

FINAL
Environmental Impact Report
General Plan Update, Zoning Code Amendments, and Climate Action Plan
City of South San Francisco, San Mateo County, California
State Clearinghouse Number 2021020064

Prepared for:
City of South San Francisco
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South San Francisco, CA 94080
650.877.8535

Contact: Billy Gross, Senior Planner

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Contact: Mary Bean, Project Director

Date: September 6, 2022

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SECTION 1: INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of South San Francisco (Lead Agency) has evaluated the comments received on the General Plan Update, Zoning Code Amendments, and Climate Action Plan Draft Program Environmental Impact Report (Draft Program EIR). Pursuant to CEQA Guidelines Section 15132, this Final EIR includes a list of persons, organizations, and agencies that provided comments on the Draft Program EIR; responses to the comments received regarding the Draft Program EIR; and errata, or revisions to the Draft Program EIR; as well as a Mitigation Monitoring and Reporting Program (MMRP) for use by the City of South San Francisco during its review.

This document is organized into three sections:

- **Section 1—Introduction.** Provides an introduction to the Final EIR.
- **Section 2—Responses to Written Comments.** Provides a list of the agencies, organizations, and individuals who commented on the Draft EIR. Copies of all of the letters received regarding the Draft EIR and responses thereto are included in this section.
- **Section 3—Errata.** Includes an addendum listing refinements and clarifications on the Draft EIR, which have been incorporated.

The Final EIR includes the following contents:

- Draft Program EIR (provided under separate cover)
- Draft Program EIR Appendices (provided under separate cover)
- Responses to Written Comments on the Draft Program EIR and Errata (Sections 2 and 3 of this document)
- Mitigation Monitoring and Reporting Program (MMRP) (provided under separate cover)

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SECTION 2: RESPONSES TO WRITTEN COMMENTS

2.1 - List of Authors

A list of public agencies, organizations, and individuals that provided comments on the City of South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan Draft Program Environmental Impact Report (Draft Program EIR) is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

Author	Author Code
State Agencies	
California Department of Transportation	Caltrans
California Geological Survey	CGS
Local Agencies	
San Francisco International Airport	SFO
Individuals	
Buchalter	BUCHALTER

2.2 - Responses to Comments

2.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the City of South San Francisco, as the Lead Agency, evaluated the comments received on the Draft Program EIR (State Clearinghouse No. 2021020064) for the General Plan Update, Zoning Code Amendments, and Climate Action Plan, and has prepared the following responses to the comments received. Section 15088(c) of the State CEQA Guidelines specifies that the focus of the responses to comments shall be on the disposition of significant environmental issues. Responses to comments regarding the merits of the project or on issues unrelated to the project’s environmental impacts are not required. Accordingly, such comments are summarized and noted in the responses and will be reviewed by the City before any action by decision makers.

This Response to Comments document becomes part of the Final EIR for the project in accordance with CEQA Guidelines Section 15132.

2.2.2 - Comment Letters and Responses

The comment letters reproduced in the following pages follow the same organization as used in the List of Authors.

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California Department of Transportation

DISTRICT 4
OFFICE OF REGIONAL AND COMMUNITY PLANNING
P.O. BOX 23660, MS-10D | OAKLAND, CA 94623-0660
www.dot.ca.gov



August 9, 2022

SCH #: 2021020064
GTS #: 04-SM-2021-00446
GTS ID: 21933
Co/Rt/Pm: SM/101/22.022

Billy Gross, Principal Planner
315 Maple Avenue
South San Francisco, CA 94083

Re: South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan Program Environmental Impact Report

Dear Billy Gross:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the General Plan Update, Zoning Code Amendments and Climate Action Plan Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated, and efficient transportation system. The following comments are based on our review of the July 2022 draft EIR.

Project Understanding

The proposed project includes the implementation of the South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan which are collectively referred to as the proposed project in this document. The General Plan Update anticipates approximately 14,312 net new housing units and approximately 42,297 net new employment opportunities by 2040. The Proposed Land Use Map designates the general location, distribution, and extent of land uses within the Planning Area and identifies proposed land use designations for each parcel within the City of South San Francisco and within the City's SOI. The updated 2022 Climate Action Plan (CAP) includes a community-wide inventory of greenhouse gas (GHG) emissions and identifies strategies and measures to reduce GHG emissions generated by existing and future uses in the City.

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Billy Gross, Principal Planner
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Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide ([link](#)).

2

Caltrans' acknowledges that the project Vehicle Miles Traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the Office of Planning and Research's (OPR) Technical Advisory. However, due to the increased amount of projected vehicle miles traveled, this project will have significant and unavoidable impacts to the transportation network as indicated in the environmental document. The Plan presents an expected jobs to housing ratio of 3.53 by 2040. This jobs to housing ratio results in greater VMT and greenhouse gas emissions and may negatively impact local and State climate goals and the transportation network. Increasing the housing development in the two Priority Development Areas of the City (the Downtown PDA and the El Camino Real PDA) can support lower VMT and mitigate impacts from the Plan.

3

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Active Transportation

Class IV facilities, along with Class I paths, are typically the lowest-stress facilities for users of all ages and abilities. It is noted that the City currently has 0 miles of Class IV facilities. While the City emphasizes low-stress active transportation networks and connectivity in this project, Caltrans encourages prioritizing the implementation of a network of low-stress bikeways so that this number increases. Prioritization and target build horizons of Class IV facilities should be included in both policy and action in this General Plan update. Please reach out to Caltrans for coordination as needed to support this implementation.

5

MOB-4.1.4 and MOB-4.2 mention incorporating first/last-mile connections and micro-mobility as an innovation where feasible. Caltrans encourages a more robust prioritization of micro-mobility, which may realize more mitigation of projected VMT impacts. Scooters, bikeshare, e-bikes, e-mopeds, and infrastructure to store, dock, and support these devices can successfully shift users from single occupancy vehicle trips to non-polluting transportation modes. As with all transport, a well-established multi-modal network provides compounding positive effects. Caltrans encourages multi-modal goals, policies and projects that support safe and equitable access for all users, motorized and non-motorized, within the City's travelshed. By emphasizing micro-mobility, low-stress bikeways, and a lower jobs to housing ratio, it will help mitigate negative impacts of the projected VMT increases.

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Transportation Operations

Caltrans appreciates the City working with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections that help manage offramp queues related to safety. When conducting safety reviews for proposed land use projects and plans affecting the State Highway System, please refer to the [Caltrans Traffic Safety Bulletin](#).

7

Equitable Access

If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

8

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

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Sincerely,



MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse

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State Agencies

California Department of Transportation (Caltrans)

Response to Caltrans-1

The commenter provides general introductory remarks and does not raise any environmental issues. No response is required.

Response to Caltrans-2

The commenter provides general information about the analysis of Vehicle Miles Traveled (VMT) and does not raise any environmental issues. No response is required.

Response to Caltrans-3

The commenter acknowledges that the Draft Program EIR provided VMT analysis consistent with the Governor’s Office of Planning and Research (OPR) Technical Advisory. No response is required.

Response to Caltrans-4

The commenter notes that the Draft Program EIR identifies a significant and unavoidable VMT impact, and suggests that increasing housing development in the two Priority Development Areas in the City can support lower VMT that would mitigate this impact.

Comment is noted. The General Plan would increase the allowable area of housing in both Priority Areas, adding allowances for mixed use, as well as the addition of approximately 10,000 housing units.

Through an extensive community engagement process that included over 75 public meetings, the General Plan created a land use plan that aimed to:

- Retain life science uses that will ensure South San Francisco will remain a world class life sciences destination and an economic engine for the region.
- Produce a range of housing types for different income levels and household types across the City to balance job and housing growth and distribute the potential impacts of future growth.
- Maintain industrial uses in Lindenville and East of 101 Area.

The General Plan and EIR allows up to 14,312 net new housing units within the General Plan 2040 time horizon, representing a 63 percent increase in housing units in the City (22,877 housing units in 2022 per California Department of Finance). Along with new housing opportunities along El Camino near the South San Francisco Bay Area Rapid Transit (BART) station and Downtown near the South San Francisco Caltrain Station, the General Plan establishes new, mixed-use residential neighborhoods in East of 101 and Lindenville. These areas allow for a mix of high-density residential and commercial uses. Since these areas did not previously allow residential development, the General Plan also ensures development of appropriate City services, amenities, and retail to support new residential growth.

To support this effort and the implementation of mixed-use communities, the City launched a Specific Plan for Lindenville earlier this year as a follow-up implementation action in the General Plan (SA-22.1.1). The Specific Plan aims to help realize the General Plan’s vision for the area with the

development of more detailed design standards, implementation programs, and capital improvements to successfully create residential neighborhoods in a historically industrial area.

Response to Caltrans-5

The commenter provides information about Class IV bikeway facilities and encourages the City to prioritize the implementation of a network of low-stress bikeways as part of the General Plan Update.

The comment is noted, and the City agrees with the need for more Class IV facilities. As noted in the General Plan Update, the proposed project encourages implementation of the Active South City Plan, which focuses on a number of new bikeway facilities including Class IV facilities.

Response to Caltrans-6

The commenter provides information about first/last-mile connections and encourages the City to prioritize micro-mobility and multimodal goals, policies and projects to help mitigate the negative impacts of the projected VMT increases.

The comment is noted, and the City agrees with the need for more micro-mobility facilities. As noted in the comment, MOB 2.1.3 directs the City to implement the Active South City Pedestrian and Bicycle Plan. This Plan is the City's roadmap to encouraging use of and designing facilities for micro-mobility devices, which have overlap with bicycle and pedestrian facilities.

Response to Caltrans-7

The commenter expresses appreciation for the City in working with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections, and provides a link to the Caltrans Traffic Safety Bulletin.

The comment is noted; no response is required.

Response to Caltrans-8

The commenter notes that the project must maintain bicycle and pedestrian access during construction and that any Caltrans facilities affected by the project must meet Americans with Disabilities Act (ADA) standards after project construction.

The comment does not identify any significant environmental issues or raise questions regarding the analysis in the Draft Program EIR. The City intends to maintain bike and pedestrian access throughout construction. No further response is required.

Response to Caltrans-9

The commenter provides closing remarks and contact information. No response is required.

From: "Frost, Erik@DOC" <Erik.Frost@conservation.ca.gov>
Date: August 9, 2022 at 10:56:57 AM MDT
To: "Gross, Billy" <Billy.Gross@ssf.net>
Cc: OLRA@conservation.ca.gov, OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Subject: City of South San Francisco General Plan Update (SCH 2021020064) - CGS comments

[NOTICE: This message originated outside of City of South San Francisco -- DO NOT CLICK on links or open attachments unless you are sure the content is safe.]

