-280 is approximately 3 miles southwest of the project site; the site would not be visible from I-280 at this distance. The site contains no historic buildings, rock outcroppings, or significant scenic resources. Refer to Section 5, *Cultural Resources*, for a discussion of historic resources, and Section 4, *Biological Resources*, for a discussion of trees on site.

Because the site is not visible from the scenic corridor of I-280, the proposed project would not affect views from a state-designated scenic highway, and the project would have no impact under this issue area. This impact will not be discussed in the EIR.

NO IMPACT

c. Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The project site is in an urbanized area surrounded by commercial, industrial, and other campus-like development. As noted previously, the project site and surrounding land uses carry a BTP zoning designation in the City's General Plan, which allows for a maximum permitted floor area ratio (FAR) of 0.5. However, with a conditional use permit, the maximum permitted FAR is 1.0. The BTP land use designation does limit building height in the area East of Highway 101, except to that permissible under Federal Aviation Regulations Part 77 of 2,000 feet in height (City of South San Francisco 1999). The project would have a FAR of 1.0 and a maximum height of 98 feet with structured parking on-site. Therefore, the project would be consistent with its BTP zoning and land use designation.

The project would also be consistent with surrounding land uses. Additionally, project design would be subject to the City's Design Review Board for final approval to determine its compliance with South San Francisco Municipal Code (SSFMC) Section 20.110 which sets forth land use regulations and development standards for employment districts The BTP land use is classified as an employment district per the SSFMC. The project's consistency with the zoning, land use designation, and review by the City of South San Francisco's Design Review Board would ensure that impacts to visual character and quality would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. Would the project create a new source of substantial light or glare that would adversely affect daytime or nighttime views in the area?

The project site is in an urbanized area with relatively high levels of existing lighting created by existing commercial, office, and industrial uses, along with cars that pass the site in the evenings or at night. Sources of light from these uses include building-mounted and perimeter lighting, interior lighting visible through windows, streetlights, and headlights from vehicles on Forbes Boulevard and other nearby streets and Highway 101, approximately 1 mile away.

New sources of light on the project site would include interior lighting visible through windows, exterior lighting associated with the parking structure and surface parking, headlights from vehicles, and exterior building lights to illuminate signage, parking areas, and walkways. There are no light-sensitive uses such as residences or schools in the immediate vicinity. New sources of light would not have an adverse effect to day or night views beyond existing conditions. Furthermore, new sources of light associated with the project would not have a significant impact on the night sky, as they would only incrementally contribute to the existing light and glare levels already present.

The primary source of glare in the area occurs when sunlight reflects off metallic and glass surfaces, such as windows of parked or moving vehicles, or windows and surfaces of buildings southeast and west of the project site. The proposed office building would be constructed with surfaces such as black corrugated metal panels, white and grey metal panels, and vision glass that would produce some glare from the project site but are designed to reduce glare to a minimal amount. The project buildings would contribute to existing conditions by introducing new daytime glare from the windows of vehicles parked on the site's limited surface parking and from the sun's reflection on glass and metallic surfaces of the proposed building. The proposed project's landscaping would include the addition of forty-six (46) new trees along the perimeter of the project site which would reduce the glare from vehicles parked on the site's surface parking lot.

The project is not located near light-sensitive receptors and would be consistent with surrounding land uses. Furthermore, the project would be required to comply with SSFMC Section 15.48.080 for the lighting related to exterior security for businesses, SSFMC Section 20.120.0008 for the lighting and illumination of parking and loading areas, and SSFMC Section 20.300.010(G) for lighting and glare regulations. Consistent with surrounding land uses, the project would use materials that reduce the amount of glare reflected off the building. The project would minimize glare from vehicles on the surface parking lot with landscaping along the perimeter of the project site and incorporation of shrubbery throughout the surface parking lot. Therefore, in its context the project would not create a new source of substantial light or glare. Impacts related to light and glare would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

2 Agriculture and Forestry Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	■
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	■

Setting

The site is in an urban area of South San Francisco, surrounded by development, including roadways and commercial uses. The project site is currently zoned BTP.

The California Department of Conservation (DOC) manages the Farmland Mapping and Monitoring Program to assess and record suitability of land for agricultural purposes. In each county, the land is analyzed for soil and irrigation quality and the highest quality land is designated as Prime Farmland. The project site and vicinity are designated as Urban and Built-Up Land and the site does not have any identified agricultural or forest land (DOC 2016).

Regulatory Setting

PRC Section 12220(g) defines forest land as:

> land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

PRC Section 4526 defines timberland as:

> land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. Commercial species shall be determined by the board on a district basis.

Government Code Section 51104(g) defines a timberland production zone as:

> an area which has been zoned pursuant to Section 51112 or 51113 and is devoted to and used for growing and harvesting timber, or for growing and harvesting timber and compatible uses, as defined in subdivision (h).

Impact Analysis

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The project site and surrounding area is located entirely in the Urban and Built-Up Land area (DOC 2016). Project implementation would only modify the project site; therefore, no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would be affected by project implementation and no impact would occur. This impact will not be discussed in the EIR.

NO IMPACT

b. Would the project conflict with existing zoning for agricultural use or a Williamson Act contract?

The project site and surrounding areas are not subject to Williamson Act contracts (DOC 2018). The project would only involve construction and modification at the project site and immediately adjacent public right-of-way; therefore, no Williamson Act contracts would be affected by project implementation and no impact would occur. This impact will not be discussed in the EIR.

NO IMPACT

c. Would the project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)); timberland (as defined by Public Resources Code Section 4526); or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?

d. Result in the loss of forest land or conversion of forest land to non-forest use?

e. Would the project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

While some vegetation is present on the project site, the site itself is not forest or timberland. The project site does not provide forest and timber resources. As such, the project would not convert forest or timberland uses, and no impact would occur. This impact will not be discussed in the EIR.

NO IMPACT

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3 Air Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	■	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	■	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	■	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	■

Setting

Air Quality Background

The City of South San Francisco is in the Peninsula subregion of the San Francisco Bay Area Air Basin (SFBAAB), which is under the jurisdiction of the Bay Area Air Quality Management District (BAAQMD). Air quality in the SFBAAB is affected by the region's emission sources and by natural factors. Topography, speed and direction of wind, and air temperature gradient all influence air quality. The SFBAAB experiences a Mediterranean climate, with warm, dry summers and cool, damp winters.

Air pollutant emissions in the SFBAAB are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point and area sources. Point sources occur at a specific location and are often identified by an exhaust vent or stack. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and include sources such as residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and some consumer products. Mobile sources refer to emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when high winds suspend fine dust particles.

Both the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. These ambient air quality standards represent safe levels of contaminants that avoid specific adverse health effects

associated with each pollutant. As the local air quality management agency, BAAQMD is required to monitor air pollutant levels to ensure that state and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards.

The USEPA has set primary national ambient air quality standards (NAAQS) for ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter with a diameter of up to ten microns (PM_{10}) and up to 2.5 microns ($PM_{2.5}$), and lead (Pb). Primary standards are those levels of air quality deemed necessary, with an adequate margin of safety, to protect public health. In addition, California has established health-based ambient air quality standards for these and other pollutants, some of which are more stringent than the federal standards.

Depending on whether the standards are met or exceeded, the SFBAAB is classified as being in "attainment" or "nonattainment." Under state law, air districts are required to prepare a plan for air quality improvement for pollutants for which the district is in non-compliance. The BAAQMD is in non-attainment for the federal standards for ozone and $PM_{2.5}$ and in non-attainment for the state standard for ozone, $PM_{2.5}$, and PM_{10}. The health effects associated with criteria pollutants for which the SFBAAB is in non-attainment are described in Table 1.

Table 1 Health Effects Associated with Non-Attainment Criteria Pollutants

Pollutant	Adverse Effects
Ozone	(1) Short-term exposures: (a) pulmonary function decrements and localized lung edema in humans and animals and (b) risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage.
Suspended particulate matter (PM_{10} and $PM_{2.5}$)	(1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).

Source: USEPA 2018

Air Quality Management

The BAAQMD is primarily responsible for assuring that national and state ambient air quality standards are attained and maintained in the Bay Area. The BAAQMD is also responsible for adopting and enforcing rules and regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, inspecting stationary sources of air pollutants, responding to citizen complaints, monitoring ambient air quality and meteorological conditions, awarding grants to reduce motor vehicle emissions, conducting public education campaigns, as well as many other activities. The BAAQMD has jurisdiction over much of the nine-county Bay Area, including San Mateo County.

The California Clean Air Act requires each nonattainment district in the State to adopt a plan showing how the State Ambient Air Quality Standards will be met in their area of jurisdiction. The BAAQMD adopted the 2017 Clean Air Plan (2017 Plan) as an update to the 2010 Clean Air Plan. The 2017 Plan provides a regional strategy to protect public health and protect the climate. To fulfill state ozone planning requirements, the 2017 control strategy includes all feasible measures to

reduce emissions of ozone precursors—reactive organic gases (ROG) and nitrogen oxides (NO_X)—and reduce transport of ozone and its precursors to neighboring air basins. In addition, the 2017 Plan builds upon and enhances the BAAQMD's efforts to reduce emissions of fine particulate matter and toxic air contaminants (BAAQMD 2017a). The 2017 Plan also lays the groundwork for a long-term effort to reduce Bay Area greenhouse gas (GHG) emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

Air Emission Thresholds

The BAAQMD's significance thresholds in the updated May 2017 CEQA Guidelines for project operations are the most appropriate thresholds for use in determining air quality impacts of the proposed project. The BAAQMD has developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether the proposed project could result in potentially significant air quality impacts. If all the screening criteria are met by a proposed project, then the lead agency or applicant would not need to perform a detailed air quality assessment of their project's air pollutant emissions. BAAQMD's construction-related screening levels for office-type buildings are 277,000 square feet of new building space. For operational emissions, the minimum screening levels are 117,000 square feet of new building space (BAAQMD 2017b). Although the size of the proposed structures is below the construction screening criteria thresholds, the estimated emissions for construction were analyzed. The project would exceed screening criteria for operation and, therefore, operational emissions were analyzed.

The BAAQMD has provided numeric thresholds for criteria pollutants for projects that exceed the screening criteria described above or for projects where the screening criteria do not apply. Table 2 presents the significance thresholds for criteria air pollutants during project construction and operation. These represent the levels at which a project's individual emissions of criteria air pollutants or precursors would result in a cumulatively considerable contribution to the SFBAAB's existing air quality conditions. For the purposes of this analysis, the project would result in a significant impact if emissions would exceed any of the thresholds shown in Table 2.

Table 2 Air Quality Thresholds of Significance

Pollutant/ Precursor	Maximum Annual Emissions (tons/year)	Average Daily Emissions (pounds/day)
ROG	10	54
NO_X	10	54
PM_{10}	15	82
$PM_{2.5}$	10	54

Notes: NO_X = oxides of nitrogen; $PM_{2.5}$ = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM_{10} = respirable particulate matter with an aerodynamic resistance diameter of 10 micrometers or less; ROG = reactive organic gases.

Source: BAAQMD 2017b

BAAQMD also provides a preliminary screening methodology to conservatively determine whether a proposed project would exceed CO thresholds. Specifically, a project would result in a less than significant impact related to local CO concentrations if the following criteria are met:

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, regional transportation plan, and local congestion management agency plans.
- The project traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- The project traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

Methodology

This air quality analysis conforms to the methodologies recommended in the BAAQMD's CEQA Air Quality Guidelines (BAAQMD 2017b). The project's construction and operational emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2, which uses project-specific information, including the proposed land uses, square footages of each use (e.g., research and development and office space), and project location to estimate construction and operational emissions from new development. The project's emissions were modeled based on the project description. The complete CalEEMod modeling output is provided in Appendix AQ.

Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

To be consistent with an air quality management plan (AQMP), a project must conform to the local General Plan and must not result in or contribute to an exceedance of the local jurisdiction's forecasted future population. A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding the forecasts used in the development of the AQMP. The most recent and applicable adopted air quality plan is the 2017 Clean Air Plan. Therefore, the proposed project would result in a significant impact if it would conflict with or obstruct implementation of the 2017 Plan (BAAQMD 2017a).

As stated previously in *Project Description*, the project site has an existing land use of BTP, which allows for corporate headquarters, research and development facilities, and offices. Therefore, the proposed project would be consistent with the existing land use designation of the project site.

The Association of Bay Area Government's (ABAG) is the regional planning agency used by the BAAQMD to forecast growth in the area. According to ABAG, the City of South San Francisco is expected to have 46,365 jobs in 2020, which is estimated to increase to 50,075 jobs by 2025 (ABAG 2017b). According to the project's Transportation Demand Management Plan (Appendix TDM), the project could add 451 employees to the city. Since anticipated initial operational year for the project is 2023, this number represents 12 percent of the expected growth from 2020 to 2025 and would not cause the city to exceed the AMBAG job forecasts. The project would replace an existing warehouse, which had originally provided jobs in the city, and some of the project-related job increases would include this replacement. Therefore, the project would not cause the area to exceed the regional growth forecasts and would not conflict with the implementation of the AQMP. This impact would be less than significant and will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

The project would result in temporary construction emissions, including demolishing the existing structure, removing the existing on-site paving, site preparation and grading, building construction, paving, and architectural coating of the proposed structures. Construction activities have the potential to generate fugitive dust (PM_{10} and $PM_{2.5}$) through grading and from the exposure of soil to wind erosion and dust entrainment. In addition, exhaust emissions associated with heavy construction equipment and worker vehicles would potentially degrade regional air quality.

Long-term emissions associated with project operation would include emissions from natural gas and electricity use for space and water heating and landscape maintenance equipment and architectural coating associated with on-site development (area sources), and mobile emissions from traffic generated by the project.

Construction

Table 3 summarizes the estimated maximum daily emissions (pounds) of pollutants associated with project construction. As shown below, criteria pollutant emissions associated with construction would not exceed the BAAQMD thresholds. Therefore, project construction would not result in a cumulatively considerable net increase of a criteria pollutant, and impacts would be less than significant.

Table 3 Air Quality Thresholds of Significance

Pollutant/Precursor	Maximum Daily Emissions (pounds/day)	Significance Threshold (pounds/day)	Significant Impact?
ROG	16.0	54	No
NO_X	34.3	54	No
PM_{10}	8.0	82	No
$PM_{2.5}$	4.6	54	No

Source: Appendix AQ

In addition, the City would impose a standard Condition of Approval on the project, targeting air quality and implementing related mitigation measures, as detailed below:

Standard Condition of Approval

All proposed projects shall comply with the BAAQMD recommended Basic Construction Mitigation Measures, listed below to meet the best management practices threshold for fugitive dust:

a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.

b) All haul trucks transporting soil, sand, or other loose material off-site shall be covered.

c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

d) All vehicle speeds on unpaved roads shall be limited to 15 mph.

e) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.

f) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator.

h) Post a publicly visible sign with the telephone number and person to contact at the lead agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.

Impacts related to emissions during construction would be less than significant, and the standard Condition of Approval above would further ensure that air quality impacts related to construction activities would be further reduced.

Operation

Table 4 summarizes the project's maximum annual operational emissions for each criteria pollutant, which includes area, energy, and mobile source emissions. As shown below, the emissions generated by project operation would not exceed BAAQMD thresholds for criteria pollutants. Therefore, the project would not contribute substantially to an existing or projected air quality violation. In addition, because criteria pollutant emissions and regional thresholds are cumulative in nature, the project would not result in a cumulatively considerable net increase of criteria pollutants.

Table 4 Air Quality Thresholds of Significance

Pollutant/ Precursor	Maximum Annual Emissions (tons/year)	Significance Threshold (tons/year)	Significant Impact?
ROG	0.7	10	No
NO_X	0.4	10	No
PM_{10}	0.6	15	No
$PM_{2.5}$	0.2	10	No

Source: Appendix AQ

CO Hotspots

The SFBAAB is in attainment of federal and state CO standards. As noted above, the BAAQMD preliminary screening methodology notes that a project would result in a less than significant impact to local CO concentrations if the following the project:

- Is consistent with an applicable congestion management program

- Would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour
- Would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway).

As described in the Transportation Impact Analysis, the project would be consistent with the Congestion Management Plan (CMP) of the San Mateo City/County Association of Governments (C/CAG). Moreover, according to the project's Access and Circulation Memo (Appendix TRA) , most project trips would use Forbes Boulevard and Allerton Avenue to access and leave the project site. With the addition of 881 daily trips, the project would not cause significant impacts or delays at the nearby intersections and would not result in an increase in traffic volumes to more than 44,000 vehicles per hour (Appendix TRA). The project is not located in an area served by a bridge, underpass or tunnel. The proposed parking structure would not exceed 24,000 vehicles per hour. Thus, the project would not result in individually or cumulatively significant impacts from CO emissions.

The project would not create a cumulatively considerable increase in criteria pollutants during construction or operation, and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

Certain population groups, such as children, the elderly, and people with health problems, are particularly sensitive to air pollution. Sensitive receptors are defined as population groups that are more susceptible to exposure to pollutants and examples include health care facilities, retirement homes, school and playground facilities, and residential areas. The proposed project is not close to sensitive receptors. The nearest sensitive land use are single-family residences approximately 0.9 mile west of the project site.

A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. In the Bay Area, a number of urban or industrialized communities exist where the exposure to TACs is relatively high compared to other communities. However, according to the BAAQMD CEQA Guidelines, the project site is not in an impacted community (BAAQMD 2017b). Sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The project would not involve any of these uses; therefore, it is not considered a source of TACs. As discussed in the response to criterion b, the project would not create emissions that would exceed BAAQMD thresholds. Therefore, it would not expose sensitive receptors to substantial pollutant concentrations and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Odors from construction activities are associated with construction equipment exhaust and the application of asphalt and architectural coatings. Odors emitted from construction activities would be temporary and cease upon completion of project construction. There are no nearby sensitive land uses. The proposed project would introduce office space as part of the development, which is not considered a source of substantial objectionable odors, as listed on Table 3-3 in the BAAQMD *CEQA Air Quality Guidelines* (BAAQMD 2017b). Therefore, the project would have no impact related to other emissions, including odors. This impact will not be discussed in the EIR.

NO IMPACT

4 Biological Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	■	☐	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	■
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	■
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	■
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	■
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	■

Setting

The project site is in an urbanized commercial area in South San Francisco, approximately 0.5 mile west of the San Francisco Bay and 0.75 mile east of Highway 101. Topography on the site is generally flat and ranges between 18 and 44 feet above mean sea level. The project site has a single-story warehouse structure that will be demolished. A set of abandoned railroad tracks (northeast/southwest-running) and a vegetated earthen berm are at the north end of the site. The project site is surrounded by commercial development (business parks and paved parking lots) to the north, east, and west, and is bordered by an empty lot to the south.

Except for the area where the existing building is, the project site is paved and has landscaping along Forbes Boulevard. Ruderal vegetation exists at the periphery of the site, along fences set up to isolate construction. Vegetation along the railroad tracks is dominated by fennel (*Foeniculum vulgare*) and pampas grass (*Cortaderia* sp.), with scattered coyote brush (*Baccharis pilularis*); the site has more ornamental species as it curves south towards Forbes Boulevard at its east end. Landscaped trees, including pines (*Pinus* sp.) and black acacia (*Acacia melanoxylon*), occur to the south of the site, along Forbes Boulevard and at the eastern end where the planned trail would be located. White-crowned sparrows (*Zonotrichia leucophrys*), rock doves (*Columba livia*), and a feral cat (*Felis catus*) were observed on the site.

According to the Arborist Report prepared for the project site, four trees exist at the site, including a red ironbark eucalyptus (*Eucalyptus sideroxylon*), two Canary Island pine trees (*Pinus canariensis*), and a Monterey pine (*Pinus radiata*) (Appendix ARB). The eucalyptus and Monterey pine trees are protected under the SSFMC.

Regulatory Setting

Federal and State

Regulatory authority over biological resources is shared by federal, state, and local agencies under a variety of laws, ordinances, regulations, and statutes. Primary authority for biological resources lies with the land use control and planning authority of local jurisdictions (in this instance, the City of South San Francisco).

