101 Gull Drive Project

State Clearinghouse Number 2021100227

Draft Environmental Impact Report

Lead Agency:

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

December 2021

LAMPHIER - GREGORY
URBAN PLANNING, ENVIRONMENTAL ANALYSIS & PROJECT MANAGEMENT | 510.535.6690

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Introduction

Purpose of the Environmental Impact Report

The California Environmental Quality Act and the Guidelines promulgated thereunder (together "CEQA") require an Environmental Impact Report (EIR) be prepared for any project which may have a significant impact on the environment. An EIR is an informational document, the purposes of which, according to CEQA are "to provide public agencies and the public in general with detailed information about the effect which a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project." The information contained in this EIR is intended to be objective and impartial, and to enable the reader to arrive at an independent judgment regarding the significance of the environmental impacts resulting from the proposed project.

This EIR evaluates the potential environmental impacts that may be associated with the 101 Gull Drive Office / Research and Development project ("project") in South San Francisco, California.

Environmental Impact Report Review Process

The City of South San Francisco distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on October 14, 2021 and ending on November 12, 2021 and a scoping meeting was held on November 4, 2021. An Initial Study was attached to the NOP, which included initial analysis of environmental topics to focus the EIR. As indicated in the Initial Study, substantial evidence indicates that no significant impacts would occur to the following issue areas with the incorporation of mitigation identified in the Initial Study: Air Quality, Cultural Resources, Geology and Soils, Tribal Cultural Resources, and Utilities and Service Systems. The following topic areas were addressed in the Initial Study and determined not to have significant impacts: Aesthetics, Agricultural Resources, Biological Resources, Energy, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Wildfire. The two topics of Hazards and Hazardous Materials and Transportation were identified as those that would be addressed in the Draft EIR.

The City received two letters in response to the NOP during the public review period and no verbal comments. The two letters were from the Native American Heritage Commission noting required coordination (performed during the Initial Study preparation with no responses received), and from CalTrans outlining standard procedures for analysis and mitigation of projects (taken into consideration in the analysis in this Draft EIR).

The Initial Study is included as Attachment A to this document. The NOP and written responses received are presented in Appendix B.

This Draft EIR, together with the Final EIR (discussed below) will constitute the EIR for the proposed project. The EIR is intended to enable City decision makers, public agencies, and interested citizens to evaluate the environmental issues associated with the proposed project.

In reviewing the Draft EIR, readers should focus on the sufficiency of the document in identifying and analyzing the possible environmental impacts associated with the project. Readers are also encouraged to review and comment on ways in which significant impacts associated with this project might be avoided or mitigated. Comments are most helpful when the basis for the comments is explained and they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate significant environmental impacts.

The Draft EIR, its supporting documentation, and details relating to the project are on-file and available for review online at: www.ssf.net/CEQAdocuments under the "101 Gull Drive" project. If you are unable to view documents online, please use the contact below to arrange access to an alternate digital copy or hard copy. Comments on the Draft EIR may be submitted in writing until 5:00 P.M. PST on the last day of the public review period to:

Stephanie Skangos, Associate Planner
City of South San Francisco
Economic & Community Development Department
315 Maple Avenue
South San Francisco, CA 94083-0711
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The comments received during the public review period will be compiled and presented together with responses to those comments in the Final EIR. Any minor revisions to the Draft EIR will also be included in the Final EIR.

This EIR serves as an informational document for the public and City of South San Francisco decision makers. The process includes public hearings before the Planning Commission to consider certification of a Final EIR and approval of the proposed project. An EIR does not control the agency's ultimate discretion on the project. However, as required under CEQA, the agency must respond to each significant effect identified in the EIR by making findings and, if necessary, by making a statement of overriding considerations for any significant and unavoidable impacts. In accordance with California law, the EIR on the project must be certified before any action on the project can be taken. Once the EIR is certified, the City of South San Francisco can then consider whether the project as proposed should be approved, revised, or rejected.

Content and Organization of the Draft EIR

The previously issued NOP and all written responses to the NOP are presented in Appendix A. The previously issued Initial Study is included in Appendix B.

An Executive Summary follows this introduction as Chapter 2. This summary presents an overview of the project and the potentially significant environmental impacts that may be associated with the project, including a listing of recommended mitigation measures and a discussion of those impacts which would remain significant and unavoidable even following mitigation.

The Draft EIR presents a description of the project in Chapter 3.

Chapters 4 through 6 present environmental analysis of the project, focusing on the following issues:

Chapter 4: Hazards and Hazardous Materials

Chapter 5: Transportation, Circulation and Parking

Chapter 6: Other CEQA Topics

Chapter 7 presents an evaluation of the environmental effects that may be associated with the proposed project and three alternatives evaluated: the "No Project" Alternative, the “R&D Only” Alternative and the “Reduced Development” Alternative.

Chapter 8 lists the persons who prepared the Draft EIR, identifies those persons and organizations contacted during the preparation of the document, and lists the reference materials used.

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Executive Summary

Introduction and Project Overview

This report, together with its appendices, constitutes the Draft Environmental Impact Report (EIR) on the proposed 101 Gull Drive project ("project"). The Lead Agency for environmental review under the California Environmental Quality Act is the City of South San Francisco (as Lead Agency).

The project site is located at 101 Gull Drive (Assessor's Parcel Number 015-082-250), within the City of South San Francisco's "East of 101" planning area. The 3.8-acre project site is currently vacant. While the site is located along Gull Drive, it is largely separated from the roadway by a grade change and steep 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 along with the new driveway on Gull Drive proposed as a part of the project.

The project Sponsor, Sanfo Group LLC, is proposing construction and operation of a new 166,613-square-foot, 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 the proposed connection to Gull Drive for the mutual access easements in the vicinity.

The proposed project is consistent with the existing General Plan designation and zoning at the site.

Areas of Known Controversy

The EIR scoping process did not identify areas of known controversy for the proposed project.

Summary of Conclusions

The following **Table 2.1** provides a summary of significant environmental impacts, identified mitigation measures, and the resulting level of significance after implementation of mitigation measures. For a more complete discussion of potential environmental impacts and mitigation measures, please refer to individual topic area chapters of this Draft EIR and sections of the Initial Study (Appendix A).

Impacts are categorized as follows:

Significant and Unavoidable. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per CEQA Guidelines Section 15093.

Less than Significant with Mitigation. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under CEQA Guidelines Section 15091.

Less than Significant. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures.

No Impact: The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Issues Not Studied in Detail in the EIR

Table 2.1 includes significant impacts from topic areas of the environmental checklist addressed in the Initial Study (Appendix A). As indicated in the Initial Study, substantial evidence indicates that no significant impacts would occur to the following issue areas with the incorporation of mitigation identified in the Initial Study: Air Quality, Cultural Resources, Geology and Soils, Tribal Cultural Resources, and Utilities and Service Systems. The following topic areas were addressed in the Initial Study and determined not to have significant impacts: Aesthetics, Agricultural Resources, Biological Resources, Energy, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, and Wildfire. The two topics of Hazards and Hazardous Materials and Transportation are addressed in this Draft EIR.

Significant and Unavoidable Impacts

Based on the analysis presented in this EIR, the project would result in the following environmental impact that would be considered significant and unavoidable:

Vehicles Miles Traveled Impact (TR-2): The vehicle miles traveled per employee exceeds the City's adopted threshold of 15 percent below the regional average under existing and future conditions. Even with contribution toward first- and last-mile strategies to increase use of alternate modes of travel (Mitigation Measure TR-2), this impact would remain significant and unavoidable.

Note that this impact is not unique to this project. Because the estimated vehicle miles traveled for this project is based on averages for the entire East of 101 area, most office/R&D projects in this area incur a significant and unavoidable impact with respect to vehicle miles traveled unless they are located within one half mile of the Caltrain station.

Potentially Significant Impacts and Mitigation Measures

Potentially significant impacts are largely limited to construction-period disturbance, including impacts and mitigation related to construction period dust and emissions (Mitigation Measure Air-1); potential disturbance of unknown archaeological, paleontological, or tribal cultural resources (Cul-1, Cul-2, Cul-3); and appropriate construction given site characteristics in a seismically-active region (Geo-1).

Additionally, the project would contribute toward previously-identified area sewer line upgrades (Util-1).

The project would be required to adhere to remediation measures in the Amended Site Closure Plan and Post-Closure Maintenance Plan (PCMP) to address hazardous materials concerns at the site including appropriate handling and capping of metals-impacted site soils and vapor barriers if necessary to address methane gas migration from the nearby landfill (Haz-2).

The impacts listed in this subsection would be reduced to less than significant levels through implementation of the identified mitigation measures. All other impacts would be less than significant without the need for mitigation.

Summary of Alternatives

Three alternatives to the project were evaluated in Chapter 20 of this EIR, including:

- The **"No Project" Alternative** in which the site remains vacant.
- The **"R&D Only" Alternative** representing the same structures as proposed but constrained to the generally lower-employee use of R&D rather than allowing office.
- The **"Reduced Development" Alternative** representing an approximately 30% smaller office/R&D development on the same site.

The "No Project" alternative was identified as the environmentally superior alternative, since it would not result in any substantial changes to the site and therefore, has the lowest possible impacts in every parameter. However, this alternative does not meet any of the project objectives and would not prevent future development of the site consistent with the underlying land use designation and zoning (such as the project).

The CEQA Guidelines also require that "if the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives" (CEQA Guidelines Section 15126.6(e)(2)). The CEQA Guidelines require a consideration of whether alternatives "avoid or substantially lessen" significant impacts of the proposed project. In general, the environmentally superior alternative minimizes adverse impacts to the environment, while still achieving the basic project objectives.

Neither the "R&D Only" Alternative nor the "Reduced Development" Alternative would avoid any significant impacts of the project or reduce the significance level of any impacts. With fewer resultant employees at the site, both these alternatives would marginally reduce the significant and unavoidable project impact related to vehicle miles traveled while the impact would remain significant and unavoidable. Both these alternatives would be substantially similar though marginally environmentally superior to the proposed project and would meet project objectives though to a lesser degree than the project.

Because the "Reduced Development" Alternative would marginally reduce construction-related impacts as well as operational-related impacts (without changing the need for mitigation or significance conclusions compared to the project), the "Reduced Development" Alternative would be the next most environmentally superior after the "No Project" Alternative. As noted above, differences between the impacts under this alternative and the proposed project would be marginal only.

Table 2.1: Summary of Project Impacts and Mitigation Measures

Potentially Significant Impacts	Regulatory Requirements / Mitigation Measures	Resulting Level of Significance
Significant and Unavoidable Impacts		
Impact TR-2: Vehicles Miles Traveled. The vehicle miles traveled per employee exceeds the City's adopted threshold of 15 percent below the regional average under existing and future conditions.	**Mitigation Measure TR-2: First- and Last-Mile Strategies.** The project sponsor shall coordinate with the City for the project sponsor to implement the following off-site improvements to support the project's first- and last-mile and active transportation connections necessary to support reductions in Home-Based Work Vehicle Miles Traveled. • Participation in first-/last-mile shuttle program(s) to Caltrain and BART. Shuttles may be operated by Commute.org and/or other East of 101 shuttle providers offering services open to the general public. • Restriping of five crosswalks at the intersection of Oyster Point Boulevard and Eccles Avenue, one crosswalk at the intersection of Oyster Point Boulevard, and two crosswalks at the intersection of Oyster Point Boulevard and the 329-333 Oyster Point Boulevard driveway with high-visibility longitudinal markings to enhance pedestrian access to the westbound shuttle stop and nearby land uses. The project sponsor shall additionally coordinate with the City for the project sponsor to pay fair-share contribution toward the following off-site improvements to support the project's first- and last-mile and active transportation connections necessary to support reductions in Home-Based Work Vehicle Miles Traveled. • Modification of the existing eastbound shuttle stop at the far side of the Oyster Point Boulevard/Eccles Avenue intersection to provide an accessible five-foot long by eight-foot-wide landing pad and pavement markings (if such facilities are not already fully funded or constructed by the City or SamTrans). • Installation of a westbound shuttle stop at the far side of the Oyster Point Boulevard/Eccles Avenue intersection including a pole, accessible five-foot long by eight-foot-wide landing pad, pavement markings, and shelter (if such facilities are not already fully funded or constructed by the City or SamTrans). • Provision of eastbound and westbound Class II buffered bicycle lanes along Eccles Avenue between Forbes Boulevard and Oyster Point Boulevard, spanning approximately 3,000 linear feet. The improvement consists primarily	Significant and Unavoidable

Table 2.1: Summary of Project Impacts and Mitigation Measures

Potentially Significant Impacts	Regulatory Requirements / Mitigation Measures	Resulting Level of Significance
	of restriping the curbside vehicle travel lane in each direction to a Class II buffered bicycle lane and signage. The bicycle facility will help close a gap between the project and a planned Class I shared-use pathway between Forbes Boulevard / Eccles Avenue and the South San Francisco Caltrain station.	
Less Than Significant Impacts With Mitigation		
Impact Haz-2: Accidental Release of Hazardous Materials. Through compliance with applicable regulations, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.	**Mitigation Measure Haz-2: Adherence to Remediation Measures.** Applicant or project sponsor shall ensure that project design and construction shall incorporate the recommended remediation measures in an Amended Site Closure Plan and Post-Closure Maintenance Plan (PCMP) approved by the San Mateo County Department of Environmental Health, to avoid or reduce the hazards related to the presence of hazardous materials (burn ash) and combustible vapor at this site. The remediation measures are anticipated to include the following, based on the measures contained in the current PCMP: • Placement of cap throughout the development area consistent with the final cover / capping plan in an approved Amended PCMP. • Installation of building combustible gas protection and monitoring features to consist of a subfloor vapor barrier and passive venting system, and interior alarm system, unless determined not to be necessary (due to vapor levels following current removal of landfill materials from nearby portions of the Oyster Point Landfill). • Adhering to applicable provisions of the existing Risk Management Plan and Health and Safety Plan for soil handling during excavations for utility trenches, foundations, and other site work. • Adherence to water conservation standards for landscaping and irrigation to reduce or eliminate the potential for water infiltration into underlying contaminated soil layers.	Less than Significant
Criteria Pollutants and Dust Impact: Construction of the project would result in emissions and fugitive dust. While the project	**Mitigation Measure Air-1: Basic Construction Management Practices, Measures**: The project applicant / owner / sponsor shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition,	Less than Significant

Table 2.1: Summary of Project Impacts and Mitigation Measures

Potentially Significant Impacts	Regulatory Requirements / Mitigation Measures	Resulting Level of Significance
would be below threshold levels, the Bay Area Air Quality Management District (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.	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. The use of dry power sweeping is prohibited. 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. The Air District's phone number shall also be visible to ensure compliance with applicable regulations.	
Cultural Resources Impact: There are no known cultural or tribal cultural resources at the site. However, given the moderate potential for unrecorded archeological resources and Native	**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	Less than Significant

Table 2.1: Summary of Project Impacts and Mitigation Measures

Potentially Significant Impacts	Regulatory Requirements / Mitigation Measures	Resulting Level of Significance
American resources at a currently-developed site, mitigation measures Cul-1, Cul-2, and Cul-3 shall be implemented.	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. **Mitigation Measures 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. **Mitigation Measures 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.	
Seismic Hazards Impact: The San Francisco Bay Area is a seismically active region and the project site includes undocumented fill and soils with low potential for expansion, liquefaction, and lateral spreading. To mitigate the potential for damage to structures or people, the following measure shall be implemented:	**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.	Less than Significant

Table 2.1: Summary of Project Impacts and Mitigation Measures

Potentially Significant Impacts	Regulatory Requirements / Mitigation Measures	Resulting Level of Significance
Paleontological Resources Impact: There are no known paleontological resources at the site. However, given the potential for unrecorded paleontological resources at a currently-developed site, mitigation measures Culture-1, 2, and 3 shall be implemented.	**Mitigation Measures Cul-1, Cul-2, and Cul-3** would also reduce the potential impact related to unknown paleontological resources.	Less than Significant
Tribal Cultural Impact: There are no known tribal cultural resources at the site. However, given the moderate potential for unrecorded archeological resources and Native American resources at a currently-developed site, mitigation measures Cul-1, Cul-2, and Cul-3 shall be implemented.	**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.	Less than Significant
Sewer Capacity Impact: 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. Mitigation measure Util-1 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.	**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 a Sewer Master Plan update or directly fund their fair share of the improvement.	Less than Significant

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Project Description

Note that Figures 3.1 through 3.5b are included together at the end of this chapter (pages 3-5 through 3-10).

Project Applicant

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

Project Objectives

The City of South San Francisco has identified the following objectives for the 101 Gull Drive Project in coordination with the applicant:

1. Allow for development and productive use of a currently vacant lot.

2. Construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents.

3. Build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

Location and Vicinity of the Project

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 Boulevard. **Figure 3.1** 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 3.1,** and the project parcel, including access easements, is shown in **Figure 3.2**.

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 3.2**. 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 of 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 in **Figure 3.3,** and the grading and drainage plan is shown in **Figure 3.4**. Building elevations are shown in **Figures 3.5a** and **3.5b**.

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.

Project Approvals

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. The project would also require the City to grant an easement for vehicular ingress and egress to Gull Drive.

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.