Mr. Gross,

The California Geological Survey (CGS) has received the Notice of Availability of a Program Environmental Impact Report (EIR) for the proposed South San Francisco General Plan Update. This email conveys the following recommendations from CGS concerning geologic issues related to the subject area:

1. Liquefaction and Landslide Hazards

On September 23, 2021, the CGS released an Official Seismic Hazard Zone Report (SHZR) and Earthquake Zone of Required Investigation Map (EZRIM) for the San Francisco South quadrangle, which includes the subject area. Although the EIR does appear to accurately reflect the extent of Earthquake Zones of Required Investigation (EZRI) for liquefaction in Exhibit 3.6-5, the EZRI for landslides do not match those published by the CGS. The EIR text should be revised to note that zone of required investigation for liquefaction and landsliding are mapped within the City, and Exhibit 3.6-4 should be revised based on information in the links below:
<https://maps.conservation.ca.gov/cgs/EQZApp/app/>
<https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps>
Cities and counties affected by EZRI must regulate certain development projects within them. The Seismic Hazards Mapping Act (1990) also requires sellers of real property (and their agents) to disclose at the time of sale that the property lies within such a zone.

If you have any additional comments or questions, please feel free to call or email.

Erik

Dr. Erik Frost

Senior Engineering Geologist | Seismic Hazards Program
California Geological Survey
715 P Street, MS 1901, Sacramento, CA 95814
(916) 205-8255
erik.frost@conservation.ca.gov

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California Geological Survey (CGS)

Response to CGS-1

The commenter provides a link to mapping for liquefaction and landslide hazards, and asks that Exhibit 3.6-4 and Exhibit 3.6-5 be revised accordingly.

The comment is noted, and the updated Exhibit 3.6-4 and Exhibit 3.6-5 are included in Section 3, Errata. The updated exhibits do not change the analysis or conclusions of the Draft Program EIR.

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San Francisco International Airport

August 9, 2022

Billy Gross, Principal Planner
City of South San Francisco
Planning Division
315 Maple Ave.
South San Francisco, CA 94080

TRANSMITTED VIA E-MAIL and U.S. MAIL
billy.gross@ssf.net

Subject: Comment Letter: Draft Program Environmental Impact Report for Proposed South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan

Thank you for notifying San Francisco International Airport (SFO or the Airport) regarding the preparation of a Draft Program Environmental Impact Report (Program EIR) for the proposed South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan (the Proposed Project). We appreciate this opportunity to coordinate with the City of South San Francisco (the City) in considering potential land use compatibility issues that the Proposed Project may pose and should address.

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As described in the Draft Program EIR, the project site is the geographic limits of the City, in San Mateo County. The southeastern portion of the project borders, and in certain areas overlaps with, City and County of San Francisco/SFO property boundaries. The City is primarily residential, with this use occupying approximately 40% of its land area, followed by industrial/research and development at approximately 30%, and parks/open space/common greens at approximately 10%. The Proposed Project would serve as a blueprint for the City’s vision through the year 2040 and would replace the 1999 General Plan and inform updates to the City’s Zoning Ordinance.

The Airport’s specific comments regarding Draft Program EIR are noted below:

1. NOISE COMPATIBILITY

The Airport is concerned that much of the land slated for zoning changes is closer to the Airport than the previous General Plan’s housing element, and portions of the proposed mixed-use residential zones are within the Airport’s runway safety zone boundaries and 65 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour. We expressed concern about this issue in our March 22, 2021 comment letter, which is attached hereto as Exhibit A (and incorporated by reference.). In the 1999 General Plan, the City acknowledged the significance of and retained areas east of U.S. 101 for cargo handling and freight forwarder uses that support the cargo operations of companies using SFO. The Airport appreciates that in the intervening years, the City has successfully maintained these land uses east of U.S. 101, which enhance and support the relationship among the City, its residents, and the Airport, and supports the City and regional economy. These existing compatible land uses east of U.S. 101 include industrial, warehousing, hotels, and office/research & development. The Airport cautions against the Proposed Project’s departure from this successful practice.

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The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP) policies for noise are to protect the comfort and quality of life of the City's residents, and SFO discourages residential uses within the Airport's 65 dB or higher contours. The Draft Program EIR identifies in Impact HAZ-5 that the General Plan Policy SA-12.6 requires the City to encourage residential development in the South Spruce area that is within the 65 dB CNEL, provided that the structure meets the standard indoor 45 dB noise requirement. This impact statement does not acknowledge that the SFO ALUCP also requires the grant of an avigation easement to the City and County of San Francisco, as the proprietor of SFO, as a condition of allowing residential development within the 65 dB CNEL contour.¹ At a minimum, the requirement for granting an avigation easement should be included in Impact HAZ-5 in determining the level of significance. Impact LUP-2 also acknowledges that portions of the proposed mixed-use residential land use designations are located within the 65 dB CNEL and does state the requirement for granting an avigation easement but does not mention the requirement to reduce the indoor noise level to 45 dB. Also, while avigation easements are an important liability mitigation tool, they do not replace the imperative to avoid introducing incompatible uses into a noise-affected area. As shown in ALUCP Table IV-1, residential uses are not compatible within the 70 dB contour and higher, and the Draft Program EIR should evaluate them as such.

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Further, many Airport departure procedures are designed to ascend over either the San Bruno Gap or Oyster Point, including one procedure, the Shoreline Departure visual procedure, which is a noise abatement procedure designed specifically to keep aircraft over the industrial areas of the City east of U.S. 101 and away from its traditional residential areas. Any residential developments east of U.S. 101, such as those proposed in the General Plan Update, could reduce the efficacy of the Nighttime Preferential Runway Use program developed in 1988 and put in place specifically to protect residents of South San Francisco, Daly City, and Pacifica by maximizing flights over water and industrial areas between 1:00 a.m. and 6:00 a.m. Any residential uses allowed in areas east of U.S. 101 would experience noise disturbances from aircraft departures. We expressed concern about this in our March 22, 2021 comment letter. The Draft Program EIR has not specifically analyzed these potential environmental impacts of the Proposed Project. The Airport also urges the City to engage the SFO Airport/Community Roundtable as soon as possible to notify the public and stakeholders about the project as it relates to the existing and long-established aircraft noise abatement procedures to the City and adjacent cities.

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Also, in Impact NOI-3, the Draft Program EIR states "These airport activity noise levels could exceed the City's noise/land use compatibility standards for certain land uses." This language implies that the Airport is actively exceeding noise and land use compatibility standards. This language is misleading and should be corrected; rather, the General Plan Update would allow for mixed-use residential uses within the already established 65 dBA CNEL. Also, within this impact statement, an incorrect reference to Mitigation Measure (MM) NOI-2 is made; there is no MM NOI-2. Rather, it should be MM NOI-3, which properly corresponds to the number of the impact statement.

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¹ SFO ALUCP Noise Policy-3.

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August 9, 2022
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If the City were to propose a development which the ALUC determines is incompatible with the SFO ALUCP, then the City would be compelled to override the ALUC determination through its City Council if it wishes to proceed with the development. An override of the noise compatibility policy requires granting of an aviation easement to the City and County of San Francisco, as proprietor of SFO.

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2. SAFETY COMPATIBILITY

With respect to safety, Impact LUP-2 identifies that the southern portions of the General Plan Update area are within various runway end safety zones, including the Inner Approach/Departure Zone (Zone 2), Inner Turning Zone (Zone 3), and Outer Approach/Departure Zone (Zone 4) and has the potential to conflict with respective zone restrictions. We expressed concern about this in our March 22, 2021 comment letter. Each of these zones carries restrictions on what may be located there, based on the safety compatibility criteria and guidelines in the ALUCP, which in turn were adapted from the California Airport Land Use Planning Handbook. The Handbook’s risk-based guidance is informed by a rigorous analysis of historical aircraft incident data. The ALUCP already recognizes the intense level of existing development in the vicinity of SFO and makes compromises compared to the Handbook’s recommendations, and the Airport recommends against further degradation of these safety restrictions.

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The Draft Program EIR concludes, however, under Impact LUP-2 that the Proposed Project would not cause a significant environmental impact. It is not clear how the Draft Program EIR comes to this conclusion as there are clear potential conflicts with safety compatibility policies as acknowledged in Impact LUP-2. The purpose of the safety compatibility policies is twofold: 1) to protect the public health, safety, and welfare by minimizing the public’s exposure to the risk associated with potential aircraft accidents in the Airport vicinity and 2) to protect the public interest in providing for the orderly development of SFO by preventing the creation of new safety problems in Airport environs. The overall objective is to minimize risks associated with potential aircraft accidents to persons on the ground and aircraft occupants.

3. AIRSPACE COMPATIBILITY

Impact HAZ-5 describes how the City would consult with the City/County Association of Governments (C/CAG) and the Federal Aviation Administration (FAA) when new development is proposed in the vicinity of SFO. This language is potentially misleading as the City is not required to “consult” with but rather, it is required to submit to the C/CAG (or specifically, the Airport Land Use Commission within C/CAG) for a determination of consistency with the SFO ALUCP.

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As it pertains to height compatibility, any proposed structure must lie wholly beneath the critical aeronautical surfaces defined in the SFO ALUCP and must obtain a Determination of No Hazard from the FAA. These processes are parallel, as the SFO ALUCP and the FAA study different airspace surfaces when coming to their determinations. Given the degree of confusion that the City and the Airport have observed on this process over the past several years, the Airport suggests clarifying language that acknowledges these two parallel determination processes. Further, the

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Billy Gross, City of South San Francisco
August 9, 2022
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Airport recommends clarifying that for purposes of airspace evaluation, both the FAA and the SFO ALUCP reference elevations above mean sea level (MSL) as defined by the 0-foot origin of the North American Vertical Datum of 1988 (NAVD88), and not the ground level.

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CONT

* * *

The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to the General Plan update, Program EIR, or any future projects, please do not hesitate to contact me at (650) 821-6678 or at nupur.sinha@flysfo.com.

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Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE6A4CE495...

Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport
P.O. Box 8097
San Francisco, California 94128

Attachment

cc: Susy Kalkin, ALUC
Sean Charpentier, C/CAG
Sam Hindi, Chairperson, SFO Airport/Community Roundtable
Audrey Park, SFO

ATTACHMENT

Comment Letter from SFO to City of South San Francisco re: Notice of Preparation of a Program
Environmental Impact Report for Proposed South San Francisco General Plan Update (March 22, 2021)



San Francisco International Airport

March 22, 2021

Billy Gross
Senior Planner
City of South San Francisco
Planning Division
315 Maple Ave.
South San Francisco, CA 94080

TRANSMITTED VIA EMAIL
billy.gross@ssf.net

Subject: Notice of Preparation of a Program Environmental Impact Report for Proposed South San Francisco General Plan Update

Dear Mr. Gross,

Thank you for notifying San Francisco International Airport (SFO or the Airport) regarding the preparation of a Program Environmental Impact Report (Program EIR) for the proposed South San Francisco General Plan Update (the project). We appreciate this opportunity to coordinate with the City of South San Francisco (the City) in considering and evaluating potential land use compatibility issues that the project may pose and should address.

