INITIAL STUDY

101 GULL DRIVE PROJECT

Lead Agency:

City of South San Francisco
Economic & Community Development Department
315 Maple Avenue
South San Francisco, CA 94083-0711

OCTOBER 2021

Prepared By:
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INTRODUCTION TO THIS DOCUMENT

This document serves as the Initial Study for the 101 Gull Drive project ("project"). As discussed in this document, an EIR will be prepared to address indicated topics. Full project application materials are available for review upon request from the Planning Department at City of South San Francisco (see contact info below).

PUBLIC REVIEW

This Initial Study will be circulated for a 30-day public review period. Comments may be submitted in writing by email or regular mail to the following address:

Stephanie Skangos, Associate Planner
City of South San Francisco
Economic & Community Development Department
315 Maple Avenue
South San Francisco, CA 94083-0711
Phone: 650-877-8535
Email: stephanie.skangos@ssf.net

PROJECT INFORMATION

All figures for the project information are included together on pages 5 through 10.

PROJECT ENTITLEMENTS

Development of the project would require the following approvals from the City of South San Francisco: Conditional Use Permit (Parking/Loading Reduction, Incentive-Based Floor Area Ratio (FAR) Bonus, Parking Garage Rooftop Planting), Design Review, Transportation Demand Management Program.

Because the project is located in the San Francisco International Airport Land Use Compatibility Plan area, the project would be subject to Airport Land Use Commission review and approval.

The project is required to comply with Municipal Regional Permit requirements related to stormwater pollution prevention.

LEAD AGENCY

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PROJECT SPONSOR

Mike Stanford
Sanfo Group LLC
3351 Greenview Drive
El Dorado Hills, CA 96762

PROJECT LOCATION AND EXISTING USES

The project site (APN 015-082-250) is a vacant, generally triangular-shaped 3.8-acre lot located in the East of 101 area of the City of South San Francisco, California. The project proposes the construction and operation of a 166,613 square foot office/research and development (R&D) building with adjoining structured parking and a new driveway on Gull Drive along with mutual access easements with the neighboring properties also connecting to Eccles Avenue and Oyster Point Road. **Figure 1** shows the project location.

The site is located along Gull Drive, but is largely separated from the roadway by a grade change and step slope. The project site is located behind businesses fronting Eccles Avenue and Oyster Point Boulevard and existing access easements with nearby properties would provide mutual access to driveways on those roadways and the new driveway on Gull Drive proposed as a part of this project. The regional location of the project is shown in **Figure 1** and the project parcel, including access easements, is shown in **Figure 2**.

The site is relatively level, except along its south and east portions, which slope down at inclinations of approximately 2:1 (horizontal to vertical). The maximum slope height is around 40 feet.

The site is generally underlain by about 10 to 55 feet of undocumented fill consisting of loose to medium dense sandy soil and stiff to very stiff clayey soil with varying amounts of debris. The fill is around 10 feet thick at the northeast corner of the site and increases to the south and to the west with the thickest portion near the top of the existing slope. The fill is underlain by stiff to hard clay and sandy clay over bedrock. Bedrock, consisting of sandstone and claystone of the Francisco Complex was encountered at depths ranging from 12 to 68 feet below ground surface. Bedrock generally becomes deeper to the southwest.

Due to the steep slope of the native soil and bedrock underlying the site and the current site topography, the depth to groundwater is variable. The depth to groundwater is approximately 30 feet below ground surface and the groundwater flow direction is to the southeast, generally toward the San Francisco Bay.

The site is impacted by contamination from historic and adjacent uses. During the 1950s, trash was reportedly burned on a portion of the project site and/or burn ash dumped at the site. The trash burning/ash dumping activities were not licensed. While the burn ash located at the project site is assumed to be associated with activity at the now-closed Oyster Point Landfill across Gull Drive from the site, the project site was not used for disposal of municipal solid waste. The residual burn ash material consists of ash, brick, concrete, metal fragments, and glass, and select metals concentrations were reported at concentrations above industrial or commercial environmental screening levels, requiring further action. Additionally, migration of landfill gas from the Oyster Point Landfill had historically been a concern. Hazards and Hazardous Materials will be discussed in detail in the Environmental Impact Report.

General Plan Designation / Zoning

Business and Technology Park / Business Technology Park (BTP)

Surrounding Land Uses

Uses in the project vicinity include a mix of office, warehouse, corporate, commercial, and light industrial uses in Business Technology Park zoning. The project parcel is bounded to the north, west, and south by office/commercial and light industrial buildings and associated parking lots. Gull Drive borders the project parcel to the east.

Four existing businesses would directly share the access driveway(s) with the project. The existing easements are shown on **Figure 2**. Adjacent to the north of the project site is Plenty Unlimited, Inc., a hydroponic produce company. Two buildings, together comprising the Nickell Property, sit southwest of the Plenty Unlimited building across the mutually-accessible 30-foot driveway to Eccles Avenue. The Nickell Property includes several office complexes and a wholesale business (MTC Trading Company). Both the Nickell and Plenty Unlimited properties have direct connections from their parking lots to the Eccles Avenue driveway.

On the other side of the Plenty Unlimited building to the east is Iron Mountain, a records storage and document shredding facility. This property is separated from Plenty Unlimited by two parallel approximately 30-foot drive aisles (both owned by Plenty Unlimited, but grade separated such that they are separate aisles), which intersect with Oyster Point Boulevard east of the signalized intersection with Eccles Avenue and the signalized intersection with a driveway to the north.

A mutual access easement also runs along the northwest border or the project site and the USDA facility to the southwest of the project site, allowing access around the back of the Plenty Unlimited and Iron Mountain properties and, if the project is implemented, to Gull Drive via the proposed new driveway.

Project Description

Overview and Building Massing

The proposed project would involve construction of a new 166,613-square-foot (sf), 7-story, office / research and development (R&D) building and an attached 4.5-story 419-stall parking garage. Site improvements would also include open space, landscaping, outdoor seating areas, pedestrian walkways, and vehicular circulation elements, including a connection to Gull Drive for the mutual access easements in the vicinity (see above).

The exterior office/R&D building design would include fiber cement panels and colored glass with metal louvers and overhangs and would reach heights of 115.5 feet tall to the top of the parapet, with allowable rooftop elements up to 128 feet. The parking garage would reach heights of 44 feet tall.

The project site plan is shown on **Figure 3** and the grading and drainage plan is shown in **Figure 4**. Building elevations are shown on **Figures 5a** and **5b**.

Access & Parking

Vehicular access to and from the project would be via three routes (all of which have mutual access easements with nearby properties per discussion above):

- A new right-in/right-out only driveway on Gull Drive (which would require recording a new access easement over a sliver of City-owned land).

- Along the shared drive aisle heading southwest from the site then along an existing driveway between the Plenty Unlimited and Nickell properties to connect with Eccles Avenue at an unsignalized intersection.
- Along one of the two adjacent 30-foot drive aisle easements between the Plenty Unlimited and Iron Mountain buildings to Oyster Point Boulevard. While the intersection of these driveways with Oyster Point Boulevard is not signalized and would be limited to right-in, right-out movements by existing medians on Oyster Point Boulevard, it is possible for vehicles to access the adjacent signalized driveway intersection internally through the parking lot area for full turning options. Due to the constraints of the connection to Oyster Point Boulevard at this access point, the project's on-site circulation has been designed to discourage outbound movement along this pathway.

The companies currently using the existing paved drive aisle along the northwestern boundary of the existing parcel for access and circulation would continue to have the same access and rights to do so; with development of the project, vehicles accessing the project site would also use the driveway and drive aisles.

Construction

Construction is expected to span approximately 22.5 months. Site preparation would occur in the first 1.5 months, followed by 3 months of foundation work, then 18 months of building and parking garage construction, which would overlap with 2 months for hardscape and landscaping toward the end of that period. This active construction period would be followed by inspections and closeout. It is expected that future tenants would engage in additional interior build out of the space to suit their needs. Construction activities are targeted to begin in late summer 2022 with operations beginning as early as summer of 2024.

No substantial excavation or subsurface floors / parking is proposed. Grading would involve 18,440 cubic yards of cut across the site. Some of that would be balanced on site, with a net import of 1,780 cubic yards and export of 16,460 cubic yards. Drilled piles are proposed for building support that would be drilled down to bedrock (approximately 15 to 60 feet). To address the stability of the slope along the south and east portions of the site, design-level geotechnical recommendations would include a combination of additional rows of piles, ground improvement and/or tighter spacing of piles.

Depth to groundwater is approximately 30 feet below the ground surface (of the development portion of the site, not the slope), and dewatering is not anticipated during foundation work.

Figure 1: Project Location

Source: Fehr & Peers, for this project analysis

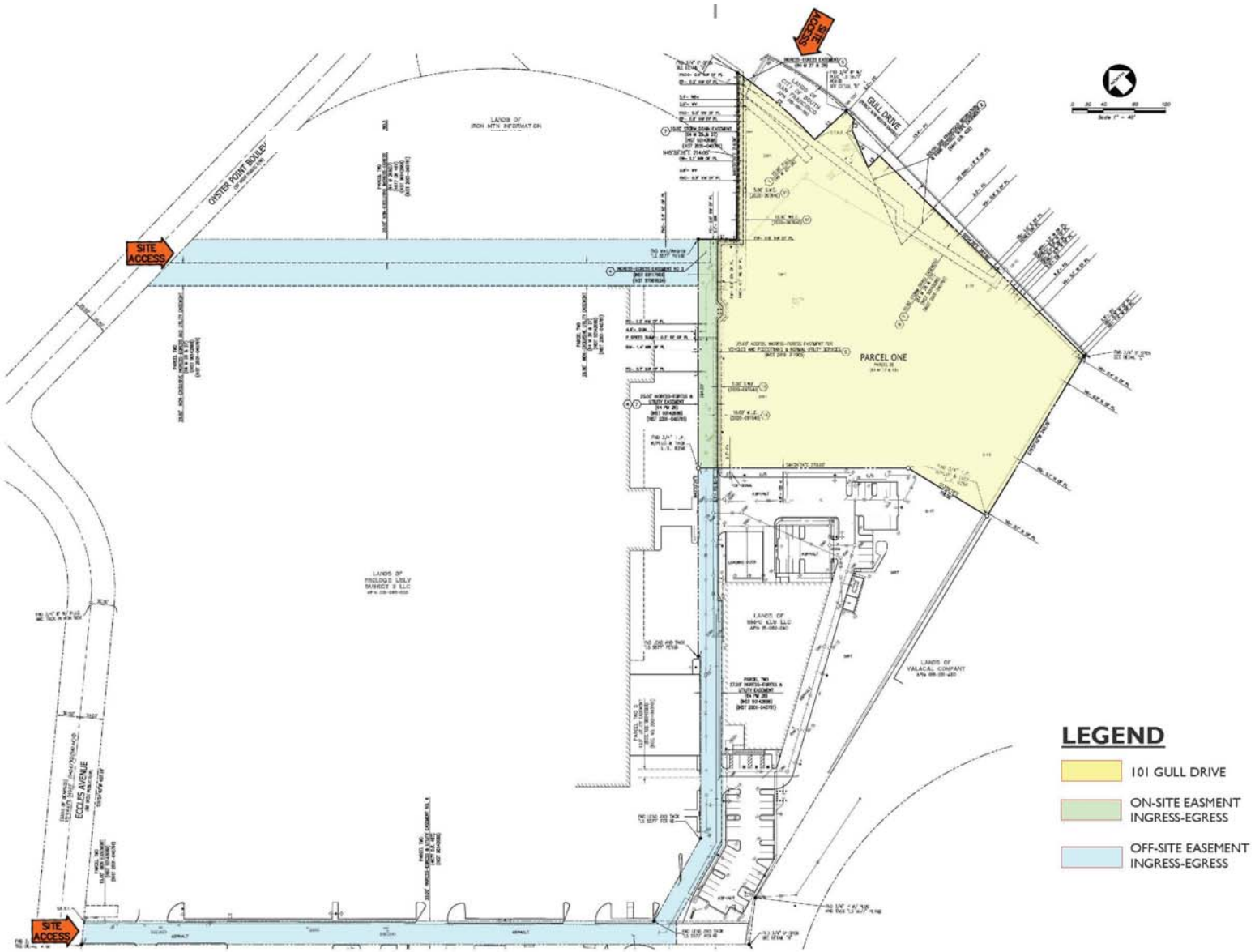


Figure 2: Existing Conditions and Access Easements
Source: Project Plan Set, dated 10/8/2021