Figure 3.1: Project Location

Source: Fehr & Peers, for this project analysis

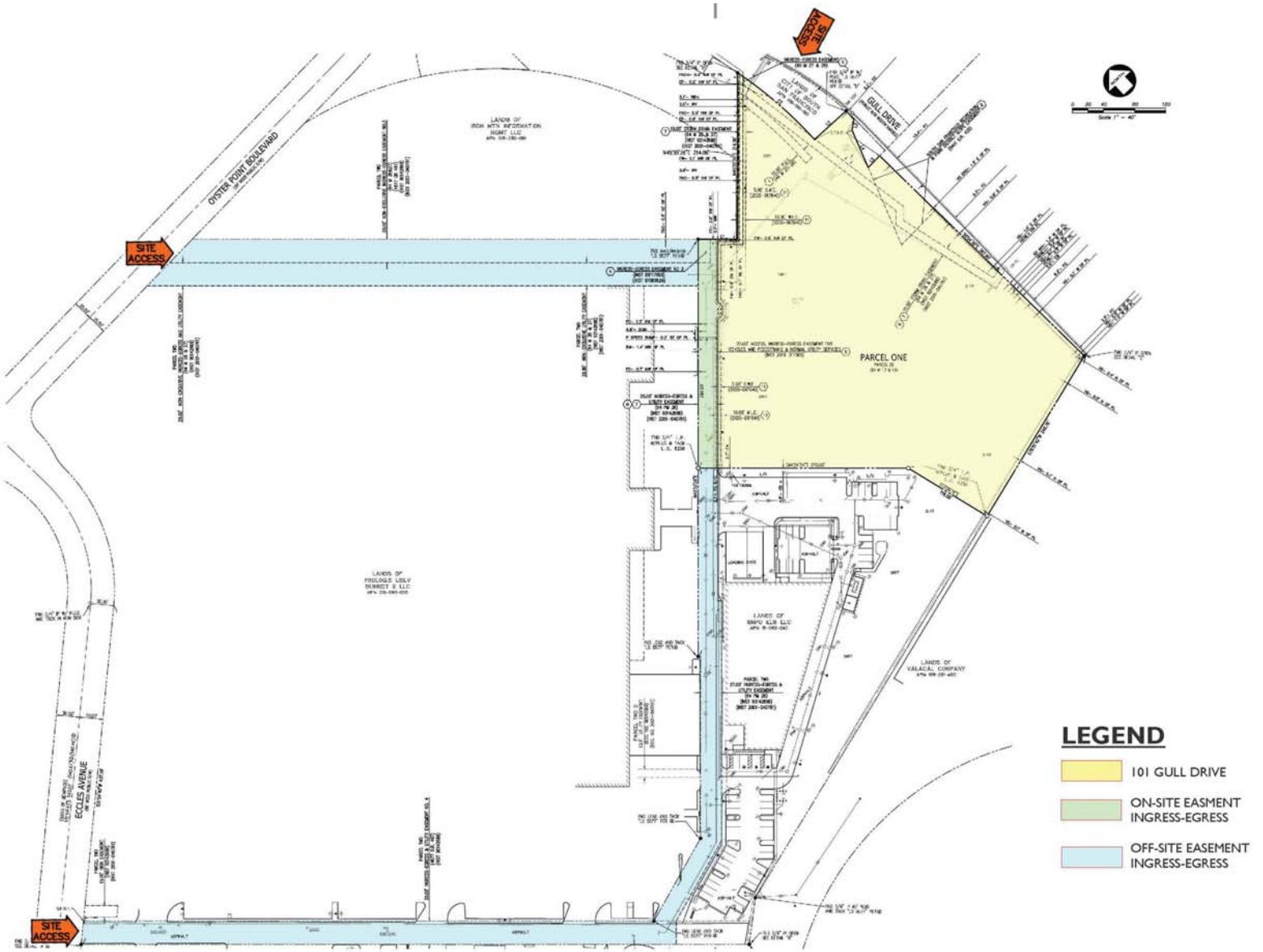

Figure 3.2: Existing Conditions and Access Easements

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

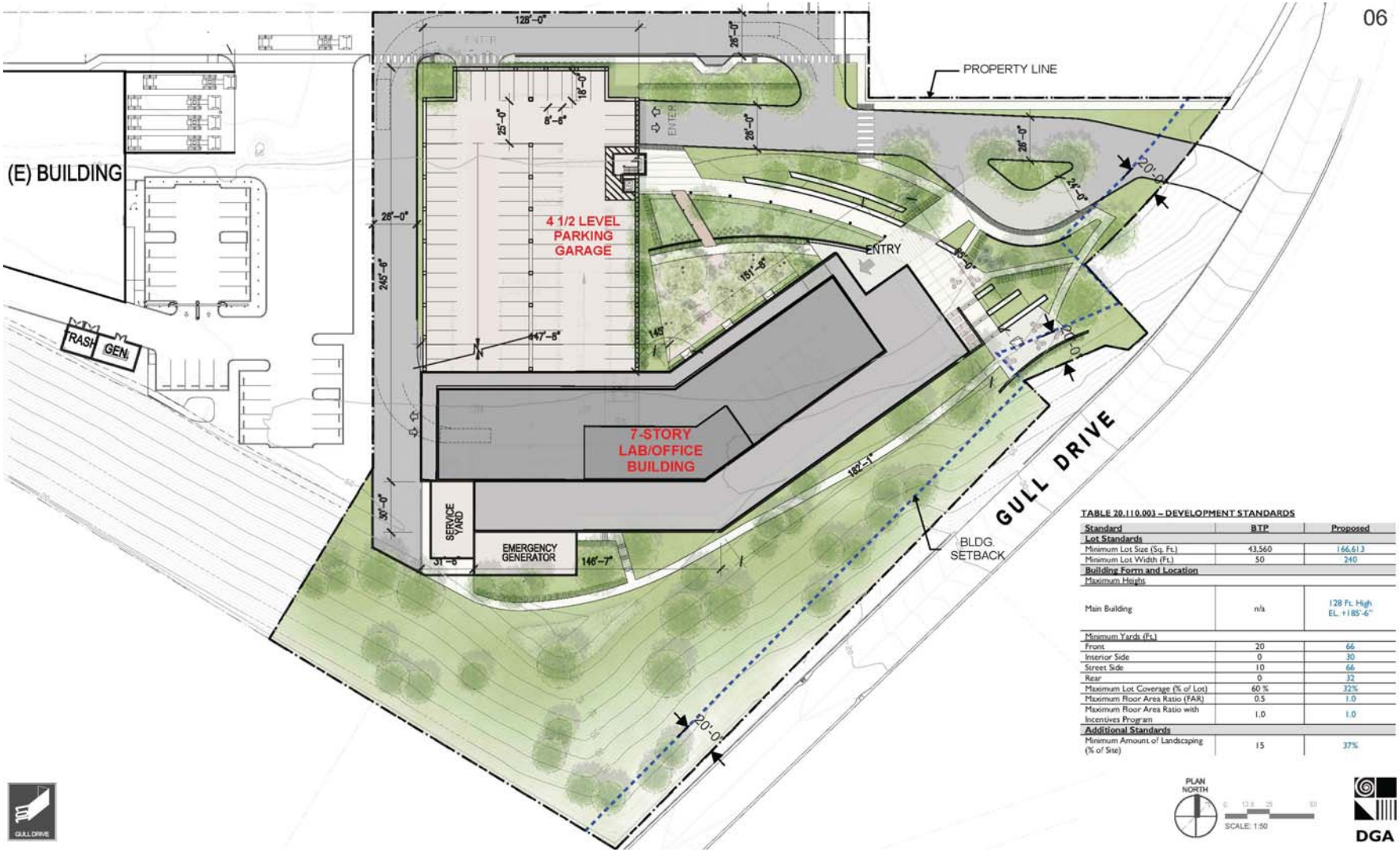

Figure 3.3: Illustrative Site Plan

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

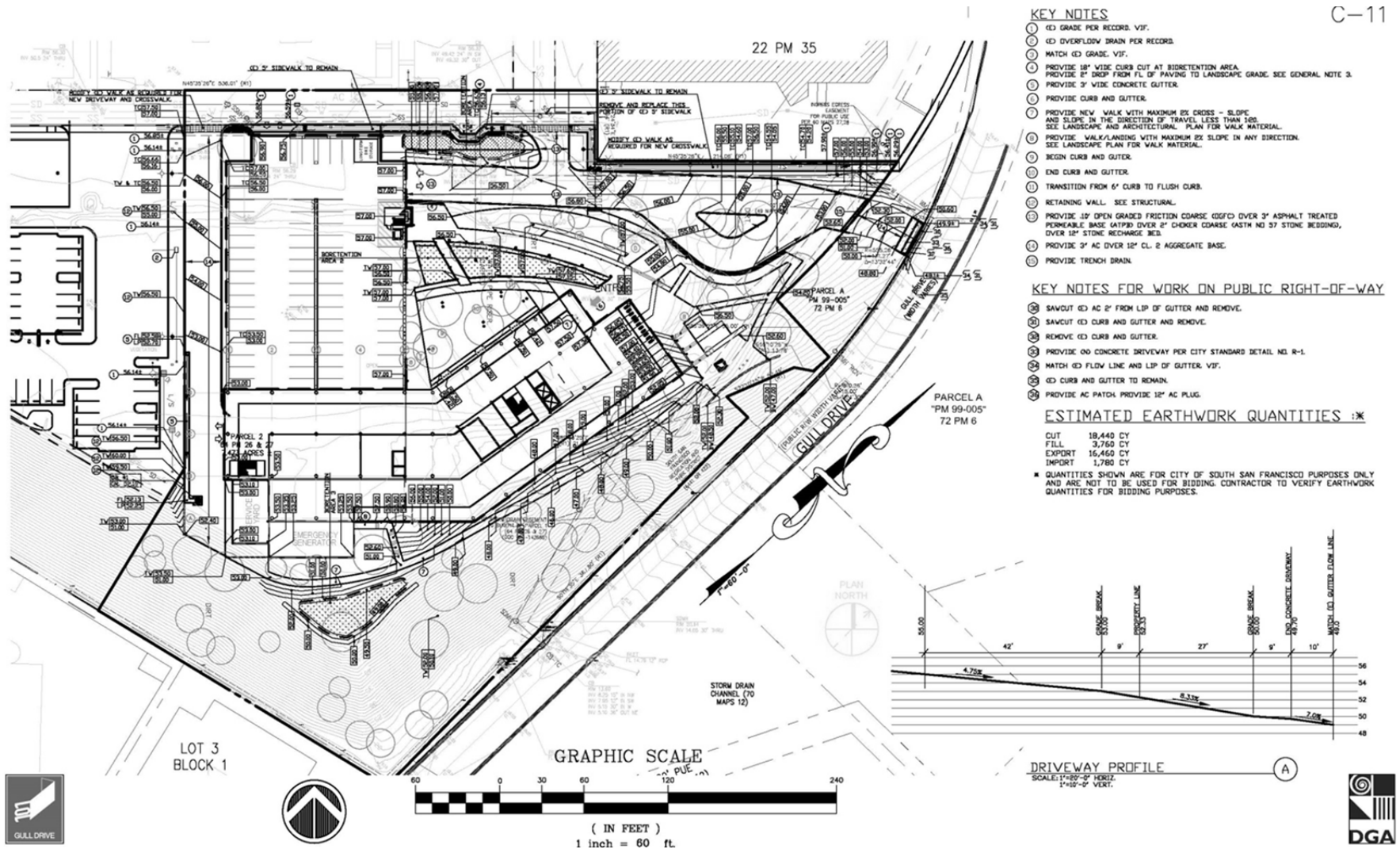

Figure 3.4: Grading and Drainage Plan

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

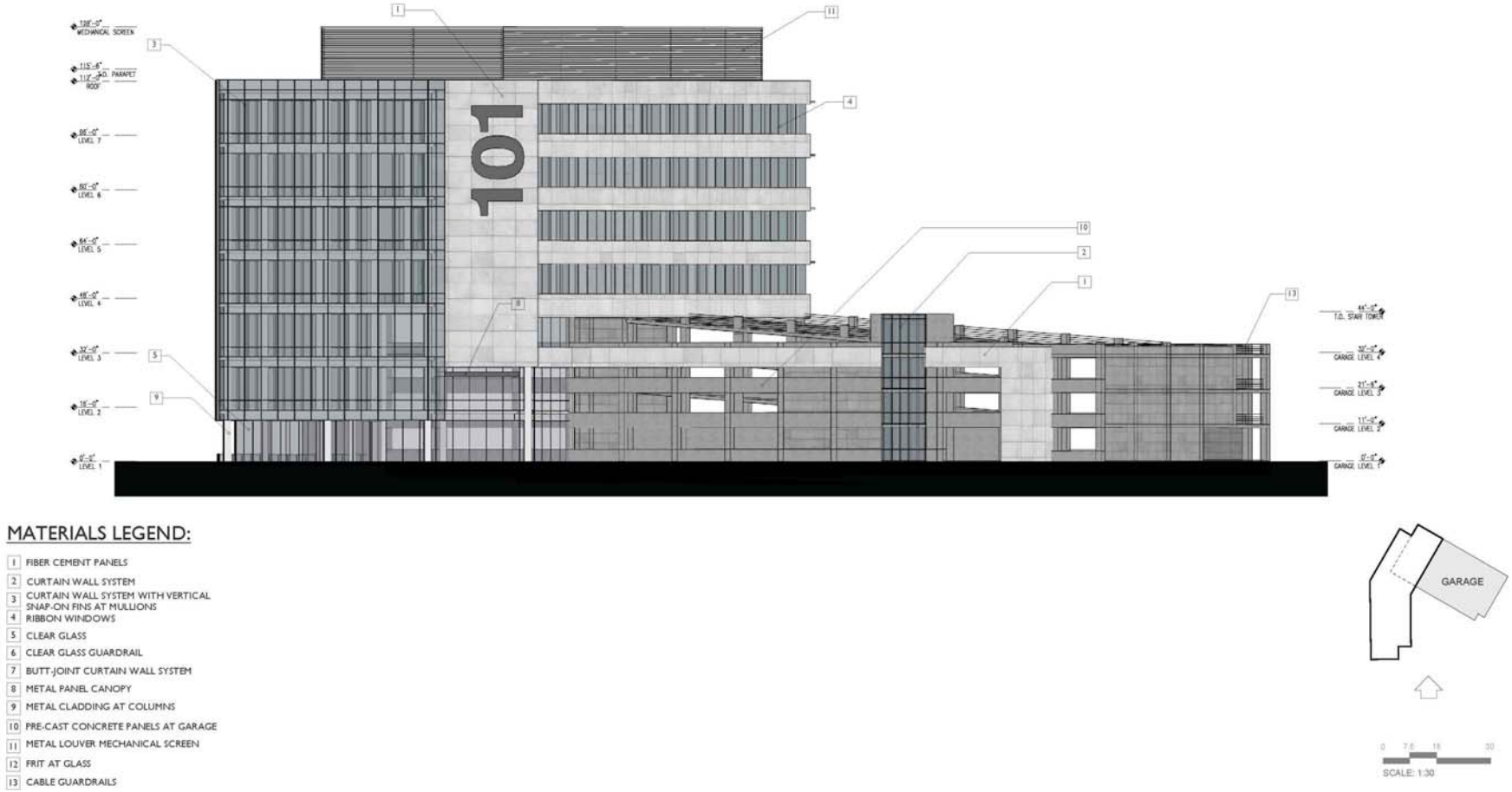

Figure 3.5a: Exterior Elevations - Northeast

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

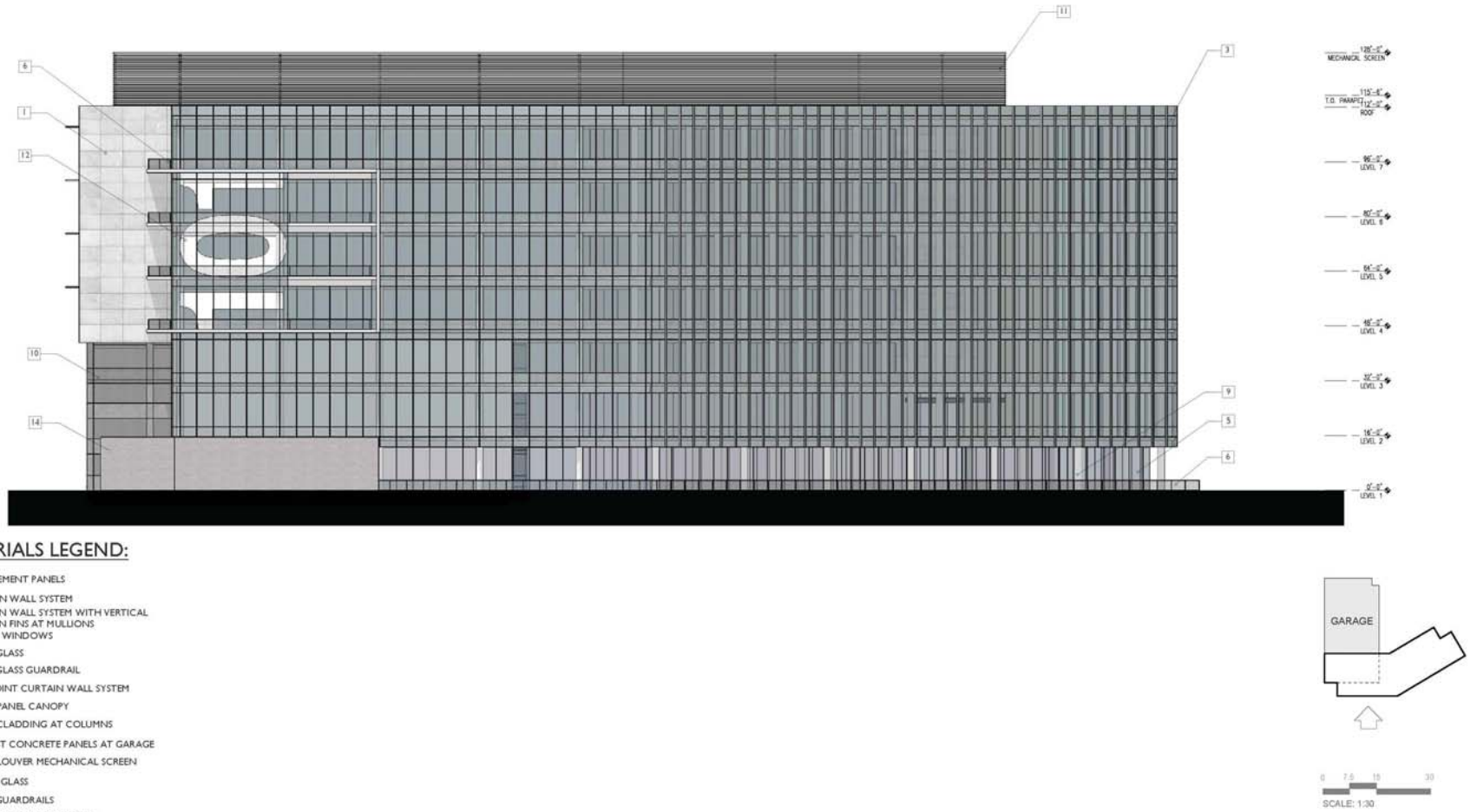

Figure 3.5b: Exterior Elevations - South

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

4

Hazards and Hazardous Materials

Introduction

A hazardous material is a substance or combination of substances which, because of its quantity, concentration, or physical, chemical or infectious characteristics, may pose a substantial present or potential hazard to human health and safety, or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

This chapter utilizes information from the following reports prepared for this project or analysis:

> Langan Engineering and Environmental (Langan) was contracted to conduct a Phase I Environmental Site Assessment of the project site. Information is from their report dated December 22, 2020, included as Attachment C to this document.