As described in the Notice of Preparation (NOP), the project site is the geographic limits of the City, in San Mateo County. The southeastern portion of the project borders, and in certain areas overlaps with, City and County of San Francisco/SFO property boundaries. The City is primarily residential, with this use occupying approximately 40% of its land area, followed by industrial/research and development (RD) at approximately 30%, and parks/open space/common greens at approximately 10%. The NOP notes that presently there are about 150 acres of vacant land remaining in the City, which amounts to 3.4% of the City. This project will serve as a blueprint for the City’s vision through the year 2040 and will replace the 1999 General Plan and inform updates to the City’s Zoning Ordinance.

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The City’s proposed changes are highlighted in Proposed Land Use Maps and, specifically, the Land Use Map depicting the changes from the existing map (see Figure 1). This map highlights the concentration in change along the U.S. Highway 101 (U.S. 101) corridor, the “East of 101” precinct including Oyster Point, and transit nodes such as the San Bruno Bay Area Rapid Transit (BART) and South San Francisco BART and Caltrain stations, which have been targeted for zoning intensification. The NOP notes that the project permits approximately 14,324 net new housing units and approximately 13,352 net new employment opportunities by 2040. This map highlights that much of this change will come from intensifying land uses which were previously exclusively office/RD or industrial under the 1999 General Plan to include mixed use or high-density mixed use, which would allow for residential uses.

The Airport is concerned that much of the land slated for this change is closer to the Airport than the previous General Plan’s housing element, and portions of the proposed mixed-use residential zones are within the Airport’s runway safety zone boundaries and 65 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour. In the 1999 General Plan, the City acknowledged the significance of and retained areas east of U.S. 101 for cargo handling and freight forwarder uses that support the cargo operations at SFO. The Airport appreciates that in the intervening years, the City has successfully maintained these land uses east of U.S. 101, which enhance and support the relationship among the City, its residents, and the Airport. These existing compatible land uses east of U.S. 101 include industrial, warehousing, hotels, and office/RD. The Airport cautions against the project’s proposed departure from this successful practice.

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AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

LONDON N. BREED
MAYOR

LARRY MAZZOLA
PRESIDENT

ELEANOR JOHNS
VICE PRESIDENT

RICHARD J. GUGGENHIME

EVERETT A. HEWLETT, JR.

MALCOLM YEUNG

IVAR C. SATERO
AIRPORT DIRECTOR

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The close proximity of these areas to SFO would require developments to undergo federal, state, and local regulatory review processes specific to airport noise, airspace safety, and other land use compatibility standards, including 14 Code of Federal Regulations Part 77 regulations for the safety, efficient use, and preservation of navigable airspaces. Airport staff encourages the City to work closely with the Airport Land Use Commission (ALUC)¹ to determine project consistency with the Comprehensive Airport Land Use Compatibility Plan for the Environs of SFO (ALUCP)² and other regulatory review procedures. The Program EIR should evaluate the project for consistency with all ALUCP regulatory requirements and policies.

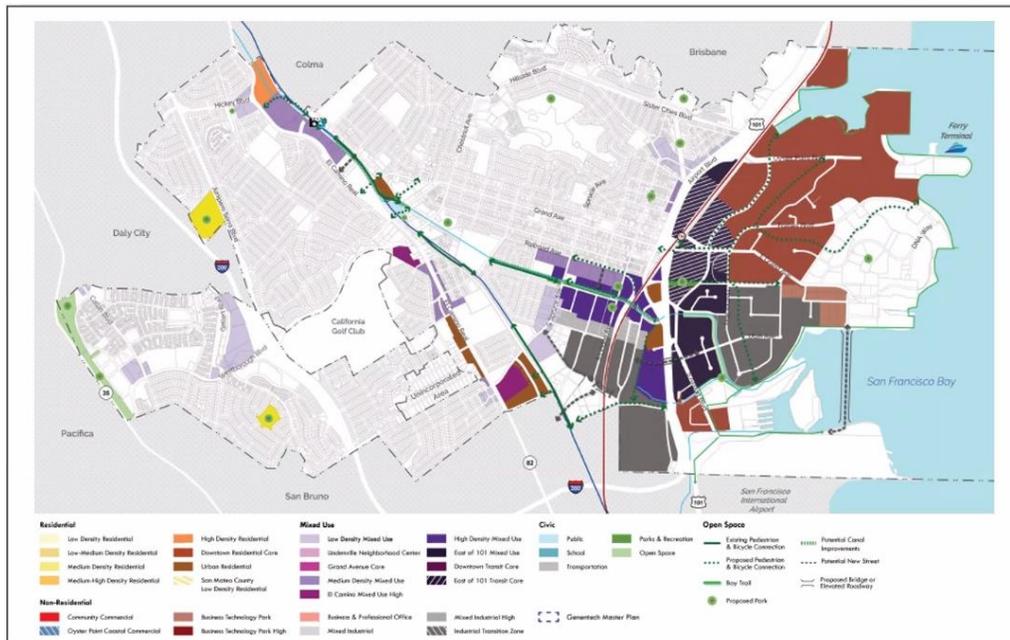


Figure 1: Proposed Changes from Existing Land Use Map (NOP of Program EIR Exhibit 5)

The ALUCP establishes policies, to ensure compatibility between the Airport and surrounding land uses and to protect local residents and workers from adverse effects of airport operations. All three topics are based on research into actual effects of airport operations on human health and safety.³

- **Noise:** Reduce the potential number of future residents who could be exposed to noise effects from airport and aircraft operations.
- **Safety:** Minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and/or catastrophic incidents.
- **Elevation/Height:** Protect the navigable airspace around the Airport for the safe and efficient operation of aircraft in flight.

¹ State law requires an ALUC for every county with an airport in its jurisdiction. *See* Cal. Pub. Util. Code §§ 21670-21679.5. In San Mateo County, the City/County Association of Governments of San Mateo County (C/CAG) board serves as the ALUC.

² State law requires the preparation of an ALUCP. *See id.* In 2012, C/CAG, in consultation with the Airport and surrounding communities, adopted the current ALUCP, which addresses issues related to compatibility between airport operations and surrounding proposed land use development, considering noise impacts, safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification.

³ California Department of Transportation (Caltrans) Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011.

Mr. Billy Gross
March 22, 2021
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Most of the City, and all of the areas of proposed land use intensification around and to the east of U.S. 101, are located within the ALUCP Airport Influence Areas A and B (see Figure 2). The ALUCP requires all residential development within Area A, which is the entirety of San Mateo County, to provide real estate disclosures, a copy of which can be found at ALUCP Appendix G-7. Additionally, within the more restrictive Area B, “the ALUC [the C/CAG Board] shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezoning, and land development proposals.”⁴ The City must accordingly submit the proposed general plan update to the ALUC for review.

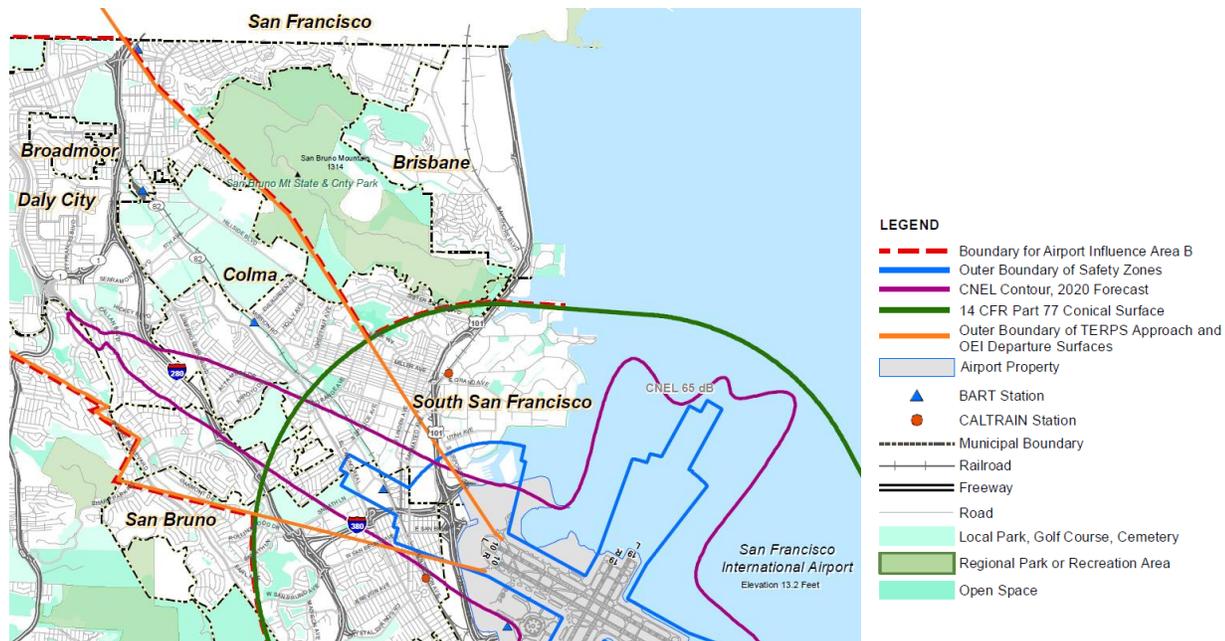


Figure 2: ALUCP-defined boundaries affecting South San Francisco (ALUCP Exhibit IV-3)

With respect to noise compatibility, portions of the project are situated within the Airport’s 65 dB CNEL noise contour, and some even within the 70 dB contour. The ALUCP policies for noise are to protect the comfort and quality of life of the City’s residents, and SFO discourages residential uses within the Airport’s 65 dB or higher contours. To the extent that the project would allow such uses, the Program EIR must disclose and evaluate any inconsistency with the ALUCP. The ALUCP requires the grant of an aviation easement to the City and County of San Francisco, as the proprietor of SFO, as a condition of allowing residential development within the 65 dB contour.⁵ While aviation easements are an important mitigation tool, they do not replace the imperative to avoid introducing incompatible uses into a noise-affected area in the first place. As shown in ALUCP Table IV-1, residential uses are not compatible within the 70 dB contour and higher, and the Program EIR should evaluate them as such.

Further, many Airport departure procedures are designed to ascend over either the San Bruno Gap or Oyster Point, including one procedure, the Shoreline Departure visual procedure, which is a noise abatement procedure designed specifically to keep aircraft over the industrial areas of the City east of U.S. 101 and away from its traditional residential areas. Any residential developments east of U.S. 101 could reduce the efficacy of the Nighttime Preferential Runway Use program developed in 1988 and put in place specifically to protect residents of South San Francisco, Daly City, and Pacifica by maximizing flights over water and industrial areas between

⁴ ALUCP IP-2 (Airport Influence Area B – Policy/Project Referral Area), p. IV-11.

⁵ ALUCP NP-3.