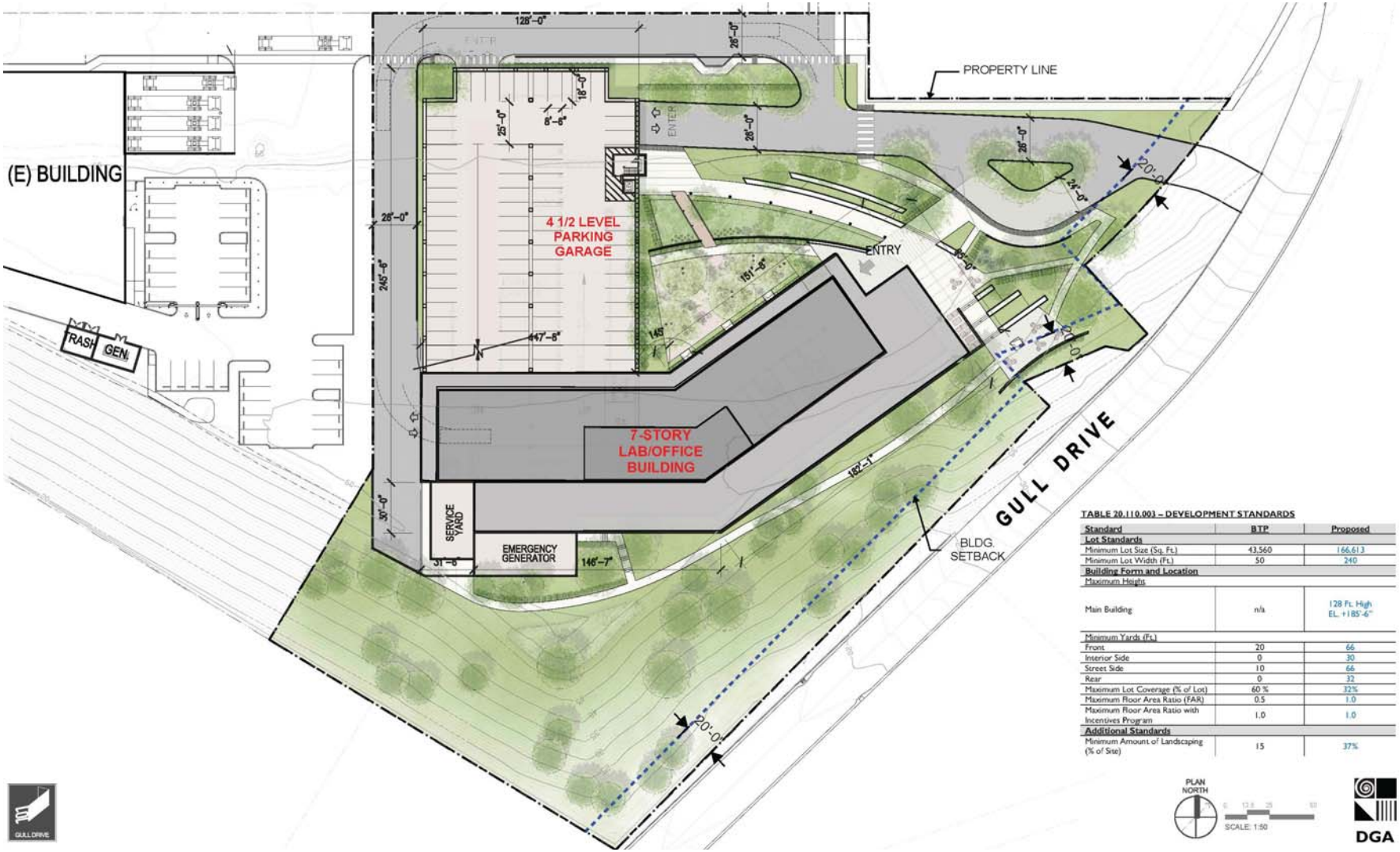


Figure 3: Illustrative Site Plan

Source: Project Plan Set, dated 10/8/2021

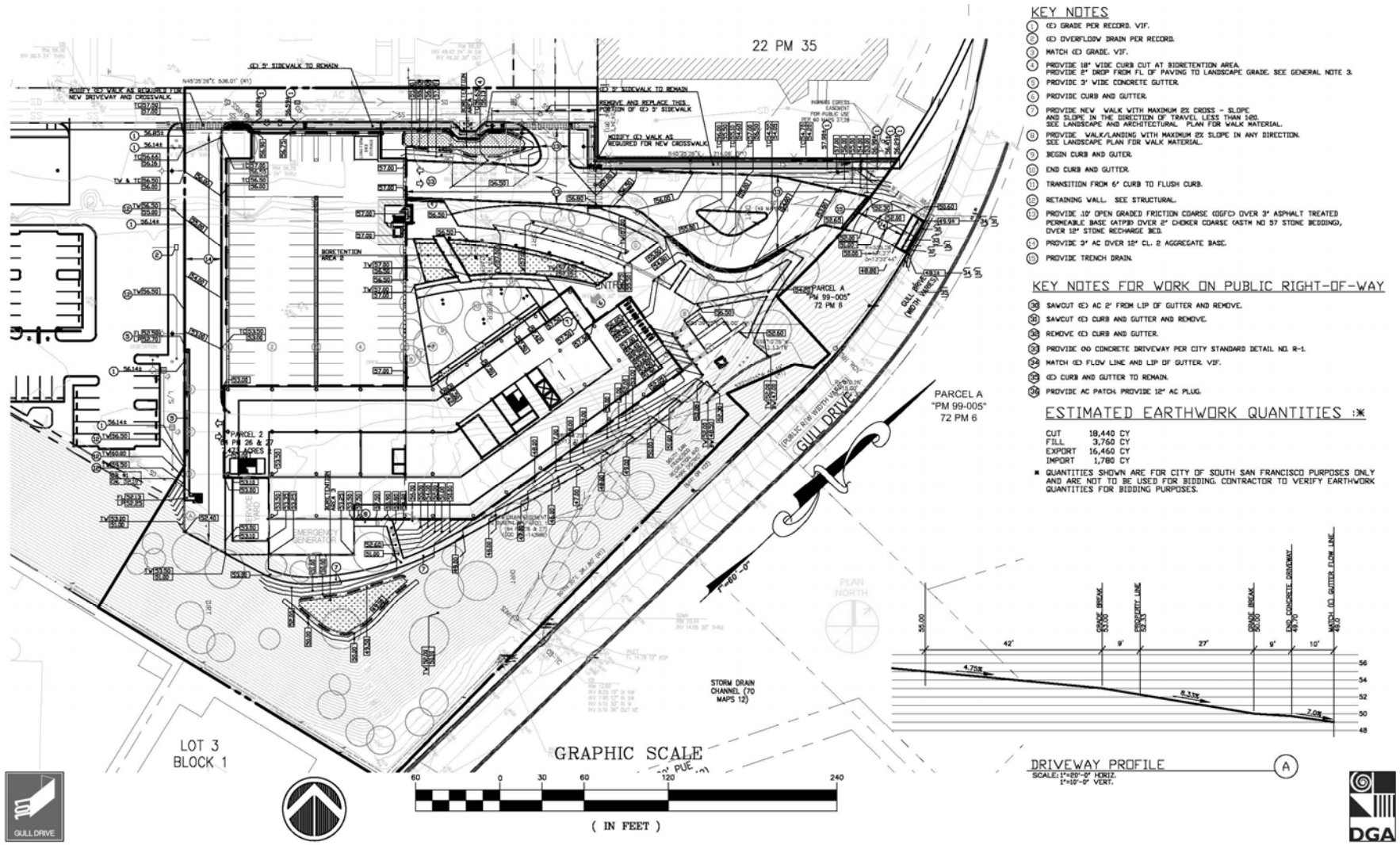
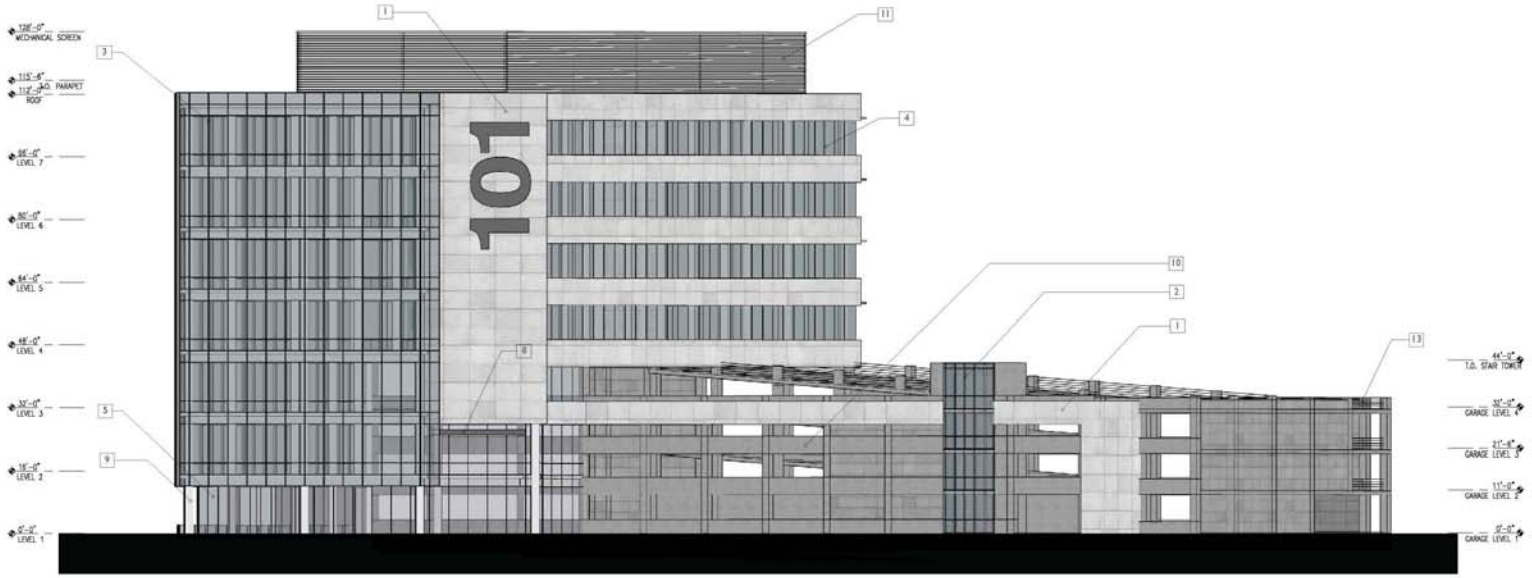


Figure 4: Grading and Drainage Plan

Source: Project Plan Set, dated 10/8/2021



MATERIALS LEGEND:

1. FIBER CEMENT PANELS
2. CURTAIN WALL SYSTEM
3. CURTAIN WALL SYSTEM WITH VERTICAL SNAP-ON FINS AT MULLIONS
4. RIBBON WINDOWS
5. CLEAR GLASS
6. CLEAR GLASS GUARDRAIL
7. BUTT-JOINT CURTAIN WALL SYSTEM
8. METAL PANEL CANOPY
9. METAL CLADDING AT COLUMNS
10. PRE-CAST CONCRETE PANELS AT GARAGE
11. METAL LOUVER MECHANICAL SCREEN
12. FRIT AT GLASS
13. CABLE GUARDRAILS

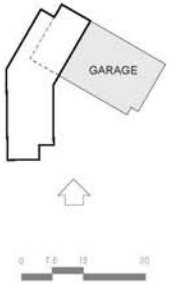
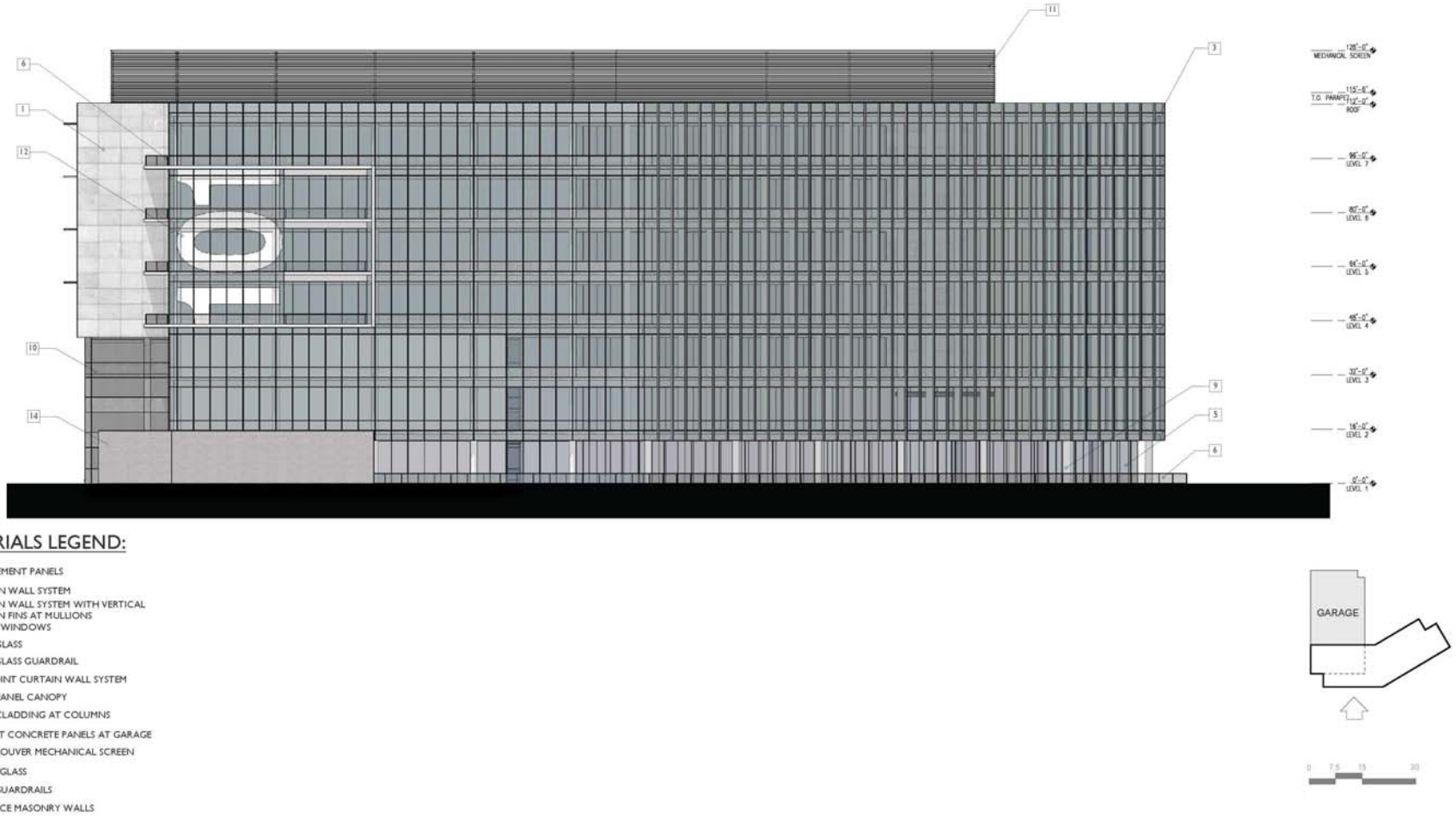


Figure 5a: Exterior Elevations - Northeast

Source: Project Plan Set, dated 10/8/2021



MATERIALS LEGEND:

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3. CURTAIN WALL SYSTEM WITH VERTICAL SNAP-ON FINS AT MULLIONS
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6. CLEAR GLASS GUARDRAIL
7. BUTT-JOINT CURTAIN WALL SYSTEM
8. METAL PANEL CANOPY
9. METAL CLADDING AT COLUMNS
10. PRE-CAST CONCRETE PANELS AT GARAGE
11. METAL LOUVER MECHANICAL SCREEN
12. FRIT AT GLASS
13. CABLE GUARDRAILS
14. SPLIT-FACE MASONRY WALLS

Figure 5b: Exterior Elevations - South

Source: Project Plan Set 2/28/2021

LEAD AGENCY DETERMINATION

On the basis of this evaluation:

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

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because mitigation measures to reduce these impacts will be required of the project. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

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

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

Signature Date

Stephanie Skangos, Associate Planner

INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

Environmental factors that may be affected by the project are listed alphabetically below. Factors marked with an "X" (☒) were determined to be potentially affected by the project, involving at least one impact that is a potentially significant impact as indicated by the Checklist on the following pages. Unmarked factors (☐) were determined to not be significantly affected by the project, based on discussion provided in the Checklist, including the application of mitigation measures.

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

An EIR will be prepared to address the indicated topics above.

EVALUATION OF ENVIRONMENTAL EFFECTS

The Checklist portion of the Initial Study begins below, with explanations of each CEQA issue topic. Four outcomes are possible, as explained below.

1. A "no impact" response indicates that no action that would have an adverse effect on the environment would occur due to the project.

2. A "less than significant" response indicates that while there may be potential for an environmental impact, there are standard procedures or regulations in place, or other features of the project as proposed, which would limit the extent of this impact to a level of "less than significant."

3. Responses that indicate that the impact of the project would be "less than significant with mitigation" indicate that mitigation measures, identified in the subsequent discussion, will be required as a condition of project approval in order to effectively reduce potential project-related environmental effects to a level of "less than significant."

4. A "potentially significant impact" response indicates that further analysis is required to determine the extent of the potential impact and identify any appropriate mitigation. If any topics are indicated with a "potentially significant impact," these topics would need to be analyzed in an Environmental Impact Report.

1. AESTHETICS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?			☒	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			☒	
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage points.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			☒	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			☒	

a) Scenic Vistas

The project vicinity is predominantly developed with business park and industrial uses and is not considered a scenic resource or vista in any vicinity plans. The East of 101 Area Plan (Policy 5.3) states that a design goal of development in the Plan Area should be to "Protect visually significant features of the East of 101 Area, including views of the Bay and San Bruno Mountain."[1] CEQA generally protects against significant adverse impacts to public views of scenic vistas, taking into consideration whether the view is from a location at which people gather specifically to enjoy views and the environmental context (i.e., if the area is a natural area or a developed urban area). While views of the Bay and San Bruno Mountain are considered scenic vistas for purposes of this analysis, there are no designated public viewing locations in the vicinity of the project. Views from public roadways are discussed below to indicate the potential for changed views from public locations.

San Bruno Mountain, which lies northwest of the project site, is not visible from Gull Drive (to the east) or Forbes Boulevard (to the south) due to the relative ground elevations and existing development in the area. Similarly, views toward the Bay from area roadways that would cross the site are already substantially blocked at road level by existing area development, topography, and landscaping.

While areas of the adjacent development could experience some blockage of views of the Bay or San Bruno Mountain (for example, views from the parking area south of the Nickell Property and the Plenty Unlimited building could be partially obstructed), this would not be considered a substantial adverse effect, as these are not public viewing locations where people gather specifically to enjoy views and obstruction of private views is not considered a significant environmental impact under CEQA.

[1] East of 101 Area Plan, July 1994, p. 13

Taking both the regulatory and specific locational/scenic context into account, the impact on scenic vistas from implementation of the project would be considered ***less than significant***.

b) Scenic Highways

The project would not be visible from a designated or eligible State Scenic Highway. U.S. 101 is not a designated or eligible State Scenic Highway corridor in the vicinity of the project nor are there any scenic corridors identified in the area.[2] The project would ***be less than significant*** on a state scenic highway or scenic resources viewable from such a highway.

c) Visual Character

The project is located in an urbanized area and therefore the threshold of significance is whether the project would conflict with applicable zoning and other regulations governing scenic quality. The site is currently zoned for Business and Technology Park (BTP) use, under which R&D and office uses are explicitly permitted. While the proposed project would require a Conditional Use Permit for Parking/Loading Reduction, Incentive-Based FAR Bonus, and Parking Garage Rooftop Planting, these are allowable approvals under the site planning and would therefore not be considered conflicts. Therefore, the impact on visual character from implementation of the project would be considered ***less than significant***. Additionally, City staff will review the proposed design as part of the approval process, and design parameters would be imposed by the City.

d) Light and Glare

Sources of light and glare in the project vicinity include interior and exterior building lights, service areas and surface parking lots, and city street lights. Light and glare associated with vehicular traffic along major thoroughfares in the area also create sources of glare. The existing level and sources of light and glare are typical of those in a developed urban business park setting.