Environmental Setting

Site Use History

The project site is historically undeveloped land on a hillside along the western margin of the San Francisco Bay. In the early 1900s, as part of modifications being made to the coastline of the Bay, fill material was placed on the project site. During the 1950s, a portion of the site was used as a burn dump, with those operations ceasing before the end of that decade. Additional fill material was placed over the burn ash material to raise the project site to the current grades. Based on review of aerial photos, the project site appears to have been graded to the current configuration by the 1980s. The project site has remained undeveloped, vacant land.

Current Site Use and Potential Contamination

The top layer of soil at the site consists of undocumented fill material ranging from approximately 10 to 20 feet thick. A layer of burn ash material underlies the fill, ranging from 10 to 25 feet thick, with native clays and silts, followed by bedrock, below that.

Soil sampling found elevated concentrations of metals in the burn ash material, including arsenic, copper, lead, and zinc. These levels exceeded the applicable environmental screening levels (ESLs) allowed for commercial shallow soil. Testing on the undocumented fill above the burn ash found concentrations of arsenic and lead above the ESLs allowed for commercial shallow soil and antimony, arsenic, chromium VI, cobalt, and lead at levels above those allowed for residential shallow soil but below the ESLs for commercial shallow soil. The presence of lead in multiple shallow soil samples is likely at concentrations that could potentially be classified as hazardous waste if exported from the property for off-site disposal.

A soil vapor investigation conducted in 2006, detected methane at the site at concentrations up to 41% by volume, exceeding the limits of 5% at the property perimeter and 1.25% within on-site structures set by the San Mateo County Health Services Division (SMCEHD) Local Enforcement Agency (LEA) per California Code of Regulations Title 27 (27 CCR) §20921. The highest concentrations of methane were found in the northeastern corner of the project site, which is across Gull Drive from property identified as formerly part of Oyster Point Landfill. Benzene and vinyl chloride were also detected in soil vapor at concentrations above both residential and commercial vapor intrusion ESLs.

Groundwater sampling conducted between 2008 and 2009 found that the shallow groundwater at the project site appears to have been impacted with metals consistent with the presence of burn ash material below the water table. One well also found low concentrations of petroleum hydrocarbons.

The project site (combined with the adjacent parcel at the time) was listed in the RWQCB Geotracker database under the name "560 Eccles" with a status of "Informational Item as of 12/13/2018" and case number T10000012436. The records available on Geotracker were related to the abandonment of the former groundwater monitoring wells. The project site is also listed in the CalRecycle SWIS database as a former "Nonhazardous Ash Disposal/Monofill Facility" under the name "USDA Building (41-CR-0028)" with an operational status of "Closed" and a regulatory status of "Unpermitted."

Other Contamination in the Vicinity

Most of the nearby listings of off-site property were either closed by the regulatory agency, located in a direction from the project site that is inferred to be hydrologically down-gradient, a significant distance away, and/or otherwise determined in the Phase I Environmental Site Assessment (Attachment C) not to have a potential impact on the project site. The following properties remain of environmental interest with respect to contamination at the project site.

- The USDA building owned by SMPO ELS, LLC at 560 Eccles Avenue is the western adjoining property and inferred to be hydrologically up- to cross- gradient. The building has a valid permit for the storage of small quantities of diesel fuel in an aboveground storage tank for a backup generator. There have been no violations, spills, or releases from the facility operations noted.

- The property at 336 Oyster Point Boulevard is the northern/western adjoining property and inferred to be hydrologically up- to cross- gradient. The site is a leaking underground storage tank (LUST) cleanup site (SWRCB Case #T0608100451) with a status of "Completed- Case Closed as of 11/14/1995" and notes that a 2,000-gallon diesel underground storage tank was removed in 1987 and, while petroleum hydrocarbons were detected in groundwater, that a No Further Action (NFA) letter was issued in 1995 indicating that no further monitoring of the groundwater was required due to the low levels of petroleum hydrocarbons in groundwater and lack of technically feasible remediation. Therefore, due to the NFA determination, this property is not considered an environmental concern for the project site.

- The property at 349 Oyster Point Boulevard is approximately 350 feet northwest of the project site and inferred to be hydrologically up- to cross- gradient. The site was formerly occupied by a metal reclamation plant which operated between 1907 and 1987. It is a LUST cleanup site (SWRCB Case #T0608114784) with a status of "Completed- Case Closed as of 7/17/2001" and as a cleanup program site under the name "Wildberg Brothers" with case number T10000008176 and a status of "Completed - Case Closed as of 3/21/2018." Alternative case numbers for the property are San Mateo County LOP case number 559014 and RWQCB case numbers 41-1115

and 41S0028. The property is also listed in the DTSC Envirostor database as a voluntary cleanup site under the name "Wildberg Brothers (Boliden Metech)" with case number 41330049 and a status of "Certified as of 11/30/1987." Testing over the years found relatively high concentrations of lead in some samples from that site, leading to the removal of affected site soils in October 1995. In November 1995, DTSC issued a NFA letter related to the lead remediation. During construction activities in 1997, soil impacted with petroleum hydrocarbons was encountered. Excavation activities were performed, removing additional impacted soil and a NFA letter was issued related to the petroleum hydrocarbon contamination. Due to the NFA determinations, this property is not considered to be an environmental concern for the project site.

- The former Oyster Point Landfill is the eastern adjoining property across Gull Drive and inferred hydrologically downgradient. This property is listed in the RWQCB Geotracker database as a land disposal site under the name "Oyster Point Landfill" with case number L10009323371 and a status of "Open as of 1/1/1965." Alternative case numbers for the property are RWQCB case number 2 417061001. The site is also listed in the CalRecycle SWIS database as a former "Solid Waste Disposal Site" under the name "So. San Francisco Municipal Dump/Oyster (41-AA-0065)" with an operational status of "Closed" and a regulatory status of "Unpermitted." Redevelopment of the landfill is currently ongoing as part of a larger, multi-phase development project by the City of South San Francisco and Kilroy Realty Corporation, including multiple office/R&D buildings, infrastructure improvements, and open space areas. The current work is subject to a Final Closure Plan (FCP) and Postclosure Monitoring and Maintenance Plan (PCMMP), detailing procedures for closure and long-term monitoring and maintenance of the landfill pursuant to Title 27 CCR §21190 requirements. Since the Oyster Point Landfill is downgradient of the project site, groundwater impacts are not anticipated to be a concern. However, due to the unknown extent of refuse potentially remaining in place beneath Gull Drive and further west within the eastern adjoining parcel owned by the City of South San Francisco (APN 015-190-180), and the ongoing operation, maintenance, and monitoring requirements for the perimeter landfill gas monitoring features immediately outside the eastern project site boundary, the Oyster Point Landfill is considered to be an environmental concern for the project site.

Other Hazard and Hazardous Materials Issues

Schools and Daycare Facilities

CEQA establishes special requirements for certain projects near schools to ensure that potential health impacts resulting from exposure to hazardous materials, wastes, and substances will be carefully examined and disclosed in a negative declaration or EIR, and that the lead agency will consult with other agencies in this regard.

There are no schools located within or near the project site, or within the entire East of 101 area. There are four daycare centers located within the East of 101 area, including:

- Gateway Child Development Center at 559 Gateway Boulevard
- Genentech's Cabot 2nd Generation at 342 Allerton Avenue
- Genentech's 2nd Generation at 444 Allerton Avenue

- Early Years Preschool at 371 Allerton Avenue

All of these daycare centers are farther than one-quarter mile from the project site.

Airports

Aviation safety hazards can result if projects are located near airports. The public airport located nearest to the project site is San Francisco International Airport (SFO), located approximately 2 miles south of the project site. There are no private airstrips in the vicinity.

Wildland Fires

The California Department of Forestry and Fire Protection (CAL FIRE) is required by law to map areas of significant fire hazard based on fuels, terrain, weather, and other relevant factors (PRC 4201-4204 and Govt. Code 51175-89). Factors that increase an area's susceptibility to fire hazards include slope, vegetation type and condition, and atmospheric conditions. The CAL FIRE San Mateo County Fire Hazard Severity Zone Map does not identify any very high or high zones of fire hazard severity in the vicinity of the project site.

Regulatory Setting

Adoption of and development pursuant to the project is subject to government health and safety regulations applicable to the transportation, use, and disposal of hazardous materials. This section provides an overview of the health and safety regulatory framework that is potentially applicable to the project.

Federal

Hazardous Materials Management

The primary federal agencies with responsibility for hazardous materials management include the United States Environmental Protection Agency (US EPA), U.S. Department of Labor Occupational Safety and Health Administration (OSHA), and the U.S. Department of Transportation (DOT). Federal laws, regulations and responsible agencies are summarized below and are discussed in detail in this section.

The Emergency Planning and Community Right to Know Act of 1986 imposes requirements to ensure that hazardous materials are properly handled, used, stored, and disposed of and to prevent or mitigate injury to human health or the environment in the event that materials are accidently released.

Hazardous Materials Site Listings

The National Priorities List (NPL) is a compilation of over 1,200 sites for priority cleanup under the Federal Superfund Program. The Proposed National Priorities List identifies sites considered for NPL listing. The Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS) system contains data on potentially hazardous waste sites that have been reported to the US EPA by California. CERCLIS contains sites that are proposed or are on the NPL, and sites that are in the screening and assessment phase.

Hazardous Waste Handling

Under the Resource Conservation and Recovery Act (RCRA), the US EPA regulates the generation, transportation, treatment, storage and disposal of hazardous waste. The Hazardous and Solid Waste Act amended RCRA in 1984. The amendments specifically prohibit the use of certain techniques for the disposal of hazardous waste.

Hazardous Materials Transportation

The US Department of Transportation (DOT) has the regulatory responsibility for the safe transportation of hazardous materials. The DOT regulations govern all means of transportation except packages shipped by mail (49 Code of Federal Regulations (CFR)). The US Postal Service (USPS) regulations govern the transportation of hazardous materials shipped by mail.

Occupational Safety

The Occupational Safety and Health Act of 1970 (Fed/OSHA) sets standards for safe workplaces and work practices, including the reporting of accidents and occupational injuries (29 CFR).

Aviation Safety and Aviation Hazards

The closest airport to the project site is the San Francisco International Airport (SFO), approximately 2 miles to the south. The *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (ALUCP) is used by the City/County Association of Governments of San Mateo County (C/CAG) to promote compatibility between SFO and surrounding land uses. The project site is subject to Federal Aviation Regulations and the SFO ALUCP, which provides policies and regulations pertaining to land use that may affect, or be affected by airport operations, including restrictions for the height of structures within the ALUCP area and/or elements that may affect normal aviation operations or that could create a safety hazard for aircraft.

State of California

Primary state agencies with jurisdiction over hazardous chemical materials management are the Department of Toxic Substances Control (DTSC) and the Regional Water Quality Control Board (RWQCB). Additional state agencies are also involved in hazardous materials management. These agencies include Cal/OSHA (which is part of the Department of Industrial Relations), State Office of Emergency Services (OES), California Air Resources Board (CARB), Bay Area Air Quality Management District (BAAQMD), California Department of Transportation (Caltrans), California Highway Patrol (CHP), State Office of Environmental Health Hazard Assessment (OEHHA) and the California Integrated Waste Management Board (CIWMB).

In January 1996, the California Environmental Protection Agency (Cal EPA) adopted regulations implementing a Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program). The program has six elements:

- Hazardous waste generators and hazardous waste on-site treatment;
- Underground storage tanks;
- Aboveground storage tanks;

- Hazardous materials release response plans and inventories;
- Risk management and prevention programs; and
- Unified Fire Code, hazardous materials management plans, and inventories.

The Unified Program is implemented at the local level. The Certified Unified Program Agency (CUPA) is the local agency that is responsible for the implementation of the Unified Program. In South San Francisco, the San Mateo County Department of Environmental Health (SMCDEH) is the designated CUPA.

Hazardous Materials Management

The California Hazardous Materials Release Response Plans and Inventory Law of 1985 (Business Plan Act) requires that any business that handles hazardous materials prepare a business plan, which must include the following:

- Details, including floor plans, of the facility and business conducted at the site;
- An inventory of hazardous materials that are handled or stored on site;
- An emergency response plan; and
- A training program for safety and emergency response for new employees, with annual refresher courses

The California Hazardous Materials Incident Report System (CHMIRS) provides information regarding spills and other incidents gathered from the California Office of Emergency Services.

Hazardous Waste Handling

The DTSC regulates the generation, transportation, treatment, storage and disposal of hazardous waste. State and federal laws require detailed planning to ensure that hazardous materials are properly handled, used, stored, and disposed of, and, in the event that such materials are accidentally released, to prevent or to mitigate injury to health or the environment. Laws and regulations require hazardous materials users to store these materials appropriately and to train employees to manage them safely.

Under the federal Resource Conservation and Recovery Act of 1976 (RCRA), individual states may implement their own hazardous waste programs in lieu of RCRA, as long as the state program is at least as stringent as federal RCRA requirements. In California, the DTSC regulates the generation, transportation, treatment, storage and disposal of hazardous waste. The hazardous waste regulations establish criteria for identifying, packaging, and labeling hazardous wastes; prescribe management of hazardous waste; establish permit requirements for hazardous waste treatment, storage, disposal and transportation; and identify hazardous wastes that cannot be disposed of in landfills.

Hazardous Materials Transportation

The State of California has adopted DOT regulations for the intrastate movement of hazardous materials. State regulations are contained in Title 26 of the California Code of Regulations (CCR), which includes requirements applicable to the transportation of hazardous waste originating in the State and

passing through the State. The two state agencies that have primary responsibility for enforcing federal and state regulations and responding to hazardous materials transportation emergencies are the California Highway Patrol (CHP) and the California Department of Transportation (Caltrans).

Occupational Safety

The California Occupational Safety and Health Administration (Cal/OSHA) assumes primary responsibility for developing and enforcing workplace safety regulations in California. Because California has a federally approved OSHA program, it is required to adopt regulations that are at least as stringent as those found in Title 29 of the CFR. Cal/OSHA standards are sometimes, but not always, more stringent than federal regulations.

Cal/OSHA Title 8 regulations concerning the use of hazardous materials in the workplace require employee safety training, safety equipment, accident and illness prevention programs, hazardous substance exposure warnings, and emergency action and fire prevention planning. Cal/OSHA enforces regulations for hazard communication programs, which contain training and information requirements, including procedures for identifying and labeling hazardous substances, and communicating hazard information relating to hazardous substances and their handling. The hazard communication program also requires that Materials Safety Data Sheets (MSDS) be available to employees, and that employee information and training programs be documented. These regulations also require preparation of emergency action plans (escape and evacuation procedures, rescue and medical duties, alarm systems, and training in emergency evacuation).

Cal/OSHA (8 CCR), like Fed/OSHA (29 CFR), includes extensive, detailed requirements for worker protection applicable to any activity that could disturb asbestos-containing materials, including maintenance, renovation, and demolition. These regulations are also designed to ensure that persons working near the maintenance, renovation or demolition activity are not exposed to asbestos.

Emergency Response

California has developed an emergency response plan to coordinate emergency services provided by federal, state and local government and private agencies. Responding to hazardous materials incidents is one part of this plan. The plan is administered by the State Office of Emergency Services (OES), which coordinates the responses of other agencies, including Cal EPA, CHP, CDFG, the San Francisco Bay RWQCB and the South San Francisco Fire Department (SSFFD). The SSFFD provides first response capabilities, if needed, for hazardous materials emergencies within the East of 101 Area.

Additional Regulatory Setting Specific to Life Sciences Facilities

While the exact tenant or tenants of the proposed building have not yet been identified, the following regulations are listed as they are potentially applicable to R&D/life sciences types of facilities depending on the specifics of the operations therein.

Microbiological, Biomedical and Animal Laboratories

The United States Department of Health and Human Services (USDHHS), Centers for Disease Control and Prevention (CDC), and National Institutes of Health (NIH) prescribe containment and handling practices for use in microbiological, biomedical, and animal laboratories. Based on the potential for transmitting biological agents, the rate of transmission of these agents, and the quality and concentrations of

biological agents produced at a laboratory, Biosafety Levels are defined for four tiers of relative hazards. Biosafety Level 1 (BSL-1) is for the least hazardous biological agents, and Biosafety Level 4 (BSL-4) is for the most hazardous biological agents. Biosafety Levels for infectious agents are based on the characteristics of the agent (virulence, ability to cause disease, routes of exposure, biological stability and communicability), the quantity and concentration of the agent, the procedures to be followed in the laboratory, and the availability of therapeutic measures and vaccines.

Federal and state laws, such as the Animal Welfare Act, specify standards for record keeping and the registration, handling, care, treatment and transportation of animals. Such laws are enforced by the U.S. Department of Agriculture and the California Department of Health Services (DHS).

Medical wastes must be managed as a biohazardous material, in accordance with Section 117635 of the California Health and Safety Code. The management of biohazardous materials must comply with USDHHS guidelines and DHS regulations pertaining to such materials. Biohazardous medical waste is generally regulated in the same manner as hazardous waste, except that special provisions apply to storage, disinfection, containment and transportation. The DHS Medical Waste Management Program enforces the Medical Waste Management Act and related regulations.