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CONT

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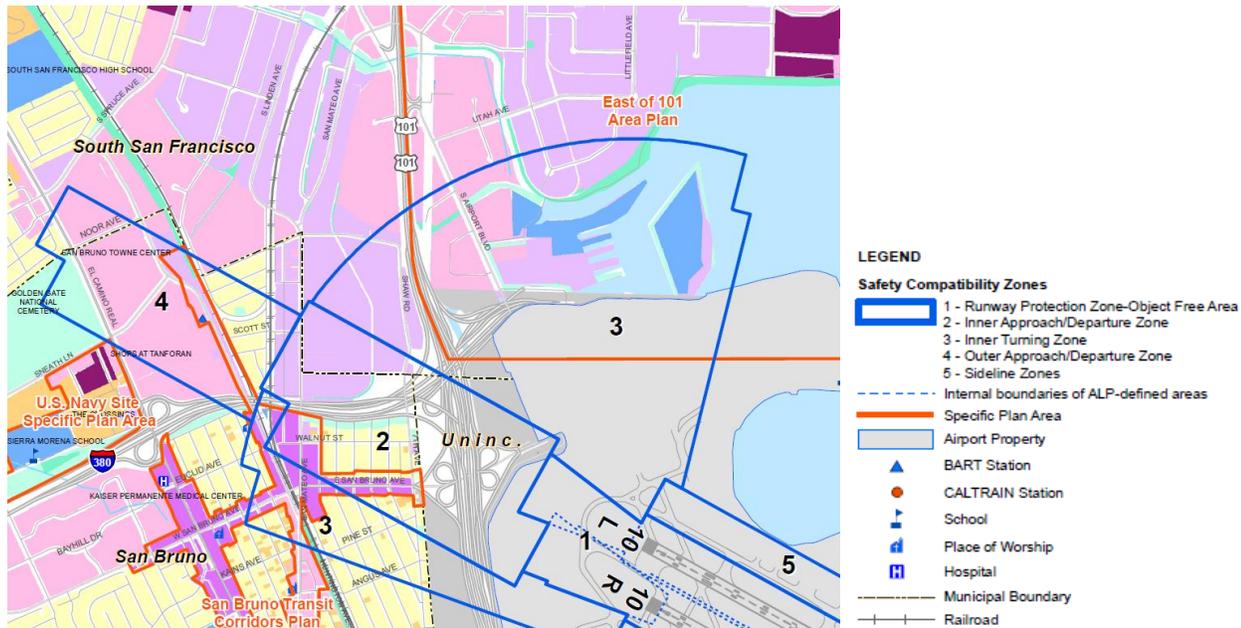
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1:00 a.m. and 6:00 a.m. Any residential uses allowed in areas east of U.S. 101 would experience noise disturbances from aircraft departures. The Program EIR should evaluate these potential environmental impacts of the project. The Airport also urges the City to engage the SFO Airport/Community Roundtable as soon as possible to notify the public and stakeholders about the project as it relates to the existing and long-established aircraft noise abatement procedures to the City and adjacent cities.

17
CONT

Any proposed residential uses outside of the 65 dB contour should still meet the interior noise requirements of the California Building Code. Noise impacts on sensitive receptors and any necessary mitigation measures should be fully evaluated in the Program EIR, and the EIR should describe the project’s consistency with noise policies described in ALUCP, including noise policies NP-1 through NP-4.

The Airport understands and supports the City’s efforts to address the region’s housing supply shortage with its General Plan update. SFO has felt the effects of the housing crisis firsthand, with many people who work at the Airport forced to finding housing 60 miles away, or farther. This places a considerable hardship on the employees, Airport, neighboring communities, and the regional surface transportation system, and we would welcome affordable, transit-oriented housing closer to the Airport. However, subjecting new residents to excessive aircraft noise is not an equitable solution. SFO requests that the City revise its proposals for residential and mixed uses away from the 65 dB CNEL contour, including the southern portions of Highway 101 and San Bruno BART station. Any upzoning proposed along the City’s commercial core along Grand Avenue or higher density around South San Francisco BART station would be outside of the critical 65 dB CNEL contour and would not pose these concerns.



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Figure 3: SFO runway safety compatibility zones around South San Francisco (ALUCP Exhibit IV-8)

With respect to safety, the southern portions of the General Plan area are within various runway end safety zones, including the Inner Approach/Departure Zone, Inner Turning Zone, and Outer Approach/Departure Zone (see Figure 3). Each of these zones carry restrictions on what may be located there, based on the safety compatibility criteria and guidelines from the California Airport Land Use Planning Handbook. The Handbook’s risk-based guidance is informed by a rigorous analysis of historical aircraft incident data. The ALUCP already recognizes the intense level of existing development in the vicinity of SFO, and the Airport recommends against overriding these

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restrictions. The Program EIR should also describe and evaluate the project's consistency with land use criteria within these runway end safety zones, as described in ALUCP SP-1 through SP-3.

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CONT

With respect to elevation, the Airport appreciates the City's commitment to protecting the critical airspace surfaces defined in the ALUCP, as these surfaces protect the safety and economic vitality of the Airport and the City. The Airport has observed several points of confusion regarding airspace surfaces and requests that the City work with SFO staff to ensure the accuracy of the guidance provided in the General Plan Update.

For example, all critical airspace surfaces are based on elevation above mean sea level (AMSL) – not height above ground level (AGL). Therefore, if the General Plan Update establishes height restrictions, it should note them in AMSL rather than AGL and incorporate by reference the most recently adopted version of the ALUCP. It should also note that the finished height of any proposed development must be maintained below these clearance limits, including architectural parapets, machine rooms, antennas, etc. The Airport suggests that any exhibits included in the General Plan Update should include prominent notes which address these common concerns.

20

Finally, the General Plan Update also proposes a new vehicular bridge between Oyster Point, likely around the southern end of Haskins Way, and North Access Road on Airport property. While we understand this may be highly notional, if the City does intend to pursue the concept, the Program EIR should fully evaluate it. We also request that the City keep the Airport apprised of any developments regarding this proposal, which would require close coordination with the Airport. For example, the Airport would need to understand vehicular movements and how the bridge could increase or redistribute traffic on the Airport's roadways and intersection with Interstate 380 in deciding whether to support the project.

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The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to the General Plan update, Program EIR, or any future projects, please do not hesitate to contact me at (650) 821-9464 or at nupur.sinha@flysfo.com.

Sincerely,

DocuSigned by:

 7D552AE6A4CE495...

Nupur Sinha
 Acting Planning Director
 Planning and Environmental Affairs

cc: Susy Kalkin, Airport Land Use Committee
 Sandy Wong, C/CAG
 Audrey Park, SFO, Acting Environmental Affairs Manager

Local Agencies

San Francisco International Airport (SFO)

Response to SFO-1

The commenter provides introductory remarks. No response is required.

Response to SFO-2

The commenter expresses concern about the location of proposed land uses being closer to the Airport than the previous General Plan's housing element, noting that appropriate compatible uses east of U.S. 101 include industrial, warehousing, hotels, and office/research and development. SFO discourages residential uses within the Airport's 65 decibel (dB) or higher contours.

The comment is noted. In response to the SFO 2021 letter, the City modified the proposed plan to ensure that residential uses would not be located within the 70 dB or higher contours identified in the SFO Airport Land Used Compatibility Plan (ALUCP). Residential uses within the 65 dB contour are required to meet the 45 dB interior standard (Title 24).

Response to SFO-3

The commenter notes that GP Policy SA-12.6 requires the City to encourage residential development in the South Spruce area that is within the 65 dB Community Noise Equivalent Level (CNEL), provided that the structure meets the standard indoor 45 dB noise requirement. The ALUCP requires the grant of an aviation easement to the City and County of San Francisco, as the proprietor of SFO, as a condition of allowing residential development within the 65 dB CNEL contour, and this requirement should be included in Impact HAZ-5 in determining the level of significance.

The commenter also notes that Impact LUP-2 acknowledges this requirement but does not mention the requirement to reduce indoor noise to 45 dB.

Proposed/future development must comply with the City's Policies NOI-1.1 and NOI-1.2, which establish interior noise compatibility standards. This impact is identified and addressed in Impact NOI-3 and is mitigated to less than significant with implementation of MM NOI-2.

Response to SFO-4

The commenter notes that while aviation easements are an important liability mitigation tool, they do not replace the imperative to avoid introducing incompatible uses into a noise-affected area. As shown in ALUCP Table IV-1, residential uses are not compatible within the 70 dB contour and higher, and the Draft Program EIR should evaluate them as such.

In response to the SFO 2021 letter, the City modified the proposed plan to ensure that residential uses would not be located within the 70 dB or higher contours. Residential uses within the 65 dB contour are required to meet the 45 dB interior standard (Title 24).

Response to SFO-5

The commenter notes that any residential developments east of U.S. 101, such as those proposed in the General Plan Update, could reduce the efficacy of the Nighttime Preferential Runway Use program developed in 1988 and put in place specifically to protect residents of South San Francisco, Daly City, and Pacifica by maximizing flights over water and industrial areas between 1:00 a.m. and

6:00 a.m. Any residential uses allowed in areas east of U.S. 101 would experience noise disturbances from aircraft departures. The Draft Program EIR has not specifically analyzed these potential impacts.

See Response to Comment SFO-3, in reference to the fact that the impact is mitigated by requiring developments to comply with interior noise standards.

Response to SFO-6

The commenter urges the City to engage the SFO Airport/Community Roundtable as soon as possible to notify the public and stakeholders about the proposed project as it relates to the existing and long-established aircraft noise abatement procedures to the City and adjacent cities.

The comment is noted. No further response is required.

Response to SFO-7

The commenter notes that in the discussion for Impact NOI-3, the Draft Program EIR states “These airport activity noise levels could exceed the City’s noise/land use compatibility standards for certain land uses.” This language implies that the Airport is actively exceeding noise and land use compatibility standards. The comment notes that this language is misleading and should be corrected to state that the General Plan Update would allow for mixed-use residential uses within the already established 65 dBA CNEL. The commenter also notes a typographical error related to Mitigation Measure (MM) NOI-2. The comment states that the correct reference should be MM NOI-3, which properly corresponds to the number of the impact statement.

The statement has been revised in Section 3, Errata to state, “The General Plan Update would allow for mixed-use residential uses within the already established 65 dBA CNEL.”

The reference to MM NOI-3 has been corrected in Section 3, Errata to reference MM NOI-2.

Response to SFO-8

The commenter notes that if the City were to propose a development which the Airport Land Use Commission (ALUC) determines is incompatible with the SFO ALUCP, then the City would be compelled to override the ALUC determination through its City Council if it wishes to proceed with the development. An override of the noise compatibility policy requires granting of an aviation easement to the City and County of San Francisco, as proprietor of SFO.

The comment is noted; no further response is required.

Response to SFO-9

The commenter notes that Draft Program EIR Impact LUP-2 identifies that the southern portions of the General Plan Update area are within various runway end safety zones, including the Inner Approach/Departure Zone (Zone 2), Inner Turning Zone (Zone 3), and Outer Approach/Departure Zone (Zone 4) and has the potential to conflict with respective zone restrictions. The Draft Program EIR concludes under Impact LUP-2 that the proposed project would not cause a significant environmental impact. The commenter inquires as to how the Draft Program EIR comes to this

conclusion as there are clear potential conflicts with safety compatibility policies as acknowledged in Impact LUP-2.

The Draft Program EIR identifies the requirement that future projects would be required to be designed to ensure conformance with the SFO ALUCP.