Residential uses and natural areas are particularly sensitive to light and glare impacts. The project is located in a commercial and industrial area with no immediately adjacent residential uses or natural areas and has lighting consistent with that existing in the area. As a standard condition of Project approval, new lighting will be required to conform to the City's standards that limit the amount of light that can spill over to other properties through the use of downcast lighting fixtures.

The project would result in development and lighting treatments typical of the existing commercial/industrial urban settings and consistent with lighting standards to minimize lighting on adjacent areas, and would therefore not result in new sources of substantial adverse light or glare. The impact would be ***less than significant***.

[2] California Department of Transportation, State Scenic Highway Mapping System, available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

2. AGRICULTURE AND FORESTRY RESOURCES In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production(as defined by Government Code section 51104(g))?				☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?				☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				☒

a-e) Agriculture and Forestry Resources

The project site is located in a developed urban area adjacent to a highway. No part of the site is zoned for or currently being used for agricultural or forestry purposes or is subject to the Williamson Act.[3] There would be ***no impact*** to agricultural and forestry resources as a result of this project.

[3] South San Francisco General Plan, 1999.

3. AIR QUALITY Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?			☒	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?		☒		
c) Expose sensitive receptors to substantial pollutant concentrations?			☒	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			☒	
a) Conflict with or obstruct implementation of the applicable air quality plan?			☒	

a) Air Quality Plan

Projects within South San Francisco are subject to the Bay Area Clean Air Plan, first adopted by the Bay Area Air Quality Management District (BAAQMD) (in association with the Metropolitan Transportation Commission and the Association of Bay Area Governments) in 1991 to meet state requirements and those of the Federal Clean Air Act. The plan is meant to demonstrate progress toward meeting the ozone standards, but also includes other elements related to particulate matter, toxic air contaminants, and greenhouse gases. The latest update to the plan, adopted in April 2017, is the Bay Area 2017 Clean Air Plan.

BAAQMD recommends analyzing a project's consistency with current air quality plan primary goals and control measures. The impact would be presumed significant if the project would conflict with or obstruct attainment of the primary goals or implementation of the control measures.

The primary goals of the Bay Area 2017 Clean Air Plan are:

- Attain all state and national air quality standards
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants
- Reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050 (This standard is addressed in Section 8: Greenhouse Gas Emissions.)

The project would be required to comply with all applicable rules and regulations related to emissions and health risk and would not result in a new substantial source of emissions or toxic air contaminants (see items b-d below) or otherwise conflict with the primary goals of the 2017 Clean Air Plan.

Many of the Clean Air Plan's control measures are targeted to area-wide improvements, large stationary source reductions, or large employers and these are not applicable to the proposed

project. However, the project would be consistent with all rules and regulations related to construction activities and the proposed development would meet current standards of energy and water efficiency (Energy Control Measure EN1 and Water Control Measure WR2) and recycling and green waste requirements (Waste Management Control Measures WA3 and WA4) and does not conflict with applicable control measures aimed at improving access/connectivity for bicycles and pedestrians (Transportation Control Measure TR9) or any other control measures.

The project, therefore, would be consistent with the Clean Air Plan and have a ***less than significant*** impact in this regard.

b) Air Quality Standards/Criteria Pollutants

Ambient air quality standards have been established by state and federal environmental agencies for specific air pollutants most pervasive in urban environments. These pollutants are referred to as criteria air pollutants because the standards established for them were developed to meet specific health and welfare criteria set forth in the enabling legislation and include ozone precursors including nitrogen oxides and reactive organic gasses (NOx and ROG), carbon monoxide (CO), and suspended particulate matter (PM_{10} and $PM_{2.5}$). The Bay Area is considered "attainment" for all of the national standards, with the exception of ozone. It is considered "nonattainment" for State standards for ozone and particulate matter.

Past, present and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts.[4]

BAAQMD updated their Guidelines for air quality analysis in coordination with adoption of new thresholds of significance on June 2, 2010.[5] The most recent version of the Guidelines is dated May 2017.

Project-related air quality impacts fall into two categories: short-term impacts that would occur during construction of the project and long-term impacts due to project operation. BAAQMD's adopted thresholds are average daily emissions during construction or operation of 54 pounds per day or operational emissions of 10 tons per year of NOx, ROG or $PM_{2.5}$ and 82 pounds per day or 15 tons per year of PM_{10}.

Construction Emissions

Construction of the project would involve demolition, excavation and site preparation, and building erection. Although these construction activities would be temporary, they would have the potential to cause both nuisance and health-related air quality impacts.

Construction emissions for the project were modeled using the California Emissions Estimator Model ("CalEEMod"). Project details were entered into the model including the proposed land uses, Transportation Demand Management Plan trip reductions, Peninsula Clean Energy carbon intensity

[4] BAAQMD, May 2017, *California Environmental Quality Act Air Quality Guidelines*, p. 2-1.

[5] Bay Area Air Quality Management District. June 2, 2010. News Release http://www.baaqmd.gov/~/media/Files/Communications%20and%20Outreach/Publications/News%20Releases/2010/ceqa_100602.ashx .

factors, demolition/earthwork volumes, and construction schedule. Model defaults were otherwise used. The CalEEMod results are included in Attachment A. Emissions from construction are summarized in **Table 1**.

Table 1: Daily Regional Air Pollutant Emissions for Construction (Pounds per Day)

Description	Reactive Organic Gases	Nitrogen Oxides	Particulate Matter (PM_{10})*	Fine Particulate Matter ($PM_{2.5}$) *
Average Daily Emissions	5	19	0.69	0.65
BAAQMD Daily Thresholds	*54*	*54*	*82*	*54*

* Applies to exhaust emissions only

Source: CalEEMod results included as Attachment A, converted from tons per year to pounds per day across the active construction days (approximately 533 days).

Construction-period emissions levels are below BAAQMD thresholds presented in Table 1. However, BAAQMD considers dust generated by grading and construction activities to be a significant impact associated with project development if uncontrolled and recommends implementation of construction mitigation measures to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds. These basic measures are included in Mitigation Measure Air-1, below and would further reduce construction-period criteria pollutant impacts.

Mitigation Measure

Air-1: **Basic Construction Management Practices.** The project applicant / owner / sponsor shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures".

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

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

iii) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, unless the City Engineer determines that an alternative cleaning method would achieve the same standard of air pollution prevention and also reduce the potential for stormwater pollution.

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

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

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

vii) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.

viii) Post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. Bay Area Air Quality Management District's 24-hour general air pollution complaint phone number shall also be visible to ensure compliance with applicable regulations.

With implementation of Mitigation Measure Air-1, the impact related to construction-period criteria pollutant impacts would be ***less than significant with mitigation***. Because construction-period emissions would not exceed applicable significance thresholds, additional construction mitigation measures would not be required to mitigate impacts.

Operational Emissions

Emissions from operation of the project could cumulatively contribute to air pollutant levels in the region. These air pollutants include ROG and NOx that affect ozone levels (and to some degree – particulate levels), PM_{10}, and $PM_{2.5}$. Emissions of air pollutants associated with the project were predicted using CalEEMod. This model predicts daily emissions associated with development projects including transportation, energy and other utilities, and on-site activities such as landscaping and building cleaning and maintenance. CalEEMod inputs and results are included in Attachment A and summarized in **Table 2**, below.

Table 2: Regional Air Pollutant Emissions for Operations (Pounds per Day for Daily, Tons per Year for Annual)

Description	Reactive Organic Gases	Nitrogen Oxides	Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Project Emissions, Daily	5.2	7.2	3.9	1.1
BAAQMD Daily Significance Thresholds	*54*	*54*	*82*	*54*
Project Emissions, Annual	0.9	1.3	0.7	0.2
BAAQMD Annual Significance Thresholds	*10*	*10*	*15*	*10*

Source: CalEEMod results included as Attachment A. Average daily emissions were calculated by converting from tons per year to pounds/days.

Daily and annual air emissions predicted with build-out of the proposed project are reported in Table 2 above and compared against BAAQMD thresholds.

As vehicular emissions have improved over the years, carbon monoxide hotspots have become less of a concern. BAAQMD presents traffic-based criteria as screening criteria for carbon monoxide impacts, as follows.[6] The project is consistent with General Plan and zoning designations for the site

[6] Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, p. 3-2, 3-3.

and area planning and would implement a Transportation Demand Management Plan per South San Francisco Municipal Code to reduce project trips. The project is therefore consistent with the Congestion Management Plan (CMP) of the San Mateo City/County Association of Governments (C/CAG), which is the first threshold. The other two screening thresholds are whether the project would increase traffic volumes at affected intersections to more than 44,000 vehicles per hour or to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (such as a tunnel or underground parking garage, which the project or vicinity intersections do not include). These hourly traffic volumes are very high and much higher than those in the vicinity. For example, the highest volume roadway in the vicinity of the project is Oyster Point Boulevard, which carries less than 17,000 vehicles per day under existing conditions and is forecast to carry just over 30,000 vehicle per day with cumulative development by 2040. With daily volumes below the hourly volume thresholds, the hourly volumes would be even lower and the project would not have the potential to exceed the screening thresholds. The project would not result in individually or cumulatively significant impacts from CO emissions.

The project is below significance thresholds established by BAAQMD and meets localized CO screening criteria. As a result, the project would have a ***less than significant*** impact on regional air quality during the operational period.

c) Sensitive Receptors

A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. In the Bay Area, a number of urban or industrialized communities exist where the exposure to TACs is relatively high compared to other communities. According to the BAAQMD CEQA Guidelines, the project site is not in an impacted community.[7]

Substantial sources of TACs include, but are not limited to, land uses such as freeways and high-volume roadways, truck distribution centers, ports, rail yards, refineries, chrome plating facilities, dry cleaners using perchloroethylene, and gasoline dispensing facilities. The project would not involve any of these uses. However, construction activity that uses traditional diesel-powered equipment results in the emission of diesel particulate matter including fine particulate matter, which is considered a toxic air contaminant and potential health risk.

Certain population groups, such as children, the elderly, and people with health problems, can be particularly sensitive to air pollution. With respect to air pollutants, examples of sensitive receptors include health care facilities, retirement homes, school and playground facilities, and residential areas. The project itself is not considered a sensitive receptor. There are few sensitive receptors in the East of 101 area of South San Francisco, but there are scattered day care facilities and some live-aboard house boats in the marina in the Oyster Point area. All these sensitive receptors are over 1,000 feet from the proposed project, which is the screening distance recommended by BAAQMD.

Therefore, because there are no sensitive receptors within the screening distance of site and the project does not exceed criteria pollutant emissions levels during either the construction or operational period (discussed under this section 3(a) above), the project would not expose sensitive receptors to substantial pollutant concentrations and impact in this regard would be ***less than significant***.

[7] Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, Figure 5-1.

d) Objectionable Odors

Odors from construction activities are associated with construction equipment exhaust and the application of asphalt and architectural coatings. Odors emitted from construction activities would be temporary and not likely to be noticeable much beyond the project site's boundaries. The proposed office/R&D use is consistent with the type of development in the area, and is not a use type considered by BAAQMD to be a source of substantial objectionable odors.[8] The same types of uses that are sensitive to pollutants would be sensitive to odors, and as discussed under this section 3(a) above, there are no sensitive receptors within 1,000 feet of the project. Therefore, the potential for objectionable odor impacts to adversely affect a substantial number of people is ***less than significant***.

[8] Bay Area Air Quality Management District. May 2017. *California Environmental Quality Act Air Quality Guidelines*, Table 3-3.

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

a–c) Special Status Species and Habitat and Wetlands

The project site is maintained as a vacant site and can generally be described as a grassy and weedy area with scattered shrubs that is regularly mowed/cut. The General Plan has assessed parcels in the area that have the potential for biological resources. The project site is mapped as an area that can be considered not to have biological resources, thus precluding the need for a Biological Resources Assessment.[9]

Special-status species are unlikely to occur in the project vicinity due to its highly disturbed and urbanized nature. The project site was not mapped in the East of 101 Area Plan as an area with sensitive biological resources.[10] Plant and animal species that may occur in the vicinity would be common species associated with urban, developed, and ruderal conditions throughout the San Francisco Bay area. No wetlands, riparian habitats, or other sensitive habitats are present at the site.[11] Impacts on special-status species and habitats would therefore be ***less than significant***.

[9] South San Francisco General Plan, 1999. Figure 7-2.

[10] City of South San Francisco. East of 101 Area Plan, July 1994. Figure 18.

[11] U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper. Available at https://www.fws.gov/wetlands/data/mapper.html. Accessed August 2021.

d) Wildlife Corridors

The project site is surrounded by roadways and other developed areas and does not connect undeveloped areas or otherwise have the potential to act as a substantial wildlife corridor. Impacts related to movement of wildlife would be ***less than significant***.

e) Local Policies and Ordinances

There are no local policies or ordinances directly applicable to the project and tree removal is not proposed. Therefore, the project would have ***no impact*** regarding conflicts with local policies and ordinances, including tree preservation.

f) Habitat Conservation Plan

There is no Habitat Conservation Plan applicable to the project site. Therefore, the project would have ***no impact***.

5. CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Public Resources Section 15064.5?				☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Public Resources Section 15064.5?		☒		
c) Disturb any human remains, including those interred outside of formal cemeteries?		☒		

a) Historic Resources

The site is currently vacant and does not contain historic-age structures. There is no potential to impact historic resources , thus the project would have **no impact** on historic resources.

b, c) Archaeological Resources and Human Remains

A records search was performed by the Northwest Information Center (Attachment B), which indicated that while there are no known cultural resources present in the project area, there is a moderate to high potential for the inadvertent discovery of previously unrecorded Native American and historic-period archaeological resources based on the characteristics of the site and history of the region. A record search of the Native American Heritage Commission Sacred Lands File was completed for the project and indicated there are no known sacred lands present in the vicinity of the site (see Attachment B). While no tribes have requested consultation for project in this area, notice was sent to listed tribes in September 2021, per recommendation of the Native American Heritage Commission. No responses were received prior to publication of this Initial Study. If responses are subsequently received that require additional discussion in the CEQA context, such discussion will be included in the EIR.

There is no significant excavation or below-grade levels proposed. Given that the site is generally underlain by about 10 to 55 feet of fill, grading activities are not anticipated to disturb native soils, except limited disturbance from drilled piles for the foundation. Therefore, although not anticipated, previously unknown cultural resources or human remains could be inadvertently unearthed during ground-disturbing activities. This inadvertent discovery would be a potentially significant impact and require mitigation.

Mitigation Measures

Cul-1: Cultural Resources Worker Environmental Awareness Program (WEAP). A qualified archaeologist shall conduct a WEAP training for all construction personnel on the project site prior to construction and ground-disturbing activities. The training shall include basic information about the types of artifacts that might be encountered during construction activities, and procedures to follow in the event of a discovery. This training shall be provided for any personnel with the potential to be involved in activities that could disturb native soils.

Cul-2: Halt Construction Activity, Evaluate Find and Implement Mitigation. In the event that previously unidentified paleontological, archaeological, historical, or tribal resources are uncovered during site preparation, excavation or other construction activity, the project applicant / owner / sponsor shall cease or ensure that all such activity within 25 feet of the discovery are ceased until the resources have been evaluated by a qualified professional, who shall be retained by the project applicant / owner / sponsor, and specific measures can be implemented by the project applicant / owner / sponsor to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code.

Cul-3: Halt Construction Activity, Evaluate Remains and Take Appropriate Action in Coordination with Native American Heritage Commission. In the event that human remains are uncovered during site preparation, excavation or other construction activity, the project applicant / owner / sponsor shall cease or ensure that all such activity within 25 feet of the discovery are ceased until the remains have been evaluated by the County Coroner, which evaluation shall be arranged by the project applicant / owner / sponsor, and appropriate action taken by the project applicant / owner / sponsor in coordination with the Native American Heritage Commission, in accordance with section 7050.5 of the California Health and Safety Code or, if the remains are Native American, section 5097.98 of the California Public Resources Code.

Implementation of Mitigation Measures Cul-1, Cul-2, and Cul-3 would reduce the impacts associated with possible disturbance of unidentified cultural resources at the project site to a level of ***less than significant with mitigation***.