Radioactive Materials Regulations

The Atomic Energy Act (42U.S.C. Sections 2011- 2259) (AEA) ensures the proper management of source, special nuclear, and by-product material. The AEA, and the statutes that amended it, delegate the control of nuclear energy primarily to the Department of Energy, the Nuclear Regulatory Commission and the United States Environmental Protection Agency (US EPA). The California Radiation Control Law (California Health & Safety Code Sections 114960-114985) is a regulatory program designed to provide for compatibility with the standards and regulatory programs of the federal government and integrate an effective system of regulation within the state. The program regulates sources of ionizing radiation and establishes procedures for performance of certain regulatory responsibilities with respect to the use and regulation of radiation sources. These laws and regulations govern the receipt, storage, use, transportation and disposal of sources of ionizing radiation (radioactive material) and protect the users of these materials and the public from radiation hazards.

Local

San Mateo County Health Department

As noted above, the San Mateo County Health Department, Environmental Health Division is the primary local agency approved as the CUP) with responsibility for implementing federal and state laws and regulations pertaining to hazardous materials management. The Unified Program is the consolidation of six state environmental regulatory programs into one program under the authority of a CUPA. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Program (CalARP)
- Hazardous Waste (including Tiered Permitting)

- Underground Storage Tanks
- Above Ground Storage Tanks, and
- Hazardous Materials Management Plan and Hazardous Materials Identification System

As the local CUPA, the San Mateo County Health Department, Environmental Health Division maintains the records regarding location and status of hazardous materials sites in the county, and administers programs that regulate and enforce the transport, use, storage, manufacturing and remediation of hazardous materials. By designating a CUPA, San Mateo County has accurate and adequate information to plan for emergencies and/or disasters, and to plan for public and firefighter safety.

A Participating Agency (PA) is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction, on behalf of the CUPA. The City of South San Francisco Fire Department maintains a special program that regulates hazardous materials through disclosure and risk management plans, as well as referrals to the County of San Mateo for above ground storage tanks. Thus, the City of South San Francisco Fire Department is a PA with the San Mateo County Health Department, Environmental Health Division as the CUPA.

South San Francisco General Plan (1999)

The City of South San Francisco General Plan describes goals and policies that address the patterns of urban and industrial development in South San Francisco that may pose risks to human health and property. The goals and policies of the General Plan Safety Element are intended to acknowledge and mitigate the risk posed by such hazards. Pertinent Safety Element policies are listed below:

- **Policy 8.3-G-2:** Minimize the risk to life and property from the generation, storage and transportation of hazardous materials and waste in South San Francisco. Comply with all applicable regulations and provisions for the storage, use and handling of hazardous substances as established by federal (US EPA), State (DTSC, RWQCB, Cal OSHA, Cal EPA), and local (County of San Mateo, City of South San Francisco) regulations.
- **Policy 8.3-I-2**: Continue to maintain hazardous waste regulations in the City's Zoning Ordinance.
- **Policy 8.3-I-3**: Prepare a Geographic Information Systems (GIS) coverage for the sites included in the Cortese List of Hazardous Waste and Substances Sites.
- **Policy 8.3-I-4**: Establish an ordinance specifying routes for transporting hazardous materials.
- **Policy 8.4-I-3**: Require site design features, fire retardant building materials, and adequate access as conditions for approval of development or improvements to reduce the risk of fire within the City.
- **Policy 8.6-I-1**: Maintain and update the City's Emergency Response Plan, as required by State law, to minimize the risk to life and property of seismic and geologic hazards, flooding, hazardous materials and waste, and fire.

- **Policy 8.6-I-3**: Coordinate regular emergency drills with emergency organizations, including City and County Fire, Police, Emergency Medical Services, and Public Works; San Francisco International Airport; and California Environmental Protection Agency.

- **Policy 8.7-I-1**: Do not permit land uses that pose potential hazards to air navigation in the vicinity of SFO. These land uses include the following:

    1. Any use that would direct a steady or flashing light of white, red, green or amber color towards an aircraft engaged in an initial straight climb following takeoff or toward a landing, other than FAA-approved navigational lights;

    2. Any use that would cause sunlight to be reflected toward an aircraft engaged in an initial straight climb following takeoff or toward an aircraft engaged in a straight final approach toward a landing;

    3. Any use that would generate smoke or rising columns of air;

    4. Any use that would attract large concentrations of birds within approach and climb-out areas; and

    5. Any use that would engage electrical interference that may interfere with aircraft communications or aircraft instrumentation.

East of 101 Area Plan (adopted 1994)

The project site is also located within the *East of 101 Area Plan* planning area, which provides a detailed implementation guide for the area. The East of 101 Area Plan is principally used to provide direction related to project design and certain other facets of development in the area not otherwise covered in the General Plan or other City plans. Some of the policies in the East of 101 Area Plan related to hazards and hazardous concerns are listed below.

- **Policy L1U9:** Uses that emit loud noise or create hazardous materials, water contaminants or other pollutants shall only be allowed in the East of 101 Area after review by the Planning Commission. The Planning Commission must find, in addition to any other required findings, that a proposed use would include all feasible measures to mitigate such adverse impacts and that the use would also have mitigating benefits such as employment creation or revenue generation.

- **Policy L2U3**: Maximum heights of buildings in the East of 101 Area shall not exceed the maximum heights established by the Airport Land Use Commission based on Federal Aviation Regulations Part 77 Criteria.

- **Policy L3U1**: No new above ground, bulk fuel tanks are permitted after July 25, 1994. Any above ground fuel tanks that lawfully existed prior to July 1994 may be maintained but may not be replaced or expanded.

- **Policy G5EO**: If hazardous fill such as garbage organics is encountered, it shall be appropriately disposed by a project developer during construction. This material shall not be used for either structural fill or grading fill. However, other uses may be possible such as landscaping around

vegetation if the fill has a high organic content. If no acceptable use is found on-site, the hazardous fill should be properly disposed off-site.

South San Francisco Municipal Code

The South San Francisco Municipal Code includes regulatory requirements addressing use and disposal of hazardous materials and hazardous waste. These regulatory requirements include the following:

Chapter 14.04 Stormwater Management and Discharge Control

- **Section 14.04.320, Coordination with hazardous materials inventory and response program**: The first revision of a business plan for any facility subject to the city's hazardous materials inventory and response program shall include a program for compliance with this chapter, including the prohibitions on non-stormwater discharges and illicit discharges, and the requirement to reduce stormwater pollutants to the maximum extent practicable.

Chapter 14.08 Water Quality Control

- **Section 14.08.170, Reporting and recordkeeping requirements for permittee**: All industrial users discharging any substance which, if otherwise disposed of, would be a hazardous or acutely hazardous waste under 40 CFR part 261, must comply with the notification requirements in 40 CFR 403.12(p)(1) and (3) unless exempted under the provisions of 40 CFR 403.12(p)(2). Any written notification required by this subsection shall be provided to the city, the EPA Regional Waste Management Division Director and state hazardous waste authorities. The industrial user shall certify that it has a program in place to reduce the volume and toxicity of hazardous wastes generated to the degree it has determined to be economically practical. The city may accept a copy of a hazardous waste reduction or minimization plan otherwise required by law, as compliance with this requirement.

- **Section 14.08.210, General discharge regulations**: It is unlawful to discharge or cause to be discharged directly or indirectly, any pollutant or wastewater into any storm sewer or into any sewage facility that will interfere with the operation or performance or pass through of the POTW. These general prohibitions apply to all users whether or not the user is subject to categorical pretreatment standards or any other national, state, or local pretreatment standards or requirements. The discharge of the following is prohibited:

    1. Wastes or wastewater containing any radioactive materials except in compliance with applicable state and federal regulations;

    2. Any pesticides containing algaecides, antibiotics, fungicides, herbicides, insecticides or any similar pesticides in amounts deleterious to any sewage treatment process or to the aquatic life of the waters receiving the effluent; and

    3. Any wastewater or pollutant that results in the presence of toxic gases, vapors or fumes within the POTW in a quantity that may cause acute worker or public health or safety problems.

Impacts and Mitigation Measures

Significance Criteria

Based on Appendix G of the CEQA Guidelines, the proposed project would have a significant hazards and hazardous materials impact if it would do any of the following.

- Create a significant hazard to the public or the environment through the routine transport, use or disposal of hazardous materials.
- Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
- Emit hazardous emissions, or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school.
- Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.
- For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project results in a safety hazard or excessive noise for people residing or working in the project area.
- Impair implementation of or physical interference with an adopted emergency response plan or emergency evacuation plan.
- Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires.

Routine Transport, Use, Disposal or Storage of Hazardous Materials

Impact Haz-1: Routine Use of Hazardous Materials. With compliance with applicable regulations, the project would not expose employees, the nearby public, or the environment to significant hazards due to the routine transport, use, disposal, or storage of hazardous materials (including chemical, radioactive and biohazardous waste). (***Less than Significant***)

Construction at the project site would involve small amounts of hazardous materials routinely used in construction, such as fuels, paints, and solvents.

The proposed project would result in development and operation of an office and R&D building which may include laboratories and other research facilities that are likely to use, store or require the transportation and disposal of hazardous materials, depending on the particulars of the future tenant(s). The amount and type of hazardous materials may vary over time, with changes in research and additions to hazardous materials lists. These hazardous materials may include inorganic and organic chemicals, chemical reagents and reaction products, solvents, mercury, lead, asbestos, radioisotopes, biohazards, fuels, oils, paints, cleansers, and pesticides.

For the handling of hazardous materials during operations, the facility would be required to adhere to all applicable state and local regulations, seek consultation with the SMCEHD, and apply for applicable permits. In addition, registration of the materials through the SMCEHD Hazardous Material Business Plan Program would be required to ensure safe and responsible handling. Additionally, hazardous chemicals that are typical in office settings (e.g., toners, paints, kitchen and restroom cleaners, and other maintenance materials) would likely also be used. Landscaping and maintenance on the project site would require the use of a wide variety of commercial products that are formulated with hazardous materials (e.g., fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides). Such materials are considered common and are unlikely to be stored or used in large quantities. Any spills involving these materials would be small and localized and would be cleaned up as they occur.

The City requires that building spaces be designed to handle the intended uses, with sprinklers, alarms, vents, and secondary containment structures, in accordance with the guidelines laid out in the City's Fire Code. Compliance with state and local regulations would ensure that buildings are equipped with safety measures including sprinklers, alarms, etc., to minimize potential impacts of the presence of hazardous materials. The City further requires that upon completion of the construction of the proposed building, occupancy is not allowed until a final inspection is made by the South San Francisco Fire Department (SSFFD) for conformance of all building systems with the City's Fire Code and National Fire Protection Association requirements. The inspection includes a review of the emergency evacuation plans. Finally, compliance with the California Department of Transportation regulations would ensure that all necessary safety precautions would be taken during transport of hazardous materials during all phases of the project. Therefore, with compliance with applicable regulations, the proposed project would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials during operation and this impact would be ***less than significant***.

Hazardous Materials Site and Reasonably Foreseeable Upset and Accident Conditions

Impact Haz-2: Accidental Release of Hazardous Materials. Through compliance with applicable regulations, the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. (***Less than Significant with Mitigation***)

Project construction and operation would involve the routine transport, use, disposal, and/or storage of hazardous materials. Impacts related to such routine handling are addressed above.

The project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, and is adjacent to the now-closed Oyster Point Landfill. Hazardous materials upset or accident could have the potential to occur related to these hazardous materials concerns as described below.

As detailed in the Phase I Environmental Site Investigation and summarized above, site contamination concerns include a layer of burn ash with elevated concentrations of metals and the possible presence of methane in the soil vapor due to migration of landfill gas from the former Oyster Point Landfill to the east.

A closure/post-closure development plan (PCMP) is in place at the project site. The project requires approval from the San Mateo County Department of Environmental Health, which will include an amended PCMP to reflect the proposed development at the site.

Consistent with the current PCMP, an amended PCMP will include measures designed to minimize potential exposure of workers and building occupants to contaminated soils and vapor during and after site development. This is likely to be achieved generally through capping site soils with asphalt, concrete and vegetative barriers; installation of a vapor barrier and venting system below the building foundation to address the potential for migration onto the site of combustible vapor; and implementation of safety measures for soil handling during construction.

Project construction activities have the potential to result in the release of contaminated soils and project operation has the potential to bring site users into contact with contaminated soils and combustible vapors. This impact is considered potentially significant and requires mitigation consistent with an approved amended PCMP, and as also listed in the measure below.

Mitigation Measure Haz-2: Adherence to Remediation Measures. The applicant or the project sponsor shall ensure that project design and construction incorporate the recommended remediation measures in an Amended Site Closure Plan and Post-Closure Maintenance Plan (PCMP) approved by the San Mateo County Department of Environmental Health, to avoid or reduce the hazards related to the presence of hazardous materials (burn ash) and combustible vapor at this site. The remediation measures are anticipated to include the following, based on measures contained in the current PCMP:

- Placement of cap throughout the development area consistent with the final cover / capping plan in an approved Amended PCMP.
- Installation of building combustible gas protection and monitoring features to consist of a subfloor vapor barrier and passive venting system, and interior alarm system, unless determined not to be necessary (due to vapor levels following current removal of landfill materials from nearby portions of the Oyster Point Landfill).
- Adhering to applicable provisions of the existing Risk Management Plan and Health and Safety Plan for soil handling during excavations for utility trenches, foundations, and other site work.
- Adherence to water conservation standards for landscaping and irrigation to reduce or eliminate the potential for water infiltration into underlying contaminated soil layers.

Consistent with conclusions under the current PCMP, compliance with an amended PCMP would result in human health and ecological risk evaluations during both construction and operations to be insignificant assuming implementation of identified measures into the proposed project. With implementation of Mitigation Measure Haz-2, the impact relating to a hazardous material site and the accidental release of hazardous materials would be ***less than significant***.

Emissions of Hazardous Materials near a School

There are no existing schools within one-quarter mile of the project site and none within the East of 101 Area. There are no childcare facilities within one-quarter mile of the project site. The closest daycare centers are approximately 0.5 miles from the project site, including the Cabot 2nd Generation at 342 Allerton Avenue and the 2nd Generation at 444 Allerton Avenue, as well as the private Early Years

Preschool at 371 Allerton Avenue. The project would have ***no impact*** with respect to hazardous materials within one-quarter mile of a school.

Hazardous Materials Site

The project site is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Because the contamination at the site represents potential impacts related to upset and accident conditions during site construction, these criteria are assessed together under Impact Haz-2 above.

Safety Hazards Related to a Public or Private Airport or Airstrip

Impact Haz-3: **Development within Airport Land Use Plan Boundaries**. The proposed project is located within the Airport Land Use Plan boundaries of San Francisco International Airport (SFO), but the project would comply with applicable regulations including required consultation with the Federal Aviation Administration prior to construction and would not result in a safety hazard for people residing or working at the project site. (***Less than Significant***)

The project site is within the boundary of the SFO ALUCP and as such, the compatibility criteria contained within the ALUCP are applicable to development at the project site. Most of the East of 101 Area, including the project site, is located outside of the ALUCP-designated Safety Compatibility zone that would have restricted types of uses, but within Airport Land Use Compatibility Area B, which requires Airport Land Use Commission review of land development proposals, such as the proposed project to confirm compatibility with airport uses and airspace safety. Development on the project site is limited to heights between 200 and 250 feet above mean sea level according to the ALUCP but could be modified through consultation with the Federal Aviation Administration (FAA). The proposed project rooftop elements would reach up to 128 feet above ground level on a site that is approximately 60 feet above mean sea level for a total height above mean sea level of approximately 188 feet. Thus, the project would be consistent with height limitations identified in the ALUCP. Notification and consultation with the Airport Land Use Commission would be required under CFR part 77.9 and would ensure that the project is compatible with the SFO ALUCP. Therefore, this impact would be ***less than significant***. [1]

Impairment or Interference with an Emergency Response or Evacuation Plan

Impact Haz-4: Temporary Construction Obstructions. The proposed project would not result in permanent changes to the roadway system or otherwise result in changes to area emergency response or evacuation plans. No substantial construction-period roadway obstruction is planned and any temporary construction obstructions would follow appropriate procedures. (***Less than Significant***)

[1] 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, including Exhibit IV-14 . Available at: http://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf

The project would not include any changes to existing public roadways that provide emergency access to the site or surrounding area. Vehicular access to and from the project would be via two existing mutual access easements with nearby properties and one additional new access to Gull Drive, which would be available via a mutual access easement to nearby properties, providing an additional point of ingress/egress to all nearby properties. The proposed project would be designed to comply with the California Fire Code and the City Fire Marshal's code requirements that require on site access for emergency vehicles, a standard condition for any new project approval.

No substantial obstruction in public rights-of-way has been proposed with the project's construction activities. However, any construction activities can result in temporary intermittent roadway obstructions, but these would be handled through standard procedures with the City to ensure adequate clearance is maintained.

Therefore, with compliance with applicable regulations and standard procedures, the impact with respect to impairment or interference with an Emergency Response or Evacuation Plan would be ***less than significant***.

Wildland Fires

The project site is a highly developed industrial area, and no wildlands are intermixed within this industrial area. The closest wildlands area is San Bruno Mountain County Park located approximately one mile away. The proposed project would not exacerbate wildfire risks of any nature, would not substantially impair an adopted emergency evacuation plan or emergency response plan, and it not located in or near a Local or State Responsibility area with a Very High Fire Hazard Severity Zone designation. The project is not susceptible to significant risk of loss, injury or death involving wildland fires and there would be ***no impact*** in this regard.[2]

Cumulative Hazards Risks

The project, when combined with other past, present, existing, approved, pending and reasonably foreseeable development in the vicinity, would not result in significant cumulative hazards. With implementation of applicable regulatory requirements, cumulative impacts related to hazards and hazardous materials would be less than significant. Cumulative health and safety impacts could occur if off-site hazards related to the project were to interact with or combine with similar effect of other cumulative development within the East of 101 Area. These impacts could only occur through limited mechanisms: air emissions, transport of hazardous materials and waste, inadvertent release of hazardous materials to the sewer or non-hazardous waste landfill, and potential accidents that require hazardous materials emergency response capabilities.