As stated in Impact LUP-2, local plans, policy actions, or development activities that affect areas within that boundary must receive ALUC approval or have a finding of overriding considerations prior to local permit issuance. The SFO ALUCP requires all residential development within Area A, which is the entirety of San Mateo County, to provide real estate disclosures (see SFO ALUCP Appendix G-7). Additionally, within Area B, the ALUC (C/CAG of San Mateo County) is responsible for reviewing proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezoning, and land development proposals. As such, the City is required to submit the General Plan Update to the ALUC for review and approval. Further, future development within the SFO ALUCP areas must also be referred to the ALUC for a determination of consistency. Future development under the proposed project would be evaluated for consistency with the 2011 California Airport Land Use Planning Handbook and the SFO ALUCP. In reviewing individual project applications, the City would determine which policies and actions apply and whether project modifications would be required to ensure compatibility with the ALUCP, depending on the specific characteristics of the project type and/or project site during the development review process. Buildings within the ALUCP area would be required to comply with Federal Aviation Administration (FAA) regulations for height.

Furthermore, the General Plan Update includes policies and actions related to land use compatibility. Action SA-12.5.1 requires the General Plan to be in conformance with land use compatibility standards in the ALUCP. Policy SA-21.3 allows building heights within maximum limits permitted under FAA regulations. These actions, along with the requirements of the ALUCP and South San Francisco Municipal Code ensure that future development would be consistent with the ALUCP.

Response to SFO-10

The commenter clarifies that the use of the term consultation with the City/County Associations of Governments (C/CAG) and FAA is misleading, as the City is actually required to submit to the C/CAG for a determination of consistency.

Impact HAZ-5 is revised in the Final EIR to clarify that the City is required to submit to the C/CAG for a determination of consistency with the SFO ALUCP. Please refer to Section 3, Errata.

Response to SFO-11

The commenter notes that any proposed structure must lie wholly beneath the critical aeronautical surfaces defined in the SFO ALUCP and must obtain a Determination of No Hazard from the FAA. The commenter recommends clarifying that for purposes of airspace evaluation, both the FAA and the SFO ALUCP reference elevations above mean sea level (MSL) as defined by the 0-foot origin of the North American Vertical Datum of 1988 (NAVD88), and not the ground level.

As the commenter notes, for purposes of airspace elevation, MSL and not ground level is used to reference elevations. This comment does not raise any environmental issues with respect to the Draft Program EIR or proposed project and no further response is required.

Response to SFO-12

The commenter provides closing remarks. No response is required.

Response to SFO-13

The commenter provides introductory remarks in response to the March 22, 2021 Notice of Preparation (NOP). The comment does not raise any environmental concerns or questions regarding the project. No further response is required.

Response to SFO-14

This NOP comment raises questions regarding the location of proposed land uses in relation to the airport. In response to this comment, the proposed plan was revised as further explained in Response to SFO-2.

Response to SFO-15

This NOP comment summarizes the proposed project and states that the City must submit the proposed plan to the ALUC for review. As explained in Impact LUP-2 and Response to SFO-9, the City is required to submit the General Plan Update to the ALUC for review and approval. Moreover, the Draft Program EIR identifies the requirement that future projects would be required to be designed to ensure conformance with the SFO ALUCP.

Response to SFO-16

This NOP comment discusses the need for an aviation easement. Please refer to Response to SFO-4.

Response to SFO-17

This NOP comment regarding residential development east of U.S. 101 and the relationship to the efficacy of the Nighttime Preferential Runway Use program is addressed in Response to SFO-5. The suggestion to SFO Airport/Community Roundtable is noted; however, this suggestion does not raise any environmental concern or question that requires a further response under CEQA. This NOP comment also suggests that Draft Program EIR discuss noise impacts with relation to areas outside of the 65 dBA contour. Accordingly, potential impacts to areas outside of the 65dBA CNEL contours are discussed in Section 3.11 of the Draft Program EIR. (See, e.g., Draft EIR, pp. 3.11-13, 3.11-34-3.11-35.)

Response to SFO-18

This NOP comment expresses support for the City's housing supply shortage and raises concerns about location of proposed land uses. In response, the City modified the proposed plan to ensure that residential uses would not be located within the 70 dBA or higher contours identified in the ALUCP. Please refer to Response to SFO-3.

Response to SFO-19

This NOP comment states that the southern portions of the Planning Area are within various runway end safety zones, including the Inner Approach/Departure Zone, Inner Turning Zone, and Outer Approach/Departure Zone, and requests that the Draft Program EIR describe and evaluate the

project’s consistency with land use criteria within these runway end safety zones, as described in the SFO Airport Land Use Compatibility Plan (ALUCP) SP-1 through SP-3. Please refer to Response to SFO-9.

Response to SFO-20

This NOP comment notes that for purposes of airspace elevation, MSL and not ground level is used to reference elevations. This comment does not raise any environmental issues with respect to the Draft Program EIR or proposed project and no further response is required.

Response to SFO-21

This NOP comment requests that the Draft Program EIR evaluate impacts of the proposed vehicular bridge between Oyster Point and North Access Road on airport property. Proposed improvements on airport property and potential hazards are addressed in Impact HAZ-5 in Section 3.8 of the Draft Program EIR. Land use compatibility of proposed improvements are further discussed in Section 3.10 of the Draft Program EIR.

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August 9, 2022

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VIA E-MAIL (BILLY.GROSS@SSF.NET)

Billy Gross
Principal Planner
City of South San Francisco
315 Maple Avenue
South San Francisco, CA 94080

Re: Comments on the Shape SSF 2040 General Plan Update and Draft Environmental Impact Report (SCH# 2021020064)

Dear Billy:

Thank you for the opportunity to comment on the City of South San Francisco’s Shape SSF 2040 General Plan Update (the “General Plan Update”), associated Zoning Code Update and Draft Environmental Impact Report (“DEIR”).

As you know, Healthpeak is the owner of the property located at 420, 440, 466, and 494 Forbes Boulevard (“Property”) in the “East of 101” area of the City of South San Francisco, California (the “City,” or “South S.F.”). Buchalter represents Healthpeak as land use counsel for the development of the Property. Healthpeak looks forward to the City Council’s adoption of the General Plan Update and Zoning Code Update so that Healthpeak may proceed with its efforts to develop the Property with approximately 1,652,930 square feet of office and lab space and associated amenities (the “Vantage Project”). Healthpeak also proposes to construct a new fire station on the Property to benefit the Forbes Boulevard area.

1

Healthpeak supports and endorses the City’s efforts to prepare a General Plan Update and Zoning Code amendments that incorporate the vision for a more intensive level of development in the East of 101 area. We are encouraged by the policies the City is proposing to incorporate into the General Plan Update and Zoning Code amendments, and appreciate the DEIR’s thorough analysis of the potential impacts of buildout of the General Plan. The proposed changes to the General Plan and City zoning ordinance increase the intensity within the *Business and Technology Park* land use designation and will allow Healthpeak to develop the Vantage Project

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Los Angeles
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Seattle



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at the 2.0 FAR density it envisions. Accordingly, the purpose of this letter is to submit clarifying comments regarding the General Plan Update as applied to the Property, and clarify the DEIR’s assessment of impacts associated with the proposed increased development potential in furtherance of implementing the City’s development vision for the area.

2
CONT

The General Plan contemplates development at a 2.0 FAR on the Property, and the DEIR fully evaluates associated impacts.

General Plan, pages 60-64 – General Plan Update Figure 6 and Table 2: General Plan Land Use Designations designate the Property *Business Technology Park (BTP) High*. According to the General Plan, the BTP High designation allows high-density corporate headquarters, research and development facilities, and offices (FAR ranges from 0.5 up to 2.0 with community benefits). Healthpeak supports the proposed General Plan Update land use designation on the Property.

3

General Plan, page 116– Policy SA-21.1 promotes urban campus-style life science uses for R&D uses for life science and other innovative companies. Policy SA-21.2 proposes to restrict warehousing and distribution uses in BTP High areas. R&D campus uses often include distribution facilities and warehouses as ancillary uses to support R&D and life science uses. Please clarify that such ancillary uses would be allowed as secondary uses under the BTP High designation.

4

DEIR, Pages 2-7, -10 through -11, -13, -15 – Healthpeak understands that the building projections in the General Plan Update and DEIR are based on the General Plan Update designation for the Property as *Business Technology Park (BTP) High*. The *BTP High* land use designation allows “high-density corporate headquarters, research and development facilities, and offices” with FAR density ranging from 0.5 to 2.0 with community benefits. (General Plan Update, p. 65.) This is necessary to achieve the City’s Policy LU-5.2 for the City to “support a mix of larger, higher-intensity [R&D company] campuses.” (General Plan Update, p. 72.)

Recognizing that the City “is a fully built city,” the DEIR explains that, “new development will primarily occur on parcels that already contain some existing homes or businesses” and that this will require locating much of this new development in the East of 101 area. (DEIR, p. 2-10.) Approximately 493 acres of the East of 101 area is slated for the *BTP High* designation. (DEIR, Table 2-2.) The Draft EIR and specifically Tables 2-4, 2-6, and 2-7 describe the estimated “development activity anticipated to occur through buildout of the General Plan Update.” These estimates include the number of Projected Jobs, as well as Projected Square Footage to increase in the *Business Technology Park High* land use designation upon General Plan buildout. For example, the *BTP High* designation is projected to create approximately 16,198 jobs and to amount to approximately 7,788,187 additional square feet of development in the City. (DEIR, Table 2-6.)

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The Property is currently underutilized. We agree with the City’s proposal to designate the Property as *BTP High*, as it is a prime location for accommodating some of the General Plan Update’s anticipated development. Currently, much of the Property contains a variety of low intensity single-story commercial uses. One parcel is undeveloped and is used for semi-truck parking. The Vantage Project would redevelop this underutilized Property at a 2.0 FAR with over 1.6 million square feet of high-intensity research and development and office facilities as envisioned in the General Plan Update and thoroughly evaluated in the DEIR.

5
CONT

The DEIR assumes that future development under the BTP High land use designation would generate approximately 40,656 jobs at 83 new jobs per acre. Healthpeak, however, is concerned that the employment generation estimates identified in Table 2-6 in the DEIR may be low compared to the actual employment generated by life sciences and R&D land uses based on the tenants that occupy Healthpeak’s campuses in the City. Please clarify the basis for the employment estimates presented in Table 2-6 and confirm that the estimates correspond to the nature of higher intensity life science uses contemplated by the *BTP High* designation.

The Vantage Project is consistent with General Plan Update policy to locate employment uses near transit centers, which, in part, further the reduction in the City’s greenhouse gas (“GHG”) emissions.

General Plan Update pages 70, 198; DEIR, Pages 3.2-25, 3.7-36, 3.7-41, and 3.7-55 – General Plan Update Policy LU-2.1 encourages the City to “Prioritize development near transit centers. Collaborate with developers and property owners to locate new . . . employment uses near transit centers to minimize reliance on personal automobiles.” Policy LU-2.1 encourages that development “assist in reducing or avoiding potential impacts related to GHG emissions.” Additionally, mobility Policy MOB-4.1 and its associated action items require a substantial increase in “the proportion of travel using modes other than driving alone.” This may be through site connectivity improvements, expanded transit services, employee transit subsidies, and first/last mile connection improvements. These General Plan Update policies and actions “would help reduce GHG emission generation from existing and future development.” (DEIR, p. 3.7-55.)