The California Department of Fish and Wildlife (CDFW) is a trustee agency for biological resources throughout the state under CEQA and has direct jurisdiction under the California Fish and Game Code (CFGC). Under the California Endangered Species Act and the federal Endangered Species Act, the CDFW and the U.S. Fish and Wildlife Service (USFWS), respectively, have direct regulatory authority over species formally listed as threatened or endangered (and listed as rare for CDFW). Native and/or migratory bird species are protected under the CFGC Sections 3503, 3503.5, and 3511.

Statutes in the Clean Water Act (CWA), CFGC, and California Code of Regulations (CCR) protect wetlands and riparian habitat. The U.S. Army Corps of Engineers (USACE) has regulatory authority over wetlands and waters of the United States under Section 404 of the CWA. The State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) ensure water quality protection in California pursuant to Section 401 of the CWA and Section 13263 of the Porter-Cologne Water Quality Control Act. The CDFW regulates waters of the State under the CFGC Section 1600 et seq.

Special-status species are those plants and animals: 1) listed, proposed for listing, or candidates for listing as Threatened or Endangered by the USFWS and the National Marine Fisheries Service (NMFS) under the federal Endangered Species Act; 2) listed or proposed for listing as Rare, Threatened, or Endangered by the CDFW under the California Endangered Species Act; 3) recognized as California Species of Special Concern by the CDFW; 4) afforded protection under CFGC; and 5) occurring on Lists 1 and 2 of the CDFW California Rare Plant Rank (CRPR) system.

Local

SSFMC Chapter 13.30 provides tree protection requirements that would apply to the project. The chapter defines a protected tree as "any upright, single-trunked tree not considered to be a heritage tree…or a tree listed in subsection (2) … with a circumference of forty-eight inches when measured fifty-four inches above natural grade." and also lists species that are considered heritage trees with a diameter of six-inches or more and located on an undeveloped property" (SSFMC 13.30.020). Heritage trees include mostly native species such as California bay (*Umbellaria californica*), oak (*Quercus* spp.), and California buckeye (*Aesculus californica*); these are protected when they have a circumference of 30 inches or more. The trees listed in subsection (2) of the SSFMC code include introduced species such as Blue Gum (*Eucalyptus globulus*), Black Acacia (*Acacia melanoxylon*), or Glossy Privet (*Lingustrum lucidum*), and must have a circumference of 75 inches or more to qualify as a protected tree.

Methods

Literature Review and Desktop Biological Evaluation

Qualified biologists reviewed agency databases, relevant literature, aerial photos, and site photos for baseline information on special-status species and other sensitive biological resources occurring or potentially occurring at the project site and in the immediate surrounding area. The following sources were reviewed for background information:

- CDFW California Natural Diversity Data Base (CDFW 2019a) and Biogeographic Information and Observation System (CDFW 2019b)
- CDFW Special Animals List (CDFW 2019c) and Special Vascular Plants, Bryophytes, and Lichens List (CDFW 2019d)
- California Native Plant Society Online Inventory of Rare and Endangered Plants of California (California Native Plant Society 2019)
- USFWS Information for Planning and Consultation (IPaC; USFWS 2019a)
- USFWS Critical Habitat Portal (USFWS 2019b)
- USFWS National Wetlands Inventory (NWI; USFWS 2019c)

A review of the California Natural Diversity Data Base (CDFW 2019a) was conducted for recorded occurrences of special-status plant and wildlife taxa in the region prior to conducting a reconnaissance-level field survey. For this review, the database search parameters included all occurrences in the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle encompassing the project site (*San Francisco South*), and the six surrounding quadrangles (*Point Bonita, San Francisco North, Hunters Point, San Mateo, Montara,* and *Oakland West*).

A final list of regionally occurring special-status plants and animals was compiled, and individual species were evaluated for potential to occur based on habitat conditions and proximity to known

occurrences. The NWI (USFWS 2019c) and the National Hydrography Datasets (USGS 2019) were reviewed for potential aquatic resources, including jurisdictional waters of the United States or waters of the State.

Biological Survey

On November 21, 2019, a qualified biologist conducted a reconnaissance-level survey of the project site to document site conditions, assess the presence of on-site habitat, and evaluate the potential for special-status species and other sensitive biological resources to occur on the project site.

Impact Analysis

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Special-Status Plants

Seventy-seven (77) special-status plant species were identified to have occurrence records within the seven USGS quadrangles containing and surrounding the project site (CDFW 2019a; California Native Plant Society 2019; USFWS 2019a). All the reported species have specific habitat requirements (e.g., soil type, elevation, aspect). The existing conditions (developed and disturbed) and the lack of native vegetation communities or suitable ecological conditions preclude the occurrence of rare plants on the site, and no special-status plant species are expected to occur. Because construction activities are limited to previously disturbed, developed, and landscaped areas with ruderal and ornamental vegetation, impacts to special-status plant species would not occur.

Special-Status Wildlife

Forty-seven special-status animal species were identified with known occurrence records in the seven USGS quadrangles containing and surrounding the project site (CDFW 2019a; CDFW 2019c; USFWS 2019a). This list was reviewed and refined according to the potential for species to occur based on the presence and quality of habitats on the project site. Of these, two species have the potential to occur on the site: Western bumble bee (*Bombus occidentalis*) and American peregrine falcon (*Falco peregrinus anatum)*.

The western bumble bee (state candidate for listing) has a low potential to occur on site. This bee was once widespread in the northwestern U.S. but is in decline from central California to southern British Colombia. In California, it has been lost from 53 percent of its historic range and has an 84 percent decline in relative abundance (Xerces Society et al. 2018). Habitat loss and alteration, pathogens, urban development and fragmentation, and other factors have contributed to their decline. The most recent of the three occurrence records within 5 miles of the project site is from 1996 (CDFW 2019a). Three unconfirmed sightings have been reported approximately 11 miles north and east of the project site within the last two years (Xerces Society et al. 2019); however, confirmed populations are thought to be restricted to higher elevations in the Sierra Nevada since 2012 (Xerces Society et al. 2018). A generalist forager, the western bumble bee nests underground in cavities or rodent burrows. It requires limited ground disturbance and an abundance of floral resources, as well as suitable overwintering sites for queens. Given the precipitous decline in bumblebees over the last two decades, absence of recent confirmed sightings in the project vicinity,

and the fragmented and disturbed nature of onsite vegetation communities, there is a very low likelihood that the project site provides suitable habitat for this species. The project would not have impacts to western bumble bee.

The peregrine falcon (a state fully protected species) has two occurrence records within 5 miles of the project site (CDFW 2019a). There is potential for the species to forage on site, but there is no suitable nesting habitat for peregrine falcon (e.g., cliffs or skyscrapers) on or next to the project site. Impacts to peregrine falcon are not expected.

Despite the lack of robust native vegetation communities, the site could be used by species of migratory birds that use trees, shrubs, or man-made structures as nesting habitat. Native bird nests are protected by CFGC Section 3503. The nesting season generally extends from February 1 through August 31 in California but can vary based upon annual climatic conditions. Construction activities could result in the mortality of, or injury to birds, or construction activity and noise could produce disturbance-related nest abandonment. Impacts to most non-listed bird species through nest destruction or abandonment would not be considered a significant impact under CEQA, but loss of active nests or mortality would be a violation of CFGC code. Impacts to special-status birds may be considered significant under CEQA if those impacts would jeopardize the viability of a local or regional population. Therefore, mitigation measures would be required to avoid or reduce the proposed project's potentially significant impacts to special-status wildlife and avoid violations of the CFGC that protects nesting migratory birds.

Mitigation Measure

BIO-1 Nesting Bird Avoidance and Minimization Efforts

- To the extent feasible, the project applicant shall schedule demolition and construction activities to avoid the nesting season. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1 through August 31. If demolition and construction activities will occur during the breeding season, then a qualified biologist shall conduct a pre-construction nesting bird survey no more than 14 days prior to initiation of ground disturbance and vegetation removal. The biologist shall conduct the nesting bird pre-construction survey in the disturbance footprint and a 50-foot buffer where access can be authorized. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in San Mateo County.
- If nests are found, the biologist shall determine and demarcate an avoidance buffer (the size of which depend upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified of the existence of the buffer zone and shall be instructed to avoid entering the buffer zone during the nesting season. No construction activities shall occur inside this buffer, and no access in the buffer allowed until the avian biologist confirms that breeding/nesting is complete and the young have fledged the nest, or the nest has become otherwise inactive (e.g., depredated). Encroachment into the buffer shall occur only at the discretion of the qualified biologist.

Significance After Mitigation

Implementation of Mitigation Measure BIO-1 would ensure protection of nesting birds that may be on-site during construction activities. These measures would reduce the potentially significant

impact to special-status species to a less than significant level. This impact will not be discussed further in the EIR, but the mitigation measure will be included in the EIR's executive summary and in the project's mitigation monitoring and reporting program.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

The review of the resource agency databases for sensitive natural communities in the seven USGS quadrangles containing and surrounding the project site identified four sensitive natural communities: northern coastal salt marsh, northern maritime chaparral, serpentine bunchgrass, and valley needlegrass grassland. None of these sensitive natural communities are present on the project site, nor are any other sensitive natural communities. No substantial adverse effect on sensitive natural communities would occur as a result of project activities. This impact will not be discussed in the EIR.

NO IMPACT

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Based on a review of information on biological resources in the project region and data collected during the reconnaissance site visit, no vegetated wetlands or potentially jurisdictional features occur in the project area. No impacts to jurisdictional wetlands or waters would occur. This impact will not be discussed in the EIR.

NO IMPACT

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The project area consists of developed and disturbed areas with primarily ornamental and ruderal vegetation. Land use in the vicinity is mostly commercial with no connectivity to natural habitats, and is therefore not expected to support wildlife movement. No impacts to wildlife movement corridors would occur as a result of project activities. This impact will not be discussed in the EIR.

NO IMPACT

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

As described in the Arborist Report prepared for the project, three of the existing trees on the project site are protected under the City's municipal code (Appendix ARB). If project activities result in tree removal, pruning greater than 30 percent, or construction, excavation, paving, or storage within the dripline of protected trees in the project site, the applicant would be required to obtain a permit from the City of South San Francisco's Park's Division for all protected trees impacted. The fee for tree removal or pruning is $100 per tree. If a tree will be removed, an additional $350 refundable deposit is also required and will be returned once replanting conditions are met. To meet replanting conditions, three 15-gallon size or two 24-inch-box-minimum-size landscape trees must be planted for each tree removed per SSFMC Section 13.30. Therefore, no conflicts with local

policies or ordinances protecting biological resources would occur. This impact will not be discussed in the EIR.

NO IMPACT

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

There are no habitat conservation plans, natural community conservation plans, or other similar plans that govern activities on the project site. Therefore, the proposed project would not conflict with a habitat conservation plan, natural community conservation plan, or other approved habitat conservation plan. This impact will not be discussed in the EIR.

NO IMPACT

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5 Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	■
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	■	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	■	☐

The information in this section is based primarily on a Cultural Resources Assessment conducted by Rincon Consultants in November 2019. This report is included as Appendix CUL.

Setting

The project site lies in the USGS San Francisco South Quadrangle, Township 3 South, Range 5 West Section 22 (Figure 1). The project site is in the East Side region of South San Francisco, an area characterized by its industrial buildings and factories. The project site is currently developed with a single commercial property that is over 50 years of age. At the time of this analysis, the property was approximately 75 percent demolished (Appendix CUL).

The California Historical Resources Information System (CHRIS) search was completed on November 6, 2019. The search was performed to identify previously recorded cultural resources, as well as previously conducted cultural resources studies within the project site and a 0.5-mile radius surrounding it. The CHRIS search included a review of the National Register of Historic Places (NRHP), the California Register of Historical Resources (CRHR), the Office of Historic Preservation Historic Properties Directory, the California Inventory of Historic Resources, and the Archaeological Determinations of Eligibility list.

The Northwest Information (NWIC) records search identified 14 previously conducted cultural resources studies that have been performed within a 0.5-mile radius of the project site; none of the studies overlap with the project site (Table 5).

Table 5 Previous Cultural Resources Studies within 0.5 mile of the Project Site

Report Number	Author(s)	Year	Title	Relationship to Project Site
S-023551	McKale, George and S. Gillies	2000	*Cultural Resources Assessment Golden Gate Power Project, San Francisco International Airport, San Mateo County, California*	Outside
S-023551a	Allen, James	2000	*Paleontological Resources Assessment, Golden Gate Power Project, San Francisco International Airport, San Mateo County, California*	Outside
S-023551b	McKale, George and S. Gillies	2000	*Cultural Resources Assessment, Phase I, United Golden Gate Power Project, San Francisco International Airport, San Mateo County, California*	Outside
S-023551c	McKale, George and S. Gillies	2000	*Cultural Resources Assessment, Phase II, United Gold Gate Power Project, San Francisco International Airport, San Mateo County, California*	Outside
S-023551d	McKale, George and S. Gillies	2000	*Paleontological Resources Assessment Phase II United Golden Gate Power Project, San Francisco International Airport, San Mateo County, California*	Outside
S-027930	Brown, Kyle, A. Marlow, J. Allan, and W. Self	2003	*Cultural Resource Assessment of Alternative Routes for PG&E's Jefferson-Martin Transmission Line, San Mateo County, California*	Outside
S-030163	William Self Associates, Inc.	2005	*Historic Property Survey Report, San Francisco Bay Water Transit Authority, South San Francisco Ferry Terminal Project, Oyster Point Marina and Park, City of South San Francisco, San Mateo County, California.*	Outside
S-030163a	Estes, Allen and A. Arrigoni	2005	*Archaeological Survey Report San Francisco Bay Water Transit Authority South San Francisco Ferry Terminal Project Oyster Point Marina and Park, City of South San Francisco, San Mateo County, California*	Outside
S-035285	Clark, Matthew	2008	*Historic Property and Archaeological Inventory Report for the South San Francisco Gateway Business Park Project, South San Francisco, San Mateo County, California*	Outside
S-035458	Clark, Matthew	2008	*City of South San Francisco East of 101 Sewer Improvements, Initial CEQA Historic Resources Research for East Grand, Allerton, Forbes & DNA Way Sanitary Sewer Project*	Outside
S-037275	Billat, Lorna	2010	*New Tower ("NT") Submission Packet, FCC Form 620, East Grandview Water Tank, SF- 53638A*	Outside

Report Number	Author(s)	Year	Title	Relationship to Project Site
S-038706	Cohen, David	2011	*Cultural Resources Records Search and Site Visit for T-MOBILE WEST CORPORATION a Delaware Corporation Candidate SF03113-A (Eccles Joint Pole SSF), R.O.W. In front of 475 Eccles Avenue, South San Francisco, San Francisco County, California (letter report)*	Outside
S-048738	Jurich, Denise and A. Grady	2011	*California High-Speed Train Project, Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San Jose Section, Archaeological Survey Report, Technical Report*	Outside
S-048738a	Grady, Amber and R. Brandi	2011	*California High-Speed Train Project Environmental Impact Report/Environmental Impact Statement, Draft: San Francisco to San Jose Section Historic Architectural Survey Report, Technical Report*	Outside

Source: Northwest Information Center 2019

Additionally, the NWIC records search identified two previously recorded cultural resources within a 0.5-mile radius of the project site, neither of which is within the project site (Table 6).

Table 6 Previously Recorded Resources within 0.5 mile of the Project Site

Primary Number	Trinomial	Resource Type	Description	Recorder(s) and Year(s)	Relationship to Project Site	NRHP/ CRHR Status
P-41-000043	CA-SMA-39	Prehistoric	Insufficient information	N. Nelson (ca. 1905)	Outside	Unknown
P-41-000884		Multi-building resource	Industrial Complex; since demolished	The Firm of Bonnie L. Bamburg (1986)	Outside	Potentially eligible for NRHP

Source: Northwest Information Center 2019

Regulatory Setting

CEQA

PRC Section 5024.1, Section 15064.5 of the CEQA Guidelines, and PRC Sections 21083.2 and 21084.1 were used as the basic guidelines for the cultural resources analysis. CEQA Guidelines Section 21084.1 requires that a lead agency determine if a project could have a significant effect on historical resources. A historical resource is one listed in or determined to be eligible for listing in the California Register of Historical Resources (CRHR) (Section 21084.1), included in a local register of historical resources (Section 15064.5[a][2]), or any object, building, structure, site, area, place, record, or manuscript that a lead agency determines to be historically significant (Section

15064.5[a][3]). Resources listed in the National Register of Historic Places (NRHP) are automatically listed in the CRHR.

According to CEQA, impacts that adversely alter the significance of a resource listed in or eligible for listing in the CRHR are considered a significant effect on the environment. These impacts could result from physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired (CEQA Guidelines Section 15064.5 [b][1]). Material impairment is defined as demolition or alteration in an adverse manner [of] those characteristics of a historical resource that convey its historical significance and that justify its inclusion in, or eligibility for inclusion in, the California Register (CEQA Guidelines Section 15064.5[b][2][A]).

National Register of Historic Places

The NRHP was established by the National Historic Preservation Act of 1966 as "an authoritative guide to be used by Federal, State, and local governments, private groups and citizens to identify the Nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment" (CFR 36, CFR 60.2). The NRHP recognizes properties that are significant at the national, state, and local levels. To be eligible for listing in the NRHP, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Districts, sites, buildings, structures, and objects of potential significance must also possess integrity of location, design, setting, materials, workmanship, feeling, and association. Properties are eligible for the NRHP if they:

Criterion A: Are associated with events that have made a significant contribution to the broad patterns of our history

Criterion B: Are associated with the lives of persons significant in our past

Criterion C: Embody the distinctive characteristics of a type, period, or method of installation, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction

Criterion D: Have yielded, or may be likely to yield, information important in prehistory or history

In addition to meeting at least one of the designation criteria, resources must also retain integrity. The National Park Service recognizes seven aspects or qualities that, considered together, define historic integrity. To retain integrity, a property must possess several, if not all, of these seven qualities, defined in the following manner:

Location: The place where the historic property was constructed or the place where the historic event occurred

Design: The combination of elements that create the form, plan, space, structure, and style of a property

Setting: The physical environment of a historic property

Materials: Materials are the physical elements that were combined or deposited during a particular period and in a particular pattern or configuration to form a historic property

Workmanship: The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory

Feeling: A property's expression of the aesthetic or historic sense of a particular period

Association: The direct link between an important historic event or person and a historic property

California Register of Historical Resources

The CRHR was created by Assembly Bill (AB) 2881, which was established in 1992. The CRHR is an authoritative listing and guide to be used by state and local agencies, private groups, and citizens in identifying the existing historical resources of the state that deserve to be protected, to the extent prudent and feasible, from substantial adverse change (PRC 5024.1(a)). The criteria for eligibility for the CRHR are consistent with NRHP criteria but have been modified for state use in order to include a range of historical resources that better reflect the history of California (PRC 5024.1(b)). Certain properties are determined by the statute to be automatically included in the CRHR by operation of law, including California properties formally determined eligible for, or listed in, the NRHP.

According to PRC Section 5024.1(c), a resource may be listed in the CRHR if it meets one or more of the following criteria, which are modeled on NRHP criteria:

Criterion 1: It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage

Criterion 2: It is associated with the lives of persons important to our past

Criterion 3: It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values

Criterion 4: It has yielded, or may be likely to yield, information important in prehistory or history

If it can be demonstrated that a project will cause damage to a *unique archaeological resource*, the lead agency may require reasonable efforts be made to permit any or all of these resources to be preserved in place or left in an undisturbed state. To the extent that resources cannot be left undisturbed, mitigation measures are required (PRC Section 21083.2[a], [b]).

PRC Section 21083.2(g) defines a *unique archaeological resource* as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

Criterion 1: Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information

Criterion 2: Has a special and particular quality such as being the oldest of its type or the best available example of its type

Criterion 3: Is directly associated with a scientifically recognized important prehistoric or historic event or person

City of South San Francisco

Adopted in 1986, the City of South San Francisco Historic Preservation Ordinance establishes the designation criteria for local historic landmarks and districts. The ordinance was updated in 2011.