Because cumulative land use in the East of 101 Area relies on the same roads to be used by the project, the project would contribute to a cumulative increase in the amount of hazardous materials transported to and from the area. Cumulative increases in the transportation of hazardous materials and wastes

[2] California Department of Forestry and Fire Protection. 2007. San Mateo County Fire Hazard Severity Zones in SRA. Available: https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building- codes/fire-hazard-severity-zones-maps/.

would not be significant because the probability of accidents is relatively low due to stringent regulations that apply to transport, use and storage of hazardous materials. The project, in combination with other development in the East of 101 Area would add to cumulative traffic congestion on those roadways used for evacuation. Traffic congestion during an evacuation event is inevitable, but the roadway system in the East of 101 Area allows for multiple possible evacuation routes in the case of an emergency.

For these reasons, the proposed project, in combination with other past, present, and reasonably foreseeable future projects, and with compliance with identified regulation and project-specific mitigation, would not result in additional significant cumulative hazards or hazardous materials impacts.

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5
Transportation

Introduction

This chapter of the EIR evaluates the potential impacts of the project related to transportation. It has been prepared in coordination with Fehr & Peers.

Environmental Setting

Roadway Facilities

The project site is located on the west side of Gull Drive near Oyster Point Boulevard and Eccles Avenue in the City of South San Francisco's East of 101 employment area. Regional access to the project site is provided via U.S. Route 101 (U.S. 101) accessed via Oyster Point Boulevard to the north and East Grand Avenue via Eccles Avenue or Forbes Boulevard to the south. **Figure 5.1** shows the project location and the surrounding roadway and transit system. Project site vehicular access is provided via a new two-way driveway on Gull Drive to the east, an easement to Oyster Point Boulevard to the north (via 340 Oyster Point Boulevard), and an easement to Eccles Avenue to the west (via 570-590 Eccles Avenue).

- U.S. 101 is an eight-lane freeway and principal north-south roadway connection between San Francisco, San José, and intermediate San Francisco Peninsula cities. In South San Francisco, U.S. 101 is located approximately one mile west of the project site and serves the East of 101 area with three primary access points. Near the project site, U.S. 101 carries about 220,000 vehicles per day and defines the East of 101 area's western edge and barrier to east-west bicycle and pedestrian connectivity. Access points are listed below:

    - Oyster Point Boulevard: Northbound on- and off-ramps intersect Dubuque Avenue at and immediately south of Oyster Point Boulevard. Southbound on-ramps are at Dubuque Avenue, adjacent to the northbound off-ramp. The southbound off-ramp intersects Gateway Boulevard/Oyster Point Boulevard as the intersection's fifth leg.

    - East Grand Avenue: Northbound off-ramps are at East Grand Avenue/Poletti Way and on-ramps are to the west at Grand Avenue/Airport Boulevard. Southbound off-ramps are at Airport Boulevard/Miller Avenue. There is no southbound freeway access at this location.

    - South Airport Boulevard: Northbound on- and off-ramps are at South Airport Boulevard/ Wondercolor Lane; southbound on- and off-ramps are immediately south of the San Mateo Avenue/Produce Avenue/South Airport Boulevard intersection.

- Gull Drive is a two-lane road connecting Oyster Point Boulevard with Forbes Boulevard and provides direct vehicular access to the project site. It has Class II bicycle lanes and is signalized where it connects to Oyster Point Boulevard and Forbes Boulevard.

- Eccles Avenue is a two-lane roadway connecting Oyster Point Boulevard on the north and Forbes Boulevard on the south. Signalized at both Oyster Point Boulevard and Forbes Boulevard, Eccles Avenue has no street parking. The project site can be accessed from Eccles Avenue via an easement driveway.

- Oyster Point Boulevard is an east-west arterial street that connects U.S. 101 with the Oyster Point Marina. It has mostly four travel lanes between Gull Drive and U.S. 101. The project site could be accessed from Oyster Point Boulevard via an easement driveway.

- Forbes Boulevard is a four-lane street extending north from East Grand Avenue, then running east into the Genentech campus, terminating at DNA Way. East of Allerton Avenue, Forbes Boulevard has two lanes and Class II buffered bicycle lanes. There is not direct driveway access from the project site to Forbes Boulevard.

- East Grand Avenue is an east-west arterial street. It has six travel lanes west of Gateway Boulevard, four travel lanes east of Gateway Boulevard, and two travel lanes east of Haskins Way. U.S. 101 freeway ramps at East Grand Avenue enable project site access from the south.

Transit Facilities and Service

Transit services are not located along the project's frontage, but there are transit options within walking distance of the project site. The South San Francisco Ferry Terminal is located approximately 0.6 miles from the project site (a 10 to 15 minute walk). The South San Francisco Caltrain station and South San Francisco BART Station are farther away (approximately 1.5 miles and 4.1 miles, respectively) and no SamTrans bus service currently serves the east of U.S. 101 area in South San Francisco near the project site. The project site therefore relies on supplementary public shuttle services to connect employees with regional transit. Shuttles to BART and Caltrain operated by the Peninsula Traffic Congestion Relief Alliance (Commute.org) stop about 0.2 miles from the project site on Oyster Point Boulevard. Existing transit services are shown in **Figure 5.1**.

Regional Transit Service

The following transit services operate within South San Francisco and are accessible from the project site, primarily via Commute.org shuttles. Descriptions provided in this section reflect conditions prior to the COVID-19 pandemic, which has resulted in atypical travel behavior and changes to transit services.

- BART provides regional rail service between the East Bay, San Francisco, and San Mateo County, connecting between San Francisco International Airport and Millbrae Intermodal Station to the south, San Francisco to the north, and Oakland, Richmond, Pittsburgh/Bay Point, Dublin/Pleasanton and Fremont in the East Bay. Two BART lines serve South San Francisco Station: the Yellow Line connecting Antioch with San Francisco International Airport, and the Red Line connecting Richmond and Millbrae. Each BART line operates every 15-minutes throughout the day.

- Caltrain provides passenger rail service on the Peninsula between San Francisco and San José, and limited service to Morgan Hill and Gilroy during weekday commute periods. The South San Francisco Caltrain Station serves local and limited trains, with 23 northbound and 23 southbound weekday trains. The South San Francisco Caltrain Station provides weekday service from around 5:30 A.M. to 12:00 A.M., with approximately 30-minute headways during peak times and 60-minute headways during off-peak times. In 2022, Caltrain plans to relocate the South San Francisco Caltrain station

Figure 5.1: Project Vicinity Roadways and Transit Facilities

Source: Fehr & Peers

several hundred feet to the south near the East Grand Avenue/Airport Boulevard intersection and provide more direct pedestrian and shuttle access to the East of 101 area via a tunnel with access at East Grand Avenue and Poletti Way. By 2024, Caltrain plans to complete its electrification project to support the operation of faster and more frequent rail service on the Peninsula.

- The Water Emergency Transportation Authority (WETA) provides weekday commuter ferry service between the Oakland/Alameda ferry terminals and the South San Francisco Ferry Terminal at Oyster Point. There are three morning departures from Oakland/Alameda to South San Francisco, and three evening departures from South San Francisco to Oakland/Alameda.

- SamTrans provides bus service in San Mateo County but does not serve the East of 101 employment area near the project site. Draft recommendations from the Reimagine SamTrans project call for extending Route 130 from its current terminus in downtown South San Francisco into the East of 101 area via East Grand Avenue, Gateway Boulevard, and Oyster Point Boulevard by Fall 2022; however, these recommendations have not yet been adopted.

East of 101 Commuter Shuttle Service

Commute.org provides weekday commute period first/last mile shuttles connecting employers with BART, Caltrain, and the ferry. Three shuttle routes serve the Oyster Point Boulevard corridor connecting to the South San Francisco BART station, the South San Francisco Caltrain Station, and the South San Francisco Ferry Terminal. Shuttles have timed connections to Caltrain and ferry service, while BART shuttles meet every other peak period trains. While the closest eastbound shuttle stop to the project site is located about 0.2 mile away near the intersection of Oyster Point and Eccles Avenue, there is no corresponding westbound shuttle stop.

Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, trails, and pedestrian signals. Pedestrian facilities near the project site tend to serve walking trips connecting to shuttle stops, the ferry terminal, and nearby offices and businesses. The following pedestrian facilities exist near the project site:

- Gull Drive has a continuous sidewalk along the east side of the street connecting Oyster Point Boulevard to Forbes Boulevard. A partial sidewalk on the west side of the street also connects the project site to Oyster Point Boulevard, but this sidewalk does not continue to Forbes Boulevard due to steep grades and a drainage culvert.

- Oyster Point Boulevard has a continuous sidewalk on the southern side of the street but does not have a sidewalk on the northern side between Gull Drive and Eccles Avenue. Oyster Point Boulevard may be accessed from the project site via the western sidewalk along Gull Drive or via the western easement driveway through 340 Oyster Point Boulevard. At the intersection of Oyster Point Boulevard and Gull Drive, marked crosswalks exist on the south and east legs of the intersection. Oyster Point Boulevard provides the primary pedestrian connection to shuttle services as well as the South San Francisco Ferry Terminal.

- Eccles Avenue has a continuous sidewalk on the western side of the street but lacks a sidewalk on the eastern side of the street. Eccles Avenue may be accessed from the project site via the western easement driveway along 570-590 Eccles Avenue.

- Forbes Boulevard has a sidewalk on the north side of the street that connects to the sidewalk on the western side of Gull Drive. Forbes Boulevard provides pedestrian access to the northern end of the Genentech campus.

- A segment of the San Francisco Bay Trail runs along the shoreline in the East of 101 area, providing a continuous off-street shared-use trail connection between Brisbane's Sierra Point to the north and South Airport Boulevard at the San Bruno Canal to the south.

Gaps in sidewalks near the project site are shown on **Figure 5.2**.

Bicycle Facilities

Bicycle facilities consist of separated bikeways, bicycle lanes, routes, trails, and paths, as well as bicycle parking, bicycle lockers, and showers for cyclists. The California Department of Transportation (Caltrans) recognizes four classifications of bicycle facilities as described below.

Class I—Shared-Use Pathway:	Provides a completely separated right-of-way for the exclusive use of cyclists and pedestrians with crossflow minimized (e.g., off-street bicycle paths).
Class II—Bicycle Lanes:	Provides a striped lane for one-way travel on a street or highway. May include a "buffer" zone consisting of a striped portion of roadway between the bicycle lane and the nearest vehicle travel lane.
Class III—Bicycle Route:	Provides for shared use with motor vehicle traffic; however, are often signed or include a striped bicycle lane.
Class IV—Separated Bikeway:	Provides a right-of-way designated exclusively for bicycle travel adjacent to a roadway and which are protected from vehicular traffic. Types of separation include, but are not limited to, grade separation, flexible posts, inflexible physical barriers, or on-street parking.

Current bicycle facilities in the project vicinity, as designated by the City's Bicycle Master Plan and the draft Active South City: Bicycle and Pedestrian Master Plan (ongoing), are shown in **Figure 5.2** and discussed below.

- Gull Drive has Class II bicycle lanes between Oyster Point Boulevard and Forbes Boulevard and provides bicycle connectivity between the project site to Forbes Boulevard and Oyster Point Boulevard.

- Forbes Boulevard has Class II bicycle lanes between Allerton Avenue and DNA Way. An extension of bike lanes between Eccles Avenue and Allerton Avenue is planned.

- Oyster Point Boulevard has Class II bicycle lanes between Gull Drive and Gateway Boulevard.

- The Bay Trail is a Class I mixed-use trail along the San Francisco Bay shoreline.

Figure 5.2: Project Vicinity Bicycle and Pedestrian Facilities

Source: Fehr & Peers

Bicyclists primarily access the project site from Oyster Point Boulevard and Forbes Boulevard via Gull Drive and Eccles Avenue. While the City continues to expand its bicycle network, the East of 101 area has historically experienced low volumes of bicyclists due to commute lengths, lack of continuous low stress bicycle facilities, lack of network connectivity to residences and transit stations, and topography.

The reconstructed South San Francisco Caltrain station (currently under construction, with completion expected in 2022) features a bicycle and pedestrian undercrossing that will connect the East of 101 area to residents and transit facilities west of U.S. 101. The undercrossing represents the first non-motorized connection spanning the Caltrain and U.S. 101 corridors, which represent substantial barriers to east-west bicycle and pedestrian travel.

Emergency Vehicle Access

Emergency vehicles typically use major streets through the study area when heading to and from an emergency and/or an emergency facility. Arterial roadways allow emergency vehicles to travel at higher speeds and provide enough clearance space to permit other traffic to maneuver out of the path of the emergency vehicle and yield the right-of-way. The nearest fire station to the project is Fire Station 62 located at 249 Harbor Way, approximately 1.4 miles south of the project site. Emergency vehicle access to the project site presently occurs via easements at 570-590 Eccles Avenue and 340 Oyster Point Boulevard.

Regulatory Setting

Summary

The City of South San Francisco has jurisdiction over all local City streets and City-operated traffic signals within the study area. Several regional agencies, including the San Mateo City/County Association of Governments (C/CAG), the Congestion Management Agency in San Mateo County, and the Metropolitan Transportation Commission (MTC), coordinate and establish funding priorities for intra-regional transportation improvement programs. Freeways serving South San Francisco (US 101, I-380 and I-280), associated local freeway ramps and local surface highway segments are under the jurisdiction of the State of California Department of Transportation (Caltrans). Transit service providers such as BART, Caltrain, SamTrans, and WETA (ferry service), have jurisdiction over their respective services.

State

California Department of Transportation

Caltrans has authority over the state highway system, including freeways, interchanges, and arterial routes. Caltrans operates and maintains state highways in the project site vicinity. The Guide for the Preparation of Traffic Impact Studies (Caltrans 2001) provides information that Caltrans uses to review impacts on state highway facilities, including freeway segments. This guidance was updated by the Local Development – Intergovernmental Review Program Interim Guidance published in November 2016 for consistency with Senate Bill (SB) 743, described below.

Assembly Bill 32 and Senate Bill 375

With the passage of Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006, the state committed itself to reducing greenhouse gas (GHG) emissions to 1990 levels by 2020. The California Air Resources Board (CARB) is coordinating a response to comply with AB 32. In 2008, CARB defined its 1990 baseline level of emissions. On December 11, 2008, CARB adopted its Proposed Scoping Plan for AB 32. This scoping plan included approval of SB 375 as the means for achieving regional transportation-related GHG targets. In 2011, CARB completed its major rulemaking for reducing GHG emissions. Rules on emissions, as well as market-based mechanisms such as the cap-and-trade program, took effect on January 1, 2012.

SB 375 provides guidance regarding curbing emissions from cars and light-duty trucks to help the state comply with AB 32. There are four major components to SB 375. First, SB 375 requires regional GHG emissions targets. CARB's Regional Targets Advisory Committee guides the adoption of targets to be met by 2020 and 2035 for each Metropolitan Planning Organization (MPO) in the state. These targets, which MPOs may propose themselves, must be updated every eight years in conjunction with the revision schedule of the housing and transportation elements of local general plans. Second, MPOs are required to create a Sustainable Communities Strategy (SCS) that provides a plan for meeting regional targets. The SCS and the Regional Transportation Plan (RTP) must be consistent, including action items and financing decisions. If the SCS does not meet the regional target, the MPO must produce an alternative planning strategy that details an alternative plan for meeting the target. Third, SB 375 requires regional housing elements and transportation plans to be synchronized on eight-year schedules. In addition, Regional Housing Needs Assessment allocation numbers must conform to the SCS. If local jurisdictions are required to rezone land as a result of changes in the housing element, rezoning must take place within three years of adoption of the housing element. Finally, MPOs must use transportation and air emissions modeling techniques that are consistent with the guidelines prepared by the California Transportation Commission. Regional transportation planning agencies, cities, and counties are encouraged, but not required, to use travel demand models that are consistent with California Transportation Commission guidelines. The adopted RTP, per SB 375 (Plan Bay Area 2040), is discussed below.

Complete Streets (AB 1358)

Assembly Bill (AB) 1358, also known as the California Complete Streets Act of 2008, requires cities and counties to include "complete street" policies in their general plans. These policies address issues regarding the safe accommodation of all users, including bicyclists, pedestrians, motorists, public transit vehicles and riders, children, the elderly, and persons with disabilities. These policies can apply to new streets as well as the redesign of transportation corridors.

Senate Bill 743

Senate Bill (SB) 743, was signed into law in 2013 and is codified in Section 21099 of the California Public Resources Code with the intent to better align CEQA transportation impact analysis practices and mitigation outcomes with the State's goals to reduce greenhouse gas (GHG) emissions, encourage infill development, and improve public health through more active transportation. SB 743 created several key statewide changes to CEQA, as described in the EIR sections referenced above. This discussion focusses on changes related to the assessment of transportation and parking impacts under CEQA.

As required by SB 743, the Office of Planning and Research (OPR) amended CEQA Guidelines Section 15064.3 to provide an alternative to automobile delay, as described by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, for evaluating traffic impacts of proposed projects. The new metric, vehicle miles traveled (VMT), measures the total number of miles traveled by vehicles daily on the roadway network and thereby the impacts on the environment from those miles traveled (e.g., through GHG emissions). In other words, SB 743 changes the focus of transportation impact analysis in CEQA from measuring impacts on drivers to measuring the impact of driving on the environment, particularly as it relates to GHG emissions. Land use projects with one or more of the following characteristics would generally have lesser VMT impacts relative to projects without these characteristics:

- A mix of project uses;
- Support for a citywide jobs/housing balance;
- Proximity to high-quality transit service; and
- Locations in highly walkable or bikeable areas.

Additionally, CEQA Guidelines Section 15064.3 (b)(1) states that lead agencies generally should presume that projects within 0.5 mile of an existing major transit stop or an existing stop along a high-quality transit corridor will have a less-than-significant impact on VMT. This presumption would not apply, however, if project-specific or location-specific information indicates that the project will still generate significant levels of VMT. For transportation infrastructure projects, such as a street extension, projects that reduce or have no impact on VMT are presumed to have a less-than-significant impact on VMT.

