101 Gull Drive Project

State Clearinghouse Number 2021100227

Final Environmental Impact Report

Lead Agency:

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

March 2022

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Chapters 1 through 8 can be found in the Draft EIR.

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Introduction to the Final EIR

Purpose of the Final EIR

The California Environmental Quality Act and the Guidelines promulgated thereunder (together "CEQA") require an Environmental Impact Report (EIR) to 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 impacts resulting from the proposed project.

This Final Environmental Impact Report (Final EIR) document, together with the Draft Environmental Impact Report (Draft EIR) published in December 2021, shall constitute the Environmental Impact Report (EIR) prepared for the proposed 101 Gull Drive Project ("project") in the City of South San Francisco, California, pursuant to CEQA as amended (commencing with Section 21000 of the California Public Resources Code) and the CEQA Guidelines. The project applicant is Sanfo Group, LLC. The Lead Agency is the City of South San Francisco.

Summary of the Project

The full description of the project is included in Chapter 3 of the Draft EIR. A brief summary is included here for convenience.

The project site is located at 101 Gull Drive 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.

The proposed project would involve the construction 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 a connection to Gull Drive.

EIR Review Process

Draft EIR

A Draft EIR was made available for public review in December 2021. During the public review period for the Draft EIR, the City received one written comment.

Final EIR

This Final EIR contains all comments received by the City on the Draft EIR and also includes responses to these comments in Chapter 11. Revisions to the Draft EIR are included in Chapter 10 of this Final EIR.

The Planning Commission hearing to receive comments was held on February 3, 2022. No public comments were received at the hearing and all oral comments and questions made by the Planning Commission were either not related to the environmental analysis or were responded to at that hearing, and no changes or revisions to the Draft EIR were required in response to those comments.

There are no text changes to the Draft EIR necessitated in response to written comments received on the Draft EIR.

Some editorial revisions were made to the mitigation measure language to clarify the party responsible for implementation. These revisions are detailed in Chapter 10.

None of the responses to comments or revisions contained in this Final EIR would be considered "significant new information" under section 15088.5 of the CEQA Guidelines and therefore no recirculation of the Draft EIR is required.

The EIR will be presented to the City at a public hearing to consider certification of this document as a technically adequate, full disclosure document consistent with the requirements of CEQA. Assuming certification of this EIR as complete and adequate under CEQA, this Final EIR document together with the Draft EIR will constitute the EIR for this project.

An EIR does not control the agency's ultimate discretion on the project. In accordance with California law, the EIR must be certified before any action on the project can be taken. However, EIR certification does not constitute project approval.

Report Organization

This Final EIR consists of the following chapters, commencing after Chapter 8 of the Draft EIR:

Chapter 9: Introduction to the Final EIR. This chapter outlines the purpose, organization, and scope of the Final EIR document and important information regarding the public review and approval process.

Chapter 10: Revisions to the Draft EIR. This chapter includes corrections, clarifications or additions to text contained in the Draft EIR based on comments received after the City's review.

Chapter 11: Response to Comments on the Draft EIR. This chapter provides reproductions of the letter received on the Draft EIR. The response to the comments is also provided in this chapter immediately following the comment letter.

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Revisions to the Draft EIR

Introduction

The following are minor text changes, additions or modifications made to the Draft EIR for the 101 Gull Drive Project. These changes were initiated by City staff. There are no revisions needed in response to public comments received on the Draft EIR.

Comments, including the original location in the Draft EIR of the text to be changed, are in *italics*. Deletions are noted by ~~strikethrough~~. Additions are <u>underlined</u>.

Lack of "Significant New Information"

This Final EIR provides substantial evidence that the information and revisions contained in this document would not constitute "substantial new information" under CEQA and so would not require recirculation of the Draft EIR under section 15088.5 of the CEQA Guidelines. To that end, the following conclusions can be made from information in this document:

(1) No new significant environmental impacts would result from the project or from a new mitigation measure proposed to be implemented.

(2) No substantial increase in the severity of an environmental impact would result unless new mitigation measures are adopted that reduce the impact to a level of insignificance.