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

a, b) Energy

The threshold of significance related to energy use is whether the project would result in wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct state or local plans for renewable energy or energy efficiency.

The project would use energy in various ways, including directly to power the building, heating and cooling, and also to power vehicles. Construction and routine operation and maintenance also consume energy. Additionally, there is indirect energy consumption related to the production and distribution of energy and other utilities and transportation and disposal of waste. That being said, there is no quantified threshold for energy consumption against which to compare a quantified amount of energy use. Rather, the threshold hinges on whether the energy consumption would be wasteful, inefficient, or unnecessary.

As a project on a vacant site that is consistent with the General Plan and zoning designation for the site, it can be concluded that the project is consistent with City plans for area development and therefore that energy consumption for construction and operations would not be considered unnecessary.

As discussed in other sections of this analysis, the project incorporates energy and energy-related efficiency measures meeting all applicable requirements, including water and waste efficiency. The project would be required to comply with all standards of Title 24 of the California Code of Regulations and the California Green Building Standards Code (CALGREEN), as applicable, aimed at the incorporation of energy-conserving design and construction. The project would also implement a Transportation Demand Management Plan to reduce employee trips, thereby reducing energy consumption for transportation for the employees.

As detailed in sections 3: Air Quality and 8: Greenhouse Gas Emissions, the project is also consistent with regional and local climate actions plans, as currently applicable, which include measures related to energy consumption.

Therefore, although the project would incrementally increase energy consumption, it would not result in a significant impact related to energy consumption in a wasteful, inefficient, or unnecessary manner or otherwise conflict with energy plans and the impact in this regard would be ***less than significant***.

7. GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)				☒
ii) Strong seismic ground shaking?		☒		
iii) Seismic-related ground failure, including liquefaction?		☒		
iv) Landslides?		☒		
b) Result in substantial soil erosion or the loss of topsoil?			☒	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?		☒		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?		☒		
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		☒		

This section utilizes information from the Preliminary Geotechnical Site Assessment and Supplemental Discussion ("Geotechnical Report") prepared for the applicants by Langan Engineering and Environmental Services, dated November 12, 2020 and August 2, 2021, which is available as part of project application materials.

a, c, d) Geologic Hazards

The major active faults in the area are the San Andreas, San Gregorio, and Hayward Faults. The closest fault traces are located almost 4 miles from the project site. The project site is not within an Alquist-Priolo Seismic Hazard Zone, and no known active or potentially active faults traverse the site. Therefore, the project has no impact related to rupture along a fault.

However, the San Francisco Bay Area is a seismically active region and the site is likely to encounter strong seismic ground shaking during the lifetime of the project, which can result in seismic-related ground failure including liquefaction depending on the characteristics of the site and development. The soil and development characteristics can also result in risks of non-seismic-related hazards, including lateral spreading and expansive soil.

The project's Geotechnical Report concludes that most of the fill encountered on site is sufficiently dense and/or has sufficient cohesion to resist substantial liquefaction, lateral spreading, and seismic densification during a large earthquake on one of the nearby faults. Isolated layers of medium dense sand at the site may be susceptible to liquefaction, estimated at about 1 inch of liquefaction-induced settlement and 1 inch of cyclic densification settlement should be anticipated during a major earthquake. Because the liquefiable layers are not continuous and occur near the base of the adjacent slope, the potential for lateral spreading is low.

The stability of the slope was also specifically considered, given the characteristics of the site soils and proposed development. While development is proposed on the relatively level portion of the site, buildings are proposed within 20 feet of the slopes at the south and east edges of the site. These slopes have inclinations of approximately 2:1 (horizontal to vertical) and the maximum slope height is around 40 feet. The project's Geotechnical Report concludes that the proposed development is feasible and would not result in slope instability with appropriate foundation support including a combination of additional rows of piles, ground improvement, and/or tighter spacing of piles.

The geotechnical analysis concluded that the potential geological hazards can be addressed through appropriate design and construction, which would occur as part of the design-level geotechnical recommendations and structural plans as specified in mitigation measure Geo-1.

Mitigation Measure

Geo-1: **Compliance with a design-level Geotechnical Investigation report prepared by a Registered Geotechnical Engineer and with Structural Design Plans as prepared by a Licensed Professional Engineer.** Proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer and a Licensed Professional Engineer. The structural engineering design, with supporting Geotechnical Investigation, shall incorporate seismic parameters compliant with the California Building Code.

Compliance with a design-level Geotechnical Investigation and Structural Design Plans, as required by Mitigation Measure **Geo-1** would reduce the potential impact of seismic hazards including liquefaction and slope stability to a level of ***less than significant with mitigation***.

b) Soil Erosion

Project construction, particularly grading and site preparation, can result in erosion and loss of topsoil from the project site. The development portion of the project site is generally flat. Outside of the proposed development area are existing slopes along the site's east and southeast boundaries with inclinations of approximately 2:1 (horizontal to vertical) and a maximum slope height around 40 feet. Grading would involve 18,440 cubic yards of cut across the site. Some of that would be balanced on site, with a net import of 1,780 cubic yard and export of 16,460 cubic yards. No substantial changes are proposed to the existing slopes.

The project would be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity, Construction General Permit Order 2009-0009-DWQ (Construction General Permit), administered by the State Water Resources Control Board (SWRCB). Coverage under the NPDES Permit would require implementation of a Stormwater Pollution Prevention Plan (SWPPP) and various site-specific best management practices (BMPs) to reduce erosion and loss of topsoil during site demolition and construction. Compliance with the NPDES permit and BMPs during demolition and construction such as straw wattles, silt fencing, concrete washouts, and inlet

protection during construction would reduce impacts resulting from loss of topsoil. The project would be required to comply with South San Francisco Municipal Code ("SSFMC") Section 15.56.030, which would require the development of the project site to control filling, grading, and dredging which may increase flood damage.

Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. With the implementation of a SWPPP and Erosion Control Plan to prevent erosion, sedimentation, and loss of topsoil during and following construction – which are required under existing regulations and therefore not needed to be implemented as mitigation - the soil erosion impacts of the project would be ***less than significant***.

e) Septic Tanks

The project would not include the use of septic tanks and associated disposal facilities. Therefore, the project would have ***no impact*** in this regard.

f) Unique Geologic Feature or Paleontological Resource

The area east of Highway 101 is underlain by deposits of Bay mud up to 80 feet deep in some places, which have some sensitivity for paleontological vertebrates, but no paleontological resources have been found on the project site (University of California Museum of Paleontology 2019).[12, 13]

The project site falls within a highly urbanized area and the site is underlain by about 10 to 55 feet of fill. Project grading activities are not anticipated to disturb native soils, though drilled piles would reach into native soils. Therefore, the project has a low potential to directly or indirectly destroy unique paleontological resources or a unique geologic feature. That being said, there is some potential that previously-undiscovered paleontological resources could be encountered, which would be addressed through the following measures.

Mitigation Measures Cul-1a, Cul-2, and Cul-3 would also reduce the potential impact related to unknown paleontological resources.

Implementation of mitigation measures Cul-1, Cul-2, and Cul-3 would reduce the impacts associated with possible disturbance of previously-unidentified paleontological resources to a ***less than significant with mitigation*** level.

[12] South San Francisco General Plan, 1999.

[13] University of California Museum of Paleontology (UCMP) Online Database. 2019. UCMP specimen search portal, http://ucmpdb.berkeley.edu/ (accessed September 2021).

8. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			☒	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			☒	

a) Greenhouse Gas Emissions

BAAQMD has determined that greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. Construction and operation of the proposed project would be additional sources of GHG emissions, primarily through consumption of fuel for transportation and energy usage on an ongoing basis. The threshold of significance for operational GHGs is a brightline of 1,100 metric tons carbon dioxide equivalent (CO_2e) per year for small projects that do not meet the efficiency threshold or an efficiency threshold of 4.6 metric tons CO_2e per service population (residents and employees) per year for large projects that do not meet the brightline threshold. Because this is not a small project, the efficiency threshold will be used for this analysis.

State Assembly Bill 32 (AB 32) required California state and local governments to reduce greenhouse gas emissions to 1990 levels by 2020. The BAAQMD thresholds were based on those 2020 targets. State Senate Bill 32 (SB 32) was subsequently adopted to require that there be a further reduction in GHG emissions to 40% below the 1990 levels by 2030. BAAQMD has not yet updated their thresholds to address future target reductions past 2020. While not yet adopted by BAAQMD, the additional 40% reduction by 2030 identified in SB 32 equates to a 2030 efficiency standard of 2.8 metric tons CO_2e per year per service population.

BAAQMD has not proposed a separate threshold of significance for construction-related GHG emissions, though recommends quantification and a determination regarding significance in relation to meeting AB 32 (and now SB 32) goals. Standard practice is to divide the construction emissions by 40 years (an average building life) and add that to the operational emissions.

The project's GHG emissions were modeled using CalEEMod, as discussed in section 3: Air Quality. A summary of the results are included in **Table 3** on the next page and the CalEEMod input and output can be found in Attachment A and as detailed, the emissions quantification incorporated project details, some of which serve to reduce GHG emissions including Transportation Demand Management Plan trip reductions, and the lower carbon intensity factors of the Peninsula Clean Energy provider.

As shown in Table 3, GHG emissions would be below BAAQMD's efficiency threshold based on 2020 reductions and also the projected 2030 efficiency threshold. Therefore, the project would have a ***less-than-significant*** impact related to increased GHG emissions.

Table 3: Greenhouse Gas Emissions

Description	metric tons CO_2e per year
Project Emissions, Operational	1,275
Project Emissions, Construction (averaged over 40 years)	29
Project Emissions, Total	**1,304**
Project Service Population	555
Project Emissions, Total (per Service Population)	**2.35**
BAAQMD Project Service Population Significance Threshold 2020	*4.6*
Exceeds 2020 Threshold?	***No***
Projected Service Population Significance Threshold 2030	*2.8*
Exceeds 2030 Threshold?	***No***

Source: CalEEMod results included as Attachment A.

Notes: CO_2e is carbon dioxide equivalent units, the standard measure of total greenhouse gasses.

Service Population was calculated at approximately 300 square feet per employee for office/R&D. While office and specifically tech office uses could have a higher number of employees, a lower number was used here for a more conservative analysis of GHG emissions.

b) Greenhouse Gas Reduction Plans

The City adopted a GHG reduction plan in 2014, known as the City of South San Francisco Climate Action Plan ("SSF CAP"). This plan estimated community-wide GHG emissions of 548,600 metric tons CO_2e in 2005 and a target reduction of 15% below the 2005 baseline levels by 2020. Because the SSF CAP only demonstrates consistency with the AB 32 near-term reduction target for 2020, it is not a "qualified" CAP available for CEQA streamlining for projects after 2020 and was therefore not used in place of emissions quantification under section 8(a) above. However, until an updated CAP is adopted, the current SSF CAP's measures and development requirements still apply to projects constructed and operated after 2020. Therefore, this analysis evaluates the proposed project's consistency with applicable measures and development requirements in the SSF CAP.

Many of the SSF CAP's reduction measures are targeted to city-wide strategies that are not directly applicable to the proposed project. The project includes bicycle facilities and has pedestrian connections to shuttle stops on Oyster Point Boulevard (to/from BART and Caltrain stations) and participate in a Transportation Demand Management program (contributing to SSF CAP Measures 1.1 through 1.3). The project includes tree plantings (SSF CAP Measure 3.4,) would meet current standards of energy and water efficiency (SSF CAP Measures 3.1 and 6.1), and occupants would participate in recycling for waste reduction (SSF CAP Measure 5.1). A discussion of the project's consistency with the Clean Air Plan is included in section 3: Air Quality.

Additionally, GHG emissions associated with the proposed project were analyzed per the BAAQMD Guidelines against thresholds based on 2020 target reductions and projected 2030 target

reductions. BAAQMD's thresholds and methodologies take into account implementation of state-wide regulations and plans, such as the Assembly Bill 32 Scoping Plan and adopted state regulations such as Pavley and the low carbon fuel standard. Systemic changes will be required at the state level to achieve California's future (post-2020) GHG reduction goals. Regulations, such as future amendments to the low-carbon fuel standard, updates to the state's Title 24 standards, and implementation of the state's Short-Lived Climate Pollutant Reduction Strategy, including forthcoming regulations for composting and organics diversion, will be necessary to attain the magnitude of reductions required for the state's goals. The project would be required to comply with applicable operational regulations or be directly affected by the outcomes (e.g., vehicle trips and energy consumption would be less carbon intensive because of statewide compliance with future low-carbon fuel standard amendments and increasingly stringent Renewables Portfolio Standards). Therefore, for the foreseeable future, the Specific Plan would not conflict with any other state-level regulations pertaining to GHGs in the post-2020 era. Additionally, as detailed under section 8(a) above, project emissions would not exceed threshold levels, including projected 2030 threshold levels consistent with adopted state reduction targets.

Therefore, there would be a ***less than significant*** impact in relation to consistency with GHG reduction plans.

9. HAZARDS AND HAZARDOUS MATERIALS Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All topics	☒			

Because hazards and hazardous materials considerations are expected to be of interest to the public and decision-makers, the discussion of this topic area is being deferred to the EIR. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Hazards and Hazardous Materials section will be addressed in the EIR.

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

a) Water Quality and Discharge

Construction activities have the potential to impact water quality through erosion and through debris and oil/grease carried in runoff could result in pollutants and siltation entering stormwater runoff and downstream receiving waters if not properly managed. The project would be required to obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the State Water Resources Control Board. Coverage under this permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) for review and approval by the City.[14] At a minimum, the SWPPP would include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. Furthermore, the County of San Mateo's Water Pollution Prevention Program would require the project site to implement BMPs during project construction to reduce pollution carried by stormwater such as keeping sediment on site using perimeter barriers and storm drain inlet protection and proper management of construction materials, chemicals, and wastes on site. Additional BMPs required by South San Francisco Municipal Code Section 14.04.180 would also be implemented during project construction. Per standard City procedures, compliance with SWPPP requirements and BMPs would be verified during the construction permitting process.

[14] SWRCB, Construction General Permit Order 2009-0009-DWQ (Construction General Permit)

Project operations have the potential to result in sources of stormwater pollutants such as oil, grease, and debris to stormwater drainage flowing over roadways and other impermeable surfaces and entering the city's stormwater system, served by the City of South San Francisco's Public Works Department, Maintenance Division. The project site drains to an existing storm drain system that outfalls to a tidally influenced channel that is connected to the San Francisco Bay. With the proposed improvements, runoff from the rooftop and parking areas would be retained and treated via bio-retention basins and flow-through planters.

Federal Clean Water Act regulations require municipalities to obtain National Pollution Discharge Elimination System (NPDES) permits which outline programs and activities to control surface stormwater pollution. Municipalities, such as the City of South San Francisco, must eliminate or reduce "non-point" pollution, consisting of all types of substances generated as a result of urbanization (e.g. pesticides, fertilizers, automobile fluids, sewage, litter, etc.), to the "maximum extent practicable" (as required by Clean Water Act Section 402(p)(3)(iii)). Clean Water Act Section 402(p) and USEPA regulations (40 CFR 122.26) specify a municipal program of "best management practices" to control stormwater pollutants. Best Management Practices (BMP) refers to any kind of procedure or device designed to minimize the quantity of pollutants that enter the storm drain system. To comply with these regulations, each incorporated city and town in San Mateo County joined with the County of San Mateo to form the San Mateo County Water Pollution Prevention Program (SMCWPPP) in applying for a regional NPDES permit, which includes Provision C.3. [15] The C.3 requirements are intended to protect water quality by minimizing pollutants in runoff, and to prevent downstream erosion by: designing the project site to minimize imperviousness, detain runoff, and infiltrate runoff where feasible; treating runoff prior to discharge from the site; ensuring runoff does not exceed pre-project peaks and durations; and maintaining treatment facilities. Project applicants must prepare and implement a Stormwater Control Plan containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the SMCWPPP C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity.