This shift in transportation impact criteria is expected to align transportation impact analysis and mitigation outcomes with state goals to reduce GHG emissions, encourage infill development, and improve public health through more active transportation. Although OPR provides recommendations for adopting new VMT analysis guidelines, lead agencies retain discretion in designing their methodology. Lead agencies must select their preferred method for estimating and forecasting VMT, their preferred significance thresholds for baseline and cumulative conditions, and the mitigation strategies they consider feasible. Lead agencies must prove that their selected analysis methodology aligns with SB 743's goals to promote infill development, reduce GHGs, and reduce VMT. To aid in SB 743 implementation, the following state guidance has been published:

- OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA
- California Air Resources Board's (CARB's) 2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals
- California Department of Transportation's (Caltrans') Local Development–Intergovernmental Review Program Interim Guidance, Implementing Caltrans Strategic Management Plan 2015–2020 Consistent with SB 743

On June 10, 2020, the City of South San Francisco adopted Resolution 77-2020 establishing VMT thresholds and methodology effective July 1, 2020. The VMT thresholds applied in this analysis are further described in the Significance Criteria section below.

Regional

San Mateo City/County Association of Governments

The San Mateo City/County Association of Governments (C/CAG) is the Congestion Management Agency (CMA) for San Mateo County and is authorized to set State and federal funding priorities for improvements affecting the San Mateo County Congestion Management Program (CMP) roadway system. The C/CAG-designated CMP roadway system in South San Francisco near the project site includes U.S. 101 and Interstate 380.

C/CAG has adopted guidelines to reduce the number of net new vehicle trips generated by new land development. These guidelines apply to all developments that generate 100 or more net new peak hour vehicular trips on the CMP network and are subject to CEQA review. The goal of these guidelines is that developers and/or tenants will reduce demand for all new peak hour trips (including the first 100 trips) projected to be generated by a development.

C/CAG has adopted guidelines as a part of its CMP, which are intended to reduce the regional traffic impacts of substantive new developments. The guidelines apply to all projects in San Mateo County that will generate 100 or more net new peak hour trips on the CMP network and are subject to CEQA review. C/CAG calls for projects that meet the criteria to determine if a combination of acceptable measures is possible that has the capacity to "fully reduce," through the use of a trip credit system, the demand for net new trips that the project is anticipated to generate on the CMP roadway network (including the first 100 trips). C/CAG has published a list of mitigation options in a memorandum. South San Francisco's Transportation Demand Management (TDM) ordinance is consistent with CCAG's ordinance, so by adhering to the City's ordinance, the proposed project would also be compliant with CCAG's guidelines.

Local

City of South San Francisco General Plan

The 1999 South San Francisco General Plan (General Plan) provides a vision for long-range physical and economic development of the City, provides strategies and specific implementing actions, and establishes a basis for judging whether specific development proposals and public projects are consistent with the City's plans and policy standards. The General Plan contains a Transportation Element, which includes policies, programs, and standards to enhance capacity and provide new linkages to provide "Complete Streets" that are safe, comfortable, and convenient routes for walking, bicycling, and public transportation to increase use of these modes of transportation, enable active travel as part of daily activities, reduce pollution, help reduce transportation demand, and meet the needs of all users of the streets, including bicyclists, children, persons with disabilities, pedestrians, users of public transportation, seniors, youth, and families, while continuing to maintain a safe and effective transportation system for motorists and movers of commercial goods. The general plan includes the following policies that are applicable to transportation and circulation.

- Guiding Principle 4.2-G-1: Undertake efforts to enhance transportation capacity, especially in growth and emerging employment areas such as in the East of 101 area.

- Guiding Principle 4.2-G-2: Improve connections between different parts of the city. These would help integrate different parts of the city. Connections between areas west and east of U.S. 101 (currently limited to streets that provide freeway access) would also free-up capacity along streets

Grand Avenue and Oyster Point Boulevard that provide access to U.S. 101. (Amended by Resolution 26-2014, adopted February 12, 2014)

- Guiding Principle 4.2-G-8: Use the Bicycle Master Plan to identify, schedule, and implement roadway improvements that enhance bicycle access. (Amended by Resolution 26-2014, adopted February 12, 2014)

- Guiding Principle 4.2-G-9: Use the Pedestrian Master Plan to identify, schedule, and implement roadway improvements that enhance pedestrian access. (Amended by Resolution 26-2014, adopted February 12, 2014)

- Guiding Principle 4.2-G-10: Make efficient use of existing transportation facilities and, through the arrangement of land uses, improved alternate modes, and enhanced integration of various transportation systems serving South San Francisco, strive to reduce the total vehicle-miles traveled.

- Guiding Principle 4.2-G-13: Integrate Complete Streets infrastructure and design features into street design and construction to create safe and inviting environments for people to walk, bicycle, and use public transportation. (Amended by Resolution 136-2014, adopted December 10, 2014)

- Guiding Principle 4.2-G-14: Make Complete Streets practice a routine part of South San Francisco's everyday operations. (Amended by Resolution 136-2014, adopted December 10, 2014)

- Guiding Policy 4.3-G-3: In partnership with employers, continue efforts to expand shuttle operations.

- Guiding Policy 4.3-G-4: In partnership with the local business community, develop a transportation systems management plan with identified trip-reduction goals, while continuing to maintain a positive and supportive business environment.

- Implementing Policy 4.3-I-4: Require provision of secure covered bicycle parking at all existing and future multifamily residential, commercial, industrial, and office/ institutional uses.

- Implementing Policy 4.3-I-11: As part of any development in Lindenville or East of 101, require project proponents to provide sidewalks and street trees as part of frontage improvements for new development and redevelopment projects.

- Implementing Policy 4.3-I-16: Favor Transportation Systems Management programs that limit vehicle use over those that extend the commute hour.

- Implementing Policy 4.4-I-4: Encourage SamTrans to increase the shuttle or bus-service to the East of 101 area to better serve the area's growing employment base.

The City of South San Francisco is presently updating its General Plan but has not yet adopted new transportation policies.

South San Francisco Bicycle Master Plan and Pedestrian Master Plan

The City's Bicycle Master Plan identifies and prioritizes street improvements to enhance bicycle access. The plan analyzes bicycle demand and gaps in bicycle facilities and recommends improvements and programs for implementation as described in the policy below.

- Policy 3.2-1: All development projects shall be required to conform to the Bicycle Transportation Plan goals, policies and implementation measures.

The City's Pedestrian Master Plan identifies and prioritizes street improvements to enhance pedestrian access. The plan analyzes pedestrian demand and gaps in pedestrian facilities and recommends improvements and programs for implementation. The Pedestrian Master Plan establishes the following policy related to the project:

- Policy 3.2: Pedestrian facilities and amenities should be provided at schools, parks, and transit stops, and shall be required to be provided at private developments, including places of work, commercial shopping establishments, parks, community facilities and other pedestrian destinations.

The City is currently updating both the Bicycle Master Plan and Pedestrian Master Plan via the Active South City: Bicycle and Pedestrian Master Plan.

South San Francisco Transportation Demand Management Ordinance

The City's Transportation Demand Management (TDM) Ordinance, which is specified in Title 20 of the City's Municipal Code in Chapter 20.400, Transportation Demand Management, seeks to reduce the amount of traffic generated by nonresidential development and minimize drive-alone commute trips. The ordinance establishes a performance target of 28 percent minimum alternative mode share for all nonresidential projects resulting in more than 100 average daily trips and identifies higher thresholds for projects requesting a floor area ratio (FAR) bonus.

Per the ordinance, all projects are required to submit annual mode share surveys. Project sponsors seeking an FAR bonus are required to submit triennial reports assessing project compliance with the required alternative mode share target. Where targets are not achieved, the report must include program modification recommendations and City officials may impose administrative penalties should subsequent triennial reports indicate mode share targets remain unachieved.

Impacts and Mitigation Measures

Significance Criteria

Based on Appendix G of the CEQA Guidelines, the proposed project would have a transportation and circulation impact if it would do any of the following:

- Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

- Generate per-employee VMT greater than the City's adopted threshold of 15 percent below the regional average, pursuant to CEQA Guidelines Section 15064.3, subdivision (b) and City of South San Francisco Resolution 77-2020 related to VMT;

- Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses; or

- Result in inadequate emergency access.

Project Trip Characterization

While congestion-based analysis is no longer used for assessment of CEQA impacts per SB 743 and City of South San Francisco Resolution 77-2020, the project's trip generation is still useful in conveying an understanding of the project and to better assess circulation on and around the site.

Proposed project traffic added to the surrounding roadway system was estimated using data collected in Fall 2019 from three sample office and research and development (R&D) campus sites in the East of 101 area. Local travel demand data were used instead of national averages because of the unique transportation and land use conditions in the East of 101 area, including peak period spreading, mix of employers, and higher rates of participation in TDM programs. In contrast, national trip generation data such as the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th edition are generally collected at suburban sites with limited non-auto access and less congestion.

The project trip generation rate was derived from the sample site data and multiplied by the size of the proposed project (gross square feet) to determine average weekday, AM peak hour, and PM peak hour vehicle trip generation volume, shown in **Table 15.1**.

Table 5.1: Project Trip Generation

Land Use	Size (KSF)	Daily	AM Peak Hour			PM Peak Hour		
		Total	In	Out	Total	In	Out	Total
Project	166.6	933	147	18	165	24	150	175

Source: Fehr & Peers 2021.

Notes: KSF = thousand square feet.

Trip generation rates based on 2019 driveway count data collected at similar sites in South San Francisco's East of 101 area and reflect a daily rate of 5.6, A.M. Peak Hour rate of 0.99, and P.M. Peak Hour rate of 1.05. Rates are reported in trips per thousand square feet.

According to this trip generation analysis, the new 166,600 square foot office building would generate 933 new daily trips, 165 new AM peak hour trips (147 inbound and 18 outbound), and 175 new PM peak hour trips (24 inbound and 150 outbound). As noted previously, the project site is currently vacant and therefore no trips were discounted from the total trip generation estimate.

Project traffic would exit the site primarily via driveways on Gull Drive and Eccles Avenue, while exiting via Oyster Point Boulevard would be discouraged via site design and signage.

The project would generate non-auto trips, including trips walking and bicycling to and from nearby destinations as well as accessing regional transit. Approximately 60 to 80 walking and bicycle trips would be generated during each peak hour, with most trips occurring via walking to and from nearby shuttle stops and the ferry terminal.

Conflict with a Transit, Bicycle or Pedestrian System Program or Policy

Impact TR-1: Increased Demand for Transit, Bicycle, and Pedestrian Facilities. The proposed project would not produce a detrimental impact to existing bicycle, pedestrian, or transit facilities, or conflict with adopted plans and programs. (***Less than Significant***)

Construction

Construction activities could potentially interfere with programs, plans, ordinances, or policies if temporary closures impede roadways, shuttle stops, bikeways, or pedestrian paths in a way that prohibits the achievement of identified goals. Similarly, construction activities could have a detrimental impact on existing bicycle, pedestrian, or transit facilities if temporary closures impede the use of these facilities. However, while temporary sidewalk and bike lane rerouting on Gull Drive is expected and roadway traffic control would be used as needed during construction, detours would be temporary in nature and would not fully impede movement or have a sustained detrimental impact on existing bicycle and pedestrian facilities. In the event of a temporary construction closure, the project would be required to prepare a traffic control plan that would document how temporary facilities, detour routes, and/or signage would be provided consistent with guidance from the California Manual on Uniform Traffic Control Devices (CA-MUTCD). Therefore, the project would not produce a detrimental impact on existing bicycle and pedestrian facilities during construction and construction-related conflicts with programs, plans, ordinances, or policies addressing the circulation system would be less than significant. No mitigation is required.

Operation

The project would not produce a detrimental impact to existing bicycle or pedestrian facilities or conflict with adopted policies in adopted City plans summarized in the Regulatory Setting section earlier in this chapter. The project would generate additional vehicle trips to existing sidewalks, bikeways, and shuttle routes along streets such as Oyster Point Boulevard and Gull Drive, and would also generate approximately 60 to 80 walking and bicycling trips on such streets during each peak hour. However, by adding approximately three vehicles per minute to the surrounding street network, the project would not adversely affect existing or planned bicycle or pedestrian facilities or substantially lengthen travel times by existing shuttle services. Although the project would add a new driveway across existing bike lanes on Gull Drive, the bike lanes would be marked per applicable design standards to minimize potential conflicts with vehicles.

Therefore, the project's impacts to walking, bicycling, and transit facilities would be less than significant. In addition, project-related conflicts with programs, plans, ordinances, or policies addressing the circulation system would be less than significant. No mitigation is required.

Vehicle Miles Travelled

Impact TR-2: Vehicles Miles Traveled. The vehicle miles traveled per employee exceeds the City's adopted threshold of 15 percent below the regional average under existing and future conditions. (***Significant and Unavoidable with Mitigation***)

On June 10, 2020, the City of South San Francisco adopted Resolution 77-2020 establishing VMT thresholds and methodology effective July 1, 2020. The adopted VMT threshold for land use projects determines that a project would have a significant transportation impact if the VMT for the project would be 15 percent below the applicable baseline VMT.

The project was analyzed based on home-based work (HBW) VMT per employee as shown in **Table 5.2**. HBW VMT per employee was derived from the C/CAG Travel Demand Model. This metric follows City

and OPR guidance for measuring office project VMT and helps compare the project's relative transportation efficiency to the regional average baseline.

Based on these factors, a significant impact would occur if existing HBW VMT per employee in the transportation analysis zone (TAZ) results in greater than 15 percent below the existing regional average. Based on the City's analysis using the C/CAG Model, this threshold would be set at 12.1 HBW VMT per employee for office and R&D projects, which represents 15 percent below the existing regional average of 14.2 HBW VMT per employee as shown in **Table 5 2**. This threshold of 12.1 HBW VMT per employee also applies to cumulative conditions.

The project's effect on VMT describes changes in VMT generation from neighboring land uses by comparing area VMT for "no Project" and "Project" scenarios. Project-generated HBW VMT per employee is calculated based on the average HBW VMT generated by employees working in the C/CAG Model transportation analysis zone (TAZ) where the project is located divided by the number of jobs within the TAZ. A TAZ is the smallest resolution available in the C/CAG Model. Each TAZ included in the model contains information related to the existing and proposed land uses and transportation options for zone. Therefore, the transportation properties of the project's TAZ are an appropriate proxy for transportation properties of the project itself.

Per City requirements, the project is required to implement a TDM Plan. The proposed project would include a TDM Plan to achieve an alternative mode use goal of 35 percent to help manage commuting via driving alone. The effects of the project's TDM Plan are included in the calculation of HBW VMT. Additional potential reductions to VMT based on implementation of the project's TDM Plan are uncertain for several reasons. First, mode share targets do not necessarily correlate with trip generation and trip length; although many East of 101 employers meet their non-drive alone mode share targets, vehicle trip generation and trip lengths remain comparable to regional averages. Second, alternative mode share targets include passenger vehicle-based modes such as vanpools and carpools, which may dilute its effectiveness of VMT reductions. Third, VMT is a measure of daily activity for all trips, whereas accounting for non-drive alone mode share targets focuses only on commute trips. Therefore, additional VMT adjustments based on the project's TDM Plan are not applicable.

Table 5.2: Home-Based Work Vehicle Miles Traveled Per Employee

Location	Estimated HBW VMT per Employee	Estimated Employees	Estimated HBW VMT
Bay Area Region (Existing)	14.2	4,461,700	63,336,200
VMT Reduction Factor	(15%)		
HBW VMT Per Employee Threshold	*12.1*		
Project (Existing)	16.2	550	8,900
Above threshold	*Yes*		
Project (2040 Cumulative)	12.9	550	7,100
Above threshold	*Yes*		

Source: Fehr & Peers 2021; C/CAG-VTA Bi-County Transportation Demand Model, 2021.

Notes: HBW = home-based work; VMT = vehicle miles traveled.

Project estimated employees are based on employment density of 1 employee per 300 square feet.

Based on this methodology, the project would generate 16.2 HBW VMT per employee under existing conditions and 12.9 HBW VMT per employee under future cumulative conditions. The above-threshold HBW VMT is due to above-average trip lengths and auto mode shares. As transit, first/last mile, and housing projects envisioned in the South San Francisco General Plan are built out, HBW VMT is expected to decline over time but would remain above the threshold of significance under cumulative conditions.

Note that this impact is not unique to the project. Since VMT is analyzed based on HBW VMT per employee averages for the entire East of 101 area, most office/R&D projects in this area incur a significant and unavoidable impact to VMT unless they are located within one half mile of the Caltrain station.

Mitigation Measure TR-2: First- and Last-Mile Strategies. The project sponsor shall coordinate with the City for the project sponsor to implement the following off-site improvements to support the project's first- and last-mile and active transportation connections necessary to support reductions in Home-Based Work Vehicle Miles Traveled.

- Participation in first-/last-mile shuttle program(s) to Caltrain and BART. Shuttles may be operated by Commute.org and/or other East of 101 shuttle providers offering services open to the general public.

- Restriping of five crosswalks at the intersection of Oyster Point Boulevard and Eccles Avenue, one crosswalk at the intersection of Oyster Point Boulevard, and two crosswalks at the intersection of Oyster Point Boulevard and the 329-333 Oyster Point Boulevard driveway with high-visibility longitudinal markings to enhance pedestrian access to the westbound shuttle stop and nearby land uses.

The project sponsor shall additionally coordinate with the City for the project sponsor to pay fair-share contribution toward the following off-site improvements to support the project's first- and last-mile and active transportation connections necessary to support reductions in Home-Based Work Vehicle Miles Traveled.

- Modification of the existing eastbound shuttle stop at the far side of the Oyster Point Boulevard/Eccles Avenue intersection to provide an accessible five-foot long by eight-foot wide landing pad and pavement markings (if such facilities are not already fully funded or constructed by the City or SamTrans).

- Installation of a westbound shuttle stop at the far side of the Oyster Point Boulevard/Eccles Avenue intersection including a pole, accessible five-foot long by eight-foot wide landing pad, pavement markings, and shelter (if such facilities are not already fully funded or constructed by the City or SamTrans).

- Provision of eastbound and westbound Class II buffered bicycle lanes along Eccles Avenue between Forbes Boulevard and Oyster Point Boulevard, spanning approximately 3,000 linear feet. The improvement consists primarily of restriping the curbside vehicle travel lane in each direction to a Class II buffered bicycle lane and signage. The bicycle facility will help close a gap between the project and a planned Class I shared-use pathway between Forbes Boulevard / Eccles Avenue and the South San Francisco Caltrain station.