Section 1440 of the ordinance identifies historic landmarks as those properties that meet one or more of the following criteria:

Criterion A: Its character, interest, or value as a significant part of the heritage of the city, the state or the nation

Criterion B: Its location as a site of a significant historic event

Criterion C: Its identification with a person or persons who significantly contributed to the culture and development of the city, the state or the nation

Criterion D: Its exemplification of a particular architectural style or way of life

Criterion E: Its exemplification of the best remaining example of a particular architectural type in the city

Criterion F: Its identification as the creation, design or work of a person or persons whose efforts have significantly influenced the heritage of the city, the state or the nation

Criterion G: Its embodiment of elements demonstrating outstanding attention to artistic, architectural and/or engineering design, detail, materials, or craftsmanship

Criterion H: Its relationship to any other historic resource if its preservation is essential to the integrity of the other historic resource (for example, it is a clearly identified element of a larger cohesive neighborhood or area whose integrity and character should be protected, such as the civic center, downtown, or a specific residential neighborhood)

Criterion I: Its unique location or singular physical characteristics representing an established and familiar visual feature of the city

Criterion J: Its potential of yielding significant information of archeological interest

Criterion K: Its integrity as a natural environment that strongly contributes to the well-being of the people of the city, the state, or the nation. For example, an area retained in or developed in a natural setting, such as portions of Sign Hill, or some other feature which contributes to the quality of life in South San Francisco

Methods

On November 22, 2019, Rincon Biologist Anastasia Ennis conducted a pedestrian field survey of the project site. During the survey, Ms. Ennis examined the area and took extensive photographs recording the project site including the existing building. As a result of the survey, one built environment property over 45 years of age was identified in the project area. This resource was recorded on California Department of Parks and Recreation 523 series forms and evaluated for listing in the NRHP and CRHR, and for local designation. In addition to the survey, as part of the background research process of identifying cultural resources for this project, Rincon conducted additional research, contacted the Native American Heritage Commission (NAHC), and requested a Sacred Lands File search of the project site and vicinity. Additionally, Rincon conducted a records search of the California Historical Resources Information System (CHRIS) at the Northwest Information Center (NWIC) at Sonoma State University. The results of these searches are discussed in more detail below.

Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

As a result of the field survey, one built environment property was recorded and evaluated to determine if it qualifies as a historical resource under CEQA. The subject property is a 45,000-square-foot building located in the Cabot, Cabot & Forbes Industrial Park and designed by architect Howard A. York in 1968. The building was developed for the San Francisco Sausage Factory, a well-known San Francisco Bay-area company.

Originally located in San Francisco on Davis Street in 1917, the San Francisco Sausage Factory moved to Broadway in 1933 where it was in operation until 1968. Originally known as the San Francisco Sausage Factory, the company was renamed the San Francisco Sausage Company in 1984 and the Columbus Salame Company by 1997. The company was one of many businesses to move to South San Francisco, a trend stretching back to the late 19th century, when the area was developed as a hub for the meat-packing industry. Industrial development in South San Francisco experienced a boom in the 1950s and 1960s.

Based on available archival materials and research conducted for this report, the subject property does not meet the applicable criteria of significance to qualify as a historical resource pursuant to CEQA. Research did not show that the property possessed associations with important events/persons or was representative of a notable architectural style or the work of a master. In addition, the near total demolition of the building has resulted in such a loss of physical integrity that the building is not eligible for local, state, or federal designation. Refer to Appendix CUL for further discussion.

As a property that is ineligible for federal, state, and local designation, the project site building is not considered a historical resource under CEQA. There are no other built environment features on the project site; therefore, the project would have no impact to historical resources under CEQA. This impact will not be discussed in the EIR.

NO IMPACT

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

Based on the findings of the cultural resources records search and Native American outreach, no archaeological resources have been identified within the project site. The results of the NWIC records search indicate the presence of one prehistoric resource (CA-SMA-39) within the project vicinity, located approximately 1,640 feet east of the project site. However, the site record for CA-SMA-39 does not contain any information on the nature or extent of the site. Given the prior development of the property and level of disturbance, there is low potential for intact subsurface archaeological deposits to be encountered during construction. However, unanticipated discoveries during construction are possible and mitigation measures would be required.

Mitigation Measures

CR-1 Unanticipated Archaeological Resources

If archaeological resources are encountered during ground-disturbing activities, work within 50 feet of the find should be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

Significance After Mitigation

Implementation of Mitigation Measure CR-1 would reduce potential impacts to unanticipated discoveries during ground-disturbing activities to less than significant. The mitigation measure will be included in the EIR's executive summary and in the project's mitigation monitoring and reporting program. This impact will not be further discussed in the EIR.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

c. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Human remains could be discovered during ground-disturbing activities. However, if human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to PRC Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner must be notified immediately. If the human remains are determined to be prehistoric, the coroner will notify the Native American Heritage Commission, which will determine and notify a most likely descendant, who must complete the inspection of the site and provide recommendations for treatment to the landowner within 48 hours of being granted access. The project's compliance with PRC Section 5097.8, the project would have less than significant impacts on disturbing human remains. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

6 Energy

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	■	☐
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	■	☐

Energy Supply Setting

Energy use relates directly to environmental quality, since it can adversely affect air quality and can generate GHG emissions that contribute to climate change. Fossil fuels are burned to create electricity that powers residences and commercial/industrial buildings, heats and cools buildings, and powers vehicles. Transportation energy use is related to the fuel efficiency of cars, trucks, and public transportation; choice of different travel modes such as auto, carpool, and public transit; and miles traveled by these modes. Construction and routine operation and maintenance of transportation infrastructure also consume energy.

Electricity

The California Public Utilities Commission and the California Energy Commission (CEC) are constantly assessing population growth, electricity demand, and reliability. The CEC is tasked with conducting assessments and forecasts of all aspects of energy industry supply, production, transportation, delivery and distribution, demand, and prices (CEC 2019a). The CEC uses these assessments and forecasts to develop energy policies that conserve resources, protect the environment, ensure energy reliability, enhance the state's economy, and protect public health and safety (PRC Section 25301(a)).

Until 2016, South San Francisco was served solely by Pacific Gas & Electric (PG&E) to meet power demands; in July 2016, PG&E customers in South San Francisco and San Mateo County were enrolled with the Peninsula Clean Energy (PCE) community choice energy program. PCE enables communities to choose clean-sourced power at a cost equivalent to PG&E rates. Although PCE will purchase the electricity, PG&E will continue to deliver electricity to homes and businesses using existing transmission and delivery lines. PG&E will still handle all trouble calls, issue and collect monthly utility bills, and offer the same rebate and assistance programs currently available (South San Francisco 2016).

PCE provides more carbon-free electricity than PG&E and plans for and secures commitments from a diverse portfolio of energy-generating resources to reliably serve the electric energy requirements

of its customers. According to PCE's Integrated Resource Plan, the main strategic goal is to provide a diverse energy portfolio free from GHG emissions. PCE's service territory covers the 20 cities located in San Mateo County, plus the unincorporated areas of the County. Within this service area, PCE serves approximately 300,000 customer accounts representing approximately 765,000 residents (PCE 2018). PCE's electricity load in 2016 was 277 gigawatt hours (GWh) and 3,026 GWh in 2017 (PCE 2018). The projected load for 2018 and the immediate future is approximately 3,700 GWh. PCE's 2016 load represented only the first phase of enrollments for 25 percent of the year. Beyond its current contractual commitments, PCE will procure additional energy products to ensure that the future energy needs of its customers are met in a reliable, cost-effective manner.

According to the CEC, San Mateo County consumed approximately 4,225.6 GWh in 2018, or approximately 14,417 billion Btu (CEC 2018a). Table 7 illustrates the County's 2018 electricity consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its electricity demand. With a population of 769,545 in 2018, San Mateo County's 2018 per capita electricity consumption was approximately 5,491 kWh, or 18.7 million Btu.

Table 7 2018 Annual Electricity Consumption

Energy Type	San Mateo County (GWh)	California (GWh)	Proportion of Statewide Consumption	County per Capita Consumption (kWh)	County per Capita Consumption (MMBtu)
Electricity (MWh)	4,225.6	281,120.2	1.5%	5,491.0	18.7

Notes: Electricity consumption volumes for San Mateo County and California are expressed in gigawatt-hours (GWh) while County per capita consumption is expressed in kilowatt-hours (kWh) and millions of Btu (MMBtu).

Source: CEC 2018

Natural Gas

California relies on out-of-state natural gas imports for nearly 90 percent of its natural gas supply. The CEC estimates that approximately 45 percent of the natural gas burned across the state is used for electricity generation, followed by residential (21 percent), industrial (25 percent), and commercial (9 percent) use. Building and appliance energy efficiency standards account for up to 39 percent in natural gas demand savings since 1990 (CEC 2019b).

South San Francisco falls within PG&E's natural gas service area, which spans central and northern California (CEC 2018b). In 2018, PG&E customers consumed a total of 4.8 billion therms of natural gas. Residential users accounted for approximately 40 percent of PG&E's natural gas consumption. Industrial and commercial users accounted for another 36 and 20 percent, respectively. The remainder was used for mining, construction, agricultural, and water pump accounts (CEC 2018c).

According to the CEC, San Mateo County consumed approximately 209.7 million therms of natural gas in 2018, or approximately 19,493 billion Btu (CEC 2018d). In 2018, San Mateo County users accounted for approximately 4.3 percent of PG&E's total natural gas consumption across the entire service area. Table 8 illustrates the County's 2017 natural gas consumption in comparison to statewide consumption and displays the County's equivalent per capita energy consumption from its natural gas demand. With a population of 769,545 in 2018, San Mateo County's 2018 per capita natural gas consumption was approximately 273 therms, or approximately 25 million Btu.

Table 8 2017 Annual Natural Gas Consumption

Energy Type	San Mateo County (U.S. therms)	California (U.S. therms)	Proportion of Statewide Consumption	County per Capita Consumption (U.S. therms)	County per Capita Consumption (MMBtu)
Natural Gas	209,663,993	12,638,157,740	1.7%	272.5	25.3

Notes: Natural gas consumption volumes for San Mateo County and California are expressed in U.S. Therms while County per capita consumption is expressed in U.S. Therms and millions of Btu (MMBtu).

Source: CEC 2018d

Methodology

The California Emissions Estimator Model (CalEEMod) Version 2016.3.2 was used to estimate air quality and GHG emissions resulting from the proposed project. The CalEEMod results (provided in Appendix AQ) provide the average travel distance, vehicle trip numbers, and vehicle fleet mix during project construction and operation. The CalEEMod results also provide the estimated gross electricity and natural gas consumption by land use during project operation. The values contained therein are used in this analysis to determine the anticipated energy consumption during construction and operation. In addition, the analysis takes into consideration the daily trips generated by the project.

Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Construction

The project would involve demolition of the existing warehouse structure site preparation and grading; pavement and asphalt installation; structure construction; architectural coating; and installation of landscaping and hardscaping. Project demolition and construction would require energy resources primarily in the form of fuel consumption to operate heavy equipment, light-duty vehicles, machinery, and generators. Table 9 summarizes the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the project site.

Table 9 Proposed Project Construction Energy Usage

	Fuel Consumption (Gallons)	
Source	Gasoline	Diesel
Construction Equipment and Vendor/Hauling Trips	–	80,303.8
Construction Worker Vehicle Trips	11,311.7	–

Source: Appendix AQ

As shown in Table 9, project demolition and construction would require approximately 11,312 gallons of gasoline and 80,304 gallons of diesel fuel. This energy use would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the

region. In addition, the project's construction contractors would demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction contractors would be required to comply with the provisions of 13 CCR Sections 2449 and 2485, which prohibit diesel-fueled commercial motor vehicles and off-road diesel vehicles from idling for more than five minutes, thereby minimizing unnecessary fuel consumption. Furthermore, the project would comply with the 2019 requirements of the California Green Building Standards Code (CALGreen) to divert a minimum of 65 percent of construction and demolition debris. These practices would result in efficient use of energy necessary to construct the project. In addition, in the interest of cost efficiency, construction contractors would not be anticipated to use fuel in a wasteful or unnecessary manner. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the project's construction energy consumption impact would be less than significant.

Operation

Energy demand from the project's operation would include fuel consumed by passenger vehicles; natural gas consumed for heating the buildings; and electricity consumed by the proposed structures, including lighting, water conveyance, and air conditioning. Table 10 shows the project's estimated total annual gasoline and diesel fuel consumption, as well as electricity and natural gas use.

Table 10 Proposed Project Operational Energy Usage

Source	Energy Consumption	
Vehicle Trips		
Gasoline	57,212.8 gallons	6,281.2 MMBtu[1]
Diesel	17,904.7 gallons	2,282.1 MMBtu[1]
Built Environment		
Electricity	1.6 GWh	5,499.6 MMBtu
Natural Gas Usage	26.7 U.S. Therms	2.5 MMBtu

[1] CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015).

Source: Appendix AQ

As shown in Table 10, the project's vehicle trips would require approximately 57,213 gallons of gasoline and 17,905 gallons of diesel fuel, or 8,563.3 MMBtu annually. The fuel consumed by the project's vehicle trips is assumed to be typical of similar office development projects in the area. The project's Transportation Demand Management (TDM) plan (provided in Appendix TDM) also includes various measures that would reduce energy use from transportation to and from the project site that are not incorporated into the totals stated above. The measures within the TDM plan were designed to create a 35 percent alternative transportation mode-use rate. These measures include a commuter management program with benefits and subsidies for transit or carpool users, resources for project commuters to use, such as carpool-matching services, mobile bicycle repair, and a web portal.

As shown in Table 10, project operation would consume approximately 1.6 GWh of electricity and 26.7 US Therms of natural gas per year. This represents an insignificant increase in the County's

existing electricity and natural gas use shown in Table 9 and Table 10. The project would comply with standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation**.** CALGreen (as codified in CCR Title 24, Part 11) requires implementation of energy-efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the CEC. As the name implies, these standards are specifically crafted for new buildings to result in energy efficient performance. The standards are updated every three years, and each iteration increases energy efficiency standards. For example, according to the CEC, residences built with the 2019 standards will use about 7 percent less energy due to energy efficiency measures versus those built under the 2016 standards, or 53 percent less energy with rooftop solar. Nonresidential buildings will use about 30 percent less energy due mainly to lighting upgrades (CEC 2018e). Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by PCE continues to increase to comply with state requirements through Senate Bill 100, which requires electricity providers to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020, 60 percent by 2030, and 100 percent by 2045.

Project construction would be temporary and typical of similar projects; it would not result in wasteful use energy. Project operation would increase energy use on the site compared to existing conditions. However, the energy use would be in conformance with the latest version of CALGreen and the Building Energy Efficiency Standards. Additionally, the electricity and natural gas use would not result in a significant increase for PCE or PG&E. Therefore, the project would not result in wasteful or unnecessary energy consumption, and impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

As discussed in question (*a*) of this section, the project would comply with CALGreen and the Building Energy Efficiency Standards, which specify energy efficiency requirements. The project is not located on a site identified for renewable resource production. The City of South San Francisco adopted energy efficiency goals and policies within its General Plan and Climate Action Plan. Table 11 identifies energy efficiency policies provided in the City's General Plan and its Climate Action Plan that are applicable to the proposed project and describes the project's consistency with these policies.

Table 11 Project Compliance with Energy Efficiency Goals and Policies

Energy Efficiency Goal or Policy	Project Consistency
City of South San Francisco General Plan	
Implementation Policy 7.3-1-2: Use the City's development review process and the California Environmental Quality Act (CEQA) regulations to evaluate and mitigate the local and cumulative effects of new development on air quality and GHG emissions.	Consistent. The project's emissions were estimated and determined to be less than significant in this Initial Study.
Implementation Policy 7.3-1-10: Facilitate energy efficiency in building regulations and streamlined review processes, providing flexibility to achieve specified energy performance levels and requiring energy efficiency measures as appropriate.	Consistent. The project includes required energy efficiency measures. Project site plans show compliance with energy efficiency measures with the inclusion of electric vehicle and shared parking requirements, water conservation, and other CALGreen measures.
Implementation Policy 7.3-1-13: Encourage efficient, clean energy and fuel use through collaborative programs, award programs, and incentives, while removing barriers to the expansion of alternative fuel facilities and infrastructure.	Consistent. The project would comply with Title 24 of the California Building Code and all applicable energy efficiency requirements.
City of South San Francisco Climate Action Plan	
Measure 1.1-3: Continue to enforce the City's Transportation Demand Management (TDM) program to require employers to demonstrate achieved mode share and to continually adjust their programs to meeting the requisite goals.	Consistent. A TDM Plan was prepared for the project which includes incentives for alternative transportation modes and on-going monitoring (Appendix TDM).
Measure 2.1-2: Revise parking design guidelines to include designated spaces for electric vehicles, carpool vehicles, and other low-emission vehicles.	Consistent. The project would include 20 electric vehicle ready charging spaces and 37 carpool/vanpool parking spaces, consistent with CALGreen.
Measure 2.1-5: Require new large-scale nonresidential developments to provide a conduit for future electric vehicle charging installations, and encourage the installation of conduits or electric vehicle changing stations for all new development.	Consistent. The project would include 20 parking spaces with conduit for future electric vehicle charging installations.
Measure 3.1-3: Encourage the use of CALGreen energy efficiency measures as a preferred mitigation for CAP streamlining.	Consistent. The project would comply with the California Green Building Standards Code.
Measure 3.4-2: Continue to require tree planting in new development in accordance with Chapter 13.30 of the Zoning Code, and encourage tree placement to maximize building shading.	Consistent. The project would be required to comply with Chapter 13.30, and includes 40 trees along the perimeter of the proposed buildings.
Measure 4.1-2: Require the construction of any new nonresidential space 5,000 square feet or more, or the conversion of unconditioned space 5,000 square feet or more, to comply with one of the following standards: ▪ Meet a minimum of 50 percent of modeled building electricity needs with on-site renewable energy sources. ▪ Participate in a power purchase agreement to offset a minimum of 50 percent of modeling building electricity use. ▪ Comply with CALGreen Tier 2 energy efficiency requirements to exceed mandatory energy efficiency requirements by 20 percent or more.	Consistent. See discussion in Section 8, *Greenhouse Gas Emissions*, under Impact GHG-2.

Energy Efficiency Goal or Policy	Project Consistency
Measure 4.1-3: Require all new development to install conduit to accommodate wiring for solar.	Consistent. The project would be required to show compliance with this measure upon building permit application.
Measure 5.1-2: Continue to enforce the existing construction and demolition recycling ordinance, requiring 100 percent of inert waste and 65 percent of non-inert waste to be recycled from all eligible projects.	Consistent. The project would be required to prepare a Waste Management Plan to show compliance with waste diversion requirements.

As shown in Table 11 the project would be consistent with applicable energy efficiency goals and policies. Therefore, potential impacts associated with renewable energy and energy efficiency would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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7 Geology and Soils

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
1. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	■	☐
2. Strong seismic ground shaking?	☐	☐	■	☐
3. Seismic-related ground failure, including liquefaction?	☐	■	☐	☐
4. Landslides?	☐	☐	■	☐
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	■	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	■	☐	☐
d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	■	☐	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	■
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	■	☐

The analysis below is based primarily on a geotechnical investigation prepared for the project by Rockridge Geotechnical in May 2019 (Appendix GEO).

Setting

Active faults are defined by the State of California to be a fault that has surface displacement within the Holocene time (approximately the last 10,000 years). Potentially active faults as defined by the State of California to be a fault that has shown evidence of surface displacement during the Quaternary (last 1.6 million years). Any fault that is sufficiently active describes a fault that has some evidence of Holocene displacement on one or more of its segments or branches. Associated issues with earthquakes include liquefaction, which is the rapid transformation of sediment to a fluid-like state. It occurs when water-saturated, loose to medium dense, relatively clay-free sands and silts are subjected to earthquake ground motion.

The project site is located in the Coast Ranges geomorphic province, which is characterized by northwest-southeast trending valleys and ridges. These are controlled by folds and faults that resulted from the collision of the Farallon and North American plates and subsequent shearing along the San Andreas fault system. Movements along this plate boundary in the Northern California region occur along right-lateral strike-slip faults of the San Andreas Fault system (Appendix GEO).

The Bay Area contains both active and potentially active faults. Major active faults in the area are the San Andreas, San Gregorio, Hayward, and Calaveras faults. However, the project site itself is not located within a State of California Earthquake Hazard Zone (DOC 2019). The nearest active fault is the North San Andreas fault, approximately 3.5 miles away from the project site. See Table 12 for the faults in the area surrounding the project site and the strength of their shaking. Strongest ground shaking anticipated to occur in the project vicinity would be triggered by the North San Andreas fault.