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

b) Groundwater Recharge and Supplies

The project is located on a designated urban area within the Visitation Valley groundwater basin.[16]

The California Water Service (Cal Water) supplies water to the City of South San Francisco and would serve the project site. Cal Water's Urban Water Management Plan (UWMP) anticipates future growth in the region that includes the project, as allowed under existing land use and zoning designation. The majority of the water supply to the Cal Water South San Francisco District (i.e., approximately 80 percent from 2005-2019) is treated water purchased from the City and County of San Francisco's Regional Water System (RWS), which is operated by the San Francisco Public Utilities

[15] Regional Water Board, 2007, Order No. R2-2007-0027, NPDES Permit No. CAS0029921.

[16] California Regional Water Quality Control Board San Francisco Bay Region, San Francisco Bay Basin Water Quality Control Plan (Basin Plan), November 2019.

Commission (SFPUC), and originates largely (85%) from the Hetch Hetchy watershed (surface water). Groundwater makes up approximately 20 percent of the water supply for the South San Francisco District, which comes from the "Westside Basin", which underlies the South San Francisco District. The Basin is currently categorized by the California Department of Water Resources as a very low priority basin and as such, the Basin is not subject to the requirements of the California Sustainable Groundwater Management Act though the Basin has been actively managed for years, including the establishment of pumping limitations.[17]

The site is currently undeveloped and therefore consists entirely of pervious surfaces. The project would result in an increase of approximately 2.4 acres of impervious surface (63% of the site). The project would construct new above and below ground drainage system that includes catch-basins, storm drain pipe, bio-retention areas, and flow-through planters to capture, treat, and discharge runoff from the entire site. The proposed drainage system would maintain the existing flow discharge pattern.

The project would not extract groundwater or directly interfere with the groundwater table through construction activities on the site, as ground disturbance would not occur below the water table.

As discussed under item a above, the project would comply with stormwater drainage requirements, including bio-retention/treatment areas to address both quality and volumes of runoff and is consistent with expected use of the site in basin planning. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and would have a ***less than significant*** impact related to groundwater.

c) Drainage Pattern Alteration

The site is currently undeveloped and therefore consists entirely of pervious surfaces across the 3.8-acre site. The project would result in approximately 2.4 acres of impervious surface (63% of the site).

As an undeveloped site, runoff currently sheet flows north to a 30-inch storm drain pipe which conveys runoff from the properties at 560 and 570 Eccles Ave., and conveys it down the slope to the 38-inch culvert. The project site is currently served by a 30-inch storm drain that conveys runoff from 560 and 570 Eccles Ave to the 38-inch culvert under Gull Drive. The 38-inch culvert conveys runoff from Gull Drive and upstream drainage areas to the tidal channel that is east of the project site. The project would construct new above and below ground drainage system that includes catch-basins, storm drain pipe, bio-retention areas, and flow-through planters to capture, treat, and discharge runoff from the entire site. The proposed drainage system would maintain the existing flow discharge pattern. According to the 101 Gull Drive Storm Drainage Report (available as part of the project materials), there is adequate capacity in the existing off-site system to accommodate flows from the project site.[18]

As discussed under this section 10(a) above, through compliance with applicable regulations, runoff from site would be the same or reduced from that existing and would not cause erosion, siltation, pollution, or flooding and as discussed above, changes to on-site conditions would meet applicable requirements and would not exceed capacity of the stormwater drainage system or result in on- or

[17] California Water Service (Cal Water), adopted June 2021, 2020 Urban Water Management Plan: South San Francisco District., available at: https://www.calwater.com/docs/uwmp2020/SSF_2020_UWMP_FINAL.pdf.

[18] BKF Engineers, August 17 2021, 101 Gull Drive Storm Drainage Report.

off-site flooding. Project impacts related to alteration of drainage patterns would be ***less than significant***.

d) Inundation

The project site is approximately 0.25 miles from the San Francisco Bay and approximately 5.75 miles from the Pacific Ocean, and according to state hazard mapping is not located in a tsunami hazard area.[19]

The nearest body of water that could experience seiche (water level oscillations in an enclosed or partially enclosed body of water) is the San Francisco Bay located approximately 5.75 miles east of the project site. A seiche would not experience run up higher than a tsunami and as discussed above, the site is not located in a tsunami hazard area and is therefore not in an area at risk for seiche inundation either. No other large bodies of water with the potential to inundate the project site by a seiche are located near the site.

The project is not located within Federal Emergency Management Agency (FEMA) Flood Zone and is therefore not at substantial risk of flooding from 100-year or more common storms.[20]

Therefore, the proposed project would not result in the risk of release of pollutants due to inundation by a tsunami, seiche, or flooding and the project impact in this regard would be ***less than significant***.

e) Implementation of Plans

As discussed under this Section 10(a) above, the project would comply with applicable requirements under the General Construction Activity Storm Water Permit, County of San Mateo's Water Pollution Prevention Program, National Pollution Discharge Elimination System (NPDES), which are intended to implement relevant laws and plans related to water quality.

As discussed under this section 10(b) above, the local groundwater basin is not required to comply with the Sustainable Groundwater Management Act, but in any case, the project would not extract or recharge a substantial amount of groundwater from the basin, would not introduce more intensive or water-demanding uses than planned for the site, and would not otherwise conflict with Cal Water's Urban Water Management Plan or groundwater management. Impacts would be ***less than significant***.

[19] California Geological Survey, 2021, Tsunami Hazard Area Map, San Mateo County, available at: https://www.conservation.ca.gov/cgs/tsunami/maps.

[20] Federal Emergency Management Agency (FEMA), effective 4/5/2019, Flood Insurance Rate Map (FIRM), Map Number 06081C0042F, available at https://www.fema.gov/flood-maps.

11. LAND USE AND PLANNING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Physically divide an established community?				☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			☒	

a) Physical Division of a Community

The project site is in an urbanized area with currently developed parcels and roadways and while currently undeveloped, the site does not act as a connection point for other parcels other than through the access easement, which would be preserved. The project would not involve any physical changes that would have the potential to divide an established community and there is therefore **no impact** in this regard.

b) Conflict with Land Use Plan

An environmental impact could occur when a project conflicts with a policy or regulation intended to avoid or reduce an environmental impact. The following discussion does not replace or preclude a consistency assessment for project approval considerations, which take into account more than potential impacts to the environment.

The site is currently zoned for Business and Technology Park (BTP) use, under which R&D and office uses are expressly permitted. While the proposed project would require a Conditional Use Permit for Parking/Loading Reduction, Incentive-Based FAR Bonus, and Parking Garage Rooftop Planting, these are allowable development standard approvals under the City's planning process and would therefore not be considered conflicts.

Therefore, the project would have a ***less than significant*** impact with regard to land use plan conflicts.

12. MINERAL RESOURCES Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				☒
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				☒

a, b) Mineral Resources

The site contains no known mineral resources and has not been delineated as a locally important mineral recovery site on any land use plan.[21] The project would have ***no impact*** related to mineral resources.

[21] U.S. Geological Survey, Mineral Resources Data System: U.S. Geological Survey, Reston, Virginia. Accessed Septmeber 2021, at: http://tin.er.usgs.gov/mrds/

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

a-b) Excessive Noise or Vibration

Noise and vibrations from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise sensitive receptors. Construction noise impacts primarily occur when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise sensitive land uses, or when construction involves particularly noisy techniques, such as driven piles.

The South San Francisco Noise Ordinance (Chapter 8.32 of the Municipal Code, Section 8.32.050) restricts construction activities to the hours of 8:00 AM to 8:00 PM on weekdays, 9:00 AM to 8:00 PM on Saturdays, and 10:00 AM to 6:00 PM on Sundays and holidays. This ordinance also limits noise generation of any individual piece of equipment to 90 dBA at 25 feet or at the property line. The project does not propose pile driving (piles would be drilled) and the project's construction activities would comply with the Noise Ordinance.

With respect to noise, examples of sensitive receptors in the East of 101 area of South San Francisco include scattered day care facilities and some live-aboard house boats in the marina in the Oyster Point area. All these sensitive receptors are over 1,000 feet from the proposed project, which is beyond the distance potentially affected by normal on-site noise for this type of construction and use.

Operation of an office/R&D use would not be considered a noise-sensitive receptor and does not produce substantial levels of off-site vibration or noise. Traffic-related noise impacts generally have the potential to occur with at least a doubling of traffic volumes on roadways adjacent to areas with noise sensitive uses that are already at or above acceptable noise conditions. In this case, as will be detailed further in the EIR, trip generation estimates for the project given proposed Transportation Demand Management Plan reductions are preliminarily estimated to total 933 daily trips. The average daily traffic (ADT) on nearby roadway segments (and anticipated contribution of project traffic as a percentage of existing traffic) include 7,800 ADT (3%) on Gull Drive, 2,200 ADT (14%) on

Eccles Avenue, 16,300 ADT (3%) on Oyster Point Boulevard, and 7,700 ADT (1%) on Forbes Boulevard. With additional cumulative growth in the area, total ADT would be increased, making the project increment even smaller than under existing conditions. All of these increases are well below a doubling of traffic that could result in a noticeable increase in traffic noise. Because net new traffic volumes would generally be below a doubling of traffic volumes in noise-impacted areas, the project would therefore not result in traffic-related noise impacts.

Therefore, because the project is consistent with construction practices and regulations and operations would be consistent with area uses and not noticeably increase traffic noise on sensitive uses, impacts from noise and vibration generated by construction and operation of the project would be ***less than significant***.

c) Airport Noise

The closest airport to the project site is the San Francisco International Airport, approximately 2.25 miles to the south. The project site is within the boundary of the Airport Land Use Compatibility Plan (ALUCP), but is not within the area substantially impacted by airplane flyover noise (i.e., the Community Noise Equivalent Level 70 Noise Contours).[22] Impacts related to excessive aircraft noise exposure would be ***less than significant***.

[22] City/County Association of Governments of San Mateo County, November 2012. Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport. Available at: http://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf

14. POPULATION AND HOUSING Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			☒	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				☒

a) Substantial Population Growth

While neither housing nor population are directly created as a result of this project, employment opportunities can indirectly increase population and the demand for housing.

Based on an average office/R&D project employment density of 300 gross square footage per employee, the project is estimated to introduce 555 new jobs to the City of South San Francisco. The current South San Francisco General Plan was released in 1999 and does not have relevant employee estimates and the updated General Plan, while being prepared during the preparation of this document, is not yet available. That being said, the project would be consistent with the land use and zoning designations for the site, and therefore should be within current and updated General Plan projections of future employees.

Plan Bay Area 2040 is the current regional long-range plan charting the course for the future of the nine-county San Francisco Bay Area. Plan Bay Area 2050 focuses on four key issues — the economy, the environment, housing and transportation. Plan Bay Area 2040 estimates a total addition of 4,698,375 total jobs to the Bay Area by 2040. The project's addition of 555 employees would increase jobs in the City and region incrementally. Compared to the total jobs projection for the entire Bay Area, the addition of 555 jobs would not be substantial. Based on consistency with land use and zoning designations of the site, project implementation would be within the expected growth of City employment and projected employment growth of the Bay Area and the impact with respect to indirect population growth would be ***less than significant***.

b) Displacement of Housing or People

There is currently no housing or people at the site that would be displaced by the project. The project would have ***no impact*** related to displacement of housing or people.

15. PUBLIC SERVICES Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services?	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Fire protection			☒	
b) Police protection			☒	
c) Schools			☒	
d) Parks			☒	
e) Other public facilities			☒	

a-e) Public Services

The proposed project is located on a developed site within the City of South San Francisco that is within the public services area, which includes South San Francisco Fire Department Station 62 located 1.5 miles southwest of the project site. The project would not directly add population, and an office/R&D use would not be anticipated to substantially increase utilization of public services, such that new or physically altered facilities would be required. The minimal increases in demand for services expected with the worker population and potential indirect population growth (see section 14: Population and Housing), would be offset through payment of development fees and annual taxes, a portion of which go toward ongoing provision of and improvements to public services. Therefore, the impact to public services would be ***less than significant***.

16. RECREATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.			☒	
b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.			☒	

a-b) Recreation

The project proposes onsite open space in the form of landscaped areas, outdoor seating areas and outlook areas, and a hillside walking trail. The construction of onsite amenities has been included in the analysis in this document and would not result in significant impacts to the environment. The project would not otherwise construct or cause to be constructed parks or recreational facilities.

Some employees at the site could use area facilities, including the nearby Oyster Point Park (approximately 0.5 miles to the northeast) and the Bay Trail, all development that does not include qualifying publically-accessible parks and recreation amenities is required to pay in-lieu fees to the City, which helps fund City facilities and programs. The use of public recreational facilities would not be anticipated to increase substantially due to by project employees such that physical deterioration would occur or construction or expansion would be necessary. Therefore, the impact related to recreation would be ***less than significant***.

17. TRANSPORTATION Would the project:	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All topics	☒			

Transportation topics were being analyzed during preparation of this Initial Study. While significance conclusions have not yet been determined, these are considered potentially significant until additional information is compiled to reach detailed conclusions. All topics under the Transportation section will be addressed in the EIR.

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

a) Tribal Cultural Resources

The project area is previously disturbed, and a search of the Sacred Lands File (included in Attachment C) did not identify any Sacred Lands that could be impacted by the project.

As discussed in more detail under section 5: Cultural Resources, a records search performed by the Northwest Information Center (included as Attachment C) confirmed there are no known Native American resources on the site and the potential for unrecorded Native American resources is considered moderate to high based on the location of the site and history of the region. Construction of the project involves ground disturbance that would mostly occur in fill over top of any native soils at the site. However, there would be some disturbance of native soils, including for drilling of foundation piles and there is some potential for unknown tribal cultural resources or human remains to be encountered.

Mitigation Measures Cul-1, Cul-2, and Cul-3 would require proper handling of any discoveries and also reduce the potential impact related to unknown tribal cultural resources.

While no tribes have requested consultation for project in this area, notice was sent to the Native American Heritage Commission listed local tribes in September 2021. No responses were received prior to publication of this Initial Study. If responses are subsequently received that require additional discussion in the CEQA context, such discussion will be included in the EIR.

Compliance with the protection procedures specified in Mitigation Measures Cul-1, Cul-2, and Cul-3 would require that if any previously-unknown tribal cultural resources and/or human remains are discovered, these would be handled appropriately and the impact of the project would be ***less than significant with mitigation***.

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

a,b, c) Water, Stormwater, Wastewater, and Other Utilities

Water

As discussed in section 10: Hydrology and Water Quality, the City of South San Francisco's East of 101 Area is served by Cal Water through a combination of local groundwater and water purchased from SFPUC's Hetch Hetchy System. Cal Water's Urban Water Management Plan (UWMP), which plans for provision of water, anticipates future growth in the region that includes the project, as allowed under existing land use and zoning designation.

Statewide regulations and other factors can impact the water system reliability. Of note, the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary (Bay-Delta Plan Amendment, adopted December 2018, Resolution No. 2018-0059) requires the release of 30-50 percent of the "unimpaired flow" on the three San Joaquin River tributaries from February through June in every year type to maintain the health of the Bay-Delta ecosystem. If implemented with no additional measures / supply in place to address the shortfall, this could impact the ability to meet the projected water demand in the UWMP during multiple dry years. However, implementation of the Bay-Delta Plan Amendment is uncertain at this time for multiple reasons, including numerous legal challenges in both state and federal courts, lack of implementation responsibility, current lack of the identified agreement between stakeholder agencies. In the meantime, the SFPUC and the Bay Area Water Supply and Conservation Agency (BAWSCA) - of which the SFPUC is a member agency - are pursuing numerous options to improve water supply reliability. The UWMP will continue to be updated regularly to reflect changes in regulations, projected demands, and water conservation and supply reliability measures.

The project is not required to prepare a separate Water Supply Assessment under Senate Bill 610 because the project has less than 1,000 employees and is less than 250,000 square feet (the threshold for a commercial office building) and can instead rely upon the planning within the current UWMP, which indicates available supply for the proposed project, which is within development assumptions for the site. Impacts with respect to water would be ***less than significant***. [23, 24, 25]

Wastewater

The wastewater collection system that serves the project site is owned and operated by the City of South San Francisco. According to the 101 Gull Drive Sanitary Sewer Analysis[26] (available as part of the project materials), the project's estimated Dry Weather Flow (PDWF), and the Peak Wet Weather Flow (PWWF) would be 83.3 gallons per minute and 138.8 gallons per minute, respectively, and these can be accommodated in the existing sewer system with the following exception:

The Oyster Point Specific Plan to the east identified required upsizing of the 8-inch gravity main in Oyster Point Blvd between approximately Gull Drive and Eccles Avenue to a 12-inch main. The Oyster Point Specific Plan project requires this mitigation with reimbursement from other area projects as appropriate. While this improvement has been fully analyzed as a part of the Oyster Point Specific Plan, that project is not fully built-out and this improvement has not yet been made. The following mitigation measure is consistent with the wording of the measure in the Oyster Point Specific Plan EIR and would be required of this project as well because this improvement is not included within the Sewer Master Plan.[27]

Mitigation Measure

Util-1: **Oyster Point Subtrunk Replacement.** An approximately 700-foot segment of 8-inch diameter sewer trunk from Eccles Avenue to Gull Road needs to be upsized to a 12-inch diameter trunk sewer. This segment of sewer trunk is not included in the Sewer Master Plan. The applicant / owner / sponsor shall either work with the City to include this improvement in an Sewer Master Plan update or directly fund their fair share of the improvement.