First- and last-mile transit connections and active transportation improvements are likely to produce the greatest project VMT reductions. Mitigation Measure TR-2, First- and Last-Mile Strategies, would help enhance first- and last-mile and active transportation connections, supporting decreased use of single-occupancy vehicles. The components of Mitigation Measure TR-2 are shown in **Figure 5.3**. The effectiveness of Mitigation Measure TR-2 is uncertain and cannot be guaranteed to fully reduce VMT under the threshold of significance under existing or cumulative conditions. Therefore, this impact would be ***significant and unavoidable with mitigation***.

Note that this impact is not unique to the project. Since VMT is analyzed based on HBW VMT per employee averages for the entire East of 101 area, most office/R&D projects in this area incur a significant and unavoidable impact to VMT unless they are located within one half mile of the Caltrain station.

For the off-site improvements, the City would collect payment from the project sponsor and would allocate those funds for the specific improvements identified. Specific details of the contributions would be addressed in the project's conditions of approval, but in any case, would comply with the Mitigation Fee Act. The potential environmental impacts of these pedestrian and bicycle improvements would be analyzed under the CEQA review prepared for the Active South City: Bicycle and Pedestrian Master Plan. Any impacts associated with the construction of these projects would be temporary and minor in nature (e.g., short-term construction impacts related to air quality and noise) and would not result in a substantial adverse impact on the environment. The participation in first- and last-mile shuttle program(s), would not result in long-term air quality, greenhouse gas, or noise impacts. Thus, no adverse secondary impacts on the environment would occur with implementation of Mitigation Measure TR-2.

Transportation Hazards

Impact TR-3: New Project Meeting Safety Standards. The proposed project would not substantially increase hazards due to a geometric design feature or incompatible uses. (***Less than Significant***)

The proposed project would not worsen any existing geometric design features or cause new design hazards. The project would rely on two existing driveways accessed via 340 Oyster Point Boulevard and 570-590 Eccles Avenue and would provide a new unsignalized driveway providing a direct connection to Gull Drive. Existing driveways would be appropriate to handle expected vehicle traffic in and out of the buildings constructed pursuant to the project. Although the driveway between 340 Oyster Point Boulevard and 570-590 Eccles Avenue includes a circuitous connection for vehicles exiting to the traffic signal at the intersection of Oyster Point Boulevard/329-333 Oyster Point Boulevard driveway, the project would include signage directing vehicles to exit via Eccles Avenue instead and include driveway geometry to encourage target circulation.

The new driveway on Gull Drive would not change the geometry of the adjacent roadways. Based on an assessment of the site, the sight distance at the proposed driveway location is expected to be adequate for drivers exiting the project site and for pedestrians crossing the driveways. The hill north of the driveway would be graded to ensure sight distance is met, and any future vegetation or signage located in the sight triangles at the driveway would be maintained to prevent restricting drivers' sight distance when exiting the driveway.

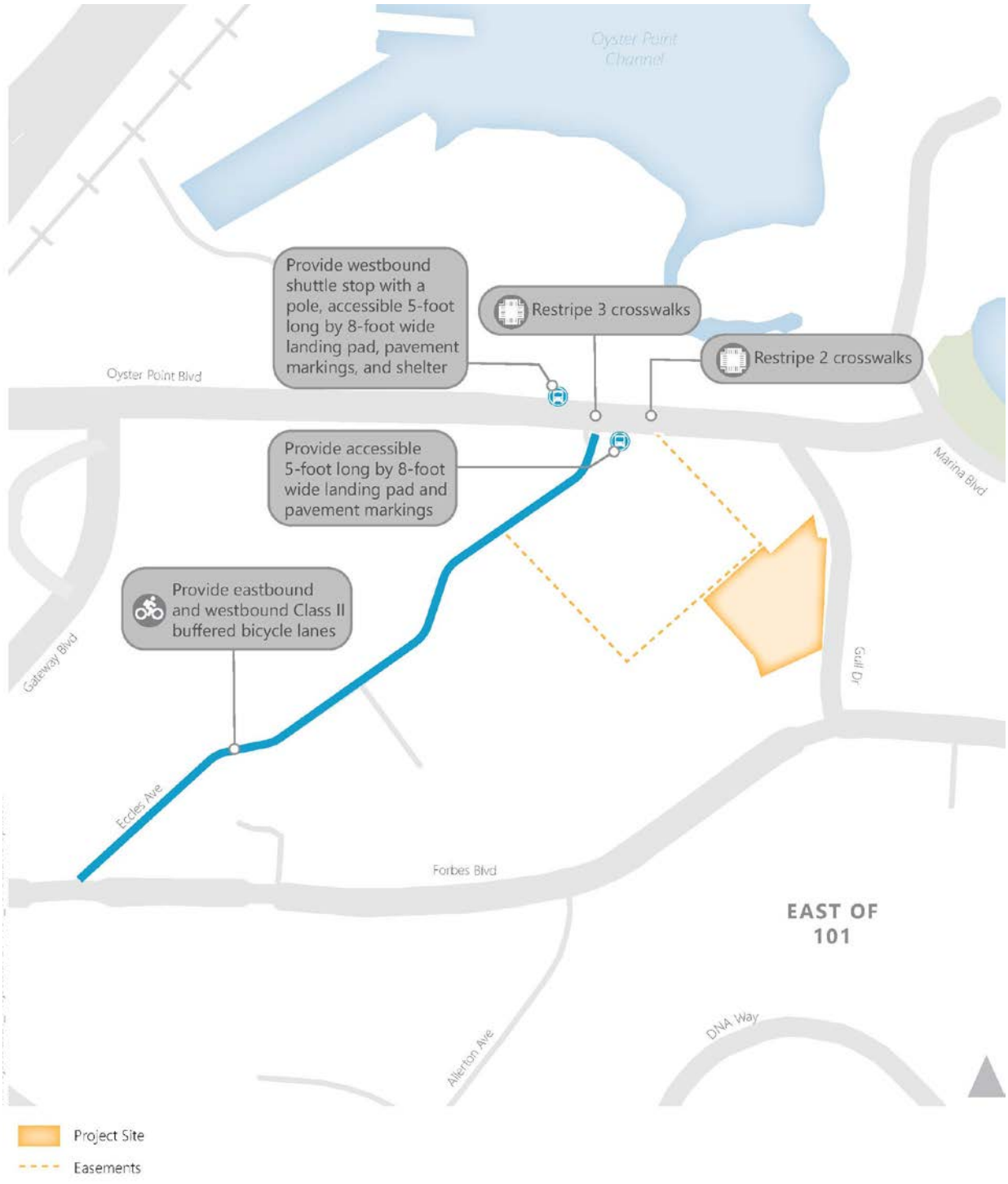

Figure 5.3: Identified Vicinity Improvements to Transit & Active Transportation

Source: Fehr & Peers

The project would not include any uses that are incompatible with the surrounding land use or the existing roadway system; trips generated by office/R&D uses are consistent with the surrounding mix of office/R&D and light industrial land uses..

Therefore, the project is not expected to result in a substantial increase to hazards, and the project's impacts to hazards would be less than significant under existing plus project conditions and less than significant under cumulative plus project conditions. No mitigation is required.

Emergency Access

Impact TR-4: Adequate Emergency Access. The proposed project would not result in inadequate emergency access. (***Less than Significant***)

Vehicle trips generated by the project would represent a small percentage of overall daily and peak hour traffic on roadways and freeways in the study area. The project would generate about three vehicle trips per minute on average during peak hours, which is not expected to introduce or exacerbate conflicts for emergency vehicles traveling near the project. The project would not include features that would alter emergency vehicle access routes or roadway facilities; fire and police vehicles would continue to have access to all facilities around the entire City. Emergency vehicles would have full access to the project site via three driveways connecting to adjacent streets; each driveway would be equipped to handle all types of emergency vehicles. Therefore, the project would result in adequate emergency access, and the project's impacts to emergency access would be less than significant under existing plus project conditions and less than significant under cumulative plus project conditions. No mitigation is required.

Cumulative Impacts

Cumulative conditions include transportation demand resulting from reasonably foreseeable land use changes and conditions associated with funded transportation projects.

As indicated in the analysis above, the vehicle miles traveled analysis was performed for both existing and future cumulative conditions with the same conclusions. There would be no difference in the impacts or conclusions related to conflict with programs, transportation hazards, or emergency access, as the conclusion that the project would comply with applicable programs and, safety standards, and provide adequate emergency access are not affected by changes in future cumulative analysis conditions. There are no additional cumulative impacts or mitigation required beyond the cumulative vehicle miles traveled impact identified above.

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6
Other CEQA Topics

Introduction

This chapter of the Draft EIR contains discussion of the following additional CEQA considerations:

- Mandatory Findings of Significance
- Significant Irreversible Modifications in the Environment
- Growth Inducing Impacts

The environmental effects of the proposed project, proposed mitigation measures, and alternatives are summarized in Chapter 2: Executive Summary.

Mandatory Findings of Significance

Appendix G of the CEQA Guidelines (Environmental Checklist) contains a list of mandatory findings of significance that may be considered significant impacts if any of the following occur:

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

2. Does the project have impacts that are individually limited, but cumulatively considerable?

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

Quality of the Environment

With compliance with regulatory requirements and implementation of mitigation measures identified in this document, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, or threaten to eliminate a plant or animal community. The project site is in an urbanized area, is generally consistent with surrounding development, and the site does not contain biological or cultural resources.

Cumulative Impacts

The immediate vicinity of the project site is largely already developed. The cumulative context for analysis in this EIR includes the existing development as well as continued redevelopment, especially in the surrounding East of 101 area.

As detailed in this EIR and the attached Initial Study, impacts of the project are considered to be less than significant or reaching that level with mitigation for all topic areas except transportation, and the same would therefore be true for cumulative impacts given the cumulative scenario for this site.

The project would result in a significant impact with respect to vehicles miles traveled per employee, which is over target rates at this site. While overall vehicles miles traveled per employee is expected to go down over time in all areas including at the project site, the analysis in this Draft EIR determined that the site continue to have vehicles miles traveled per employee rates above future cumulative threshold levels as well.

Adverse Effects on Human Beings

Potential impacts of the project on human beings include exposure to emissions, site soils and seismic activity, disturbance of site contamination during construction, potential presence of methane gas in soil vapor, and routine hazardous materials use; however, these impacts are less than significant with compliance with regulatory requirements and identified mitigation as detailed in this Draft EIR and the attached Initial Study. The project would not have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly.

Significant Irreversible Modifications in the Environment

An EIR must identify any significant irreversible environmental changes that could be caused by a project. These may include current or future uses of non-renewable resources, and secondary or growth-inducing impacts that commit future generations to similar uses. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified. The CEQA Guidelines describe three distinct categories of significant irreversible changes:

1. Changes in land use which would commit future generations to specific uses;

2. Irreversible damage; and

3. Commitment of Resources.

Changes in Land Use which Would Commit Future Generations

The project proposes office and R&D development on a site zoned for such use in the City's General Plan. The type of use is consistent with plans and policies for development of the site and would not constitute a change in land use.

Irreversible Damage

While currently vacant, the site is not in a "natural" state, and development of this site in an urbanized area would not represent damage to an otherwise natural resource. While accident involving routine

use of hazardous materials or site contamination during construction can never be fully discounted, compliance with regulatory requirements, standard procedures, and mitigation measures identified in the Draft EIR and attached Initial Study would result in non-significant risk of occurrence. Similarly, while air quality and greenhouse gas emissions would contribute to regional pollutant levels and global climate change, through compliance with applicable regulatory requirements, local greenhouse gas reduction measures, and mitigation measures identified in this Draft EIR and attached Initial Study, the project would comply with emissions reduction targets and would result in non-significant contribution to emissions-related environmental damage.

Commitment of Resources

Consumption of nonrenewable resources can include increased energy consumption, conversion of agricultural lands, and lost access to mining reserves. The project would not result in the loss of agricultural lands or mining reserves, as these are not located at or near the site. Development of the project area as proposed could result in the commitment of nonrenewable resources (e.g., gravel and petroleum products) and slowly renewable resources (e.g., wood products) used in construction. The operation of the proposed use would also require commitment of water and energy resources (e.g., petroleum products for vehicle operations, natural gas and electricity for lighting, heating, and cooling).

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. The project incorporates energy and energy-related efficiency measures meeting all applicable requirements, including water and waste efficiency. 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. 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. The project is also consistent with regional and local climate actions plans, as currently applicable, which include measures related to energy consumption.

Growth-Inducing Effects

Typical growth inducement concerns of CEQA include actions such as the extension of roadways or expansion of infrastructure capacity that would otherwise preclude new development or that would induce growth beyond what is otherwise planned. Proposed project improvements are limited to the project site or contribution to already-planned improvements such as for the vicinity sewer line and area transit and bicycle facilities.

The project is on an infill site in the East of 101 section of the city which consists almost entirely of similar employment centers. 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 2050 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 2050 estimates a total addition of 1,403,000 total jobs to the Bay Area between 2015 and 2050.[1] 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.

The project will not include physical improvements that would induce growth beyond what is otherwise planned. Proposed project improvements are limited to the project site or contribution to already-planned improvements such as for the vicinity sewer line and area transit and bicycle facilities.

[1] Metropolitan Transportation Commission and Association of Bay Area Governments, adopted October 21, 2021, Plan Bay Area 2050, Table 6-4. Available at: https://www.planbayarea.org/finalplan2050.

7

Alternatives

Introduction

CEQA Guidelines require an analysis of a reasonable range of alternatives for any project subject to an EIR. The purpose of the alternatives analysis is to provide decision-makers and the public with a discussion of alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly. Evaluation of alternatives should present the proposed action and all the alternatives in comparative form, to define the issues and provide a clear basis for choice among the alternatives.

CEQA requires that the lead agency adopt mitigation measures or alternatives, where feasible, to substantially lessen or avoid significant environmental impacts that would otherwise occur. Where a lead agency has determined that even after adoption of all feasible mitigation measures, a project as proposed would still result in significant environmental effects that cannot be substantially lessened or avoided, the agency must first determine whether any alternatives are both environmentally superior and feasible. CEQA provides the following guidelines for discussing project alternatives:

- An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation (§15126.6(a)).
- An EIR is not required to consider alternatives which are infeasible (§15126.6(a)).
- The discussion of alternatives shall focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project (§15126.6(b)).
- The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects (§15126.6(c)).
- The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis and comparison with the proposed project (§15126.6(d)).

Project Objectives

CEQA requires the analysis of alternatives that would feasibly attain “most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” (15126.6 (a)). Therefore, the stated objectives can be used as a metric against which an alternative can be measured when determining overall feasibility. Additionally, CEQA requires the evaluation of a proposed project

to address only impacts to the physical environment; economic and social effects can be analyzed only as one link in a chain of cause and effect from a proposed decision (e.g., physical changes caused, in turn, by economic and social changes) (15131). However, economic viability can be considered when determining the feasibility of a project alternative.

The following objectives have been identified for the project. Alternatives are evaluated in part based on their ability to meet these objectives.

1. Allow for development and productive use of a currently vacant lot.

2. Construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents.

3. Build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

Summary of Project Impacts

Significant and Unavoidable Impacts

Based on the analysis presented in this EIR, the project would result in the following environmental impact that would be considered significant and unavoidable:

Vehicles Miles Traveled Impact (TR-2): The vehicle miles traveled per employee exceeds the City's adopted threshold of 15 percent below the regional average under existing and future conditions. Even with contribution toward first- and last-mile strategies to increase use of alternate modes of travel (Mitigation Measure TR-2), this impact would remain significant and unavoidable.

Note that this impact is not unique to this project. Because the estimated vehicle miles traveled for this project is based on averages for the entire East of 101 area, most office/R&D projects in this area incur a significant and unavoidable impact with respect to vehicle miles traveled unless they are located within one half mile of the Caltrain station.

Potentially Significant Impacts and Mitigation Measures

Potentially significant impacts are largely limited to construction-period disturbance, including impacts and mitigation related to construction period dust and emissions (Mitigation Measure Air-1); potential disturbance of unknown archaeological, paleontological, or tribal cultural resources (Cul-1, Cul-2, Cul-3); and appropriate construction given site characteristics in a seismically-active region (Geo-1).

Additionally, the project would contribute toward area sewer line upgrades (Util-1).

The project would be required to adhere to remediation measures in the Amended Site Closure Plan and Post-Closure Maintenance Plan (PCMP) to address hazardous materials concerns at the site including appropriate handling and capping of metals-impacted site soils and vapor barriers if necessary to address methane gas migration from the nearby landfill (Haz-2).

The impacts listed in this subsection would be reduced to less than significant levels through implementation of the identified mitigation measures. All other impacts would be less than significant without the need for mitigation.

A comparison of the impacts of the alternatives to the impacts of the project is included in Table 7.1 at the end of this chapter.

Alternatives Analysis

The alternatives analysis is presented as a comparative analysis to the proposed project. A project may have the potential to generate significant impacts, but changes to certain features may also afford the opportunity to avoid or reduce such impacts. The following alternatives analysis compares the potential significant environmental impacts of the alternatives with those of the proposed project. This analysis focuses on potentially significant impacts with other topics grouped together.

Selection of Alternatives

The three alternatives analyzed in this EIR are listed below. These alternatives are intended to meet the CEQA requirements for the EIR to describe the no project alternative as well as a range of reasonable alternatives to the project that would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen significant effects.

- No Project
- R&D Only
- Reduced Development

Each of the alternatives is more fully described below, and their potential environmental effects are compared to those of the project. As permitted by CEQA (CEQA Guidelines Section 15126.6[d]), the effects of the alternatives are discussed in less detail than the impact discussions of the project. However, the alternatives analysis is conducted at a sufficient level of detail to provide the public, other public agencies, and City decision-makers adequate information to evaluate the alternatives as compared to the project. For each of the alternatives, the significance of each impact is compared to applicable thresholds. These significance conclusions assume implementation of those same regulatory requirements and mitigation measures as applied to the project (if necessary).

Alternatives Rejected From Further Consideration

Section 15126.6(c) of the CEQA Guidelines requires an EIR to identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination.