6

Under the *BTP High* designation, the higher FAR will enable the Vantage Project to intensify business and employment-generating uses on the Property. The Vantage Project would provide office and lab space for life science research and development uses, employing thousands of workers. Since the Property is located approximately three-quarters of a mile from the South San Francisco Caltrain Station, Healthpeak’s Project is primed to take advantage of its proximity to reliable transit service. Through Transportation Demand Management (“TDM”) measures, the Vantage Project will encourage and incentivize a significant share of future employees to utilize other means of transportation than single-occupancy vehicles as contemplated in the General Plan Update. Healthpeak intends to implement TDM strategies reflected in the General Plan Update to contribute to efforts to promote fewer employees



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utilizing vehicle travel in the East of 101 area. This significant reduction in single-occupancy vehicle travel will reduce corresponding GHG emissions consistent with the GP Update and recommended DEIR mitigation measures.

6
CONT

General Plan Update, page 184; DEIR Pages 3.14-17, -19 through 20, -25, -38 through -40 – The General Plan Update includes policies that would improve transportation throughout the City and reduce reliance on single-occupancy vehicles. These policies dovetail with the policies intended to reduce GHG emissions and to encourage environmentally sensitive design policies. Healthpeak supports the new General Plan Update policies.

7

The General Plan Update Should Encourage Shared Parking Districts and Coordinate with TDM to Promote Parking for East of 101 Area BTP Land Uses.

General Plan Update, pages 130 & 200 – East of 101 Area Action SA-16.1.1 provides that the City should introduce shared, district parking facilities to support visitors and employees in the East of 101 Area. Healthpeak supports the City’s proposed policy SA-16.1 to provide shared parking in this employment intensive area. Action MOB 3.3.1 provides that the City may incorporate parking maximums for office/R&D developments. Although the Vantage Project is designed to comply with the 2 spaces per 1,000 square foot of office floor area in the Zoning Code amendment, Healthpeak believes shared parking arrangement (per SA-16.1) will facilitate efforts to meet parking demand that exceeds 2.0 spaces per 1,000 square feet. Healthpeak is concerned without flexible parking requirements that it will be unable to meet parking demand for life sciences and other R&D activities within the East of 101 area, and specifically on Forbes Boulevard. In this regard, the Zoning Code amendment proposes different parking ratios for different uses. For example, a parking ratio of 2 spaces per 1,000 square feet of floor area applies to office uses¹ which differs from the parking requirement for R&D facilities. R&D uses may provide parking at a rate of 1.5 spaces per 1,000 square feet of floor area. (Amended Zoning Code, Table 20.330.004.) Office uses may have their parking ratio adjusted “based on anticipated employee density at the discretion of City.” (Amended Zoning Code, Table 20.330.004.) Healthpeak believes that *BTP High* uses should be allowed to have a minimum parking ratio rather than a maximum parking ratio of 2 spaces per 1,000 and to be able to rely on shared parking arrangements (pursuant to Policy LU-2.5) and other TDM measures to meet parking demand.

8

The City Should Equitably Distribute Transportation Improvement Costs on all New Development and Not Disproportionately Allocate Such Costs Only to R&D

General Plan Update, page 186, Table 6, Proposed New Streets and Major Transportation Investments – The General Plan Update identifies the Roebling Road Extension across East Grand Avenue to proposed Railroad Avenue for two lanes, to improve

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¹ Applicable to office spaces over 10,000 square feet.



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internal connectivity in East of 101 Area. Healthpeak supports this road improvement, provided that other new development on Roebling Road contribute to funding these local transportation improvements.

9
CONT

General Plan Update, page 194 – The General Plan Update notes that the City of South San Francisco funds transportation improvements through various sources. The primary source is via a Transportation Impact Fee (Resolution 120-2020). At current fees, the General Plan buildout could generate approximately \$1 billion upon full buildout of the General Plan. The City is also considering a community facilities district (CFD) within the East of 101 Area to augment transportation funding for the district. Preliminary funding plans for the CFD expect that it could generate approximately \$160 to \$290 million.

The General Plan Update does not clearly identify all of the transportation related impact fees that would be imposed on new development. For example, we understand that new R&D development in the East of 101 area may be subject to an “Overpass Contribution Fee” and the “East of 101 Traffic Impact Fee.” We understand the City is proposing that a Transportation Impact Fee or CFD assessment supersede the former East of 101 Impact Fee. It is one of the most significant impact fees anticipated but appears to impact developers differently depending on the type of land use. For example, the Commercial Linkage Fee seems disproportionate to R&D developers with a \$16.55/SF fee. We are concerned that this fee may further increase, and be disproportionately allocated to R&D uses.

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Commercial Linkage Fee	
See SSFMC Section 8.69 for more information. Applies to all non-residential development in the categories listed below, with an application that is deemed complete after January 1, 2019.	
Commercial Use:	Cost / Square Foot:
Retail / Restaurant / Services	\$2.76
Office / R&D	\$16.55
Hotel	\$5.52
The Commercial Linkage Fee shall be paid in full prior to issuance of the first building permit.	

Healthpeak is concerned that the City will apply new traffic impact fees or a CFD assessment, fairly and in a proportional and equitable manner for all new development in the East of 101 area, and requests that the City not disproportionately impact R&D uses with higher traffic impact fees and assessments.

General Plan Update, page 200 – To support the City’s TDM policies, the General Plan Update proposes implementation of Action MOB-3.3.1, which calls for incorporating maximum parking requirements and other TDM requirements for new office/R&D projects. Given the diversity in uses in the East of 101 Area, we request that the City not disproportionately impose



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TDM requirements on office/R&D uses, but instead develop a policy that requires all uses in the East of 101 Area to equitably reduce their impacts caused by vehicle transportation.

10
CONT

The Vantage Project would further the City’s sustainable and environmentally sensible design policies and policies designed to reduce GHG emissions.

General Plan Update, Policy SA-28.5; DEIR, Pages 3.5-11, -15, 3.7-40, and 3.7-55 – Policy SA-28.5 requires new projects to implement “sustainable and environmentally sensitive design. Incorporate sustainable and environmentally sensitive design and equipment, energy conservation features, water conservation measures and drought-tolerant or equivalent landscaping, and sustainable stormwater management features.” South S.F. Climate Action Plan Action Item CL 1.1 additional requires “Minimum LEED™ certification or equivalent for new buildings. Require all new municipal buildings and facilities to meet a minimum LEED™ silver standards.” Climate Protection Element Policy CP-5.1 provides an identical requirement for LEED certification. Implementation of this policy supports the City’s efforts to reduce its GHG emissions. These General Plan Update policies and actions “would help reduce GHG emission generation from existing and future development.” (DEIR, p. 3.7-55.)

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The Vantage Project would be designed to achieve sustainable and environmentally sensitive design in accordance with the DEIR and General Plan Update. Under the existing development agreement, Healthpeak committed to pursue a Leadership in Energy and Environmental Design (“LEED”) Green Building Rating of “Silver” or higher. Such certifications are awarded only to buildings that “improve efficiency, lower carbon emissions and create healthier places for people.” (LEED Rating System, [How LEED Works](#).) Both phases of the Vantage Project target achieving LEED Gold certification. The Vantage Project is consistent with the City’s building efficiency and climate action policies. Healthpeak supports the General Plan Update policies promoting sustainable development.

The General Plan Update EIR evaluates potential impacts associated with construction of a new fire station in the East of 101 Area.

Page 3.13-24. – In order to achieve its goal of densifying the East of 101 area, the General Plan Update proposes Policy SA-16.4, which requires the City to coordinate with the Fire Department “to ensure public services can accommodate growth” in the East of 101 area. (General Plan Update, p. 113.) Further, the General Plan Update recognizes the need for an equitable distribution of public services throughout the City, including fire stations through Action Item ECS-6.1.1. (General Plan Update, p. 252.) Amendments to the Zoning Code would permit the “Public Safety Facilities” (which is defined to include fire protection services) in the *BTP-H* zone. (Amended Zoning Code, Table 20.100.00; § 20.620.020.) Thus, both the General Plan Update and proposed Zoning Code amendments allow for the development of a fire station in the *BTP High* land use designation of the East of 101 area.

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Likewise, the General Plan Update EIR acknowledges that new fire stations may be required to serve future development in South San Francisco. The DEIR states project-specific environmental impacts of constructing new or expanded fire protection facilities to support the growth anticipated under the proposed project cannot be determined at this time because the site-specific locations and designs of future new or expanded facilities are not known. Nonetheless, the General Plan Update DEIR indicates that fire protection facilities are contemplated as part of the General Plan Update. (DEIR, p. 3.13-24.) The DEIR further explains that Table 2-7 assumes that “buildout under the proposed [General Plan] could result in approximately 68,367 square feet of nonresidential uses under the “Public” land use designation, which could include fire protection facilities.” (DEIR, p. 3.13-24.) The DEIR expects that “construction and operation of future new or expanded fire protection facilities would have similar impacts as would construction and operation of other types of new development.” (DEIR, p. 3.13-24.) New fire facilities are addressed in the DEIR and are not expected to cause significant environmental impacts. (DEIR, p. 3.13-24.)

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CONT

As you are aware, City representatives have advised Healthpeak of their interest in locating a fire station on the former Gallo property (included in the Vantage Project). Healthpeak is designing its Vantage Project to include a new fire station on a portion of the Property, provided that Healthpeak’s proposed Vantage Project is approved in a manner consistent with the level of development Healthpeak considers under the *BTP High* designation.

DEIR, Pages 3.14-17, -19 through 20, -25, -38 through -40 - The DEIR recognizes that Mitigation Measure (“MM”) TRANS-1, which requires the City to update and implement its TDM Ordinance, would help reduce total vehicle miles traveled (“VMT”) per employee for new developments. The General Plan Update and the DEIR provide for a number of new circulation improvements in the East of 101 Area to mitigate significant traffic impacts.

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Conclusion

We believe that the DEIR thoroughly discussed the General Plan Update’s anticipated environmental impacts and appreciate the City’s consideration of the further clarifying information we have provided in support of the DEIR analysis. We look forward to reviewing the final product and working with the City to developing a project that meets the City’s vision for the East of 101 neighborhood.

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Healthpeak looks forward to continued cooperation with the City to achieve a mutually beneficial General Plan Update, and supports the City's vision for the East of 101 area and the Vantage Property.

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CONT

Regards,

BUCHALTER
A Professional Corporation

A handwritten signature in blue ink, appearing to be 'Alicia Guerra', with a long horizontal line extending to the right.

By

Alicia Guerra

AG:nj

cc: Scott Bohn
Natalia De Michele
Heidi Taliaferro
Devin Bertsch
Michele Niaki

Individuals

Buchalter (BUCHALTER)

Response to BUTCHALTER-1

The commenter provides introductory remarks, noting that they represent Healthpeak in the development of their property located at 420, 440, 466, and 494 Forbes Boulevard.