With implementation of Mitigation Measure Util-1, the impact related to required sewer system capacity upgrades would be ***less than significant with mitigation***.

Stormwater

As discussed in section 10: Hydrology and Water Quality, the proposed drainage system would maintain the existing flow discharge pattern and connect to the existing storm drain system operated and maintained by the City of South San Francisco. As development on a currently vacant site, the project would result in an increase of approximately 2.4 acres of impervious surface (63% of the site) and would construct a new above and below ground drainage system that includes catch-

[23] California State Water Board, amended plan adopted December 12, 2021, Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, available at: https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf .

[24] BAWSCA, Water Reliability webpage, available at: https://bawsca.org/water/reliability

[25] California Water Service (Cal Water), adopted June 2021, 2020 Urban Water Management Plan: South San Francisco District., available at: https://www.calwater.com/docs/uwmp2020/SSF_2020_UWMP_FINAL.pdf.

[26] BKF Engineers, August 17 2021, 101 Gull Drive Sanitary Sewer Analysis.

[27] Lamphier-Gregory, January 2011, Oyster Point Specific Plan and Phase I Project Draft Environmental Impact Report, Chapter 12.

basins, storm drain pipe, bio-retention areas, and flow-through planters to capture, treat, and discharge runoff from the entire site. According to the 101 Gull Drive Storm Drainage Report[28] (available as part of the project materials), there is adequate capacity in the existing off-site system to accommodate flows from the project site and the project would not require the construction of new stormwater drainage facilities or expansion of existing facilities. Impacts with respect to stormwater would be ***less than significant***.

Electricity, Natural Gas, and Telecommunications

As discussed in section 6: Energy, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy. In addition, the project would not require the construction of new electric power, natural gas, or telecommunications facilities because it is located in an urban area already served by those utilities and would not require additional capacity. Impacts with respect to electricity, natural gas, and telecommunications would be ***less than significant***.

d, e) Solid Waste and Solid Waste Reduction

South San Francisco Scavenger Company, Inc. (SSFSC) manages all trash and recycling services in South San Francisco. SSFSC collects, receives, processes, and recycles (or transfers for landfill disposal) over 250,000 tons of waste a year.[29] Of all solid waste generated, approximately 84 percent is sent to the Corinda Los Trancos Landfill (Ox Mountain) in Half Moon Bay, California. The Corinda Los Trancos Landfill (Ox Mountain) accepts up to 3,598 tons per day and is anticipated to have available capacity until 2034.[30]

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

According to CalEEMod default values (See section 3: Air Quality and Attachment A), the project would generate approximately 12.66 tons of waste per year, or approximately 0.03 tons per day. The estimate is conservative as it does not factor in any recycling or waste-diversion programs. The 0.03 tons of solid waste generated daily by the project would represent less than 0.001 percent of the permitted landfill throughput.

The City of South San Francisco is required to meet the statewide waste diversion goal of 50 percent set by AB 939. The proposed project would comply with federal, state, and local statutes and regulations related to solid waste, such as AB 939, the SSFMC, and the City's recycling program. Impacts related to solid waste and waste facilities would be ***less than significant***.

[28] BKF Engineers, August 17 2021, 101 Gull Drive Storm Drainage Report.

[29] South San Francisco Scavenger Company, Inc. website, "About Us", available at: https://ssfscavenger.com/about-us/, accessed August 2021.

[30] California Department of Resources Recycling and Recovery (CalRecycle), 2019, SWIS Facility Detail: Corinda Los Trancos Landfill (Ox Mtn) (41-AA-002), https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1561?siteID=3223, accessed August 2021.

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

a-d) Wildfire Risk and Emergency Response

The project site is located within an urbanized area of the City of South San Francisco and is surrounded by existing industrial development. Neither the project site nor the City of South San Francisco is identified as being within a state responsibility area or a very high fire hazard severity zone and not located near such an area (the nearest very high fire severity zone is the San Bruno Mountain State and County Park, located approximately 6 miles from the project site). [31] The proposed project would have ***no impact*** related to wildfire.

[31] Department of Forestry and Fire Protection Fire and Resource Assessment Program, *San Mateo County Very High Fire Hazard Severity Zones*, November 24, 2008, available at: https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf.

21. MANDATORY FINDINGS OF SIGNIFICANCE	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
All topics	☒			

As indicated throughout this document, there are various environmental topics that will be addressed in an EIR to be prepared subsequently. Because this section relies on conclusions from all topics, it will also be addressed in the EIR.

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City of South San Francisco
This document was prepared in consultation with City of South San Francisco staff, including Gaspare Annibale, Associate Planner and Stephanie Skangos, Associate Planner.

SOURCES

1. Bay Area Air Quality Management District, May 2017, California Environmental Quality Act Air Quality Guidelines.
2. Bay Area Air Quality Management District, June 2, 2010, News Release http://www.baaqmd.gov/~/media/Files/Communications%20and%20Outreach/Publications/News%20Releases/2010/ceqa_100602.ashx
3. BKF Engineers, August 17 2021, 101 Gull Drive Sanitary Sewer Analysis
4. BKF Engineers, August 17 2021, 101 Gull Drive Storm Drainage Report
5. California Emergency Management Agency, Tsunami Inundation Map for Emergency Planning, San Mateo County.
6. California Regional Water Quality Control Board San Francisco Bay Region, San Francisco Bay Basin Water Quality Control Plan (Basin Plan), November 2019.
7. California Water Service (Cal Water), adopted June 2021, 2020 Urban Water Management Plan: South San Francisco District
8. City/County Association of Governments of San Mateo County, November 2012, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.
9. City of South San Francisco, 1994, East of 101 Area Plan.
10. City of South San Francisco, 1999, General Plan.
11. Department of Forestry and Fire Protection Fire and Resource Assessment Program, San Mateo County Very High Fire Hazard Severity Zones.
12. Federal Emergency Management Agency (FEMA), April 2019, Flood Insurance Rate Map (FIRM), Map Number 06081C0042F.
13. Langan Engineering and Environmental Services, November 12, 2020, Preliminary Geotechnical Site Assessment.
14. Langan Engineering and Environmental Services, August 2, 2021, Preliminary Geotechnical Site Assessment Supplemental Discussion.
15. University of California Museum of Paleontology (UCMP) Online Database. 2019. UCMP specimen search portal, http://ucmpdb.berkeley.edu/ (accessed September 2021).
16. U.S. Fish and Wildlife Service, National Wetlands Inventory, Wetlands Mapper.

EMISSIONS MODELING

ATTACHMENT A

to the
101 Gull Drive Project Initial Study

101 Gull Drive SSF

San Mateo County, Annual

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Research & Development	166.61	1000sqft	2.00	166,608.00	0
Enclosed Parking with Elevator	419.00	Space	1.80	167,600.00	0

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	63
Climate Zone	5			**Operational Year**	2024
Utility Company	Pacific Gas & Electric Company				
CO2 Intensity (lb/MWhr)	129.77	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics - Penninsula Clean Energy 2018 CO2 intensity factor used.

Land Use - Project total lot acreage is 166,613 square feet per plans, which was split betweent he parking and building uses for the analysis.

Demolition -

Vehicle Trips - Weekday trip rate of 5.6 per transportation study for the project, which takes into account normal employment densities and trip rates for similar project in the immediate vicinity, which already includes TDM Plan reductions.

Construction Phase - Per preliminary construciton schedule.

Grading - Estimated area to be disturbed based on a 3.8 acre site with undisturbed slopes along the boundary.

Energy Use -

Stationary Sources - Emergency Generators and Fire Pumps -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	230.00	440.00
tblConstructionPhase	NumDays	8.00	25.00
tblConstructionPhase	NumDays	18.00	40.00
tblConstructionPhase	NumDays	5.00	10.00
tblConstructionPhase	PhaseEndDate	10/5/2023	2/28/2024
tblConstructionPhase	PhaseEndDate	8/16/2023	6/7/2024
tblConstructionPhase	PhaseEndDate	9/28/2022	9/30/2022
tblConstructionPhase	PhaseEndDate	9/11/2023	6/7/2024
tblConstructionPhase	PhaseEndDate	9/16/2022	8/26/2022
tblConstructionPhase	PhaseStartDate	9/12/2023	2/5/2024
tblConstructionPhase	PhaseStartDate	9/29/2022	10/3/2022
tblConstructionPhase	PhaseStartDate	9/17/2022	8/29/2022
tblConstructionPhase	PhaseStartDate	8/17/2023	4/15/2024
tblConstructionPhase	PhaseStartDate	9/10/2022	8/15/2022
tblGrading	AcresOfGrading	12.50	3.00
tblGrading	MaterialExported	0.00	16,460.00
tblGrading	MaterialImported	0.00	1,730.00
tblLandUse	LotAcreage	3.82	2.00
tblLandUse	LotAcreage	3.77	1.80
tblProjectCharacteristics	CO2IntensityFactor	641.35	129.77
tblVehicleTrips	WD_TR	8.11	5.60

2.0 Emissions Summary

2.1 Overall Construction

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.1222	1.4064	1.0086	3.1100e-003	0.2333	0.0475	0.2808	0.1091	0.0443	0.1534	0.0000	283.9556	283.9556	0.0412	0.0000	284.9857
2023	0.2641	2.4618	2.5664	6.5000e-003	0.1744	0.0924	0.2668	0.0475	0.0869	0.1344	0.0000	582.9004	582.9004	0.0816	0.0000	584.9411
2024	1.0341	1.2091	1.3895	3.3000e-003	0.0821	0.0444	0.1265	0.0223	0.0417	0.0640	0.0000	294.3504	294.3504	0.0463	0.0000	295.5075
Maximum	**1.0341**	**2.4618**	**2.5664**	**6.5000e-003**	**0.2333**	**0.0924**	**0.2808**	**0.1091**	**0.0869**	**0.1534**	**0.0000**	**582.9004**	**582.9004**	**0.0816**	**0.0000**	**584.9411**

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2022	0.1222	1.4064	1.0086	3.1100e-003	0.2333	0.0475	0.2808	0.1091	0.0443	0.1534	0.0000	283.9555	283.9555	0.0412	0.0000	284.9855
2023	0.2641	2.4618	2.5664	6.5000e-003	0.1744	0.0924	0.2668	0.0475	0.0869	0.1344	0.0000	582.9000	582.9000	0.0816	0.0000	584.9407
2024	1.0341	1.2091	1.3895	3.3000e-003	0.0821	0.0444	0.1265	0.0223	0.0417	0.0640	0.0000	294.3502	294.3502	0.0463	0.0000	295.5073
Maximum	**1.0341**	**2.4618**	**2.5664**	**6.5000e-003**	**0.2333**	**0.0924**	**0.2808**	**0.1091**	**0.0869**	**0.1534**	**0.0000**	**582.9000**	**582.9000**	**0.0816**	**0.0000**	**584.9407**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	8-15-2022	11-14-2022	1.0594	1.0594
2	11-15-2022	2-14-2023	0.7363	0.7363
3	2-15-2023	5-14-2023	0.6667	0.6667
4	5-15-2023	8-14-2023	0.6876	0.6876
5	8-15-2023	11-14-2023	0.6891	0.6891
6	11-15-2023	2-14-2024	1.0365	1.0365
7	2-15-2024	5-14-2024	1.2467	1.2467
8	5-15-2024	8-14-2024	0.2490	0.2490
		Highest	1.2467	1.2467

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7524	5.0000e-005	5.3700e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0105	0.0105	3.0000e-005	0.0000	0.0112
Energy	0.0222	0.2021	0.1698	1.2100e-003		0.0154	0.0154		0.0154	0.0154	0.0000	352.0003	352.0003	0.0337	0.0101	355.8632
Mobile	0.1736	1.1073	1.9674	8.3800e-003	0.6918	6.7500e-003	0.6985	0.1859	6.3200e-003	0.1922	0.0000	773.8962	773.8962	0.0289	0.0000	774.6189
Waste						0.0000	0.0000		0.0000	0.0000	2.5699	0.0000	2.5699	0.1519	0.0000	6.3667
Water						0.0000	0.0000		0.0000	0.0000	25.9898	26.0924	52.0822	2.6752	0.0642	138.1055
Total	**0.9482**	**1.3094**	**2.1426**	**9.5900e-003**	**0.6918**	**0.0221**	**0.7139**	**0.1859**	**0.0217**	**0.2076**	**28.5597**	**1,151.9993**	**1,180.5589**	**2.8898**	**0.0744**	**1,274.9654**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	0.7524	5.0000e-005	5.3700e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0105	0.0105	3.0000e-005	0.0000	0.0112
Energy	0.0222	0.2021	0.1698	1.2100e-003		0.0154	0.0154		0.0154	0.0154	0.0000	352.0003	352.0003	0.0337	0.0101	355.8632
Mobile	0.1736	1.1073	1.9674	8.3800e-003	0.6918	6.7500e-003	0.6985	0.1859	6.3200e-003	0.1922	0.0000	773.8962	773.8962	0.0289	0.0000	774.6189
Waste						0.0000	0.0000		0.0000	0.0000	2.5699	0.0000	2.5699	0.1519	0.0000	6.3667
Water						0.0000	0.0000		0.0000	0.0000	25.9898	26.0924	52.0822	2.6752	0.0642	138.1055
Total	**0.9482**	**1.3094**	**2.1426**	**9.5900e-003**	**0.6918**	**0.0221**	**0.7139**	**0.1859**	**0.0217**	**0.2076**	**28.5597**	**1,151.9993**	**1,180.5589**	**2.8898**	**0.0744**	**1,274.9654**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Mobilization and Site Preparation	Site Preparation	8/15/2022	8/26/2022	5	10	
2	Grading	Grading	8/29/2022	9/30/2022	5	25	
3	Building Construction	Building Construction	10/3/2022	6/7/2024	5	440	
4	Paving	Paving	4/15/2024	6/7/2024	5	40	
5	Architectural Coating	Architectural Coating	2/5/2024	2/28/2024	5	18	

Acres of Grading (Site Preparation Phase): 0

Acres of Grading (Grading Phase): 3

Acres of Paving: 1.8

Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 249,912; Non-Residential Outdoor: 83,304; Striped Parking Area:

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Mobilization and Site Preparation	Rubber Tired Dozers	3	8.00	247	0.40
Mobilization and Site Preparation	Tractors/Loaders/Backhoes	4	8.00	97	0.37
Grading	Excavators	1	8.00	158	0.38
Grading	Graders	1	8.00	187	0.41
Grading	Rubber Tired Dozers	1	8.00	247	0.40
Paving	Cement and Mortar Mixers	2	6.00	9	0.56
Grading	Tractors/Loaders/Backhoes	3	8.00	97	0.37
Building Construction	Cranes	1	7.00	231	0.29
Building Construction	Forklifts	3	8.00	89	0.20
Building Construction	Generator Sets	1	8.00	84	0.74
Building Construction	Tractors/Loaders/Backhoes	3	7.00	97	0.37
Building Construction	Welders	1	8.00	46	0.45
Paving	Pavers	1	8.00	130	0.42
Paving	Paving Equipment	2	6.00	132	0.36
Paving	Rollers	2	6.00	80	0.38
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Mobilization and Site Preparation	7	18.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

Grading	6	15.00	0.00	2,274.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	9	124.00	55.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Paving	8	20.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	25.00	0.00	0.00	10.80	7.30	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