No Project – Allowable Site Development

The CEQA Guidelines state that, "where failure to proceed with the project will not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval" (15126.6(e)(3)(B)). The project site is currently vacant, but other than project approvals, there is nothing otherwise preventing development of this vacant site according to existing

rules and regulations. It can therefore be assumed that if this project did not proceed, the site would not be "preserved" as a vacant site, but rather another development proposal would likely be brought forth at this location. As development consistent with the existing General Plan land use designation and underlying zoning at the site, the proposed project itself represents a project that could be proposed at the site under such a "no project" condition. Therefore, since the proposed project already represents allowable site development, an alternative to represent allowable site development would not need to be different than the proposed project.

For these reasons, a "no project" alternative that looks at allowable site development was eliminated from further consideration in this EIR.

Alternative Site Location

In considering the range of alternatives to be analyzed in an EIR, the CEQA Guidelines state that an alternative site location should be considered when, "…any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location" (15126.6(f)(2)(A)).

The current proposal is specific to the project site and consistent with the land use designation and zoning for the site. While the applicant may own other sites suitable for office/R&D development, the development of one site does not preclude them from proposing development on any other sites. If this developer did not propose this project at this site at this time, it could be proposed in the same or similar details at any later date. Therefore, because the proposed type of development is not unique such that consideration of development on a different site would mean it was no longer considered at this site, consideration of an alternative site location would not effectively avoid or substantially lessen significant effects of the project and therefore, an off-site alternative was determined not to provide a useful discussion for this analysis.

For these reasons, an alternative site location was eliminated from further consideration in this EIR.

Incorporation of Residential Uses

An alternative that would incorporate residential uses at the project site either as a wholly-residential project or a mixed-use project with a residential component was considered. A residential alternative could help address regional housing shortages and would have the potential to reduce the average HBW VMT per employee by locating residential uses in an area predominantly occupied by employment uses, providing more opportunities for employees in the East of 101 area to live closer to their place of work.

The project site is identified as Business Technology Park in the General Plan and is zoned Business and Technology Park under the City's zoning ordinance. Neither of these designations permit residential uses, nor would residential uses be consistent with existing land uses in the vicinity of the project site and potentially result in conflicts by introducing emissions and noise sensitive receptors to a commercial area. Residential development at this site would not be consistent with current General Plan direction and policies to preserve land East of 101 for employment uses. As part of the City's Shape SSF 2040 General Plan update process currently underway, the City is considering residential uses in portions of the East of 101 area, potentially including high-density mixed-use residential uses in areas adjacent to and within 0.5 miles to the Caltrain station. The areas that are under consideration for residential uses are within 0.5 mile of the Caltrain station, which does not include the project site. The City does not anticipate that the Shape SSF 2040 General Plan will consider residential uses for the project site. Furthermore, a residential alternative would be inconsistent with virtually all of the project objectives.

Therefore, this alternative was rejected based on its infeasibility and inability to meet the basic project objectives.

Other Alternatives Considerations

Obviously, not every possible alternative to the project can be fully evaluated. Alternatives A through C satisfy the requirement to consider and discuss "a range of reasonable alternatives to the project" pursuant to CEQA Guidelines section 15126.6. As discussed in this chapter, these alternatives were chosen as reasonable alternatives at this site and no additional alternatives were identified that would substantially contribute to a meaningful evaluation, analysis, and comparison of the project to possible alternatives.

"No Project" Alternative

Alternative Description

CEQA Guidelines Section 15126.6(e) requires that a "no project" alternative be evaluated, along with its impacts. Alternative A is a "no project" alternative. It assumes the proposed project is not approved and the site remains vacant.

While the CEQA Guidelines allow the no project alternative to assess development under the continuation of the existing plan, policy, or operation into the future, the proposed project already represents development per existing plans and policies. Therefore, Alternative A presumes the site would remain in its current state.

Impact Comparison

Impact Summary

Under the "No Project" Alternative, the project site would remain as it is today with no substantial construction activities and no development at the site. Therefore, the potential for all of the less than significant impacts and need for mitigation would be avoided.

While continuance of the vacant state would not be considered an impact under CEQA, the "No Project" Alternative also would not develop the site consistent with the General Plan land use designation and zoning.

Hazards and Hazardous Materials

The "No Project" Alternative represents no substantial construction activities or operations at the site and, therefore, no potential for hazards and hazardous materials impacts.

Transportation

The "No Project" Alternative represents no construction or operations at the site and, therefore, no potential for transportation impacts.

Other Topics

Because the assessed "No Project" alternative would not change the conditions at the site or involve construction activities, there would be no actions that could be considered to result in environmental impacts under CEQA.

Ability to Accomplish Project Objectives and Feasibility

The "No Project" Alternative would have the following ability to meet project objectives:

1. The "No Project" Alternative would not meet the objective to allow for development and productive use of a currently vacant lot. This alternative would not result in development of the site.

2. The "No Project" Alternative would not meet the objective to construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents. This alternative would not result in any development of the site.

3. The "No Project" Alternative would not meet the objective to build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances. This alternative would not result in any development of the site.

The "No Project" Alternative would not meet any of the Project Objectives.

This alternative represents the possibility that no project is approved on this site at this time. It would not preclude application for development of the site at a later point.

"R&D Only" Alternative

Alternative Description

This alternative would have generally the same building and parking garage structures as the proposed project on the same site and footprint. The only difference is that the use would be constrained to R&D uses. Office uses (except as part of an R&D use) would not be allowed.

The proposed project would allow for any mix of office and R&D uses to be determined through identification of future tenants. Office uses have generally more employees while R&D uses have more daily trips reflecting more supporting services. Because the one significant and unavoidable impact of the project is related to the vehicle miles traveled *per employee*, a project with a lower number of employees would have a marginally lower impact in this respect.

R&D uses usually have employee densities of 300 to 350 square feet of building space per employee, whereas strictly office uses can have employment densities of 150 to 250 square feet per employee. Therefore, a 100% R&D project would have approximately 40% less employees than a 100% office project. While the project as proposed could be any mix of R&D and office uses and the analysis in the Initial Study and EIR made applicable assumptions for reasonable worst-case assessment of impacts, this alternative is intended to present the difference if the project were constrained to R&D uses only.

Impact Comparison

Impact Summary

Impacts under the "R&D Only" Alternative would be the same or marginally reduced compared to the project. No impacts would be avoided or substantially reduced by the "R&D Only" Alternative.

Because the "R&D Only" Alternative would result in fewer employees at the site than the proposed project, there would be a marginal reduction in the project's one significant and unavoidable impact. Because the threshold is based on the vehicle miles traveled *per employee* and not on the number of employees, and the per-employee rate would remain the same for a project of this type at this site, the impact would remain above threshold levels and significant and unavoidable. That being said, adding fewer employees at higher-than-threshold-level vehicle miles traveled per employee rates would contribute less to region-wide rates of vehicle miles traveled above target levels. This could be considered a marginal reduction in this impact with no change in significance or the required mitigation.

With the same structure and construction required, all construction-related impacts would remain the same under the "R&D Only" Alternative, as would the need to contribute to area-wide sewer improvements and the same mitigation would be required.

Hazards and Hazardous Materials

The "R&D Only" Alternative would require generally the same site construction as under the proposed project and would also be required to adhere to remediation measures in the Amended Site Closure Plan and Post-Closure Maintenance Plan (PCMP) to address hazardous materials concerns at the site.

As under the proposed project, compliance with applicable regulations and procedures related to routine use of hazardous materials would result in less than significant impacts related to routine handling of such materials for an R&D use.

There would be no change to hazards and hazardous materials impacts under the "R&D Only" Alternative.

Transportation

The "R&D Only" Alternative would result in fewer employees at the site than the proposed project, which could be any mix of office and R&D uses. The project's one significant and unavoidable impact was that the vehicle miles traveled per employee exceeds threshold levels. The vehicle miles traveled per employee is mostly based on location for office or R&D uses and, therefore, would not change given a change in the mix of those uses at the same site. The impact with respect to vehicle miles traveled for the "R&D Only" Alternative would therefore remain above threshold levels and significant and unavoidable. That being said, adding fewer employees at higher-than-threshold-level vehicle miles traveled per employee rates would contribute less to overall exceedances of vehicle miles traveled targets in the region. The impact of the "R&D Only" project would therefore be marginally reduced compared to the project.

Other Topics

Because site construction would be generally the same as under the proposed project, there would be no substantial change in construction-related impacts and mitigation measures including for

construction emissions and dust; potential disturbance of unknown archaeological, paleontological, or tribal cultural resources; and appropriate construction given site characteristics in a seismically-active region. Contribution toward area sewer line upgrades would also still be required under the "R&D Only" Alternative. There would be no substantial change to other impacts.

Ability to Accomplish Project Objectives and Feasibility

The "R&D Only" Alternative would have the following ability to meet project objectives:

1. The "R&D Only" Alternative would meet to the same degree the objective to allow for development and productive use of a currently vacant lot.

2. The "R&D Only" Alternative would meet to a lesser degree the objective to construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents. This alternative would result in an R&D use to create quality jobs in South San Francisco but would not provide flexibly to allow office use.

3. The "R&D Only" Alternative would meet to the same degree the objective to build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

The "R&D Only" Alternative would meet two of the three Project Objectives to the same degree as the project. The third objective would be met to a lesser degree as the "R&D Only" Alternative would not allow for flexible use of the development.

"Reduced Development" Alternative

Alternative Description

This alternative represents a reduced intensity alternative to demonstrate how impacts may be different if the project were smaller. An approximately 30% reduction in both building space and parking area was chosen, which would be consistent with a building about two floors lower (five stories), though it would likely also include a somewhat reduced footprint. The building square footage would be approximately 133,300. As with the project, any mix of office and/or R&D would be allowed.

Impact Comparison

Impact Summary

Impacts under the "Reduced Development" Alternative would be the same or marginally reduced compared to the project. No impacts would be avoided or substantially reduced by the "Reduced Development" Alternative.

Because the "Reduced Development" Alternative would result in fewer employees at the site than the proposed project, there would be a marginal reduction in the project's one significant and unavoidable impact. Because the threshold is based on the vehicle miles traveled *per employee* and not on the number of employees, and the per-employee rate would remain the same for a project of this type at this site, the impact would remain above threshold levels and significant and unavoidable. That being said, adding fewer employees at higher-than-threshold-level vehicle miles traveled per employee rates

would contribute less to region-wide rates of vehicle miles traveled above target levels. This could be considered a marginal reduction in this impact with no change in significance or the required mitigation.

While the building construction activities would be reduced in scope under the "Reduced Development" Alternative with potentially even a smaller building footprint, the entire site would still be developed (open space/landscaping and circulation elements would fill areas not developed with structures) and require site preparation generally the same as under the proposed project. Site-disturbance related impacts and mitigation measures including for construction dust; potential disturbance of unknown archaeological, paleontological, or tribal cultural resources; and also the need for appropriate construction given site characteristics in a seismically-active region would not change under the "Reduced Development" Alternative.

Building construction itself would be reduced. However, impacts related to building construction were already below significance levels so would remain less than significant under the project or the "Reduced Development" Alternative.

While a reduced project would contribute less demand to the sewer line in need of an upgrade, this is an identified area-wide improvement and as such, the need for the improvement would not be affected by reduction in the development intensity at this site and the impact and mitigation would remain substantially the same under the "Reduced Development" Alternative.

Hazards and Hazardous Materials

While the construction activities would be reduced in scope under the "Reduced Development" Alternative with potentially even a smaller building footprint, the entire site would still be developed (open space/landscaping and circulation elements would fill areas not developed with structures) and require site preparation generally the same as under the proposed project. As under the project, the "Reduced Development" Alternative would be required to adhere to remediation measures in the Amended Site Closure Plan and Post-Closure Maintenance Plan (PCMP) to address hazardous materials concerns at the site and would be required to comply with applicable regulations and procedures related to routine use of hazardous materials.

There would be no substantial change to hazards and hazardous materials impacts under the "Reduced Development" Alternative.

Transportation

The "Reduced Development" Alternative would result in approximately 30% fewer employees at the site than the proposed project. The project's one significant and unavoidable impact was that the vehicle miles traveled per employee exceeds threshold levels. The vehicle miles traveled per employee is mostly based on location for office or R&D uses and, therefore, would not change given reduced project size at the same site. The impact with respect to vehicle miles traveled for the "Reduced Development" Alternative would therefore remain above threshold levels and significant and unavoidable. That being said, adding fewer employees at higher-than-threshold-level vehicle miles traveled per employee rates would contribute less to overall exceedances of vehicle miles traveled targets in the region. The impact of the "Reduced Development" project would therefore be marginally reduced compared to the project.

Other Topics

While building construction would be reduced under the "Reduced Development" Alternative, the entire site would still be disturbed for development. There would be no substantial change in site-disturbance-related impacts and mitigation measures including for construction dust; potential disturbance of unknown archaeological, paleontological, or tribal cultural resources; and also the need for appropriate construction given site characteristics in a seismically-active region.

With a smaller building, there would be a reduction in construction-related noise, traffic, and energy use. Compliance with applicable regulations and procedures would result in project impacts below threshold levels in these topics for the project and, therefore, reductions in impacts under the "Reduced Project" Alternative would be marginal. Less building construction activities would also result in less construction-related emissions, which were already below threshold levels and further lowered by Mitigation Measure Air-1. This would again be a marginal reduction in the impact without changing significance conclusions.

Similarly, with fewer employees and a smaller building at the site, there would be marginal reductions in operational-related air quality and greenhouse gas emissions, hazardous materials handling, noise, population, demand for public services and utility and energy use. Other than sewer capacity discussed below, compliance with applicable regulations and procedures would result in project impacts below threshold levels in these topics for the project and, therefore, reductions in impacts under the "Reduced Project" Alternative would be marginal.

Contribution toward area sewer line upgrades would also still be required for all area projects including the "Reduced Development" Alternative. While a reduced project would contribute less demand to the sewer line, this is an identified area-wide improvement and as such, the need for the improvement would not be affected by reduction in the development intensity at this site.

There would be no substantial change to other impacts.

Ability to Accomplish Project Objectives and Feasibility

The "Reduced Development" Alternative would have the following ability to meet project objectives:

1. The "Reduced Development" Alternative would meet to the same degree the objective to allow for development and productive use of a currently vacant lot.

2. The "Reduced Development" Alternative would meet to a lesser degree the objective to construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents. This alternative would result in a flexible office/R&D use to create quality jobs in South San Francisco but would be a smaller project with relatively fewer jobs created.

3. The "Reduced Development" Alternative would meet to the same degree the objective to build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

The "Reduced Development" Alternative would meet two of the three Project Objectives to the same degree as the project. The third objective would be met to a lesser degree as the "Reduced Development" Alternative would result in a smaller project with fewer jobs.

Environmentally Superior Alternative

CEQA requires the identification of the environmentally superior alternative in an EIR. Where a no project alternative has been identified as the environmentally superior alternative, CEQA requires the EIR to identify another alternative that would be considered environmentally superior in the absence of the no project alternative.

Table 7.1 provides a summary comparison of the impacts of each of these alternatives relative to those of the project. This table focuses on potentially significant impacts with other topics grouped into construction-related and operational-related.

Because the differences between the project and the alternatives are often marginal only – meaning that small changes could occur in the magnitude of an impact without changing the significance conclusion - **Table 7.1** also indicated when there are marginal differences (with an arrow symbol).

Table 7.1: Summary of Impacts and Relative Comparison of Alternatives

Environmental Topic	Project	"No Project" Alternative	"R&D Only" Alternative	"Reduced Development" Alternative
Transportation (TR-2)	SU with MM	NI	SU with MM ↓	SU with MM ↓
Hazardous Materials (Haz-2)	LTS with MM	NI	LTS with MM	LTS with MM
Construction Emissions (Air-1)	LTS with MM	NI	LTS with MM ↓	LTS with MM ↓
Cultural/Tribal Cultural (Cul-1, Cul-2, Cul-3)	LTS with MM	NI	LTS with MM	LTS with MM
Geology and Soils (Geo-1)	LTS with MM	NI	LTS with MM	LTS with MM
Utilities (Util-1)	LTS with MM	NI	LTS with MM	LTS with MM
Other Topics (construction-related)	LTS	NI	LTS	LTS ↓
Other Topics (operational-related)	LTS	NI	LTS ↓	LTS ↓

NI = no impact

LTS = less than significant

SU = significant and unavoidable

with MM = with implementation of mitigation measures

↓ = marginal reduction in impacts of the same significance level

Environmentally Superior Alternative

In addition to the discussion and comparison of impacts of the proposed project and the alternatives, Section 15126.6 of the CEQA Guidelines requires that an "environmentally superior" alternative be

selected and the reasons for such a selection disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of significant impacts.

Table 7.1 above provides a summary comparison of the environmental impacts of the alternatives compared to the proposed project.

The “No Project’ Alternative would not result in any substantial changes to the site and therefore, has the lowest possible impacts in every parameter. The “No Project” Alternative would be the environmentally superior alternative. However, the “No Project’ Alternative does not meet any of the project objectives.

The CEQA Guidelines also require that “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives” (CEQA Guidelines Section 15126.6(e)(2)). The CEQA Guidelines require a consideration of whether alternatives “avoid or substantially lessen” significant impacts of the proposed project. In general, the environmentally superior alternative minimizes adverse impacts to the environment, while still achieving the basic project objectives.

Neither the “R&D Only” Alternative nor the “Reduced Development” Alternative would avoid any significant impacts of the project or reduce the significance level of any impacts. With fewer resultant employees at the site, both these alternatives would marginally reduce the significant and unavoidable project impact related to vehicle miles traveled while the impact would remain significant and unavoidable. Both these alternatives would be substantially similar though marginally environmentally superior to the proposed project and would meet project objectives though to a lesser degree than the project.

Because the “Reduced Development” Alternative would marginally reduce construction-related impacts as well as operational-related impacts (without changing the need for mitigation or significance conclusions compared to the project), the “Reduced Development” Alternative would be the next most environmentally superior after the “No Project” Alternative. As noted above, differences between the impacts under this alternative and the proposed project would be marginal only.

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