No response is required.

Response to BUCHALTER-2

The commenter supports the City's efforts to allow for more intensive development east of U.S. 101 within the Business and Technology Park land use designation, which would allow Healthpeak to develop the Vantage Project at the 2.0 floor area ratio (FAR) density it envisions.

The comment is noted; no further response is required.

Response to BUCHALTER-3

Healthpeak supports the proposed General Plan Update land use designation of *Business Technology Park (BTP) High* on the property.

The comment is noted; no further response is required.

Response to BUCHALTER-4

The commenter requests the City to confirm that ancillary uses such as distribution facilities and warehouses would be allowed in the *BTP High* designated areas.

The comment is noted, but it does not raise an environmental issue. The specifics regarding ancillary uses are presented in the Zoning Code.

Response to BUCHALTER-5

The commenter notes that the Draft Program EIR assumes that future development under the *BTP High* land use designation would generate approximately 40,656 jobs at 83 new jobs per acre. Healthpeak, however, is concerned that the employment generation estimates identified in Table 2-6 in the Draft Program EIR may be low compared to the actual employment generated by life sciences and R&D land uses based on the tenants that occupy Healthpeak's campuses in the City. The comment requests that the basis for the employment estimates presented in Table 2-6 be clarified and further requests confirmation that the estimates correspond to the nature of higher intensity life science uses contemplated by the *BTP High* designation.

The growth projections do not represent the full development capacity of the City. Rather, the growth projections represent a reasonably foreseeable estimate of the potential amount of growth within the General Plan 2040 time horizon. The *BTP High* designation ranges from 0.5 FAR up to 2.0 FAR with community benefits.

Employee generation for office and R&D uses are based on existing conditions in South San Francisco. It is estimated that office and R&D uses generate one employee per 425 square feet. This ratio was used to estimate future employees for office and R&D uses.

Response to BUCHALTER-6

The commenter notes that the Vantage Project would provide office and lab space for life science research and development uses, employing thousands of workers. Since the property is located approximately 0.75-mile from the South San Francisco Caltrain Station, Healthpeak's Project is primed to take advantage of its proximity to reliable transit service. Through Transportation Demand Management (TDM) measures, the Vantage Project would encourage and incentivize a significant share of future employees to utilize other means of transportation than single-occupancy vehicles as contemplated in the General Plan Update. Healthpeak intends to implement TDM strategies reflected in the General Plan Update to contribute to efforts to promote fewer employees utilizing vehicle travel in the East of 101 Area. This significant reduction in single-occupancy vehicle travel would reduce corresponding greenhouse gas (GHG) emissions consistent with the General Plan Update and recommended Draft Program EIR mitigation measures.

The comment is noted; individual projects will be reviewed for compliance and consistency with the General Plan Update mitigation measures related to TDM, which would ensure less than significant impacts. No further response is required.

Response to BUCHALTER-7

The commenter notes that they are in support of the proposed General Plan Update policies related to reducing reliance on single-occupancy vehicles.

The comment is noted; no response is required.

Response to BUCHALTER-8

The commenter believes that *BTP High* uses should be allowed to have a minimum parking ratio rather than a maximum parking ratio of two spaces per 1,000 and to be able to rely on shared parking arrangements (pursuant to Policy LU-2.5) and other traffic demand measures to meet parking demand.

The Draft Program EIR concludes that the buildout of the General Plan would result in significant and unavoidable VMT impacts; General Plan policies and mitigation measures are aligned to mitigate VMT impacts to the extent feasible.

Response to BUCHALTER-9

The commenter supports Healthpeak and the proposed expansion of the Roebbling Road Extension to two lanes, provided that other new development on Roebbling Road contribute to funding these local transportation improvements.

Funding for transportation improvements identified in the General Plan Update would come from a combination of sources including but not limited to impact fees and/or as a condition of approval.

Response to BUCHALTER-10

The commenter discusses the proposed funding of transportation improvements and the need to clarify how the fees would be assessed to future development projects. Healthpeak is concerned that the City will apply new traffic impact fees or a Community Facilities District (CFD) assessment fairly and in a proportional and equitable manner for all new development in the East of 101 Area,

and requests that the City not disproportionately impact R&D uses with higher traffic impact fees and assessments.

The commenter also discusses Action MOB-3.3.1, which calls for incorporating maximum parking requirements and other TDM requirements for new office/R&D projects. Given the diversity in uses in the East of 101 Area, the commenter requests that the City not disproportionately impose TDM requirement on office/R&D uses, but instead develop a policy that requires all uses in the East of 101 Area to equitably reduce their impacts caused by vehicle transportation.

Please review the Transportation Impact Fee Study. Funding for the implementation of the proposed roadway improvement may be through Capital Improvement Program (CIP) or may be through impact fees or conditions of approval for individual projects. New TDM policies would be applied to all projects, so will more equitably apply requirements. Impact fees and TDM requirements are set proportional to the transportation impacts generated by a particular land use type. Office and R&D uses in South San Francisco generate the greatest transportation-related impacts and thus, have the highest transportation-related impact fees and most aggressive TDM requirements. All new land use types of a minimum size are responsible for their fair share of fees and TDM strategies.

Response to BUCHALTER-11

The commenter discusses sustainable and environmentally sensible design policies designed to reduce GHG emissions, and notes that both phases of the Vantage Project target achieving Leadership in Energy and Environmental Design (LEED™) Gold certification. The Vantage Project is consistent with the City's building efficiency and climate action policies. Healthpeak supports the General Plan Update policies promoting sustainable development.

The comment is noted; no response is required.

Response to BUCHALTER-12

The commenter discusses public services and specifically the need for a new fire station in the East of 101 Area. Healthpeak is designing its Vantage Project to include a new fire station on a portion of the property, provided that Healthpeak's proposed Vantage Project is approved in a manner consistent with the level of development Healthpeak considers under the *BTP High* designation.

The comment is noted; no response is required.

Response to BUCHALTER-13

The commenter notes the efficacy of MM TRANS-1, which requires the City to update and implement its TDM Ordinance, would help reduce total VMT per employee for new developments. No response is required.

Response to BUCHALTER-14

The commenter provides concluding remarks and offers general support for the project. No environmental issues are raised and no further response is required.

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SECTION 3: ERRATA

The following are revisions to the Draft Program Environmental Impact Report (Draft Program EIR) for the General Plan Update, Zoning Code Amendments, and Climate Action Plan. These revisions are minor modifications to clarify inadvertent typographical errors to the document, and/or to clarify the discussion and do not change the analysis or significance of any of the environmental issue conclusions within the Draft Program EIR. The revisions are listed by page number. All additions to the text are underlined (underlined) and all deletions from the text are stricken (~~stricken~~).

3.1 - Changes in Response to Specific Comments

Executive Summary

Page ES-12

Table ES-1: Executive Summary Matrix. The following revision is made to ensure Table ES-1 accurately reflects the analysis in the Air Quality discussion at pages 3.2-57–3.2-58 of the Draft Program EIR. None of the conclusions in the Draft Program EIR were revised.

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact AIR-4: The proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.	MMs AIR-1a, AIR-1b, and TRANS-1. –	Significant and unavoidable. <u>N/A</u>

Executive Summary

Page ES-14, ES-19

Table ES-1: Executive Summary Matrix. The following revision is made to clarify that Impact CUL-3 and Impact NOI-2 would not have any significant impacts. This revision accurately reflects the analysis in the Draft Program EIR.

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact CUL-3: The proposed project could <u>would not</u> disturb human remains, including those interred outside of formal cemeteries.	–	N/A

Impacts	Mitigation Measures	Level of Significance After Mitigation
Impact NOI-2: The proposed project could <u>would not</u> result in generation of excessive groundborne vibration or groundborne noise levels.	–	N/A

3.4 - Cultural Resources and Tribal Resources

Page 3.4-36 *The following revision is made to clarify that Impact CUL-3 would not have any significant impacts. This revision accurately reflects the analysis in the Draft Program EIR.*

Human Remains

Impact CUL-3: **The proposed project ~~could~~ would not disturb human remains, including those interred outside of formal cemeteries.**

3.6 - Geology, Soils, and Seismicity

Exhibit 3.6-4 and Exhibit 3.6-5 are revised to reflect a more recent data source from the California Geological Survey. These revisions do not change any of the analysis or conclusions in the Draft Program EIR. Please refer to Exhibit 3.6-4 and Exhibit 3.6-5 in Attachment A.

3.8 - Hazards and Hazardous Materials

Page 3.8-32 *The following revisions correct an inadvertent typographical error and provide clarification. None of the conclusions or analysis in the Draft Program EIR is changed with this correction.*

Proximity to Public Airport Safety Hazard

The General Plan Update contains policies and actions that minimize the exposure of people residing or working in the Planning Area to a safety hazard or excessive noise because of proximity to SFO. Policy SA-12.6 requires the City to encourage residential development in the South Spruce area that are within the 65 decibel (db) CNEL contour, provided the interior of a structure meets the standard indoor 45 db CNEL noise requirement. Action SA-12.6.1 requires the City to review the SFO ALUCP and, as needed, to update the City of South San Francisco’s General Plan to be in conformance with land use compatibility standards in the ALUCP. Action SA-12.6.1 further states that in the event that updates to the ALUCP allow residential land uses on suitable sites on the El Camino Real corridor where residential is not currently permitted, the City will update the General Plan to allow Urban Residential uses. Lastly, Policy SA-21.3 requires the City to allow building heights in the East of 101 area to the maximum limits permitted under Federal Aviation regulations. Section 3.11, Noise, identifies additional policies and actions, as well as Mitigation Measure (MM) NOI-3 ~~NOI-2~~, Airport Noise Impact Reduction Plan, to address potential exposure to people residing or working in the vicinity of SFO to excessive noise levels. There are no actions identified in the Climate Action Plan that minimize the exposure of people residing or working in the Planning Area to a safety hazard or excessive noise because of proximity to SFO.

As the City receives development applications for subsequent development under the proposed project, those applications will be reviewed by the City of South San Francisco for compliance with the policies and actions of the General Plan Update to reduce the exposure of people residing or working in the City to a safety hazard or excessive noise because of proximity to SFO. In addition, the City’s Municipal Code, which implements the City’s General Plan would be reviewed when development applications are received, including

Chapter 15.08, California Building Code, and Chapter 8.32, Noise Regulations. Further, Section 20.320.002 (Establishment of Lawful Nonconforming Uses, Structures and Lots) (revised) ensures that no permit shall be granted that would allow the establishment or creation of an airport hazard or permit a nonconforming structure or nonconforming use to be made or become higher or become a greater hazard to air navigation. Lastly, in accordance with the SFO ALUCP, the City would consult with the C/CAG and Federal Aviation Administration when development applications for subsequent development under the proposed project in the vicinity of SFO are received, including submitting applications to the C/CAG for a determination of consistency with the SFO ALUCP.