Table 12 Active Fault Zones Near the Project Site

Fault Segment	Distance to Project Site (miles)	Direction from Site	Mean Characteristic Moment Magnitude
N. San Andreas – Peninsula	3.5	West	7.2
San Gregorio Connected	9	West	7.5
N. San Andreas – North Coast	13	Northwest	7.51
Total Hayward	14	Northeast	7.0
Total Hayward – Rodgers Creek	14	Northeast	7.3
Monte Vista – Shannon	16	Southeast	6.5
Total Calaveras	23	East	7.0
Mount Diablo Thrust	24	Northeast	6.7
Green Valley Connected	27	Northeast	6.8
Rodgers Creek	29	North	7.1

[1]Moment magnitude is an energy-based scale and provides a physically meaningful measure of the size of a faulting event. Moment magnitude is directly related to average slip and fault rupture area.

Notes: Faults were tabulated above and numerous other faults in the region are sources of potential motion. However, earthquakes that might occur on other faults throughout California are also potential generators of significant ground motion and could subject the site to intense ground shaking.

Source: Appendix GEO

Expansive soils are soils that swell in density and volume as they absorb water and contract as they lose water. Associated problems include cracking and deterioration of roadway surface, as they expand and contract during seasonal wet and dry cycles.

The project site is underlain by early Pleistocene-age alluvium. The northeastern corner of the project site is underlain by hillslope deposits; the center and southwestern corner of the site are underlain by artificial fill. In general, the site is underlain by heterogeneous alluvial sediments that consist predominantly of medium stiff to hard clays and silts interbedded with discontinuous dense to very dense granular (sand and/or gravel) layers to the maximum depth explored of about 81 feet below ground surface (Appendix GEO).

The project site sits atop silty clay. The native clay material has a slight to moderate swelling potential (USGS 1989). The project site is relatively flat, bordered by a relatively step slope down to the railroad tracks. The steepest portion of the slope is approximately 1.5:1 (horizontal: vertical) at the northeastern corner of the site with approximately 7 feet of elevation change.

Regulatory Setting

Federal and State

ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING ACT

Following the 1989 Loma Prieta earthquake, the Seismic Hazards Mapping Act (SHMA) was passed by the California legislature in 1990. The SHMA (PRC Chapter 7.8, Section 2690-2699.6) directs the Department of Conservation, California Geological Survey to identify and map areas prone to liquefaction, earthquake-induced landslides and amplified ground shaking. It also requires that

agencies only approve projects in seismic hazard zones following site-specific geotechnical investigations to determine if the identified hazard is present and the inclusion of appropriate mitigation to reduce earthquake-related hazards.

SEISMIC HAZARDS MAPPING ACT

The Seismic Hazards Mapping Act of 1990 was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under the Alquist-Priolo Act, the State Geologist is responsible for identifying and mapping seismic hazards. CGS Special Publication 117, adopted in 1997 by the State Mining and Geology Board, constitutes guidelines for evaluating seismic hazards other than surface faulting and for recommending mitigation measures as required by PRC Section 2695(a). In accordance with the mapping criteria, the CGS seismic hazard zone maps identifies areas with the potential for a ground shaking event that corresponds to 10 percent probability of exceedance in 50 years.

The purpose of the Seismic Hazards Mapping Act is to reduce the threat to public health and safety and to minimize the loss of life and property by identifying and mitigating seismic hazards. Cities, counties, and state agencies are directed to use seismic hazard zone maps developed by CGS in their land-use planning and permitting processes. The Seismic Hazards Mapping Act requires site-specific geotechnical investigations prior to permitting most urban development projects in seismic hazard zones.

CALIFORNIA BUILDING CODE (CBC)

The California Building Code (CBC), Title 24, Part 2, provides building codes and standards for the design and construction of structures in California. The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress facilities, and general stability by controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of building and structures. The CBC contains specific requirements for seismic safety, excavation, foundations, retaining walls, and site demolition. It also regulates grading activities, including drainage and erosion control. Chapter 16 of the CBC contains definitions of seismic sources and the procedure used to calculate seismic forces on structures.

The CBC is updated every three years by order of the legislature, with supplements published in intervening years. State law mandates that local governments enforce the CBC. In addition, a city and/or county may establish more restrictive building standards reasonably necessary because of local climatic, geological, or topographical conditions. The 2016 CBC is based on the 2015 International Building Code with the addition of more extensive structural seismic provisions.

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

The federal government administers the National Pollutant Discharge Elimination System (NPDES) permit program, which regulates discharges into surface waters under the Clean Water Act (CWA). The primary regulatory control relevant to the protection of water quality is the NPDES permit administered by the State Water Resources Control Board, which establishes requirements prescribing the quality of point sources of discharge and water quality objectives. These objectives are established based on the designated beneficial uses (e.g., water supply, recreation, and habitat) for a particular surface waterbody. The NPDES permits are issued to point source dischargers of pollutants to surface waters pursuant to Water Code Chapter 5.5, which implements the federal CWA. Examples include, but are not limited to, public wastewater treatment facilities, industries,

power plants, and groundwater cleanup programs discharging to surface waters (State Water Resources Control, Title 23, Chapter 9, Section 2200). The Regional Water Quality Control Board (RWQCB) establishes and regulates discharge limits under the NPDES permits.

Construction projects which disturb one or more acres of soil or are part of a larger common plan of development that disturbs one or more acres of soil must obtain coverage under the statewide NPDES General Permit for Discharges of Stormwater Associated with Construction Activity (Construction General Permit Order 2009-0009-DWQ). In order to obtain coverage under the Construction General Permit, a project-specific Stormwater Pollution Prevention Plan (SWPPP) must be prepared. The SWPPP outlines Best Management Practices (BMPs)to reduce stormwater and non-stormwater pollutant discharges, including erosion control, minimizing contact between construction materials and precipitation, and strategies to prevent equipment leakage or spills.

Regional and Local

SAN FRANCISCO BAY REGIONAL WATER QUALITY CONTROL BOARD

The City of South San Francisco is under the jurisdiction of RWQCB Region 2, the San Francisco Bay RWQCB. The San Francisco Bay RWQCB provides permits for projects that may affect surface waters and groundwater locally and is responsible for preparing the Water Quality Control Plan for the San Francisco Bay Basin (Basin Plan). The Basin Plan designates beneficial uses of water in the region and establishes narrative and numerical water quality objectives. The Basin Plan serves as the basis for the San Francisco Bay RWQCB's regulatory programs and incorporates an implementation plan to ensure water quality objectives are met.

SOUTH SAN FRANCISCO GENERAL PLAN

Goal 8.1-G-1 Minimize the risk to life and property from seismic activity and geologic hazards in South San Francisco.

EAST OF 101 AREA PLAN

Policy GEO-1 The City shall assess the need for geotechnical investigations on a project-by-project basis on sites in areas of fill shown on Figure 17 and shall require such investigations where needed.

Policy GEO-2 Where fill remains under a proposed structure, project developers shall design and construct appropriate foundations.

Impact Analysis

a.1. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?

The project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no known active or potentially active faults exist on the site. In a seismically active area, the remote possibility exists for future faulting in areas where no faults previously existed; however, the risk of surface faulting and consequent secondary ground failure from previously unknown faults is also very low (Appendix GEO). Therefore, the risk of loss, injury, or

death involving rupture of a known earthquake fault would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.2. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?

The nearest mapped active fault, the North San Andreas Fault, is approximately 3.5 miles west of the project site (Appendix GEO). The seismicity of the site is governed by the activity of the San Andreas, San Gregorio, and Hayward faults. During a major earthquake on a segment of one of the nearby faults, strong to very strong ground shaking would occur at the project site.

Project construction would be required to comply with the seismic safety requirements in the International Building Code, the CBC, and the City of South San Francisco Building Code. Compliance with such requirements would reduce seismic ground-shaking impacts to the maximum extent practicable with current engineering practices. Furthermore, the project would not increase ground-shaking hazards at adjacent properties. Therefore, impacts related to strong seismic ground shaking would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

a.3. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?

The project site has thin layers of potentially liquefiable soil between depths of approximately 8 and 38 feet below ground surface. The localized potentially liquefiable layers on the project site are generally less than 4 feet thick, and most of the material identified as potentially liquefiable in the liquefaction analyses generally consists of silty and sandy clay, as well as silty sand to sandy silt (Appendix GEO). Soil makeup would not change as a result of project implementation. The preliminary analysis found that the potentially liquefiable layers are sufficiently thin and/or have a sufficient amount of plastic fines such that the potential for surface manifestations from liquefaction, such as sand boils,[1] and loss of bearing capacity for shallow foundations are low (Appendix GEO). The thin layers of potentially liquefiable layers would not incur significant ground motion during strong ground shaking. Some potential exists for lateral spreading of the project site due to the potentially liquefiable soils and the topographic conditions. Mitigation measures would be required for the horizontal and vertical support of the proposed building to prevent damages from potential liquefaction-induced lateral spreading. Project implementation would not add any further risk associated with liquefaction induced lateral-spreading.

Due to the presence of potentially liquefiable soils and the topographic conditions, liquefaction-induced lateral spreading may be of significant impact on the project site. Therefore, mitigation measures would be required.

[1] A sand boil is sand and water that come out onto the ground surface during an earthquake as a result of liquefaction at shallow depth (USGS 2019).

Mitigation Measures

GEO-1 Seismic Design

As recommended by the project's Geotechnical Investigation (Rockridge Geotechnical 2019), a geotechnical engineer shall collect shear wave velocity measurements and use such information for final project design. Final project design shall be designed and constructed to resist the effects of earthquake motions and in compliance with the American Society of Civil Engineers, Chapter 12, Seismic Design Requirements for Building Structures. Alternatively, Site Class D shall be used for project design if shear wave velocity measurements are not taken. A seismic design classification of Site Class D corresponds to buildings and structures in areas expected to experience severe and destructive ground shaking but are not located near a major fault. Project design of a Site Class D project shall also comply with the requirements as set forth by the American Society of Civil Engineers.

Significance After Mitigation

Implementation of Mitigation Measure GEO-1 would reduce impacts related to lateral spreading to less than significant levels. The mitigation measure will be included in the EIR's executive summary and in the project's mitigation monitoring and reporting program. This impact will not be further discussed in the EIR.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

a.4. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?

Earthquakes can trigger landslides that may cause injuries and damage many types of structures. Landslides are typically a hazard on or near slopes or hillside areas, rather than on generally level areas, like the project site and vicinity. The City of South San Francisco is not in a landslide hazard zone per the County of San Mateo's Local Hazard Mitigation Plan (County of San Mateo 2016). Impacts related to landslides would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in substantial soil erosion or the loss of topsoil?

Project construction, particularly demolition, grading, and site preparation, could result in erosion and loss of topsoil from the project site. The project would be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity, Construction General Permit Order 2009-0009-DWQ (Construction General Permit), administered by the SWRCB. Coverage under the NPDES Permit would require implementation of a SWPPP and various site-specific BMPs to reduce erosion and loss of topsoil during site demolition and construction. Compliance with the NPDES permit and BMPs during demolition and construction such as straw wattles, silt fencing, concrete washouts, and inlet protection during construction would reduce impacts resulting from loss of topsoil. The project would be required to comply with SSFMC Section 15.56.030, which would require the development of the project site to control filling, grading, and dredging which may increase flood damage.

Compliance with state and local requirements would reduce impacts from soil erosion and the loss of topsoil to less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are those that have a potential to undergo significant changes in volume, either shrinking or swelling, due to their composition and moisture content. Periodic shrinking and swelling of expansive soils can cause extensive damage to other structures and roads. The site is blanketed by material with a soil behavior type of loose to medium dense sand and silty sand, and medium stiff to very stiff silty clay (Appendix GEO). According to information provided by the USGS, clay soils found in the project vicinity generally have a slight to moderate expansivity (USGS 1989). Most of the site is underlain by early Pleistocene-age alluvium. Results from field explorations indicate the site is generally underlain by heterogeneous alluvial sediments that consist predominantly of medium stiff to hard clays and silts interbedded with discontinuous dense to very dense granular sand or gravel layers (Appendix GEO).

Geotechnical concerns related to expansive soils would be foundation settlement due to the compression of the underlying clay soils. Implementation of Mitigation Measure GEO-2 would be required.

Mitigation Measure

GEO-2 Foundation Settlement

The building shall be supported on a stiffened foundation system, such as conventional reinforced concrete mat or interconnected continuous footings (i.e., a stiffened grid). If the estimated total settlements are not acceptable to the project team or the stiffened foundation system cannot be economically designed to limit differential settlement to a value that can be tolerated by the structure, then the proposed new structure shall be supported on spread footings bearing on improved soil provided that the soil improvement extends to a depth that would reduce differential settlement of the structure under both static and seismic conditions to a tolerable amount. The foundation system for the project's garage shall consists of spread footings bearing on improved ground. Drill displacement sand-cement columns or rammed aggregate piers would be the most appropriate ground improvement methods for this project.

Significance After Mitigation

Implementation of Mitigation Measure GEO-2 would reduce impacts related to expansive soils on the project site to a less than significant level. The mitigation measure will be included in the EIR's executive summary and in the project's mitigation monitoring and reporting program. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

The project site would be served by the municipal sewer system and would not require the installation of an on-site septic tank or alternate wastewater treatment systems. Therefore, no impacts from septic systems or alternative wastewater disposal systems would occur. This impact will not be discussed in the EIR.

NO IMPACT

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

The area east of Highway 101 is underlain by deposits of Bay mud up to 80 feet deep in some places (City of South San Francisco 1999). The City of South San Francisco has some sensitivity for paleontological vertebrates, but no paleontological resources have been found on the project site (University of California Museum of Paleontology 2019).

The project site falls within a highly urbanized area and is developed with a manufacturing structure. The site has been disturbed previously during construction of the existing building. The project would include grading and excavation limited to ground disturbance for foundations and utility lines. In addition, project grading for the proposed building and parking lot would generally not extend substantially below disturbance for prior development at the site. Therefore, the project has a low potential to directly or indirectly destroy unique paleontological resources or a unique geologic feature. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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8 Greenhouse Gas Emissions

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	■	☐
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	■	☐

Setting

Climate Change and Greenhouse Gases

Climate change is the observed increase in the average temperature of the earth's atmosphere and oceans along with other substantial changes in climate (such as wind patterns, precipitation, and storms) over an extended period. The term "climate change" is often used interchangeably with the term "global warming," but climate change is preferred because it more broadly encompasses other changes in addition to rising temperatures. The baseline against which these changes are measured originates in historical records identifying temperature changes that have occurred in the past, such as during previous ice ages. The global climate is continuously changing, as evidenced by repeated episodes of substantial warming and cooling documented in the geologic record. The rate of change has typically been incremental, with warming or cooling trends occurring over the course of thousands of years. The past 10,000 years have been marked by a period of incremental warming, as glaciers have steadily retreated across the globe. However, scientists have observed acceleration in the rate of warming during the past 150 years. According to the United Nations Intergovernmental Panel on Climate Change (IPCC), the understanding of anthropogenic warming and cooling influences on climate has led to a high confidence (95 percent or greater) that the global average net effect of human activities has been the dominant cause of warming and that the rate of increase is unprecedented over decades to millennia since the mid-twentieth century (IPCC 2014).

GHGs are gases that absorb and re-emit infrared radiation in the atmosphere. The gases that are widely seen as the principal contributors to human-induced climate change include carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O), fluorinated gases such as hydrofluorocarbons (HFCs) and perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). Water vapor is excluded from the list of GHGs because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off gassing associated with agricultural practices

and landfills. Observations of CO_2 concentrations, globally averaged temperature, and sea-level rise are generally well within the range of the extent of the earlier IPCC projections. The recently observed increases in CH_4 and N_2O concentrations are smaller than those assumed in the scenarios in the previous assessments. Each IPCC assessment has used new projections of future climate change that have become more detailed as the models have become more advanced.

Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases and SF_6 (California Environmental Protection Agency [CalEPA] 2006). Different types of GHGs have varying global warming potentials (GWPs). The GWP of a GHG is the potential of a gas or aerosol to trap heat in the atmosphere over a specified timescale (generally, 100 years). Because GHGs absorb different amounts of heat, a common reference gas (CO_2) is used to relate the amount of heat absorbed to the amount of the gas emissions, referred to as "carbon dioxide equivalent" (CO_2e), and is the amount of a GHG emitted multiplied by its GWP. CO_2 has a 100-year GWP of one. By contrast, CH_4 has a GWP of 25, meaning its global warming effect is 25 times greater than carbon dioxide on a molecule per molecule basis (IPCC 2007). Emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations.

Most individual projects do not generate sufficient GHG emissions to have a substantial influence on climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

Regulatory Setting

In response to an increase in man-made GHG concentrations over the past 150 years, California implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 codified the statewide goal of reducing emissions to 1990 levels by 2020 (essentially a 15 percent reduction below 2005 emission levels) and adopted regulations to require reporting and verification of statewide GHG emissions. In 2007, the governor similarly signed into law SB 97, which requires the California Office of Planning and research to develop and transmit to the California Natural Resources Agency CEQA guidelines relating to mitigating GHG emissions including those GHG effects associated with transportation or energy consumption.

On September 8, 2016, the governor signed Senate Bill (SB) 32 into law, which requires the State to further reduce GHGs to 40 percent below 1990 levels by 2030. SB 32 extends AB 32, directing the CARB to reduce GHGs to 40 percent below 1990 levels by 2030. In response, on December 14, 2017, CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan does not give project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally appropriate quantitative thresholds consistent with a statewide per capita goal of six metric tons (MT) of carbon dioxide equivalents (CO_2e) by 2030 (CARB 2017). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level) but not for individual projects because they include all emissions sectors in the state.

Pursuant to the requirements of SB 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines for the feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The CEQA Guidelines provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Most individual projects do not generate enough GHG emissions to directly influence climate change. However, physical changes caused by a project can contribute incrementally to cumulative effects that are significant, even if individual changes resulting from a project are limited. The issue of climate change typically involves an analysis of whether a project's contribution towards an impact would be cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15064[h][1]).

City of South San Francisco Climate Action Plan

The City of South San Francisco adopted its Climate Action Plan (CAP) in 2014 to address GHG emissions in the City. The CAP meets the qualifications for a qualified CAP and includes a clear path for the City to implement its proposed policies, programs, and activities that will reduce GHG emissions. Consistent with AB 32, the CAP includes targets to reduce emissions to 15 percent below 2005 baseline levels by 2020. The CAP sets a 2020 service population threshold of 3.58 MT CO_2e per service population per year. However, the proposed project would be operational after 2020 and the 2020 service population threshold would not apply as the CAP is not a qualified GHG reduction strategy for post-2020 projects (i.e., the CAP does not establish a 2030 GHG emissions reduction target consistent with SB 32). Therefore, the significance thresholds in the BAAQMD's May 2017 CEQA Guidelines for project operations within the SFBAAB are the most appropriate thresholds for use to determine the GHG impacts of the proposed project.

Plan Bay Area 2040

SB 375, signed in August 2008, requires the inclusion of Sustainable Communities' Strategies in Regional Transportation Plans to reduce GHG emissions. The Metropolitan Transportation Commission and ABAG adopted a Sustainable Communities' Strategies that meets the GHG reduction targets set forth by CARB. Plan Bay Area 2040 is a state-mandated, integrated long-range transportation, land-use, and housing plan that supports a growing economy, provides more housing and transportation choices and reduces transportation-related pollution in the nine-county San Francisco Bay Area (ABAG 2017). Plan Bay Area 2040 builds on earlier efforts to develop an efficient transportation network and grow in a financially and environmentally responsible way. Plan Bay Area 2040 will be updated every four years to reflect new priorities. The goals of Plan Bay Area 2040 related to GHG emissions include (ABAG 2017):

1. **Climate Protection.** Reduce per capita CO_2 emissions.
2. **Healthy and Safe Communities.** Reduce adverse health impacts.
3. **Open Space and Agricultural Preservation.** Direct development within urban footprint.
4. **Transportation.** Increase non-auto mode share.