3.2 Mobilization and Site Preparation - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0903	0.0000	0.0903	0.0497	0.0000	0.0497	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0159	0.1654	0.0985	1.9000e-004		8.0600e-003	8.0600e-003		7.4200e-003	7.4200e-003	0.0000	16.7197	16.7197	5.4100e-003	0.0000	16.8549
Total	**0.0159**	**0.1654**	**0.0985**	**1.9000e-004**	**0.0903**	**8.0600e-003**	**0.0984**	**0.0497**	**7.4200e-003**	**0.0571**	**0.0000**	**16.7197**	**16.7197**	**5.4100e-003**	**0.0000**	**16.8549**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Worker	2.7000e-004	1.8000e-004	1.9600e-003	1.0000e-005	7.1000e-004	0.0000	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.5884	0.5884	1.0000e-005	0.0000	0.5887
Total	**2.7000e-004**	**1.8000e-004**	**1.9600e-003**	**1.0000e-005**	**7.1000e-004**	**0.0000**	**7.2000e-004**	**1.9000e-004**	**0.0000**	**1.9000e-004**	**0.0000**	**0.5884**	**0.5884**	**1.0000e-005**	**0.0000**	**0.5887**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0903	0.0000	0.0903	0.0497	0.0000	0.0497	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0159	0.1654	0.0985	1.9000e-004		8.0600e-003	8.0600e-003		7.4200e-003	7.4200e-003	0.0000	16.7197	16.7197	5.4100e-003	0.0000	16.8549
Total	**0.0159**	**0.1654**	**0.0985**	**1.9000e-004**	**0.0903**	**8.0600e-003**	**0.0984**	**0.0497**	**7.4200e-003**	**0.0571**	**0.0000**	**16.7197**	**16.7197**	**5.4100e-003**	**0.0000**	**16.8549**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	2.7000e-004	1.8000e-004	1.9600e-003	1.0000e-005	7.1000e-004	0.0000	7.2000e-004	1.9000e-004	0.0000	1.9000e-004	0.0000	0.5884	0.5884	1.0000e-005	0.0000	0.5887
Total	**2.7000e-004**	**1.8000e-004**	**1.9600e-003**	**1.0000e-005**	**7.1000e-004**	**0.0000**	**7.2000e-004**	**1.9000e-004**	**0.0000**	**1.9000e-004**	**0.0000**	**0.5884**	**0.5884**	**1.0000e-005**	**0.0000**	**0.5887**

3.3 Grading - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0779	0.0000	0.0779	0.0417	0.0000	0.0417	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0244	0.2607	0.1909	3.7000e-004		0.0118	0.0118		0.0108	0.0108	0.0000	32.5685	32.5685	0.0105	0.0000	32.8318
Total	**0.0244**	**0.2607**	**0.1909**	**3.7000e-004**	**0.0779**	**0.0118**	**0.0897**	**0.0417**	**0.0108**	**0.0525**	**0.0000**	**32.5685**	**32.5685**	**0.0105**	**0.0000**	**32.8318**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.5900e-003	0.2824	0.0555	8.8000e-004	0.0193	8.0000e-004	0.0201	5.3000e-003	7.7000e-004	6.0700e-003	0.0000	84.8273	84.8273	4.1300e-003	0.0000	84.9306
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6000e-004	3.8000e-004	4.0900e-003	1.0000e-005	1.4800e-003	1.0000e-005	1.4900e-003	3.9000e-004	1.0000e-005	4.0000e-004	0.0000	1.2258	1.2258	3.0000e-005	0.0000	1.2265
Total	**9.1500e-003**	**0.2828**	**0.0596**	**8.9000e-004**	**0.0207**	**8.1000e-004**	**0.0216**	**5.6900e-003**	**7.8000e-004**	**6.4700e-003**	**0.0000**	**86.0530**	**86.0530**	**4.1600e-003**	**0.0000**	**86.1571**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0779	0.0000	0.0779	0.0417	0.0000	0.0417	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	0.0244	0.2607	0.1909	3.7000e-004		0.0118	0.0118		0.0108	0.0108	0.0000	32.5684	32.5684	0.0105	0.0000	32.8318
Total	**0.0244**	**0.2607**	**0.1909**	**3.7000e-004**	**0.0779**	**0.0118**	**0.0897**	**0.0417**	**0.0108**	**0.0525**	**0.0000**	**32.5684**	**32.5684**	**0.0105**	**0.0000**	**32.8318**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	8.5900e-003	0.2824	0.0555	8.8000e-004	0.0193	8.0000e-004	0.0201	5.3000e-003	7.7000e-004	6.0700e-003	0.0000	84.8273	84.8273	4.1300e-003	0.0000	84.9306
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.6000e-004	3.8000e-004	4.0900e-003	1.0000e-005	1.4800e-003	1.0000e-005	1.4900e-003	3.9000e-004	1.0000e-005	4.0000e-004	0.0000	1.2258	1.2258	3.0000e-005	0.0000	1.2265
Total	**9.1500e-003**	**0.2828**	**0.0596**	**8.9000e-004**	**0.0207**	**8.1000e-004**	**0.0216**	**5.6900e-003**	**7.8000e-004**	**6.4700e-003**	**0.0000**	**86.0530**	**86.0530**	**4.1600e-003**	**0.0000**	**86.1571**

3.4 Building Construction - 2022

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Off-Road	0.0555	0.5075	0.5318	8.8000e-004		0.0263	0.0263		0.0247	0.0247	0.0000	75.3107	75.3107	0.0180	0.0000	75.7618
Total	**0.0555**	**0.5075**	**0.5318**	**8.8000e-004**		**0.0263**	**0.0263**		**0.0247**	**0.0247**	**0.0000**	**75.3107**	**75.3107**	**0.0180**	**0.0000**	**75.7618**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.1700e-003	0.1816	0.0379	4.8000e-004	0.0117	3.4000e-004	0.0121	3.4000e-003	3.3000e-004	3.7300e-003	0.0000	46.3694	46.3694	2.4600e-003	0.0000	46.4308
Worker	0.0120	8.2100e-003	0.0879	2.9000e-004	0.0319	2.1000e-004	0.0321	8.4800e-003	1.9000e-004	8.6700e-003	0.0000	26.3460	26.3460	5.8000e-004	0.0000	26.3606
Total	**0.0171**	**0.1898**	**0.1259**	**7.7000e-004**	**0.0436**	**5.5000e-004**	**0.0442**	**0.0119**	**5.2000e-004**	**0.0124**	**0.0000**	**72.7154**	**72.7154**	**3.0400e-003**	**0.0000**	**72.7914**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0555	0.5075	0.5318	8.8000e-004		0.0263	0.0263		0.0247	0.0247	0.0000	75.3106	75.3106	0.0180	0.0000	75.7617

Total	**0.0555**	**0.5075**	**0.5318**	**8.8000e-004**		**0.0263**	**0.0263**		**0.0247**	**0.0247**	**0.0000**	**75.3106**	**75.3106**	**0.0180**	**0.0000**	**75.7617**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	5.1700e-003	0.1816	0.0379	4.8000e-004	0.0117	3.4000e-004	0.0121	3.4000e-003	3.3000e-004	3.7300e-003	0.0000	46.3694	46.3694	2.4600e-003	0.0000	46.4308
Worker	0.0120	8.2100e-003	0.0879	2.9000e-004	0.0319	2.1000e-004	0.0321	8.4800e-003	1.9000e-004	8.6700e-003	0.0000	26.3460	26.3460	5.8000e-004	0.0000	26.3606
Total	**0.0171**	**0.1898**	**0.1259**	**7.7000e-004**	**0.0436**	**5.5000e-004**	**0.0442**	**0.0119**	**5.2000e-004**	**0.0124**	**0.0000**	**72.7154**	**72.7154**	**3.0400e-003**	**0.0000**	**72.7914**

3.4 Building Construction - 2023

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2045	1.8700	2.1117	3.5000e-003		0.0910	0.0910		0.0856	0.0856	0.0000	301.3462	301.3462	0.0717	0.0000	303.1383
Total	**0.2045**	**1.8700**	**2.1117**	**3.5000e-003**		**0.0910**	**0.0910**		**0.0856**	**0.0856**	**0.0000**	**301.3462**	**301.3462**	**0.0717**	**0.0000**	**303.1383**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0152	0.5623	0.1326	1.8800e-003	0.0470	6.0000e-004	0.0476	0.0136	5.7000e-004	0.0142	0.0000	180.2007	180.2007	7.8500e-003	0.0000	180.3970
Worker	0.0445	0.0295	0.3221	1.1200e-003	0.1275	8.2000e-004	0.1283	0.0339	7.5000e-004	0.0347	0.0000	101.3535	101.3535	2.0900e-003	0.0000	101.4058
Total	**0.0597**	**0.5918**	**0.4547**	**3.0000e-003**	**0.1744**	**1.4200e-003**	**0.1758**	**0.0475**	**1.3200e-003**	**0.0488**	**0.0000**	**281.5542**	**281.5542**	**9.9400e-003**	**0.0000**	**281.8028**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.2045	1.8700	2.1117	3.5000e-003		0.0910	0.0910		0.0856	0.0856	0.0000	301.3458	301.3458	0.0717	0.0000	303.1380
Total	**0.2045**	**1.8700**	**2.1117**	**3.5000e-003**		**0.0910**	**0.0910**		**0.0856**	**0.0856**	**0.0000**	**301.3458**	**301.3458**	**0.0717**	**0.0000**	**303.1380**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0152	0.5623	0.1326	1.8800e-003	0.0470	6.0000e-004	0.0476	0.0136	5.7000e-004	0.0142	0.0000	180.2007	180.2007	7.8500e-003	0.0000	180.3970
Worker	0.0445	0.0295	0.3221	1.1200e-003	0.1275	8.2000e-004	0.1283	0.0339	7.5000e-004	0.0347	0.0000	101.3535	101.3535	2.0900e-003	0.0000	101.4058
Total	**0.0597**	**0.5918**	**0.4547**	**3.0000e-003**	**0.1744**	**1.4200e-003**	**0.1758**	**0.0475**	**1.3200e-003**	**0.0488**	**0.0000**	**281.5542**	**281.5542**	**9.9400e-003**	**0.0000**	**281.8028**

3.4 Building Construction - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0846	0.7730	0.9296	1.5500e-003		0.0353	0.0353		0.0332	0.0332	0.0000	133.3132	133.3132	0.0315	0.0000	134.1014
Total	**0.0846**	**0.7730**	**0.9296**	**1.5500e-003**		**0.0353**	**0.0353**		**0.0332**	**0.0332**	**0.0000**	**133.3132**	**133.3132**	**0.0315**	**0.0000**	**134.1014**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	6.5100e-003	0.2469	0.0562	8.3000e-004	0.0208	2.6000e-004	0.0210	6.0100e-003	2.5000e-004	6.2600e-003	0.0000	79.1521	79.1521	3.4300e-003	0.0000	79.2379
Worker	0.0184	0.0117	0.1315	4.8000e-004	0.0564	3.5000e-004	0.0567	0.0150	3.3000e-004	0.0153	0.0000	43.0526	43.0526	8.3000e-004	0.0000	43.0734
Total	**0.0249**	**0.2587**	**0.1877**	**1.3100e-003**	**0.0771**	**6.1000e-004**	**0.0778**	**0.0210**	**5.8000e-004**	**0.0216**	**0.0000**	**122.2047**	**122.2047**	**4.2600e-003**	**0.0000**	**122.3113**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0846	0.7730	0.9296	1.5500e-003		0.0353	0.0353		0.0332	0.0332	0.0000	133.3131	133.3131	0.0315	0.0000	134.1012
Total	**0.0846**	**0.7730**	**0.9296**	**1.5500e-003**		**0.0353**	**0.0353**		**0.0332**	**0.0332**	**0.0000**	**133.3131**	**133.3131**	**0.0315**	**0.0000**	**134.1012**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Vendor	6.5100e-003	0.2469	0.0562	8.3000e-004	0.0208	2.6000e-004	0.0210	6.0100e-003	2.5000e-004	6.2600e-003	0.0000	79.1521	79.1521	3.4300e-003	0.0000	79.2379
Worker	0.0184	0.0117	0.1315	4.8000e-004	0.0564	3.5000e-004	0.0567	0.0150	3.3000e-004	0.0153	0.0000	43.0526	43.0526	8.3000e-004	0.0000	43.0734
Total	**0.0249**	**0.2587**	**0.1877**	**1.3100e-003**	**0.0771**	**6.1000e-004**	**0.0778**	**0.0210**	**5.8000e-004**	**0.0216**	**0.0000**	**122.2047**	**122.2047**	**4.2600e-003**	**0.0000**	**122.3113**

3.5 Paving - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0176	0.1655	0.2444	3.8000e-004		7.9700e-003	7.9700e-003		7.3700e-003	7.3700e-003	0.0000	32.7606	32.7606	0.0103	0.0000	33.0180
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0176**	**0.1655**	**0.2444**	**3.8000e-004**		**7.9700e-003**	**7.9700e-003**		**7.3700e-003**	**7.3700e-003**	**0.0000**	**32.7606**	**32.7606**	**0.0103**	**0.0000**	**33.0180**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0300e-003	6.6000e-004	7.3800e-003	3.0000e-005	3.1600e-003	2.0000e-005	3.1800e-003	8.4000e-004	2.0000e-005	8.6000e-004	0.0000	2.4153	2.4153	5.0000e-005	0.0000	2.4165

Total	**1.0300e-003**	**6.6000e-004**	**7.3800e-003**	**3.0000e-005**	**3.1600e-003**	**2.0000e-005**	**3.1800e-003**	**8.4000e-004**	**2.0000e-005**	**8.6000e-004**	**0.0000**	**2.4153**	**2.4153**	**5.0000e-005**	**0.0000**	**2.4165**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Off-Road	0.0176	0.1655	0.2444	3.8000e-004		7.9700e-003	7.9700e-003		7.3700e-003	7.3700e-003	0.0000	32.7606	32.7606	0.0103	0.0000	33.0179
Paving	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	**0.0176**	**0.1655**	**0.2444**	**3.8000e-004**		**7.9700e-003**	**7.9700e-003**		**7.3700e-003**	**7.3700e-003**	**0.0000**	**32.7606**	**32.7606**	**0.0103**	**0.0000**	**33.0179**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	1.0300e-003	6.6000e-004	7.3800e-003	3.0000e-005	3.1600e-003	2.0000e-005	3.1800e-003	8.4000e-004	2.0000e-005	8.6000e-004	0.0000	2.4153	2.4153	5.0000e-005	0.0000	2.4165
Total	**1.0300e-003**	**6.6000e-004**	**7.3800e-003**	**3.0000e-005**	**3.1600e-003**	**2.0000e-005**	**3.1800e-003**	**8.4000e-004**	**2.0000e-005**	**8.6000e-004**	**0.0000**	**2.4153**	**2.4153**	**5.0000e-005**	**0.0000**	**2.4165**

3.6 Architectural Coating - 2024

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.9037					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0110	0.0163	3.0000e-005		5.5000e-004	5.5000e-004		5.5000e-004	5.5000e-004	0.0000	2.2979	2.2979	1.3000e-004	0.0000	2.3012
Total	**0.9053**	**0.0110**	**0.0163**	**3.0000e-005**		**5.5000e-004**	**5.5000e-004**		**5.5000e-004**	**5.5000e-004**	**0.0000**	**2.2979**	**2.2979**	**1.3000e-004**	**0.0000**	**2.3012**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	3.7000e-004	4.1500e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7900e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.3586	1.3586	3.0000e-005	0.0000	1.3593
Total	**5.8000e-004**	**3.7000e-004**	**4.1500e-003**	**2.0000e-005**	**1.7800e-003**	**1.0000e-005**	**1.7900e-003**	**4.7000e-004**	**1.0000e-005**	**4.8000e-004**	**0.0000**	**1.3586**	**1.3586**	**3.0000e-005**	**0.0000**	**1.3593**