(3) There are no new feasible alternatives or mitigation measures required to lessen significant environmental impacts of the revised project that the applicant declines to adopt.

(4) There is no information supporting a conclusion that the Draft EIR would be found to be fundamentally inadequate and conclusory such that meaningful review was precluded.

Revisions to the Draft EIR

Changes to Chapter 2: Executive Summary

- *Pages 2-4 through 2-8*

Revisions are hereby made to Table 2.1: Summary of Project Impacts and Mitigation Measures to be consistent with specific revisions made to mitigation measures later in this chapter including: Mitigation Measures Cul-1, Geo-1, Haz-2 and TR-2.

Changes to Chapter 4: Hazards and Hazardous Materials

- *Page 4-14*

Revisions are hereby made to Mitigation Measure Haz-2. These editorial revisions are made to clarify the party responsible for implementation.

Mitigation Measure Haz-2: Adherence to Remediation Measures. ~~Applicant or project sponsor~~ The project applicant / owner / 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:

Changes to Chapter 5: Transportation

- *Page 5-16*

Revisions are hereby made to Mitigation Measure TR-2. These editorial revisions are made to clarify the party responsible for implementation.

Mitigation Measure TR-2: First- and Last-Mile Strategies. The ~~project sponsor~~ project applicant / owner / sponsor shall coordinate with the City for the ~~project sponsor~~ project applicant / owner / 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.

…

The ~~project sponsor~~ project applicant / owner / 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.

Changes to Initial Study (Draft EIR Appendix B)

- *Appendix B Page 24*

Revisions are hereby made to Mitigation Measure Cul-1. These editorial revisions are made to clarify the party responsible for implementation.

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

- *Appendix B Page 28*

Revisions are hereby made to Mitigation Measure Geo-1. These editorial revisions are made to clarify the party responsible for implementation.

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. ~~P~~The project applicant / owner / sponsor shall ensure that 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.

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Response to Comments on the Draft EIR

Introduction

This chapter contains responses to the comments on the Draft EIR.

Letters received during a Draft EIR review period do not always address environmental matters and sometimes reference matters related to the project that are outside the realm of environmental review. As the environmental review document, the responses to comments included here are intentionally focused on matters specific to the environmental review that is required under CEQA. All comments are a part of the record and will be considered by the City if and when project approvals are presented for their consideration.

The City of South San Francisco received one comment letter during the public review period of the Draft EIR for the project.

List of Comments

Comment Letter

The following comment letter was received by the City during the Draft EIR review period.

Letter A: San Francisco International Airport (SFO)

Planning Commission Comment Hearing

A Planning Commission hearing to receive comments on the Draft EIR was held on February 3, 2022. No public comments were received at the hearing and all oral comments and questions made by the Planning Commission were either not related to the environmental analysis or were responded to at that hearing, and no changes or revisions to the Draft EIR were required in response to those comments.

Response to Comments

The following pages contain the one comment letter received and the City's response to it pursuant to CEQA Guideline section 15132(d).

For the comments in this letter, the information provided in the responses is deemed adequate in itself, and modification of the Draft EIR text was not necessary.

Letter A

San Francisco International Airport

February 9, 2022

TRANSMITTED VIA E-MAIL and U.S. MAIL
stephanie.skangos@ssf.net

Stephanie Skangos, Associate Planner
City of South San Francisco
Department of Economic and Community Development
315 Maple Street
South San Francisco, California 94080

Subject: ***Draft Environmental Impact Report (DEIR) Comments for the 101 Gull Drive Project***

San Francisco International Airport (SFO or the Airport) staff have reviewed the Draft Environmental Impact Report (DEIR) of for the 101 Gull Drive Project (the Proposed Project), located in the City of South San Francisco. We appreciate this opportunity to provide comments on the DEIR.

The Proposed Project is located at 101 Gull Drive (Assessor's Parcel Number 015-082-250), between Oyster Point Boulevard and Forbes Boulevard, in the City of South San Francisco. The Proposed Project would construct a new 166,613-square-foot, seven-story, office/research and development building and an attached 4.5-story, 419-stall parking garage. Site improvements would include open space, landscaping, outdoor seating areas, pedestrian walkways, and vehicular circulation elements. The maximum height of the Proposed Project would be 128 feet above ground level.