Section 3.11 - Noise and Vibration

Page 3.11-35 *The following revisions correct an inadvertent typographical error and clarify the discussion. None of the conclusions or analysis in the Draft Program EIR is changed with this correction.*

Excessive Noise Levels from Airport Activity

~~These airport activity noise levels could exceed the City's noise/land use compatibility standards for certain land uses. The General Plan Update would allow for mixed-use residential uses within the already established 65 dBA CNEL.~~ Therefore, mitigation would be required to reduce this potential impact. Airport activity noise can be mitigated at the receiving land use using acoustic-rated wall and window assemblies. For example, a combined wall assembly with a Sound Transmission Class (STC) rating of 30-STC can provide an expected 30 dBA exterior to interior reduction in noise levels. With such an assembly, exterior noise levels of 70 dBA CNEL would be reduced to approximately 40 dBA CNEL.

Therefore, with implementation of MM ~~NOI-3~~ NOI-2, which requires preparation of a noise study to identify appropriate design measures, where required, to reduce the potential effect of airport activity noise, impacts generated by future development projects under the proposed project would be reduced to less than significant with mitigation incorporated.

See also Section 3.8, Hazards and Hazardous Materials, which addresses the exposure of people residing or working in the Planning Area to a safety hazard or excessive noise because of proximity to SFO.

Page 3.11-37 *The following revisions correct an inadvertent typographical error. None of the conclusions or analysis in the Draft Program EIR is changed with this correction.*

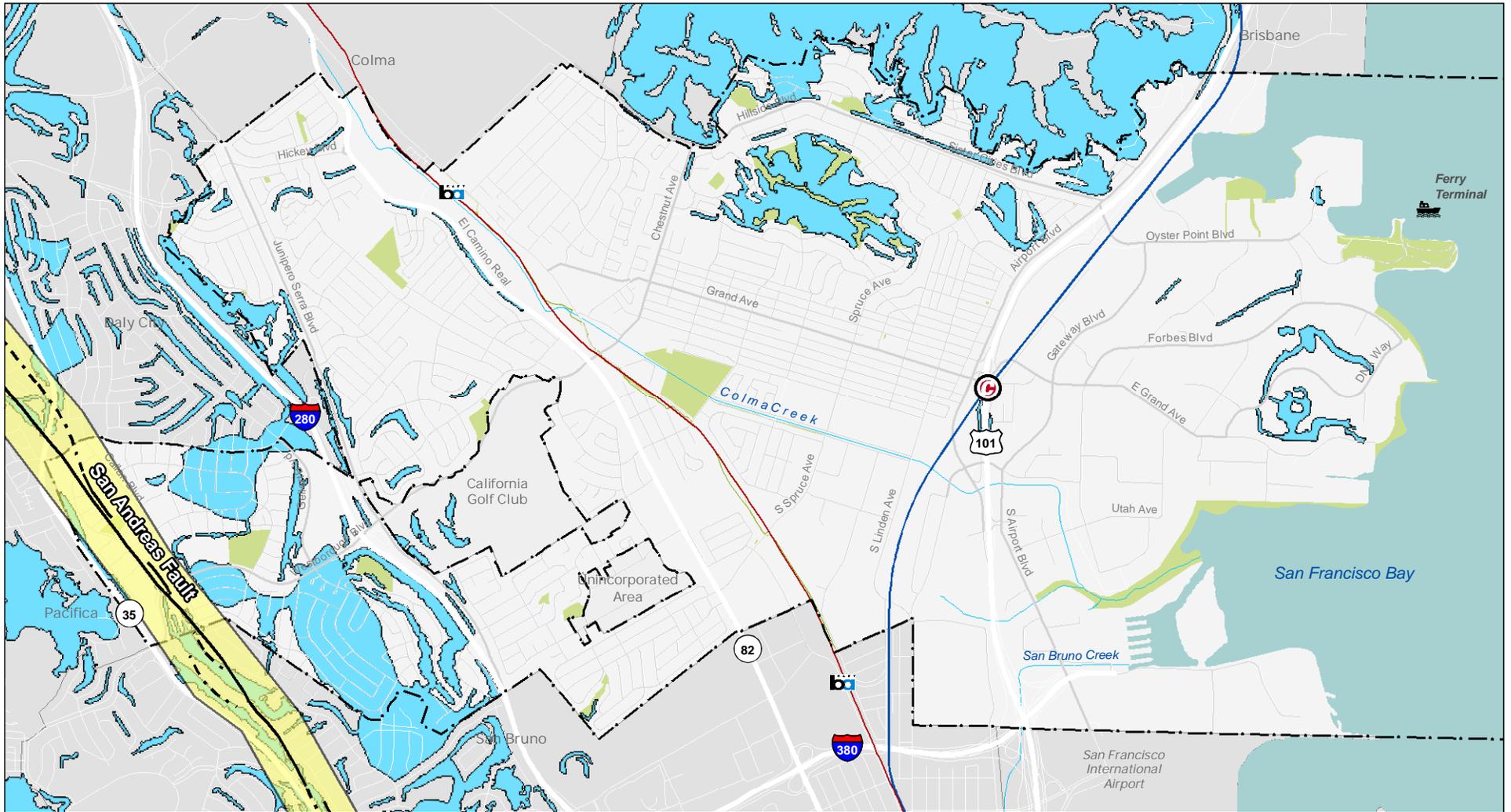
3.11.7—Cumulative Impacts

With regard to airport activity noise impacts, the combined effects of cumulative projects (other cities) surrounding South San Francisco would not result in any additional special events or sources of single-event noise in the form of aircraft flyover noise, and therefore, would not result in changes in the 65 dBA CNEL airport noise contours and would not increase airport noise impacts. However, future buildout cumulative conditions related to airport activity related noise would be the same as that identified in Impact NOI-3 discussion

above. The proposed project could still result in the introduction of land use development that could be potentially incompatible with the noise environment in the vicinity of SFO. However, as discussed in Impact NOI-3, implementation of MM NOI-3 ~~NOI-2~~, Airport Noise Impact Reduction Plan, would reduce airport activity noise impacts from implementation of the proposed project to less than significant. Therefore, with implementation of MM NOI-3 ~~NOI-2~~, airport activity noise levels from implementation of the proposed project would not result in a cumulatively considerable contribution to this less than significant cumulative impact. Therefore, the proposed project's contribution to cumulative impacts would be less than significant.

**Attachment A:
Updated Exhibits**

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Source: Raimi + Associates, July 2019. ESRI, U.S. Geological Survey (USGS). California Department of Conservation. California Geological Survey (CGS).

Jurisdictional Boundary

- - - - City of South San Francisco
- Other City Boundaries
- Sphere of Influence

Transportation Features

- BART
- Caltrain
- Highway
- Arterial
- Local Street

CGS Alquist Priolo Fault Zones & Traces

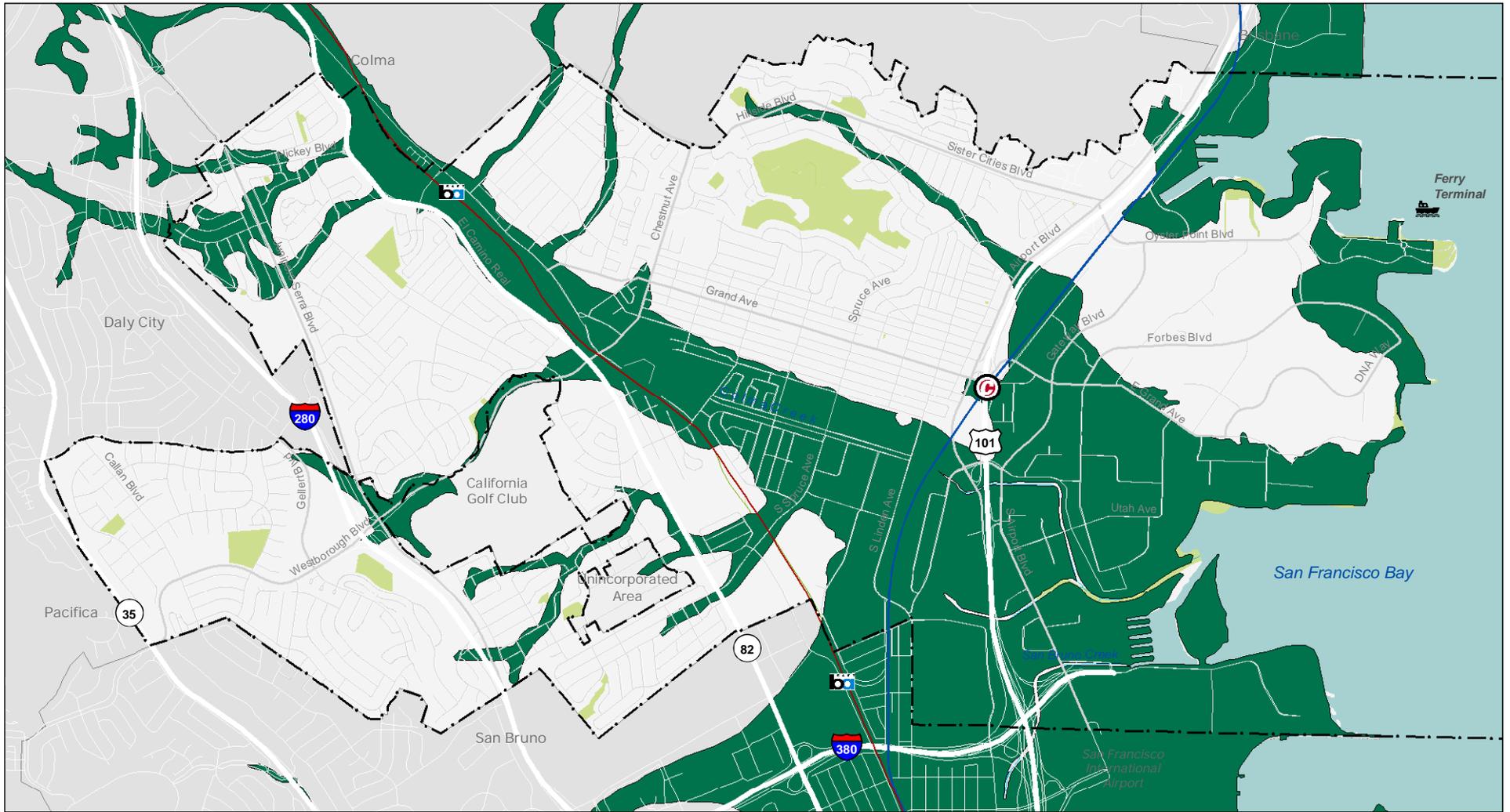
- CGS Alquist Priolo Fault Zones
- Accurately Located
- - - - Approximately Located
- Approximately Located, Queried
- - - - Inferred

CGS Landslide Zones

- Zones of Required Investigation for Earthquake-Induced Landslides



**Exhibit 3.6-4
Landslide Potential**



Source: Raimi + Associates, July 2019. ESRI, U.S. Geological Survey (USGS). California Department of Conservation. California Geological Survey (CGS).



Exhibit 3.6-5 Liquefaction Potential