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Archit. Coating	0.9037					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	1.6300e-003	0.0110	0.0163	3.0000e-005		5.5000e-004	5.5000e-004		5.5000e-004	5.5000e-004	0.0000	2.2979	2.2979	1.3000e-004	0.0000	2.3012
Total	**0.9053**	**0.0110**	**0.0163**	**3.0000e-005**		**5.5000e-004**	**5.5000e-004**		**5.5000e-004**	**5.5000e-004**	**0.0000**	**2.2979**	**2.2979**	**1.3000e-004**	**0.0000**	**2.3012**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Worker	5.8000e-004	3.7000e-004	4.1500e-003	2.0000e-005	1.7800e-003	1.0000e-005	1.7900e-003	4.7000e-004	1.0000e-005	4.8000e-004	0.0000	1.3586	1.3586	3.0000e-005	0.0000	1.3593
Total	**5.8000e-004**	**3.7000e-004**	**4.1500e-003**	**2.0000e-005**	**1.7800e-003**	**1.0000e-005**	**1.7900e-003**	**4.7000e-004**	**1.0000e-005**	**4.8000e-004**	**0.0000**	**1.3586**	**1.3586**	**3.0000e-005**	**0.0000**	**1.3593**

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.1736	1.1073	1.9674	8.3800e-003	0.6918	6.7500e-003	0.6985	0.1859	6.3200e-003	0.1922	0.0000	773.8962	773.8962	0.0289	0.0000	774.6189
Unmitigated	0.1736	1.1073	1.9674	8.3800e-003	0.6918	6.7500e-003	0.6985	0.1859	6.3200e-003	0.1922	0.0000	773.8962	773.8962	0.0289	0.0000	774.6189

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Enclosed Parking with Elevator	0.00	0.00	0.00		
Research & Development	933.00	316.56	184.93	1,849,795	1,849,795
Total	933.00	316.56	184.93	1,849,795	1,849,795

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Enclosed Parking with Elevator	9.50	7.30	7.30	0.00	0.00	0.00	0	0	0
Research & Development	9.50	7.30	7.30	33.00	48.00	19.00	82	15	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Enclosed Parking with Elevator	0.562515	0.038056	0.190319	0.106285	0.014814	0.005157	0.024895	0.046887	0.002221	0.002358	0.005460	0.000343	0.000690
Research & Development	0.562515	0.038056	0.190319	0.106285	0.014814	0.005157	0.024895	0.046887	0.002221	0.002358	0.005460	0.000343	0.000690

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Electricity Mitigated						0.0000	0.0000		0.0000	0.0000	0.0000	131.9520	131.9520	0.0295	6.1000e-003	134.5073
Electricity Unmitigated						0.0000	0.0000		0.0000	0.0000	0.0000	131.9520	131.9520	0.0295	6.1000e-003	134.5073
NaturalGas Mitigated	0.0222	0.2021	0.1698	1.2100e-003		0.0154	0.0154		0.0154	0.0154	0.0000	220.0482	220.0482	4.2200e-003	4.0300e-003	221.3559
NaturalGas Unmitigated	0.0222	0.2021	0.1698	1.2100e-003		0.0154	0.0154		0.0154	0.0154	0.0000	220.0482	220.0482	4.2200e-003	4.0300e-003	221.3559

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Research & Development	4.12355e+006	0.0222	0.2021	0.1698	1.2100e-003		0.0154	0.0154		0.0154	0.0154	0.0000	220.0482	220.0482	4.2200e-003	4.0300e-003	221.3559
Total		**0.0222**	**0.2021**	**0.1698**	**1.2100e-003**		**0.0154**	**0.0154**		**0.0154**	**0.0154**	**0.0000**	**220.0482**	**220.0482**	**4.2200e-003**	**4.0300e-003**	**221.3559**

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	tons/yr										MT/yr					
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Research & Development	4.12355e+006	0.0222	0.2021	0.1698	1.2100e-003		0.0154	0.0154		0.0154	0.0154	0.0000	220.0482	220.0482	4.2200e-003	4.0300e-003	221.3559
Total		**0.0222**	**0.2021**	**0.1698**	**1.2100e-003**		**0.0154**	**0.0154**		**0.0154**	**0.0154**	**0.0000**	**220.0482**	**220.0482**	**4.2200e-003**	**4.0300e-003**	**221.3559**

5.3 Energy by Land Use - Electricity

Unmitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Enclosed Parking with Elevator	982136	57.8112	0.0129	2.6700e-003	58.9307
Research & Development	1.25956e+006	74.1409	0.0166	3.4300e-003	75.5766
Total		**131.9520**	**0.0295**	**6.1000e-003**	**134.5073**

Mitigated

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
Enclosed Parking with Elevator	982136	57.8112	0.0129	2.6700e-003	58.9307
Research & Development	1.25956e+006	74.1409	0.0166	3.4300e-003	75.5766
Total		**131.9520**	**0.0295**	**6.1000e-003**	**134.5073**

6.0 Area Detail

6.1 Mitigation Measures Area

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.7524	5.0000e-005	5.3700e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0105	0.0105	3.0000e-005	0.0000	0.0112
Unmitigated	0.7524	5.0000e-005	5.3700e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0105	0.0105	3.0000e-005	0.0000	0.0112

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e

SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0904					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.6615					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-004	5.0000e-005	5.3700e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0105	0.0105	3.0000e-005	0.0000	0.0112
Total	**0.7524**	**5.0000e-005**	**5.3700e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0105**	**0.0105**	**3.0000e-005**	**0.0000**	**0.0112**

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0904					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	0.6615					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	5.0000e-004	5.0000e-005	5.3700e-003	0.0000		2.0000e-005	2.0000e-005		2.0000e-005	2.0000e-005	0.0000	0.0105	0.0105	3.0000e-005	0.0000	0.0112
Total	**0.7524**	**5.0000e-005**	**5.3700e-003**	**0.0000**		**2.0000e-005**	**2.0000e-005**		**2.0000e-005**	**2.0000e-005**	**0.0000**	**0.0105**	**0.0105**	**3.0000e-005**	**0.0000**	**0.0112**

7.0 Water Detail

7.1 Mitigation Measures Water

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	52.0822	2.6752	0.0642	138.1055
Unmitigated	52.0822	2.6752	0.0642	138.1055

7.2 Water by Land Use

Unmitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000
Research & Development	81.9211 / 0	52.0822	2.6752	0.0642	138.1055
Total		**52.0822**	**2.6752**	**0.0642**	**138.1055**

Mitigated

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
Enclosed Parking with Elevator	0 / 0	0.0000	0.0000	0.0000	0.0000

Research & Development	81.9211 / 0	52.0822	2.6752	0.0642	138.1055
Total		**52.0822**	**2.6752**	**0.0642**	**138.1055**

8.0 Waste Detail

8.1 Mitigation Measures Waste

Category/Year

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	2.5699	0.1519	0.0000	6.3667
Unmitigated	2.5699	0.1519	0.0000	6.3667

8.2 Waste by Land Use

Unmitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Research & Development	12.66	2.5699	0.1519	0.0000	6.3667

Total		**2.5699**	**0.1519**	**0.0000**	**6.3667**

Mitigated

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
Enclosed Parking with Elevator	0	0.0000	0.0000	0.0000	0.0000
Research & Development	12.66	2.5699	0.1519	0.0000	6.3667
Total		**2.5699**	**0.1519**	**0.0000**	**6.3667**

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

CULTURAL RECORDS SEARCH, NATIVE AMERICAN HERITAGE COMMISSION RESPONSE

ATTACHMENT B

to the
101 Gull Drive Project Initial Study

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM

ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE
HUMBOLDT
LAKE
MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCO
SAN MATEO
SANTA CLATA
SANTA CRUZ
SOLANO
SONOMA
YOLO

Northwest Information Center
Sonoma State University
1400 Valley House Drive, Suite 210
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
http://nwic.sonoma.edu

August 21, 2021 NWIC File No.: 21-0245

Rebecca Auld
Lamphier- Gregory, Inc.
4100 Redwood Road, STE 20A - #601
Oakland, CA 94619

Re: Record search results for the proposed 101 Gull Drive Project in the City of South San Francisco.

Dear Ms. Rebecca Auld:

Per your request received by our office on the 11th of August, 2021, a rapid response records search was conducted for the above referenced project by reviewing pertinent Northwest Information Center (NWIC) base maps that reference cultural resources records and reports, historic-period maps, and literature for San Mateo County. Please note that use of the term cultural resources includes both archaeological resources and historical buildings and/or structures.

As per information received by this office, the 3.8-acre project site is currently vacant. The site includes Assessor's Parcel Number 015-082-250. The project proposes construction and operation of a 166,608 square foot office/research and development (R&D) building with adjoining structured parking and a new driveway on Gull Drive along with mutual access easements with the neighboring properties also connecting to Eccles Avenue and Oyster Point Road. No substantial excavation or subsurface floors / parking is proposed and site grading will be constrained to building pad preparation involving 18,440 cubic yard of cut across the site. Drilled piles are proposed for building support that would be drilled down to bedrock (approximately 15 to 60 feet).

Review of this information indicates that there have been no cultural resource studies that cover the 101 Gull Drive project area. This 101 Gull Drive project area contains no recorded archaeological resources. The State Office of Historic Preservation Built Environment Resources Directory (OHP BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places,

lists no recorded buildings or structures within or adjacent to the proposed 101 Gull Drive project area. In addition to these inventories, the NWIC base maps show no recorded buildings or structures within the proposed 101 Gull Drive project area.

At the time of Euroamerican contact the Native Americans that lived in the area were speakers of the Ramaytush language, part of the Costanoan/Ohlone language family (Levy 1978: 485). There are Native American resources in or adjacent to the proposed 101 Gull Drive project area referenced in the ethnographic literature (Levy 1976, Nelson 1909). Using Milliken's study of various mission records, the proposed project area is located within the lands of the Urebure tribe, whose territory was located "in the San Bruno Creek area just south of San Bruno Mountain on the San Francisco Peninsula. (Milliken 1995: 258-9).

Based on an evaluation of the environmental setting and features associated with known sites, Native American resources in this part of San Mateo County have been found in areas marginal to the San Francisco Bay shore and inland in valleys, near intermittent and perennial watercourses and near areas populated by oak, buckeye, manzanita, and pine, as well as near a variety of plant and animal resources. The 101 Gull Drive project area is located on the lower terraces of an eastern facing hillside approximate 0.25 miles from the current San Francisco Bayshore between Oyster Point Park and San Bruno Point Park, formerly within and adjacent to the historic bayshore margin. Aerial maps indicate an empty dirt parcel. Given the similarity of these environmental factors and the ethnographic sensitivity of the area, there is a moderate to high potential for unrecorded Native American resources to be within the proposed 101 Gull Drive project area.

Review of historical literature and maps indicated the possibility of historic-period activity within the 101 Gull Drive project area. Early San Mateo County maps indicated the project area was located within the South San Francisco Land and Improvements Co., Abattoire (Bromfield 1894). In addition, the 1915 San Mateo USGS 15-minute topographic quadrangle indicated a portion of railroad within and adjacent to the project area. With this in mind, there is a moderate to high potential for unrecorded historic-period archaeological resources to be within the proposed 101 Gull Drive project area.

The 1956 photo revised 1980 San Francisco South USGS 7.5-minute topographic quadrangle fails to depict any buildings or structures within the 101 Gull Drive project area; therefore, there is a low possibility for any buildings or structures 45 years or older to be within the 101 Gull Drive project area.

RECOMMENDATIONS:

1) There is a moderate to high potential of identifying Native American archaeological resources and a moderate to high potential of identifying historic-period archaeological resources in the project area. As the 101 Gull Drive project indicated that drilled piles are proposed for building support that would be drilled down to bedrock (approximately 15 to 60 feet), we recommend a qualified archaeologist conduct further archival and field study to identify cultural resources. Field study may include, but is not limited to, pedestrian survey, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of archaeological resources. Please refer to the list of consultants who meet the Secretary of Interior's Standards at http://www.chrisinfo.org.

2) We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at 916/373-3710.

3) If the proposed project area contains buildings or structures that meet the minimum age requirement, prior to commencement of project activities, it is recommended that this resource be assessed by a professional familiar with the architecture and history of San Mateo County. Please refer to the list of consultants who meet the Secretary of Interior's Standards at http://www.chrisinfo.org.

4) Review for possible historic-period buildings or structures has included only those sources listed in the attached bibliography and should not be considered comprehensive.

5) If archaeological resources are encountered **during construction,** work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. Project personnel should not collect cultural resources. Native American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing

shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

6) It is recommended that any identified cultural resources be recorded on DPR 523 historic resource recordation forms, available online from the Office of Historic Preservation's website: https://ohp.parks.ca.gov/?page_id=28351

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Thank you for using our services. Please contact this office if you have any questions, (707) 588-8455.

Sincerely,

Jillian Guldenbrein
Researcher

LITERATURE REVIEWED

In addition to archaeological maps and site records on file at the Northwest Information Center of the Historical Resources Information System, the following literature was reviewed:

Brabb, Earl E., Fred A. Taylor, and George P. Miller
1982 *Geologic, Scenic, and Historic Points of Interest in San Mateo County, California*. Miscellaneous Investigations Series, Map I-1257-B, 1:62,500. Department of the Interior, United States Geological Survey, Washington, D.C.

Bromfield, Davenport
1894 Official Map of San Mateo County, California

General Land Office
1858, 1864 Survey Plat for Rancho Buri Buri, Township 3 South/Range 5 West.

Heizer, Robert F., editor
1974 *Local History Studies*, Vol. 18., "The Costanoan Indians." California History Center, DeAnza College, Cupertino, CA.

Helley, E.J., K.R. Lajoie, W.E. Spangle, and M.L. Blair
1979 *Flatland Deposits of the San Francisco Bay Region - Their Geology and Engineering Properties, and Their Importance to Comprehensive Planning*. Geological Survey Professional Paper 943. United States Geological Survey and Department of Housing and Urban Development.

Kroeber, A.L.
1925 *Handbook of the Indians of California*. Bureau of American Ethnology, Bulletin 78, Smithsonian Institution, Washington, D.C. (Reprint by Dover Publications, Inc., New York, 1976)

Levy, Richard
1978 Costanoan. In *California*, edited by Robert F. Heizer, pp. 485-495. Handbook of North American Indians, vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Milliken, Randall
1995 *A Time of Little Choice: The Disintegration of Tribal Culture in the San Francisco Bay Area 1769-1810*. Ballena Press Anthropological Papers No. 43, Menlo Park, CA.

Nelson, N.C.
1909 *Shellmounds of the San Francisco Bay Region*. University of California Publications in American Archaeology and Ethnology 7(4):309-356. Berkeley. (Reprint by Kraus Reprint Corporation, New York, 1964)

Nichols, Donald R., and Nancy A. Wright
1971 Preliminary Map of Historic Margins of Marshland, San Francisco Bay, California. U.S. Geological Survey Open File Map. U.S. Department of the Interior, Geological Survey in cooperation with the U.S. Department of Housing and Urban Development, Washington, D.C.

San Mateo County Historic Resources Advisory Board
1984 San Mateo County: Its History and Heritage. Second Edition. Division of Planning and Development Department of Environmental Management.

State of California Department of Parks and Recreation
1976 *California Inventory of Historic Resources*. State of California Department of Parks and Recreation, Sacramento.

State of California Office of Historic Preservation **
2020 *Built Environment Resources Directory*. Listing by City (through March 3, 2020). State of California Office of Historic Preservation, Sacramento.

**Note that the Office of Historic Preservation's *Historic Properties Directory* includes National Register, State Registered Landmarks, California Points of Historical Interest, and the California Register of Historical Resources as well as Certified Local Government surveys that have undergone Section 106 review.

NATIVE AMERICAN HERITAGE COMMISSION

NAHC HEADQUARTERS
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

September 8, 2021

Rebecca Auld
Lamphier-Gregory

Via Email to: Rauld@lamphier-gregory.com

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, 101 Gull Drive Project, Alameda County.

Dear Ms. Auld:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

   - Any report that may contain site forms, site significance, and suggested mitigation measures.

     All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Katy.Sanchez@nahc.ca.gov.

Sincerely,

Katy Sanchez

Katy Sanchez
Associate Environmental Planner

Attachment

On Tue, Sep 14, 2021 at 12:21 PM Sanchez, Katy@NAHC <Katy.Sanchez@nahc.ca.gov> wrote:

Hi Rebecca,

The AB 52 No letter is still in effect. The attached list is for the correct county in which the project is located. Thank you for your patience.

Katy Sanchez
Associate Environmental Planner
Native American Heritage Commission
(916) 373-3712

Native American Heritage Commission
Native American Contacts List
September 8, 2021

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Indian Canyon Mutsun Band of Costanoan
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Native American Heritage Commission
Native American Contacts List
September 8, 2021

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Foothill Yokuts
Mono
Wuksache