BAAQMD Screening Criteria

In the 2017 BAAQMD CEQA Air Quality Guidelines, the BAAQMD outlines an approach to determine the significance of projects. The BAAQMD recommends that lead agencies determine appropriate GHG emissions thresholds of significance based on substantial evidence in the record. The BAAQMD's significance thresholds in the updated May 2017 CEQA Guidelines for project operations within the SFBAAB are the most appropriate thresholds for use in determining GHG emission impacts of the proposed project. The BAAQMD developed screening criteria to provide lead agencies and project applicants with a conservative indication of whether a project could result in potentially significant GHG emission impacts. If all screening criteria are met by a project, then the lead agency or applicant would not need to perform a detailed assessment of their project's GHG emissions. These screening levels are generally representative of new development on greenfield sites without any form of mitigation measures taken into consideration (BAAQMD 2017b).

The screening criteria for operational GHG emissions of office buildings is 53,000 square feet. The proposed project would exceed the screening threshold and, therefore, the project's GHG emissions are compared in this Initial Study to the BAAQMD's significance thresholds shown in Table 13 below. It should be noted that the BAAQMD's thresholds were established based on achieving the 2020 GHG emission reduction targets set forth in the AB 32 Scoping Plan. Therefore, because the project would have a post-2020 buildout year, the efficiency threshold of significance (4.6 MT of CO_2e/SP/year) was adjusted based on the SB 32 target of a 40 percent reduction in GHG emissions below 1990 levels (Association of Environmental Professionals 2016). Since the 2020 GHG targets set forth in the AB 32 Scoping Plan are designed to reduce GHG emissions to 1990 levels, it follows that the BAAQMD threshold of 4.6 MT of CO_2e/SP/year must decrease by 40 percent by 2030 to meet the statewide 2030 GHG emission reduction targets. Therefore, for the purposes of this analysis, the project's year 2030 GHG emissions would be significant if they would exceed 2.8 MT of CO_2e/SP/year.

Table 13 GHG Significance Thresholds

GHG Emission Source Category	Operational Emissions
Non-stationary Sources	1,100 MT of CO_2e/year or 4.6 MT of CO_2e/SP/year (residents + employees)
Stationary Sources	10,000 MT/year
Plans	6.6 MT of CO_2e/SP/year (residents + employees)

Notes: SP = Service Population; MT – metric tons; CO_2e = carbon dioxide equivalents

Project emissions can be expressed on a per-capita basis as MT of CO_2e/Service Population/year, which represents the project's total estimated annual GHG emissions divided by the estimated total number of new residents and/or employees that would result from development of a project.

Methodology

GHG emissions for project construction and operation were calculated using CalEEMod, Version 2016.3.2. The model calculates emissions of the following GHGs: CO_2, N_2O, and CH_4, reported as CO_2e. For the purposes of the GHG analysis, mobile trips from the project's new office building were included in the model, per the project's Access and Circulation Memo (Appendix TRA), which included trip reduction estimated from the project's TDM Plan.

Electricity emissions are calculated by multiplying the energy use by the carbon intensity of the utility district per kilowatt hour (CAPCOA 2017). The project would be served by PCE, which has two utility options, ECOPlus and ECO100. Since ECO100 is optional, ECOPlus carbon intensity factors were utilized. In addition, PCE did not provide CO_2e factors for CH_4 or N_2O and, therefore, PG&E's factors were used.

The project's energy use was reduced by 30 percent to account for the requirements of 2019 Title 24 standards for non-residential projects (CEC 2019). In addition, CalEEMod does not incorporate water use reductions achieved by 2016 CALGreen (Title 24, Part 11). New development would be subject to CalGreen, which requires a 20 percent increase in indoor water use efficiency. Thus, to account for compliance with CalGreen, a 20 percent reduction in indoor water use was included in the water consumption calculations.

The project's service population was determined based on the estimated number of employees that would work at the project site. According to the project's TDM Plan (Appendix TDM), the project could add 451 employees. Therefore, the service population was assumed to be 451.

Impact Analysis

a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?

Construction Emissions

Project construction would generate temporary GHG emissions primarily from construction equipment on-site, as well as from vehicles transporting construction workers to and from the project site and heavy trucks to export earth materials on-site. Site preparation and grading typically generate the greatest amount of emissions due to the use of grading equipment and soil hauling. The project's construction GHG emissions are shown in Table 14 below. Construction emissions would generate an estimated 974.6 MT of CO_2e per year, or 32.5 MT of CO_2e per year when amortized over a 30-year period. The construction emissions are combined with the project's estimated operational emissions below.

Table 14 Estimated Construction GHG Emissions

Year	Project Emissions (MT/yr CO_2e)
Total	974.6
Total Amortized over 30 Years	32.5

Source: Appendix AQ

Operational Emissions

Project operation would generate GHG emissions as a result of energy use, area emissions from landscaping equipment and consumer products, waste generation and water consumption, and from mobile sources from vehicle trips generated by the project. Table 15 combines the amortized construction, operational, and mobile GHG emissions associated with the project.

Table 15 Combined Annual Emissions of Greenhouse Gases

Emission Source	Annual Emissions MT CO_2e
Construction	32.5
Operational	
Area	<0.1
Energy	314.9
Solid Waste	60.2
Water	45.1
Mobile	
CO_2 and CH_4	495.1
N_2O	4.3
Total Emissions	**952.1**
Service Population (employees)	451
Emissions per Service Population (MT CO2e/SP/year)	2.1
Project-specific Efficiency Threshold	2.8
Exceeds Threshold?	**No[1]**

[1] Emissions greater than 2.8 MT CO_2e per service population per year may conflict with substantial progress toward GHG reduction targets; as the project does not exceed this number, it would not exceed the threshold.

See Appendix AQ for CalEEMod results and N_2O mobile emissions modeling.

As shown in Table 15, the project would result in approximately 2.1 MT CO_2e per service population per year. These emissions would not exceed the 2.8 MT CO_2e per service population per year threshold. Therefore, the project's GHG emissions would have a less than significant impact. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The project would be infill redevelopment accessible by pedestrians, bicyclists, and public transit users. The nearest bike lane is a Class II bike lane on Allerton Avenue and the nearest transit stop are South San Francisco BART shuttles approximately 0.2 mile from the project site. Increased alternative transportation options would reduce vehicle trips and average vehicle miles travelled, thereby reducing mobile source GHG emissions and contributing to achieving the GHG emissions reduction goals set forth by AB 32, SB 32, and SB 375. The project site is approximately 0.8 mile from the Caltrain South San Francisco Station, and the project would provide a commute shuttle option for employees under the TDM Plan (Appendix TDM). Therefore, given the viable public transit and alternative transportation options, future guests and employees would be able to use non-auto modes to access the project site, which would reduce per capita CO_2 emissions and associated adverse health impacts related to mobile source air pollutant and GHG emissions. (As described in Section 17, *Transportation*, the project may conflict with applicable policies related to

circulation and traffic, not greenhouse gas emissions. Impacts specifically related to transportation will be analyzed further in the EIR.)

City of South San Francisco Climate Action Plan

The City of South San Francisco CAP includes a Development Review Checklist with CAP criteria that are applicable to new development. Measures in the Development Review Checklist should be included in the project design as feasible (City of South San Francisco 2014a). Table 16 summarizes the project's consistency with the Development Review Checklist. As shown therein, the project would be inconsistent with several of the Development Review Checklist criteria, including those pertaining to water-efficient fixtures, green building practices, and renewable energy. Therefore, impacts related to consistency with GHG emission reduction plans would be potentially significant; however, the project would be subject to a standard Condition of Approval that would reduce this impact.

Table 16 Project Consistency with City of South San Francisco Climate Action Plan Development Review Checklist

Goals, Targets, and Policies	Consistency
Does the project include bicycle facilities (e.g., bicycle lanes, parking, lockers)?	**Consistent**. The project would include 108 bicycle parking spaces, including at least 48 secured and covered spaces.
Will the project support bike sharing/rental programs?	**Consistent**. Although it would not directly implement bike sharing/rental programs, the project would not conflict with or impede such programs.
Will there be a commute shuttle or public transit stop on-site or within 500 feet?	**Consistent**: The project would provide a shuttle service through participation in Commute.org, as detailed in the TDM Plan (Appendix TDM). In addition, the project is located less than 0.25 mile from BART/Caltrain/Ferry shuttle stops.
Is the project within ¼ mile of a Caltrain or BART stop?	**Consistent**. Although the project site is located approximately 0.8 mile east of the South San Francisco Caltrain station, the project is located less than 0.25 mile from Caltrain shuttle stops that would take employees to this station.
Will the project include high-density housing and a diverse range of housing?	**Not applicable**. The project does not include housing.
Will the project provide traffic calming treatments?	**Consistent**. A TDM Plan was prepared for the project and includes traffic calming measures for the area. This will be further discussed in the EIR.
Is the project paying a traffic impact fee to fund bicycle and pedestrian improvements?	**Consistent**. Per SSFMC Section 8.68, the project would be required to pay a bicycle and pedestrian impact fee.
Will the project provide shared or reduced parking?	**Consistent**. The project would include 29 designated carpool parking spaces.
Will the project provide designated parking spaces for electric vehicles, carpool vehicles, or other low-emissions vehicles?	**Consistent**. The project would include one clean-air parking space and five EV-charging spaces.
Will the project have any ground-level commercial space?	**Not applicable**. The proposed project is an office building.
Does the project include any alternative-fuel stations?	**Consistent**. The project would include five electric vehicle charging stations.

Goals, Targets, and Policies	Consistency
Will the project have any pre-wiring or conduit construction to easily add electric vehicle charging stations or alternative energy facilities at a later date?	**Consistent**. The project would include five electric vehicle charging stations.
If this project is replacing an existing building, is the building being replaced more than 30 years old?	**Consistent**. The existing building on-site was constructed in 1968 and is therefore 51 years old.
Will certification of the building be sought under LEED or other green building criteria?	**Inconsistent**. The project does not include certification of the building under Leadership in Energy and Environmental Design (LEED) or other green building criteria.
Will the project include any high-reflectivity ("cool") roof or surface paving?	**Consistent**. The project would include corrugated metal roofing panels, and most parking spaces would be located within an enclosed parking garage.
Will there be a net increase in the number of mature trees on-site once the project is completed?	**Consistent**. The project site currently contains one ornamental tree. The project would add approximately 45 trees.
Will any renewable energy system be installed as part of this project?	**Inconsistent**. The project would be required to provide conduit for future solar installation. However, the project does not include installation of renewable energy systems.
Is the project a new nonresidential conditioned space of 5,000 square feet or more?	**Inconsistent**. The project is a new nonresidential development with more than 5,000 square feet of conditioned space. Therefore, Measure 4.1 of the City's CAP requires implementation of one of three alternative energy measures, none of which are included in the proposed project.
Will this project use renewable energy generated off-site?	**Consistent**. Electricity for the proposed project would be supplied by PCE, which currently has a portfolio with 51 percent eligible renewable energy sources (PCE 2018).
Will there be composting collection on-site?	**Consistent**. AB 1826 requires commercial developments to subscribe to organics recycling services. Therefore, the project would include composting collection on-site.
Will any water fixtures exceed CALGreen standards?	**Inconsistent**. The project would not include water fixtures that exceed CALGreen standards.
Will the project incorporate low-impact development (LID) practices?	**Consistent**. The project would replace over 10,000 square feet of impervious surfaces. Therefore, the project would be required by the San Francisco Bay Regional Water Quality Control Board's Municipal Regional Stormwater Permit to include LID practices per SSFMC Section 14.04.134.
Will any xeriscaping be installed?	**Consistent**. The project would include landscaping with a low Water Use Classification of Landscape Species (WUCOLS).
Will captured rainwater or graywater be used for irrigation?	**Inconsistent**. The project would not use captured rainwater or graywater for irrigation.

Source: City of South San Francisco 2014

As shown in Table 16, the project as currently proposed would not be consistent with all measures in the CAP Development Review Checklist. However, the City would impose a standard Condition of Approval on the project, as detailed below:

> For Commercial Projects: Prior to issuance of any building or construction permits, the developer shall revise the development plans to include the following Climate Action Plan requirements, subject to review and approval by the Chief Planner or designee:

a) Electric Vehicle Charging Installations Measure 2.1, Action 5: Require new large-scale nonresidential developments to provide conduit for future electric vehicle charging installations, and encourage the installation of conduits or electric vehicle charging stations for all new development.

b) Heat Island Reductions Measure 3.4, Action 1: Encourage the use of high-albedo surfaces and technologies as appropriate, as identified in the voluntary CALGreen standards.

c) Alternative Energy Facilities Measure 4.1, Action 2: Require the construction of any new nonresidential conditioned space of 5,000 square feet or more, or the conversion of unconditioned space 5,000 square feet or more, to comply with one of the following standards:

   i. Meet a minimum of 50% of modeled building electricity needs with on-site renewable energy sources. To calculate 50% of building electricity needs for the new conditioned space, the applicant shall calculate building electricity use as part of the Title 24 compliance process. Total electricity use shall include total use for the new conditioned space excluding process energy.

   ii. Participate in a power purchase agreement to offset a minimum of 50% of modeled building electricity use. Building electricity use shall be calculated using the method identified above.

   iii. Comply with CALGreen Tier 2 energy efficiency requirements to exceed mandatory energy efficiency requirements by 20% or more. For additions to existing development of 5,000 square feet or more, CALGreen Tier 2 shall be calculated as part of the Title 24 compliance process. Existing building space already permitted shall not be subject to CALGreen Tier 2 requirements.

d) Solar Wiring Installation Measure 4.1, Action 3: Require all new development to install conduit to accommodate wiring for solar.

e) Water Demand Reduction Measure 6.1, Action 2: Revitalize implementation and enforcement of the Water Efficient Landscape Ordinance by undertaking the following:

   i. Establishing a variable-speed pump exchange for water features.

   ii. Restricting hours of irrigation to occur between 3:00 a.m. and two hours after sunrise.

   iii. Installing irrigation controllers with rain sensors.

   iv. Landscaping with native, water-efficient plants.

   v. Installing drip irrigation systems.

   vi. Reducing impervious surfaces.

With the implementation of this standard Condition of Approval, the project would be consistent with all measures in the CAP Development Review Checklist, and impacts would be less than significant.

LESS THAN SIGNIFICANT IMPACT

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9 Hazards and Hazardous Materials

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	■	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	■	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?	☐	☐	■	☐
d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	■	☐
e. For a project located in an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	■	☐
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	■

Hazards and Hazardous Materials Setting

A Phase I Environmental Site Assessment (ESA) was prepared by Clayton Group Services, Inc. in March 2006 (Clayton Group Services Inc.) (Appendix HAZ). As part of the 2006 Phase I ESA, Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred for the project site and surrounding area. Federal, state, and county lists were reviewed as part of the research effort.

Adjacent Properties

Four adjacent properties were listed in the databases searched by EDR:

- **501 Forbes Boulevard.** 501 Forbes Boulevard is the eastern abutting property. It is listed in the HAZNET for the generation of metal sludge and photochemicals/photoprocessing waste, which was disposed of offsite. It is also listed in the San Mateo Business Inventory as a generator of special wastes. None of the listings indicate that hazardous materials have been released.
- **477 Forbes Boulevard**. 477 Forbes Boulevard is the western abutting property. The site is identified in the Leaking Underground Storage Tank (LUST) and Cortese databases and is listed as an active LUST site for a release in 1986. Recent samples indicate that the highest levels of contamination are present near the location of the UST. According to current file information, further delineation of the groundwater plume will be conducted to define the extent of contamination.
- **500 Forbes Boulevard**. 500 Forbes Boulevard is southeast of the project site, across Forbes Avenue. It is listed on the Resource Conservation and Recovery Act – Small Quantity Generator database as a small generator with no violations. It is also listed as a LUST; the LUST status was granted closure in 1999.
- **485-489 Cabot Road.** 485-489 Cabot Road is located approximately 0.2 mile southwest of the project site. It is listed in the LUST and HAZNET databases as “pollution characterization.”

Project Site

Based on the EDR report and a review of available documents, the project site is identified in the Historical UST Database, SWEEPS UST Database (former UST database), and the California Facility Inventory Database because of the presence of four historical USTs. Those USTs have been removed. Closure was granted for the USTs in 2004; however, residual contamination was detected in soil and groundwater in the vicinity.

The project site is also listed in the San Mateo Business Inventory as a site with an above-ground storage tank, a generator and recycler of waste oil/solvent, and the storage of hazardous materials no greater than 1,199 gallons. This storage of hazardous materials was associated with the food processing company that occupied the project site; however, the existing building is currently vacant, and the hazardous materials are no longer stored at the project site. Despite stained and cracked pavement, soil sampling in 2004 determined that subsurface impacts did not exceed acceptable levels.

The Phase 1 ESA concludes that no known recognized environmental condition is associated with the project site, except the potential contamination of soil and groundwater from historical USTs at the project site. However, given that the site has been granted regulatory closure, the ESA concludes that no further investigation or remediation is recommended.

Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Project construction may include the temporary transport, storage, use, or disposal of potentially hazardous materials including fuels, lubricating fluids, cleaners, solvents, or contaminated soils. If spilled, these substances could pose a risk to the environment and to human health. However, the transport, storage, use, or disposal of hazardous materials would be subject to federal, state, and local regulations, which would assure that risks associated with hazardous materials are minimized. The transport of any hazardous materials would be subject to federal, state, and local regulations, which would assure that risks associated with the transport of hazardous materials are minimized.

In addition, the existing structure, which was constructed in 1968, may contain asbestos and/or lead-based paint due to their age. Structures built before the 1970s were constructed typically with asbestos containing materials (ACM). Because the building was constructed before the federal ban on the manufacture of PCBs, it is possible that light ballasts in the structures contain PCB. While demolition is mostly complete, completion of demolition could result in health hazard impacts to workers if not remediated prior to construction activities. However, demolition and construction activities would be required to adhere to BAAQMD Regulation 11, Rule 2, which governs the proper handling and disposal of ACM for demolition, renovation, and manufacturing activities in the Bay Area, and California Occupational Safety and Health Administration (CalOSHA) regulations regarding lead-based materials. The California Code of Regulations Section 1532.1, requires testing, monitoring, containment, and disposal of lead-based materials, such that exposure levels do not exceed CalOSHA standards. DTSC has classified PCBs as a hazardous waste when concentrations exceed 50 parts per million in non-liquids, and the DTSC requires that materials containing those concentrations of PCBs be transported and disposed of as hazardous waste. Light ballasts to be removed would be evaluated for the presence of PCBs and managed appropriately. With required adherence to BAAQMD, CalOSHA, and DTSC regulations regarding ACM, lead-based paint, and PCBs impacts would be less than significant.

The project would involve the construction of an office building and an associated parking garage. Office uses typically do not use or store large quantities of hazardous materials. In addition, use, storage, and disposal of hazardous materials are regulated through the Resources Conservation and Recovery Act (RCRA). The California Department of Toxic Substances Control (DTSC) is responsible for implementing the RCRA program, as well as California's own hazardous waste laws. DTSC regulates hazardous waste, cleans up existing contamination, and looks for ways to control and reduce the hazardous waste produced in California. It does this primarily under the authority of RCRA and in accordance with the California Hazardous Waste Control Law (California Health and Safety Code Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (Title 22, CCR, Divisions 4 and 4.5). DTSC also oversees permitting, inspection, compliance, and corrective action programs to ensure that hazardous waste managers follow federal and State requirements and other laws that affect hazardous waste, particularly its handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. Finally, storage of any hazardous materials at or above State-defined thresholds makes a facility subject to a Hazardous Materials Business Plan (HMBP). The Hazardous Materials Compliance Division is responsible to the HMBP program for San

Mateo County. A HMBP must be submitted if these thresholds for hazardous materials are met. Compliance with these regulations would reduce potential impacts associated with the routine transport, use, storage, or disposal of hazardous materials to less than significant. This impact will not be addressed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?

There are no schools within 0.25 mile of the project site. However, it is possible that the hauling of hazardous materials during construction activities and building operation could occur within 0.25 mile of a school. As outline above under criteria (a) and (b), transport and storage of such materials would be regulated by existing federal, state, and local regulations. Impacts would therefore be less than significant. This impact will not be addressed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. Would the project be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

As described above, the Phase I ESA included a database search to evaluate if the project site is included on a list of hazardous materials sites. This included a request to San Mateo County Department of Environmental Health, the Regional Water Quality Control Board, and a review of the DTSC EnviroStor database. The project site was listed as having a closed LUST case from the release of oil and impacted soil and groundwater. However, the LUST case has been closed on GeoTracker (Appendix HAZ; SWRCB 2015), and the Phase I concludes that no further investigation or remediation is needed at the project site. Therefore, impacts would be less than significant. This impact will not be addressed in the EIR.

LESS THAN SIGNIFICANT IMPACT

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

The project site falls within the Airport Influence Area A designated in the Airport Land Use Compatibility Plan (ALUCP) for the San Francisco International Airport (SFO). However, the project site is located outside the identified noise compatibility zones, which limit uses that could create excessive noise. Moreover, as described in Section 13, *Noise*, the project would not result in excessive noise near the project site. In addition, the project site is not within the safety compatibility zones, which limit uses that could pose safety hazards to the airport. The nearest safety compatibility zone is Zone 3, which identifies incompatible uses as critical public utilities, hazardous uses, children's schools, large child day care centers, hospitals, nursing homes, stadiums, and arenas. The proposed project would not involve uses identified as incompatible with the nearest ALUCP zone. Therefore, there would be no safety hazard impacts. Impacts would be less than significant. This impact will not be addressed in the EIR.

LESS THAN SIGNIFICANT IMPACT

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The proposed project would not obstruct existing roadways or require the construction of new roadways or access points. Therefore, the proposed project would not block emergency response or evacuation routes or interfere with adopted emergency response and emergency evacuation plans. No impact would occur. This impact will not be addressed in the EIR.

NO IMPACT

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

The project site is in a developed, urbanized area surrounded by commercial development and roadways. No adjacent wildlands or densely vegetated areas are located nearby that would represent a significant fire hazard. Additionally, the project does not fall within in a Fire Hazard Severity Zone or Very High Hazard Severity Zone for wildland fires (Cal Fire 2007). Therefore, the project would not expose people or structures to significant hazards related to wildland fires and there would be no impacts. This impact will not be addressed in the EIR.

NO IMPACT

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10 Hydrology and Water Quality

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	■	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	■	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
(i) Result in substantial erosion or siltation on- or off-site;	☐	☐	■	☐
(ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	■	☐
(iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	■	☐
(iv) Impede or redirect flood flows?	☐	☐	■	☐
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	■	☐
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	■	☐

Setting

The project site is 2.96 acres and generally flat (USGS 2018). Water drains from the northern boundary to the south of the site. The nearest downstream creek is Colma Creek, approximately 1 mile from the project site; Colma Creek outfalls into the San Francisco Bay. The City of South San Francisco receives approximately 23 inches of rain annually, with rainfall concentrated in the winter months (Cal-Adapt 2019d).

Regulatory Setting

Clean Water Act

Congress enacted the CWA, formerly the Federal Water Pollution Control Act of 1972, with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the United States. The CWA requires states to set standards to protect, maintain, and restore water quality through the regulation of point source and non-point source discharges to surface water. The NPDES permit process regulates those discharges (CWA Section 402). NPDES permitting authority is administered by the SWRCB and its nine RWQCBs. The project site is in a watershed administered by the San Francisco Bay RWQCB (San Francisco Bay RWQCB 2017).

Individual projects in the city that disturb more than one acre are required to obtain NPDES coverage under the California General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The Construction General Permit requires the development and implementation of a SWPPP describing BMPs the discharger would use to prevent and retain storm water runoff. The SWPPP must contain a visual monitoring program; a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs; and a sediment monitoring plan if the site discharges directly to a waterbody listed on the 303(d) list for sediment.

Section 401 of the CWA requires that any activity that would result in a discharge into waters of the U.S. be certified by the RWQCB. This certification ensures that the proposed activity does not violate state and/or federal water quality standards. Section 404 of the CWA authorizes the U.S. Army Corps of Engineers to regulate the discharge of dredged or fill material to the waters of the U.S. and adjacent wetlands. Discharges to waters of the U.S. must be avoided where possible and minimized and mitigated where avoidance is not possible. Section 303(d) of the CWA requires states to establish total maximum daily load programs for streams, lakes, and coastal waters that do not meet certain water quality standards.

California Porter Cologne Water Quality Control Act

The Porter Cologne Water Quality Control Act of 1967 requires the SWRCB and the nine RWQCBs to adopt water quality criteria to protect state waters. These criteria include the identification of beneficial uses, narrative and numerical water quality standards, and implementation procedures. The criteria for state waters in the region are contained in the *Water Quality Objectives* Chapter of the Basin Plan for the San Francisco Bay RWQCB (San Francisco Bay RWQCB 2017). The Water Quality Control Plan, or Basin Plan, protects designated beneficial uses of state waters through the issuance of Waste Discharge Requirements and through the development of total maximum daily load standards. Anyone proposing to discharge waste that could affect the quality of the waters of the state must make a report of the waste discharge to the RWQCB or SWRCB as appropriate, in compliance with Porter-Cologne.

San Mateo Countywide Water Pollution Prevention Program

The City of South San Francisco is a contributing city to the San Mateo Countywide Water Pollution Prevention Program (SMCWPPP), which was established in 1990 in response to federal stormwater NPDES regulations. Per the SMCPPP Stormwater C.3 Guidebook (SMCWPPP 2013), projects that create or replace 2,500 square feet to 10,000 square feet of impervious surfaces are C.3 regulated projects. The Stormwater C.3 Guidebook for San Mateo County requires the implementation of one or more of the following actions: (1) direct roof runoff into cisterns or rain barrels for reuse; (2) direct roof runoff onto vegetated areas; (3) direct runoff from sidewalks, walkways, and/or patios onto vegetated areas; (4) direct runoff from driveways and/or uncovered parking lots onto vegetated areas; (5) construct sidewalks, walkways, and/or patios with permeable surfaces; or (6) construct bike lanes, driveways, and/or uncovered parking lots with permeable surfaces.

City of South San Francisco General Plan

The Parks, Public Facilities, and Services Element, Open Space and Conservation Element, and Health and Safety Element of the General Plan address hydrology and water quality issues. The following policies and programs relate to the proposed project:

Goal 5.3-G-2. Encourage water conservation measures for both existing and proposed development.

Policy 5.3-I-2. Establish guidelines and standards for water conservation and actively promote the use of water-conserving devices and practices in both new construction and major alterations and additions to existing buildings.

Goal 5.3-G-6. Maintain environmentally appropriate wastewater management practices.

Policy 5.3-I-7. Encourage new projects in East of 101 area that are likely to generate large quantities of wastewater to lower treatment needs through recycling, pretreatment, or other means necessary.

Goal 7.2-G-1. Comply with the San Francisco Bay RWQCB regulations and standards to maintain and improve the quality of both surface water and groundwater resources.

Goal 7.2-G-2. Enhance the quality of surface water resources and prevent their contamination.

Policy 7.2-I-1. Continue working with the San Francisco Bay RWQCB in the implementation of the NPDES, and continue participation in STOPPP[2] for the protection of surface water and groundwater quality.

Policy 7.2-I-2. Review and update the Best Management Practices adopted by the City and in STOPP as needed.

Goal 8.2-G-1. Minimize the risk to life and property from flooding in South San Francisco.

Policy 8.2-I-1. Continue working with RWQCB in the implementation of the San Mateo Countywide Stormwater Pollution Prevention Program (STOPPP).

[2]The program has since been renamed and is now referred to as the San Mateo County Water Pollution Prevention Program (SMCWPPP).

Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Project construction has the potential to impact water quality through erosion and through debris carried in runoff. Because the project would involve disturbance of more than one acre of land surface, it would be subject to the State of California General Stormwater Permit for Construction Activities. Compliance with the permit would require the applicant to file a Notice of Intent with the SWRCB. Permit conditions also require the development of a SWPPP. Project construction would involve heavy equipment that could result in an increase in fuel, oil, and lubricants in stormwater runoff due to leaks or accidental releases. To minimize these impacts, the project would be required to comply with SSFMC Section 14.08.100 and obtain a wastewater discharge permit prior to discharging to any public sewer (City of South San Francisco 2014b). Furthermore, the County of San Mateo's Water Pollution Prevention Program would require the project site to implement BMPs during project construction to reduce pollution carried by stormwater such as keeping sediment on site using perimeter barriers and storm drain inlet protection and proper management of construction materials, chemicals, and wastes on site. Additional BMPs required by SSFMC Section 14.04.180 would also be implemented during project construction.

Project operation could create potential sources of stormwater pollutants such as oil, grease, and debris to stormwater drainage flowing over roadways and other impermeable surfaces and entering the city's stormwater system. Stormwater would flow generally south through the project site and would enter the City's storm drain system on Forbes Boulevard, which outfalls into Colma Creek and ultimately outfall into the San Francisco Bay. The project would connect to the city's existing storm drainage and sewer facilities served by the City of South San Francisco's Public Works Department, Maintenance Division. Runoff on-site would be treated and infiltrated by four bioretention areas and two flow-thru planters totaling approximately 0.8 acre before discharging into the storm drain system on Forbes Boulevard. Each of the bioretention facilities would be sized appropriately to accommodate surface runoff from eleven drainage management areas. In addition, the project would be required to apply for a grading permit application with the City of South San Francisco and provide a winterization, dust, erosion, and pollution control plan conforming to ABAG Manual Standards for Erosion and Sediment Control Measures. .

Project compliance with applicable State General Permit requirements, City ordinances, County of San Mateo's guidelines, and General Plan policies would not result in significant impacts on water quality and would not result in a violation of water quality standards. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The California Water Service (Cal Water) supplies water to the City of South San Francisco and would serve the project site. Cal Water's Urban Water Management Plan (UWMP) anticipates future growth in the region that includes the project, as allowed under existing land use and zoning designations (Cal Water 2015). Cal Water currently uses groundwater extracted from the Merced Formation of the Colma Creek Basin, a sub-basin of the Merced Valley Groundwater Basin, commonly referred to as the Westside Basin, purchased from the San Francisco Public Utilities Commission (SFPUC [Cal Water 2015]). The Westside Basin is the largest groundwater basin in the San Francisco Bay Hydrologic Region. It is separated from the Lobos Basin to the north, the San Bruno Mountains on the east, and the San Andreas Fault and Pacific Ocean on the west. Its southern limit is defined by bedrock high that separates it from the San Mateo Plain Groundwater Basin (Cal Water 2015). Groundwater supplies approximately 10 to 15 percent of Cal Water's Bayshore District's water demand. Cal Water has an active role in local groundwater management planning to continue the sustainable use of groundwater in the area. Cal Water has offered to limit its planned production of groundwater from the Westside Basin to 1.37 million gallons per day (mgd), which at 1,535 acre-feet per year aligns with the current pumping capacity and historical production from the basin (Cal Water 2015). Cal Water's groundwater supplies will need to be supplemented by other water supplies.

The existing impervious area on the project site totals 86,581 square feet. According to the project plans, the proposed project would involve approximately 77,062 square feet of new impervious surfaces. Therefore, implementation of the project would result in a net reduction of approximately 9,519 square feet of impervious surface. In addition, the project would also involve the installation and maintenance of four bioretention basins, two flow-thru planters, and pervious surfaces. The facilities would aid in capturing increased stormwater runoff on-site and would allow for groundwater recharge within the bioretention facilities. Water that does not recharge into the groundwater would be released into the City's existing storm drain system. The project would not extract groundwater or directly interfere with the groundwater table through construction activities on the site, as ground disturbance would not occur below the water table. Furthermore, because groundwater was not observed in past geological investigations of the project site, the project would not directly interfere with the groundwater table (Appendix GEO).

Impacts related to depletion of groundwater supplies and groundwater recharge would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c.(i) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site?

c.(ii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

c.(iii) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Colma Creek is located approximately 1 mile southwest of the project site and does not flow through or adjacent to the site. Existing development between the project site and Colma Creek includes roadways, commercial, office, and industrial developments. Project construction would not alter the course of this creek or any other streams or rivers. The project site currently is and would be predominately paved with impermeable surfaces. The project would introduce new impermeable areas such that the rate or amount of surface runoff would increase. However, the project would also include bioretention areas to promote filtration and infiltration of stormwater from the project site. Stormwater control measures incorporated in the project's site design include roof drains directed to bioretention areas and permeable pavers. Landscaping would be used on the site to minimize irrigation, runoff, pesticides, and fertilizers that could contribute to runoff and to promote treatment of runoff. Although an increased amount of impervious surfaces would be introduced to the project site, the stormwater control measures used would reduce the amount of runoff that would enter the storm drain system compared to existing conditions.

The East of 101 Area Plan has accounted for the increase in development of the area. Therefore, the project would not exceed the capacity of the existing storm drain facilities, given that those facilities are prepared to accommodate the additional stormwater runoff per the East of 101 Area Plan (City of South San Francisco 1994). The project site would connect to the City's storm drain system, which delivers stormwater and other runoff into local streams and creeks and ultimately to San Francisco Bay. The project site is currently developed with predominantly impermeable surfaces. The addition of the impermeable pavement would not alter drainage substantially from the project site or increase stormwater runoff to the extent that it would result in flooding. Therefore, the project would not result in flooding on or off site or substantial erosion or siltation of a creek or river. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c.(iv) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would impede or redirect flood flows?

According to the Federal Emergency Management Agency Flood Insurance Rate Map, the project site is located in Zone X, which is characterized as an area of minimal flood hazard and having a less than 0.2 percent annual chance to be inundated by flood waters as a result of a storm event (Map #06081C0042F, April 5, 2019) (Federal Emergency Management Agency 2019). According to the California Governor's Office of Emergency Services (Cal OES) MyHazards online database, the project site is not located in a 100-year floodplain (Cal OES 2015).

Site drainage facilities currently direct flow to the south of the project site toward Forbes Boulevard and outfalls in the City's current storm drain system. The proposed stormwater control plan includes eleven drainage management areas, which would be sized to accommodate runoff from increased impervious surfaces on the project site and would direct runoff toward bioretention facilities. Of the eleven drainage management areas, four would be bio-retention basins and two would be flow-through planters. The remaining drainage management areas would be self-treating landscaping. These facilities would treat stormwater runoff before entering the City's storm drain system. The project would not alter the course of a stream or river as a result of an alteration of the existing drainage pattern. Therefore, impacts regarding drainage and flood flows would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The project site is located approximately 0.7 mile west of the San Francisco Bay, and is not located in a tsunami or seiche zone, as show in the Tsunami Inundation Maps for San Mateo County, San Francisco South Quadrangle (DOC 2009). The nearest body of water that could experience seiche (water level oscillations in an enclosed or partially enclosed body of water) is the San Francisco Bay located approximately 0.7 mile east of the project site. No other large bodies of water with the potential to inundate the project site by a seiche are located near the site. Therefore, the proposed project would not result in the risk of release of pollutants due to inundation by a tsunami, seiche, or flooding. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

The project would be served by Cal Water, which maintains an UWMP and releases annual water quality reports (Cal Water 2018b). Cal Water utilizes purchased water and the South San Francisco Water Quality Control Plant (SSFWQCP) to ensure water quality standards and goals are met. The project would not interfere with the ability of Cal Water to maintain water quality standards, as described in the 2018 Water Quality Report (Cal Water 2018b).

Cal Water provides additional water to South San Francisco via five groundwater wells. The SFPUC and Cal Water have voluntarily adopted the South Westside Basin Groundwater Management Plan as of July 2012. However, all nine groundwater basins within San Mateo County are designated as Very Low Priority and are not required to comply with the Sustainable Groundwater Management Act (San Mateo County Office of Sustainability 2019). The project site is estimated to contribute up

to 4 inches of recharge annually per the Groundwater Management Plan (SFPUC 2018). The site itself does not directly extract groundwater nor would it recharge a substantial amount of groundwater for the basin. Because the project would not conflict or obstruct the implementation of the South Westside Basin Groundwater Management Plan, and the project would not introduce more intensive uses or more water-demanding uses than allowed under existing conditions, impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

11 Land Use and Planning

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	☐	☐	☐	■
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	■	☐

Setting

As stated in the *Project Description*, the project site currently has a BTP land use designation in the City's General Plan). The project would replace a food manufacturing warehouse with office uses and a parking structure. Surrounding land uses in the project vicinity are similar commercial and industrial uses. Additionally, the project would include adaptive reuse of a strip of land with existing railroad tracks, north of the project site, as part of the City's Rails-to-Trails program.

Uses allowed under the BTP zoning designation include a mix of corporate headquarters, research and development facilities, and other offices in campus-like environments. The maximum allowed FAR is 0.5. However, a total FAR of 1.0 is allowed for research and development establishments or development that meets specific TDM, off-site improvement or design standards (SSFMC Section 20.110.001).

Regulatory Setting

City of South San Francisco Municipal Code

Section 20.110.003 (A) *Maximum Heights East of 101.* Unless otherwise stipulated in a specific plan, building heights east of 101 are allowed the maximum height limits permissible under Federal Aviation Regulations Part 77.

Section 20.110.003 (C) *Increased FAR*. Increased FAR may be permitted with a Conditional Use Permit in accordance with Table 20.110.003 (C).

1. Projects that include high quality, innovative design and product type, and maximum provisions for pedestrian and bicycle use.

Impact Analysis

a. Would the project physically divide an established community?

Project implementation would continue the existing BTP development pattern in the area and would not divide connected neighborhoods or land uses. No new roads, linear infrastructure, or other development features are proposed that would divide an established community or limit movement, travel, or social interaction between established land uses. Project construction would not physically divide an established community. This impact will not be discussed in the EIR.

NO IMPACT

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project would be consistent with the designated land use and zoning as set forth by the General Plan and zoning. Surrounding and adjacent parcels are also developed as BTP in compliance with the designated land use and zoning district. Given the project's compliance with the designated land use and with the City's zoning regulations, the project would have a less than significant impact regarding conflicts with land use plans, policies, or regulations. The project includes a request for a conditional use permits to allow for a greater FAR of 1.0 from the allowed 0.5 for a BTP designation and to reduce the number of required off-street parking spaces; with approval of this request, the project would be consistent with the designated land use and zoning for the site. This impact will not be discussed in the EIR.

The other sections of this Initial Study analyze the project's consistency with applicable plans and regulations related to mitigating environmental effects. As described in Section 8, *Greenhouse Gas Emissions*, the project would not be consistent with the City's Climate Action Plan. However, the project would be subject to a standard Condition of Approval that would require that the new structure be consistent with the Plan. In addition, as described in Section 17, *Transportation*, the project would only be partially consistent with applicable plans and policies related to traffic and the circulation system. Impacts related specifically to transportation will be analyzed further in the EIR.

LESS THAN SIGNIFICANT IMPACT

12 Mineral Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	■
b. Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	■

Setting

Major mineral resources recovered in the San Francisco Bay Area include limestone and shells, salines, sand and gravel, crushed and broken stone, and oil and gas (County of San Mateo 1986).

Pursuant to the mandate of the Surface Mining and Reclamation Act of 1975, the State Mining and Geology Board requires all cities incorporate into their general plans mapped mineral resources designations approved by the State Mining and Geology Board. Some mineral resources can be found within San Mateo County. However, there are no mineral resources in the South San Francisco area subject to the Surface Mining and Reclamation Act (DOC 1996).

Regulatory Setting

County of San Mateo General Plan

Chapter 3, *Mineral Resources,* of the County of San Mateo General Plan sets forth goals and policies for the county's mineral resources. None of the mineral resources related goals, policies, or implementation measures are relevant to the project.

Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

Some mineral resources are located within the City of South San Francisco, but mineral resources were not identified on the project site (USGS 2019). The City's General Plan and County General Plan do not identify any significant mineral resources or mining operations within the City (City of South San Francisco 1999; County of San Mateo 1986). The project would not require the uses of

substantial mineral resources during construction or operation and would not involve construction in a mineral resource site. Therefore, no impact would occur. This impact will not be discussed in the EIR.

NO IMPACT

13 Noise

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	■	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	■	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	■	☐

Noise Fundamentals

The unit of measurement used to describe a noise level is the decibel (dB). However, the human ear is not equally sensitive to all frequencies within the sound spectrum. Therefore, a method called "A-weighting" is used to filter noise frequencies that are not audible to the human ear. A-weighting approximates the frequency response of the average young ear when listening to most ordinary everyday sounds. When people make relative judgments of the loudness or annoyance of a sound, their judgments correlate well with the "A-weighted" levels of those sounds. Therefore, the A-weighted noise scale is used for measurements and standards involving the human perception of noise. In this analysis, all noise levels are A-weighted, and the abbreviation "dBA" is understood to identify the A weighted decibel.

Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. A 10 dB increase represents a 10-fold increase in sound intensity, a 20 dB increase is a 100-fold intensity increase, a 30 dB increase is a 1,000-fold intensity increase, etc. Similarly, a doubling of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the noise source would result in a 3 dB decrease.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two equivalent noise sources combined do not sound twice as loud as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA (increase or decrease); that a change of 5 dBA is readily

perceptible; and that an increase or decrease of 10 dBA sounds twice (half) as loud (California Department of Transportation [Caltrans] 2013a).

Descriptors

The impact of noise is not a function of loudness alone. The time of day when noise occurs and the duration of the noise are also important. In addition, most noise that lasts for more than a few seconds is variable in its intensity. Consequently, a variety of noise descriptors has been developed. The noise descriptors used for this analysis are the one-hour equivalent noise level (L_{eq}) and the community noise equivalent level (CNEL).

The L_{eq} is the level of a steady sound that, in a specific time period and at a specific location, has the same A-weighted sound energy as the time-varying sound. For example, $L_{eq(1h)}$ is the equivalent noise level over a 1-hour period and $L_{eq(8h)}$ is the equivalent noise level over an 8-hour period. $L_{eq(1h)}$ is a common metric for limiting nuisance noise, whereas $L_{eq(8h)}$ is a common metric for evaluating construction noise.

The CNEL is a 24-hour equivalent sound level. The CNEL calculation applies an additional 5 dBA penalty to noise occurring during evening hours (between 7:00 p.m. and 10:00 p.m.) and an additional 10 dBA penalty to noise occurring during the night (between 10:00 p.m. and 7:00 a.m.). These increases for certain times are intended to account for the added sensitivity of humans to noise during the evening and night.

Propagation

Sound from a small, localized source (approximating a “point” source) radiates uniformly outward as it travels away from the source in a spherical pattern, known as geometric spreading. The sound level decreases or drops off at a rate of 6 dBA for each doubling of distance.

Traffic noise is not a single, stationary point source of sound. Over some time interval, the movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point. The drop-off rate for a line source is 3 dBA for each doubling of distance.

Vibration

Groundborne vibration of concern in environmental analysis consists of the oscillatory waves that move from a source through the ground to adjacent structures. The number of cycles per second of oscillation makes up the vibration frequency, described in terms of hertz (Hz). The frequency of a vibrating object describes how rapidly it oscillates. The normal frequency range of most groundborne vibration that can be felt by the human body is from a low of less than 1 Hz up to a high of about 200 Hz (Crocker 2007).

While people have varying sensitivities to vibrations at different frequencies, in general they are most sensitive to low-frequency vibration. Vibration in buildings, such as from nearby construction activities, may cause windows, items on shelves, and pictures on walls to rattle. Vibration of building components can also take the form of an audible low-frequency rumbling noise, referred to as groundborne noise. Groundborne noise may result in adverse effects, such as building damage, when the originating vibration spectrum is dominated by frequencies in the upper end of the range (60 to 200 Hz). Vibration may also damage infrastructure when foundations or utilities, such as sewer and water pipes, physically connect the structure and the vibration source (FTA 2018). Although groundborne vibration is sometimes noticeable in outdoor environments, it is almost

never annoying to people who are outdoors. The primary concern from vibration is that it can be intrusive and annoying to building occupants and vibration-sensitive land uses.

Vibration energy spreads out as it travels through the ground, causing the vibration level to diminish with distance away from the source. High-frequency vibrations diminish much more rapidly than low frequencies, so low frequencies tend to dominate the spectrum at large distances from the source. Discontinuities in the soil strata can also cause diffractions or channeling effects that affect the propagation of vibration over long distances (Caltrans 2013b). When a building is impacted by vibration, a ground-to-foundation coupling loss will usually reduce the overall vibration level. However, under rare circumstances, the ground-to-foundation coupling may actually amplify the vibration level due to structural resonances of the floors and walls.

Vibration amplitudes are usually expressed in peak particle velocity (ppv) or RMS vibration velocity. The ppv and RMS velocity are normally described in inches per second (in/sec). The ppv is defined as the maximum instantaneous positive or negative peak of a vibration signal (Caltrans 2013b). Caltrans developed a guidance manual for specifically assessing vibration impacts associated with construction and also compiled vibration research and recommended limits for vibration based on the source. Table 17 summarizes the vibration limits recommended by the American Association of State Highway and Transportation Officials for structural damage to buildings.

Table 17 Maximum Vibration Levels for Preventing Damage

Type of Situation	In./sec. ppv
Historic sites or other critical locations	0.1
Residential buildings, plastered walls	0.2–0.3
Residential buildings in good repair with gypsum board walls	0.4–0.5
Engineered structures, without plaster	1.0–1.5

Source: Caltrans 2013b

Regulatory Setting

California Code of Regulations

The CCR, Title 24, Section 1207.4 requires interior noise levels attributable to exterior sources to be at or below 45 dBA in any habitable room of a development based on the noise metric used in the noise element of the local general plan. All residential windows, exterior doors, and exterior wall assemblies would be required to have sound transmission class ratings that would ensure adequate attenuation of noise at a range of frequencies. The Noise Element of the City of South San Francisco General Plan uses a noise metric of CNEL, consistent with the reference level for State noise law. Therefore, interior noise levels of the project would need to be at or below 45 dBA CNEL to be compliant with CCR requirements.

City of South San Francisco General Plan

The City's General Plan Noise Element identifies noise sources and areas of noise impact to achieve and maintain noise control and land use compatibility in the City. Noise sources in the City are primarily from vehicular traffic, railroad noise, and industrial noise. The BART is also a source of noise. High altitude aircraft are also a source of noise within the city (City of South San Francisco 1999). The following policy from the Noise Element apply to the proposed project:

Policy 9-I-8. Require the control of noise at source through site design, building design, landscaping, hours of operation, and other techniques, for new developments deemed to be noise generators.

East of 101 Area Plan

The East of 101 Area is exposed to noise from a variety of sources, including aircraft, surface transportation, and various industrial uses of the area (City of South San Francisco 1994). The following goals and policies from the Noise Element apply to the proposed project:

Policy NO-2. Office and retail developments in the East of 101 Area shall be designed so that the calculated hourly average noise levels during the daytime do not exceed an L_{eq} of 45 dBA, and instantaneous maximum noise levels do not exceed 60 dBA.

City of South San Francisco Municipal Code

The City of South San Francisco regulates noise through the City's Zoning Ordinance (SSFMC Chapter 8) and the City's General Plan. SSFMC Chapter 8.32.030 establishes a maximum noise level of 65 dBA between 7:00 a.m. and 10:00 p.m. and 60 dBA between 10:00 p.m. and 7:00 a.m. (SSFMC 2019). For areas where the measured ambient noise level exceeds these thresholds, the threshold is raised in 5-dBA increments until it encompasses or reflects the ambient noise level (Section 8.32.030[a]).

AMBIENT NOISE LEVELS

The project setting is composed of industrial and office uses with regular traffic. The primary noise surfaces in the vicinity are from overhead aircraft, surface transportation, and industrial uses in the surrounding area (City of South San Francisco 1994). The East of 101 Area Plan estimates the ambient noise level to be at CNEL 74 at the following site: 53 feet from the centerline of E. Grand Ave. and 110 feet east of the centerline of Forbes Ave (City of South San Francisco 1994).

SENSITIVE RECEPTORS

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. The nearest noise-sensitive receptors to the project site are existing multi-family residences across Highway 101, approximately 1 mile west of the project site. Surrounding uses in the project vicinity are commercial, office, or industrial. There are no sensitive receptors in the immediate project vicinity.

Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Construction Noise

Temporary noise levels would be a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of noise-generating activities. There are no sensitive receptors close to the project site. The nearest sensitive receptor is approximately 1 mile east of the project site, across Highway 101.

However, there are no sensitive receptors within 1 mile of the site; therefore, impacts would be less than significant because high levels of noise would not be perceptible by sensitive receptors at that distance. This impact will not be addressed in the EIR.

Operational Noise

Project operation would generate noise typical of an office campus environment such as noise from private vehicles (doors opening/closing, brakes, etc.), circulation walkways, and/or heating, ventilation, and air conditioning equipment. However, these noise-generating sources would be typical of the existing commercial and industrial area and would not result in a substantial increase in ambient noise levels.

Other sources of noise from the proposed project include traffic noise from vehicles that would use area roadways. According to the ITE Trip Generation Manual 10th Edition (ITE 2017), the project, would generate 1,356 daily trips (Appendix TRA). The project would also be subject to South San Francisco's TDM program which requires per City Ordinance, a 35 percent trip reduction for a FAR of 1.0. With this trip reduction, the project is estimated to generate 881 daily trips under South San Francisco's TDM (Appendix TRA). As a general rule, a doubling of traffic would result in a 3 dBA increase in off-site traffic noise levels. The project would not result in a doubling of traffic volumes on off-site roadways, therefore the project would not result in a 3 CNEL increase in off-site traffic noise levels.

Cumulative traffic in the area would increase due to general growth in the area that is not directly related to the project. Project related traffic increases in the project area would increase noise levels minimally, less than 3 CNEL, due to the site's location within a commercial and industrial area. Additionally, any increase would not impact sensitive receptors because of their location 1 mile away from the project site.

Because project operation would not be near sensitive receptors and sensitive receptors are located 1 mile from the site, impacts would be less than significant. This impact will not be addressed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Project construction would create groundborne vibration from the use of heavy construction machinery such as rollers, dozers, and loaded trucks. Project operation would not generate significant groundborne vibration because offices or R&D buildings do not require the use of heavy industrial machinery. Therefore, this analysis considers vibration impacts only from project construction. Groundborne vibrations from construction are generally limited to 100 feet from significant sources. Groundborne vibration impacts would affect sensitive receptors the most. The nearest sensitive receptor is 1 mile away, across Highway 101.

Groundborne vibration would not reach levels that could cause building damage to fragile buildings (100 VdB; FTA 2018) in the project vicinity and would have no effect on sensitive receptors. The area surrounding the project site includes primarily modern commercial and industrial buildings, which are not especially sensitive to vibration. Moreover, construction activities would be limited to the City's allowable construction hours. Therefore, vibration caused by project construction would result in a less than significant impact. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The project site is approximately 3.5 miles north of SFO and is located in Airport Influence Area A designated in the ALUCP. However, the project site is located outside the identified noise compatibility zones, which limit uses that could create excessive noise. There are no private airstrips in the project vicinity. Therefore, the project would not expose people residing or working in the project area to excessive noise levels associated with airports or a private airstrip. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

14 Population and Housing

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure)?	☐	☐	■	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	■

Setting

According to the California Department of Finance, South San Francisco has an estimated population of 67,078, with 22,059 estimated housing units (DOF 2019). The average number of persons per household is estimated at 3.15. The California Department of Finance projects the population of San Mateo County to be 838,724 by 2040 (DOF 2019).

Impact Analysis

a. Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

The project would not involve the construction of any dwelling units. Therefore, the project would not induce localized residential growth. The project would create jobs that could indirectly cause population growth through employee relocations to the project area. The project would be consistent with the land use and zoning designations for the site and could result in an incremental increase in population in the City. The project is estimated to introduce 451 new jobs to the City of South San Francisco (Appendix TDM). Plan Bay Area estimates a total addition of 4,698,375 total jobs to the entire Bay Area by 2040 (ABAG 2017b). The project's addition of 451 employees would increase jobs in the city incrementally. Compared to the total jobs projection for the entire Bay Area, the addition of 451 jobs would be a minimal amount. Project implementation would be within the projected growth of the Bay Area. This impact would be less than significant and will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site does not currently contain housing, and the project would not result in the removal of housing. Therefore, the project would not displace existing people or housing and there would be no impact. This impact will not be discussed in the EIR.

NO IMPACT

15 Public Services

		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
	1 Fire protection?	☐	☐	■	☐
	2 Police protection?	☐	☐	■	☐
	3 Schools?	☐	☐	■	☐
	4 Parks?	☐	☐	■	☐
	5 Other public facilities?	☐	☐	■	☐

Setting

The South San Francisco Fire Department (SSFFD) provides fire and emergency medical services to the City of South San Francisco. SSFFD operates five stations in South San Francisco (Fire Stations 61, 62, 63, 64, and 65). The project site is serviced by Fire Station 62, which receives approximately 1,280 calls annually (City of South San Francisco 2017).

The South San Francisco Police Department (SSFPD) provides police protection services to the City, with the exception of the Sierra Point area. SSFPD operates one police station in the City, compromised of 83 sworn positions and 35 civilian positions, divided into two divisions (City of South San Francisco 2019). The operations division of the SSFPD includes patrol, criminal investigations, downtown bike patrol, K-9, neighborhood response team, SWAT/hostage negotiations, and traffic/motors. The services division of the SSFPD includes communication, community relations, property and evidence, records, planning, and recruiting (City of South San Francisco 2019b). SSFPD is generally able to respond to high-priority calls within 2 to 3 minutes (City of South San Francisco 1999).

The South San Francisco Unified School District (SSFUSD) serves the City's K-12 student population and adult education students. SSFUSD's public institutions include nine elementary schools, three middle schools, three high schools, and one adult education center. Private schools within SSUFD

include three K-8 schools and one K-12 school (City of South San Francisco 2019c). The total number of K-12 students attending schools within the SSFUSD is 8,485 (CDE 2018).

The City of South San Francisco Parks and Recreation Department administers and maintains parks and recreation facilities including mini parks, linear parks, specialty parks, open space, and common greens (City of South San Francisco 2015b). South San Francisco currently offers 270 acres of parks and open space (City of South San Francisco 2019d). This includes 93.7 acres of community parks, neighborhood and mini parks; 28 acres of linear parks; 2 acres of specialty parks; 78.4 acres of open space; and 49.1 acres of common greens (City of South San Francisco 2015b). The Parks and Recreation Department provides parkland at an average of 4 acres per 1,000 residents (City of South San Francisco 2019d).

Regulatory Setting

City of South San Francisco

SOUTH SAN FRANCISCO GENERAL PLAN

The *Health and Safety Element* and *Parks, Public Facilities, and Services Element* of the South San Francisco General Plan address and establish goals, policies, and programs related to public services and recreation. The applicable goals, policies, and programs for the proposed project are as follows (City of South San Francisco 1999):

Goal 5.1-G-3. Provide a comprehensive and integrated network of parks and open space: improve access to existing facilities where feasible.

Goal 5.1-G-5. Develop linear parks in conjunction with major infrastructure improvements and along existing public utility and transportation rights-of-way.

Policy 5.1-I-1. Maintain the PROS Master Plan as the implementing tool for General Plan park and recreation policies and proposals.

Policy 5.1-I-2. Maintain parkland standards of 3.0 acres of community and neighborhood parks per 1,000 new residents, and of 0.5 acres of parkland per 1,000 new employees, to be located in employment areas.

Goal 5.2-G-1. Support efforts by the South San Francisco Unified School District to maintain and improve educational facilities and services.

Goal 8.4-G-2. Provide fire protection that is responsive to citizens' needs.

Goal 8.5-G-1. Provide police services that are responsive to citizen's needs to ensure a safe and secure environment for people and property in the community

Policy 8.5-I-1. Ensure adequate police staff to provide rapid and timely response to all emergencies and maintain the capability to have minimum average response times.

Policy 8.5-I-5. Continue to coordinate law enforcement planning with local, regional, State and federal plans.

PARKS & RECREATION MASTER PLAN

Goal 1. South San Francisco should provide a minimum of three acres of developed parkland per 1,000 residents, and 0.5 acre of parkland per 1,000 employees.

Impact Analysis

a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1 Fire protection?

2 Police Protection?

3 Schools?

4 Parks?

5 Other public facilities?

The SSFFD is located approximately 1.9 miles southwest of the project site. The project would be required to comply with applicable fire code standards. In addition, the project site is located within a developed area. The project would be consistent with the City's General Plan, which has accounted for an increase in employee population in the project area. Therefore, the project would not generate the need for new or expanded fire department facilities.

The SSFPD is located approximately 3.1 miles west of the project site. Project implementation would create a new building, which could generate the need for new or expanded police response. However, the project would replace an existing meat-packing industrial use building, and no substantial increase in service demand for police would be anticipated. The project would not directly result in an increased population in the SSFPD service area. Therefore, the number of calls to the police department would not change significantly. The project would not trigger the need for new or expanded facilities.

All Souls Catholic Schools is located approximately 1.7 miles west of the project site, and Martin Elementary School is located approximately 1.9 miles northwest of the project site. As discussed in Section 14, *Population and Housing*, because the project would not include the construction of new dwelling units. Furthermore, the project would not directly contribute to an increase in permanent residents in the City of South San Francisco, and the project would not substantially affect school classroom demand or result in the need for new or expanded school facilities.

Oyster Point Park is located approximately 0.7 mile northeast of the project site, Point San Bruno Park is located approximately 0.9 mile west of the project site, and Bay Trail, Point San Bruno is located approximately 1.2 miles southeast of the project site. As discussed in Section 14, *Population and Housing*, the project would not directly increase the City's population and thus would not substantially affect use of the existing or planned parks. Project employees may use the City's parks and recreation sources. Project construction would include the addition of open space for employee use which would total 10,184 square feet (approximately 0.2 acre). The addition of the open space would satisfy the Parks and Recreation Master Plan goal of 0.5 acre per 1,000 employees. The project would not result in population growth in the City, would not alter citywide demand for parks, and would not result in a substantial physical deterioration of existing recreational facilities.

The project would not result in significant impacts to public services within the City of South San Francisco. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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16 Recreation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	■
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	■

Setting

The City of South San Francisco provides 270 acres of parks and open space (City of South San Francisco 2019d). City parklands are managed by the park division of the Parks and Recreation Department. Recreational activities and centers are managed by the recreation division of the Parks and Recreation Department (City of South San Francisco 2015b).

Parks nearest the project site include Oyster Point Park, approximately 0.7 mile to the northeast, Point San Bruno Park approximately 0.9 mile east, and Bay Trail, Point San Bruno approximately 1.2 miles southeast of the project site. To the north of the project site is a strip of land with existing railroad tracks that would be re-used as part of the City's Rails-to-Trails program as a result of project implementation. The City of South San Francisco has drafted the Mobility 20/20 Plan in an effort to improve mobility in the East of 101 area. The project's conversion of existing railroad tracks to recreational trail use would provide active transportation improvements to the area (City of South San Francisco 2019e)

Regulatory Setting

Please see Section 15, *Public Services*, subsection *Regulatory Setting*.

Impact Analysis

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

The project would include construction of new recreational facilities. As part of the City's Rails-to-Trails program, the project would convert a segment of an old railroad track to the north of the site into a new trail for recreational use. The trail would include the addition of trees, benches, and light poles. As discussed in Section 4, *Biological Resources*, the development of the trail would not impact biological resources and the existing railroad tracks north of the site do not provide habitat for special-status species.

As discussed in Section 14, *Population and Housing*, the project would not directly increase the City's population and would not substantially affect the use of existing or planned parks. Project employees may use the City's parks and recreation resources. Therefore, the project would not affect the City's parkland ratio goals for residents established in the Parks & Recreation Master Plan. The project would construct 10,184 square feet (approximately 0.2 acre) of open space within the project site, which would be used by employees as gathering spaces. The gathering spaces would be comprised of benches, seat pads, and decomposed granite paving walkways interspersed throughout the site and a bocce ball court in the site's northwest corner. Project operation would comply with the Parks & Recreation Master Plan goal of achieving 0.5 acre of parkland per 1,000 employees. No impacts to parks or recreational facilities would occur. This impact will not be discussed in the EIR.

NO IMPACT

17 Transportation

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	■	□	□	□
b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	■	□	□	□
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	■	□	□	□
d. Result in inadequate emergency access?	■	□	□	□

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?

d. Would the project result in inadequate emergency access?

The proposed project would increase traffic compared to existing conditions. Trips generated as a result of the proposed project have the potential to impact area intersections and roadway segments and contribute to cumulative traffic increases. The proposed project also has the potential to conflict with applicable plans and policies addressing the circulation system. Traffic impacts would be potentially significant and will be analyzed further in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

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18 Tribal Cultural Resources

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☐	☐	■
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☐	■

Enacted in 2015, California AB 52 expands CEQA by defining a new resource category, "tribal cultural resources." AB 52 states that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states the lead agency shall establish measures to avoid impacts altering the significant characteristics of a tribal cultural resource when feasible (PRC Section 21084.3).

PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe"; in addition, tribal cultural resources are:

1. Resources listed or eligible for listing in the CRHR or in a local register of historical resources as defined in PRC section 5020.1(k), or
2. Resources determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of PRC Section 5024.1. In applying these criteria, the lead agency shall consider the significance of the resource to a California Native American tribe.

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified or adopted. Under AB 52, lead agencies are required to "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those having requested notice of projects proposed in the jurisdiction of the lead agency.

On December 31, 2019, the City sent a notice to representatives of Native American Tribes that may have an interest in development of the project site. The City did not receive any replies requesting further consultation regarding the proposed project.

Impact Analysis

a., b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is (a) listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or (b) a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The topic of Tribal Cultural Resources (TCR) considers the value of a resource to tribal cultural tradition, heritage, and identity, to establish potential mitigation options for TCRs and to recognize that California Native American tribes have expertise concerning their tribal history and practices.

On October 31, 2019, Rincon contacted the NAHC and requested a search of the Sacred Lands File and a contact list of Native Americans culturally affiliated with the project area. The NAHC emailed a response on November 13, 2019 stating that the Sacred Lands File search returned with negative results. Rincon sent letters to the NAHC-listed contacts on November 14, 2019, inquiring about potential cultural resources within the project's vicinity that may be impacted by the project. No responses from these contacts have been received prior to the publication of the EIR. Appendix CUL provides the full results of the outreach effort. Additionally, no cultural resources of Native American origin were identified that would be impacted by the project and the site is considered to have low archaeological sensitivity (see Section 5, *Cultural Resources*). Therefore, it is assumed that no tribal cultural resources are present on the project site and no impacts would occur to tribal cultural resources through project implementation. See Section 5, *Cultural Resources*, for mitigation measures related to the unanticipated discovery of archaeological resources. This impact will not be discussed in the EIR.

NO IMPACT

19 Utilities and Service Systems

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	■	☐
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	■	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	■	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	■	☐
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	■	☐

Setting

Potable Water

The City of South San Francisco's East of 101 Area is served by Cal Water. The East of 101 area is included in the Bayshore District and is part of the South San Francisco System of the Bayshore District. Water served by the district consists of a combination of local groundwater and water purchased from SFPUC's Hetch Hetchy System (Cal Water 2015). The Hetch Hetchy Reservoir supply comes from the Tuolumne River, which accounts for 85 percent of the City's water. The other 15 percent comes from local watersheds through the San Antonio, Calaveras, Crystal Springs, Pilacitos, and San Andreas reservoirs.

The Bayshore District operates 5 groundwater wells, 21 booster pumps, 12 storage tanks, and 144 miles of pipeline. The City of South San Francisco has 16,302 municipal connections and supplies 7,064-acre-feet of water (Cal Water 2015). Available water supply to the South San Francisco District in any given year varies somewhat with the availability of local surface water supplies in Cal Water's Bear Gulch District. However, during drought years, Cal Water's expected groundwater supply totals 1,535 acre-feet, which would supplement the amount of water available to the City of South San Francisco.

Cal Water's SFPUC supply is shared among three districts on the San Francisco Peninsula, a system allowing for the operational flexibility to distribute the supply as needed depending on the availability of local supplies and conditions within each district. Supply and demand, therefore, are calculated for all three districts. In a normal year, the full Individual Supply Guarantee of 35.68 mgd is available. Table 18 shows a supply and demand through 2040 of the Individual Supply Guarantee, together with the South San Francisco District groundwater supply and the Bear Gulch District surface supply for the combined demands of the three districts. Supply is expected to meet demand through 2040 based on normal year supply and demand. Table 19 shows project supply and demand through 2040 under single and consecutive dry years.

Table 18 Normal Year Supply and Demand Comparison (acre feet)

	2020	2025	2030	2035	2040
Supply Total	40,225	40,280	40,647	41,149	41,767
Demand Total	40,225	40,280	40,647	41,149	41,767
Difference	0	0	0	0	0

Source: Cal Water 2015

Table 19 Multiple Dry Years Supply and Demand Comparison (acre feet)

		2020	2025	2030	2035	2040
First Year	Supply Total	33,836	33,836	33,836	33,836	33,836
	Demand Total	41,984	42,041	42,425	42,947	43,591
	Difference	8,148	8,205	8,589	9,111	9,755
	% Shortage	19%	20%	20%	21%	22%
Second Year	Supply Total	34,223	34,223	34,223	34,223	34,223
	Demand Total	40,764	40,819	41,192	41,700	42,327
	Difference	6,541	6,596	6,969	7,477	8,104
	% Shortage	16%	16%	17%	18%	19%
Third Year	Supply Total	34,223	34,223	34,223	34,223	34,223
	Demand Total	39,758	39,812	40,176	40,671	41,283
	Difference	5,535	5,589	5,953	6,448	7,060
	% Shortage	14%	14%	15%	16%	17%

Source: Cal Water 2015

As shown in the tables, Cal Water projects typically have sufficient supplies during normal years. However, during multi-year droughts, supplies could see a shortfall of up to 20 percent or more. Under such conditions, Cal Water would implement its Water Shortage Contingency Plan (WSCP). The WSCP would require District customers to reduce their demand by eight percent. Cal Water has taken steps to increase the supply in all three districts in the event of a multi-year drought. Cal Water has also implemented an aggressive conservation program aimed at reducing per-capita usage and demands on critical water sources. The WSCP includes restrictions and prohibitions on end uses for water that carry penalties and charges for consumer violations.

Wastewater

Cal Water collects and disposes of South San Francisco wastewater via the SSFWQCP. The SSFWQCP treats wastewater from South San Francisco and Colma. The system combines both wastewater and stormwater runoff that undergo primary and secondary treatment before discharging into the San Francisco Bay. The SSFWQCP has a treatment capacity of 13mgd and 60 mgd of peak wet weather flow. The SSFWQCP does not experience any major system constraints (Cal Water 2015).

Stormwater

The project site currently drains to storm drains in the adjacent roadways, where the flow joins with the South San Francisco stormwater system. Stormwater runoff is collected and disposed of by an integrated system of storm drains, inlets, curbside gutters, catch basins, drainage ditches, and man-made channels. Ultimately, stormwater that enters the City's system drains to the San Francisco Bay. The City of South San Francisco Maintenance Division, Sewer & Storm Maintenance team inspect, clean, maintain, and repair storm drains within the City, except for Westborough and unincorporated areas (City of South San Francisco 2019).

Solid Waste

South San Francisco Scavenger Company, Inc. (SSFSC) manages all trash and recycling services in South San Francisco. SSFSC collects, receives, processes, and recycles (or transfers for landfill disposal) an average of 220,000 tons of waste a year (SSFSC 2019). In 2018, 46,692 tons of solid waste was generated in South San Francisco and disposed of at a total of 18 different facilities (CalRecycle 2019a). Of all solid waste generated, 39,317 tons (approximately 84 percent) were sent to the Corinda Los Trancos Landfill (Ox Mountain) in Half Moon Bay, California. Table 20 shows the estimated remaining capacity and anticipated closure dates at Corinda Los Trancos Landfill (Ox Mtn) (CalRecycle 2019b).

Table 20 Estimated Landfill Capacities and Closure Dates

Landfill Facility	Permitted Capacity (cubic yards)	Remaining Capacity (cubic yards)	Anticipated Closure Date
Corinda Los Trancos Landfill (Ox Mtn)	60,500,00	22,180,000	2034

Source: CalRecycle 2019b

Other Utilities

Gas and electric utilities to the project site would be provided by PG&E supplemented by PCE community choice energy program. Refer to Section 6, *Energy*, for a discussion on energy for the project site.

Regulatory Setting

State of California

CALIFORNIA GREEN BUILDING STANDARDS CODE

In January 2010, the state of California adopted the California Green Building Standards Code that establishes mandatory green building standards for all buildings in California. The code covers five categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and indoor environmental quality. These standards include a mandatory set of guidelines, as well as more rigorous voluntary measures, for new construction projects to achieve specific green building performance levels:

- Reducing indoor water use by 20 percent
- Reducing wastewater by 20 percent
- Recycling and/or salvaging 50 percent of nonhazardous construction and demolition debris
- Providing readily accessible areas for recycling by occupant

City of South San Francisco

SOUTH SAN FRANCISCO GENERAL PLAN

The Health and Safety and Parks, Public Facilities, and Services Elements of the South San Francisco General Plan discuss water and waste and establishes goals, policies and programs. Applicable goals, policies, and programs are repeated below (City of South San Francisco 1999):

Goal 5.3-G-1. Promote the orderly and efficient operation and expansion of the water supply system to meet projected needs.

Goal 5.3-G-2. Encourage water conservation measures for both existing and proposed development.

Policy 5.3-I-2. Establish guidelines and standards for water conservation and actively promote the use of water-conserving devices and practices in both new construction and major alterations and additions to existing buildings.

Goal 5.3-G-4. Promote the orderly and efficient operation and expansion of the wastewater system to meet projected needs.

Goal 5.3-G-6. Maintain environmentally appropriate wastewater management practices.

Policy 5.3-I-7. Encourage new projects in East of 101 area that are likely to generate large quantities of wastewater to lower treatment needs through recycling, pretreatment, or other means necessary.

Goal 8.3-G-1. Reduce the generation of solid waste, including hazardous waste, and recycle those materials that are used, to slow the filling of local and regional landfills, in accord with the California Integrated Waste Management Act of 1989.

Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Water

As discussed in Section 10, *Hydrology and Water Quality*, the project site would be served by adequate water supplies from Cal Water.

Wastewater

The project's estimated wastewater generation would be approximately 63 million gallons per year (CAPCOA 2017), or approximately 173,000 gallons per day. The project would be served by connection to the municipal sewer system. Wastewater would be treated by the SSFWQCP located in South San Francisco approximately 2 miles southwest of the project site. The SSFWQCP has a total treatment capacity of approximately 60 mgd and currently treats an average of 9 mgd during average dry weather flow with a remaining capacity of 51 mgd (City of South San Francisco 2019f). The project's anticipated wastewater generation would be less than 1 percent of the SSFWQCP's remaining capacity.[3] Therefore, the project would not require the construction of new municipal wastewater treatment facilities or impact the treatment capacity of existing municipal wastewater treatment providers. Impacts to wastewater treatment facilities would be less than significant. This impact will not be discussed in the EIR.

Stormwater

The project would continue to connect to the existing storm drain system operated and maintained by the City of South San Francisco. The project would result in a net reduction of 9,519 square feet of impervious surface . However, the project would also include 10,184 square feet of pervious surfaces including four bioretention basins. The project would be designed and engineered with drainage features appropriate to accommodate the project's needs. As discussed in Section 10, *Hydrology and Water Quality*, the project would be required to comply with City requirements, including obtaining a wastewater discharge permit and implementing design BMPs. The project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts would be less than significant. This impact will not be discussed in the EIR.

Electricity, Natural Gas, and Telecommunications

As discussed in Section 6, *Energy*, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy. In addition, the project would not require the construction of new electric power, natural gas, or telecommunications facilities because it is located in an urban area already served by those utilities and would not require additional capacity.

[3] Calculation: 173,422 gallons of wastewater per day divided by 51 million gallons unused treatment capacity = 0.3 percent.

Therefore, the project would not result in significant environmental impacts due to the construction of new utility facilities. Impacts would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Based on the project's estimated wastewater generation, water demand can be estimated using an industry standard assumption that water use is approximately 120 percent of wastewater generation. Therefore, the project's gross water demand would be approximately 208,000 gallons per day (approximately 0.6 acre-feet per day), or approximately 76 million gallons per year (approximately 230.2 acre-feet per year). The project would slightly increase demand for water in comparison to the existing conditions. The proposed project would demand water for faucets, toilets, and landscape irrigation and additional water use related to office building operations.

As shown in Table 18, according to the 2015 UWMP, the water supply is expected to grow and would be enough to meet demand out to 2040 under normal year scenarios (Cal Water 2015). Under normal year scenarios, the project would represent 0.6 percent of annual water demand forecasted for 2020. [4] Under normal year scenarios, sufficient water supplies would be available to serve the project from existing entitlements and resources. As shown in Table 19, according to the 2015 UWMP, the water supply is expected to decrease, and demand is expected to increase resulting in water shortages within the City of South San Francisco. However, the project would account for less than 1 percent of the City's annual water demand and would be required to comply with the City's water shortage contingency plan. The water shortage contingency plan would require the project to incorporate limited landscape irrigation and immediate leak repair per Stage 2 of a moderate water shortage of 20 percent. Project operation during multi-year drought would be less than significant with compliance with the water shortage contingency plan. This impact will not be addressed in the EIR.

LESS THAN SIGNIFICANT IMPACT

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The proposed project would generate solid waste during construction and operation. Handling of debris and waste generated during construction would be subject to SSFMC Section 8.16 coordination with Scavengers Company; and SSFMC Section 15.22.030 diversion of at least 65 percent of construction or demolition waste. The project would not involve demolition activities; therefore, construction activities would not generate substantial solid waste.

According to CalEEMod default values, the project would generate approximately 10 tons of waste per year, or approximately 0.03 ton per day (CAPCOA 2017). The estimate is conservative as it does not factor in any recycling or waste-diversion programs. The 0.03 ton of solid waste generated daily by the project would represent less than 1 percent of the available surplus capacity of the receiving

[4] Calculation: 230.2 acre-feet per year divided by 40,225 acre feet = 0.6 percent.

landfill. The City of South San Francisco is required to meet the statewide waste diversion goal of 50 percent set by AB 939. The proposed project would comply with federal, state, and local statutes and regulations related to solid waste, such as AB 939, the SSFMC, and the City's recycling program. Impacts related to solid waste and waste facilities would be less than significant. This impact will not be discussed in the EIR.

LESS THAN SIGNIFICANT IMPACT

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20 Wildfire

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	■
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	■
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	■
d. Expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	■

Setting

The City of South San Francisco is not in a fire hazard severity zone. However, north of the city limits is the San Bruno Mountain State and County Park. San Bruno Mountain State and County Park is within a high fire hazard severity zone (California Department of Forestry and Fire Protection [CAL FIRE] 2007). The project site is located within an urbanized area of the City of South San Francisco and is surrounded by existing industrial development. Furthermore, neither the project site nor the City of South San Francisco is identified as being within a high fire hazard severity zone (CAL FIRE 2007). The nearest very high fire severity zone is the San Bruno Mountain State and County Park, located approximately 6 miles from the project site.

Regulatory Setting

City of South San Francisco

SOUTH SAN FRANCISCO GENERAL PLAN

Chapter 8, *Health and Safety*, of the City of South San Francisco General Plan sets forth the goal to protect lives and property from risks associated with fire-related emergencies at the urban/wildland interface. Goals and policies relevant to wildfire hazards are as follows:

Goal 8.4-G-1. Minimize the risk to life and property from fire hazards in South San Francisco.

Goal 8.4-G-2. Provide fire protection that is responsive to citizens' needs.

Impact Analysis

a. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

b. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

c. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

d. *If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project expose people or structures to significant risks, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site is not located in a state or local fire hazard severity zone (CAL FIRE 2007). As described in Section 9, *Hazards and Hazardous Materials*, project construction and operation would not restrict implementation of an emergency plan nor would it obstruct an emergency evacuation plan. No roads would be permanently closed because of the proposed project, and no structures would be developed that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Motor vehicle and bicycle access are provided via a two-way, two-lane driveway that connects to Forbes Boulevard. This driveway would provide sufficient ingress and egress for typical passenger vehicles that would access the project site. Therefore, project implementation and operation would not interfere with existing emergency evacuation plans or emergency response plans in the area.

The project site and surrounding area are generally flat (USGS 2018). In the project vicinity, prevailing wind blows to the west-northwest (National Oceanic and Atmospheric Administration 2019). Therefore, the risk of fire carried down slopes by prevailing wind to the site would be minimal and the project would not expose employees to wildfire impacts. Furthermore, building code safety requirements, project design review, compliance with SSFFD guidelines and regulations, and General Plan policies would require the provision of fire suppression and alarm systems, which

would aid in preventing the spread of wildfires if the project site were exposed to a wildfire. Required compliance with these policies and the project's low risk to wildfire hazards would have a less than significant impact.

The project would not involve the construction of new roads or the extension of utilities that could exacerbate wildfire risk or result in temporary or ongoing impacts to the environment. The project would be required to comply with building code and fire safety requirements, as well as General Plan policies. Construction BMPs would aid in preventing that temporary construction does not exacerbate fire risks in the area.

The project site is not within a very high fire hazard severity zone, is not within a landslide area, and is generally flat. No impact would occur as a result of project implementation. This impact will not be discussed in the EIR.

NO IMPACT

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21 Mandatory Findings of Significance

	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact
Does the project:				
a. Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	■	☐	☐
b. Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	■	☐	☐	☐
c. Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	■	☐

a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

As described in Section 4, *Biological Resources,* implementation of Mitigation Measure BIO-1 would address potential impacts to nesting habitats and migratory birds. Therefore, the project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal, and impacts would be less than significant with mitigation incorporated.

As noted under Section 5, *Cultural Resources*, and Section 7, *Geology and Soils*, no historical, archeological, or paleontological resources were identified on site. Nevertheless, the potential for the recovery of buried cultural materials during development activities remains. Implementation of Mitigation Measures CR-1 and CR-2 would reduce impacts to previously undiscovered cultural resources to a less than significant level by providing a process for evaluating and, as necessary, avoiding impacts to any resources found during construction. Therefore, impacts to important examples of California history or prehistory would be less than significant with mitigation incorporated.

As noted throughout the Initial Study, most other potential environmental impacts related to the quality of environment would be less than significant or less than significant with implementation of mitigation measures.

LESS THAN SIGNIFICANT WITH MITIGATION INCORPORATED

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

As defined in CEQA Guidelines Section 15355, a cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. Cumulative impacts refer to two or more individual effects that, when considered together, are considerable or that compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects implemented over time. The cumulative scenario used in this EIR was the same as that used for the General Plan EIR.

As part of the General Plan, the City of South San Francisco estimated a total of 3.1 million square feet of growth in the East of 101 area (City of South San Francisco 1999). The City's estimated General Plan buildout accounts for 9 million square feet of non-residential space. Cumulative development in the City is anticipated to consist primarily of development in the Downtown, East of 101, El Camino, and Lindenville sub-areas (City of South San Francisco 2019). The development of the project site is within the City's projected growth. The proposed project would not be expected to result in a substantial direct increase in the local population, since it would not result in the construction of any new housing units. The proposed project would not require major increases in the capacity of local infrastructure that might later be used to support new housing development and would not result in the extension of infrastructure into areas that might ultimately support new housing.

Cumulative impacts associated with some of the resource areas have been addressed in the individual resource sections above: Air Quality, Greenhouse Gases, Water Supply, and Solid Waste (CEQA Guidelines Section 15064[h][3]) and would be less than significant. Some of the other resource areas were determined to have no impact in comparison to existing conditions and therefore would not contribute to cumulative impacts, such as Wildfire, Mineral Resources, and Agriculture and Forestry Resources. As such, cumulative impacts in these issue areas would be less than significant (not cumulatively considerable). Other issue areas (e.g., aesthetics, hazards and hazardous materials) are site-specific by nature and impacts at one location do not add impacts at

other locations or create additional impacts. The project would increase traffic compared to existing conditions and thus, will be discussed in the EIR.

The development of the project site as proposed would contribute to reduced freeway levels of service, representing potentially significant adverse cumulative impacts. This impact will be fully discussed in the EIR.

POTENTIALLY SIGNIFICANT IMPACT

c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

In general, impacts to human beings are associated with air quality, hazards and hazardous materials, and noise impacts. As detailed in analyses for air quality, hazards and hazardous materials, and noise, the proposed project would not result, either directly or indirectly, in substantial adverse hazards related to air quality, hazardous materials, or noise. Compliance with applicable rules and regulations would reduce potential impacts on human beings to a less than significant level.

LESS THAN SIGNIFICANT IMPACT

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