The Proposed Project site is inside Airport Influence Area B as defined by the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (SFO ALUCP). The Proposed Project site would be located outside the 65 decibel (dBA) Community Noise Equivalent Level (CNEL) contour and the Safety compatibility zones, and therefore would appear to be consistent with the Noise and Safety Compatibility policies adopted in the SFO ALUCP.

As described in Exhibit IV-17 of the ALUCP (see Attachment), the critical aeronautical surfaces at the Proposed Project location is at an elevation of between approximately 470 and 485 feet above mean sea level (AMSL) as defined from the origin of the North American Datum of 1988 (NAVD88). Given that the ground elevation at the Proposed Project site is around 32 feet AMSL (NAVD88), the heights of the buildings, as currently defined (as 128 feet above ground level), would be below the critical aeronautical surfaces and the Proposed Project would be compatible with the Airspace Compatibility Policies of the SFO ALUCP, subject to the issuance of a Determination of No Hazard from the Federal Aviation Administration (see below) for any proposed structures, and determinations from the City/County Association of Governments of San Mateo County as the designated Airport Land Use Commission.

This determination does not negate the requirement for the Proposed Project sponsor to undergo Federal Aviation Administration review as described in 14 Code of Federal Regulations Part 77 for both (1) the permanent structures and (2) any temporary cranes or other equipment taller than the permanent buildings which would be required to construct those structures.

Due to the proximity of the Proposed Project to the Airport and certain procedures from Runway 10L-28R, Airspace Protection Policies (AP-1 through AP-4) from the SFO ALUCP is enclosed as reminders of incompatible site characteristics, especially as it pertains to solar panels building materials/features that reflect and create bright lights/glare.

* * *

The Airport appreciates your consideration of these comments. We look forward to reviewing the Final Environmental Impact Report when made public. If I can be of assistance, please do not hesitate to contact me at (650) 821-6678 or at nupur.sinha@flysfo.com.

Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE6A4CE495...

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

Attachment

cc: Susy Kalkin, ALUC
Audrey Park, SFO Environmental Affairs Manager

and associated with human disease of varying severity.

b. Biosafety Level 3 practices, safety equipment, and facility design and construction are applicable to clinical, diagnostic, teaching, research, or production facilities in which work is done with indigenous or exotic agents with a potential for respiratory transmission, and which may cause serious and potentially lethal infection.

c. Biosafety Level 4 practices, safety equipment, and facility design and construction are applicable for work with dangerous and exotic agents that pose a high individual risk of life-threatening disease, which may be transmitted via the aerosol route and for which there is no available vaccine or therapy.

4.5 Airspace Protection

The compatibility of proposed land uses with respect to airspace protection shall be evaluated in accordance with the policies set forth in this section. These policies are established with a twofold purpose:

1. To protect the public health, safety, and welfare by minimizing the public's exposure to potential safety hazards that could be created through the construction of tall structures.

2. To protect the public interest in providing for the orderly development of SFO by ensuring that new development in the Airport environs avoids compromising the airspace in the Airport vicinity. This avoids the degradation in the safety, utility, efficiency, and air service capability of the Airport that could be caused by the attendant need to raise visibility minimums, increase minimum rates of climb, or cancel, restrict, or redesign flight procedures.

4.5.1 FEDERAL REGULATIONS REGARDING TALL STRUCTURES

14 Code of Federal Regulations (CFR) Part 77, *Safe, Efficient Use and Preservation of the Navigable Airspace*, governs the FAA's review of proposed construction exceeding certain height limits, defines airspace obstruction criteria, and provides for FAA aeronautical studies of proposed construction. **Appendix F** describes the FAA airspace review process and the extent of FAA authority related to airspace protection.

4.5.2 PART 77, SUBPART B, NOTIFICATION PROCESS

Federal regulations require any person proposing to build a new structure or alter an existing structure with a height that would exceed the elevations described in CFR Part 77, Subpart B, Section 77.9, to prepare an FAA Form 7460-1, *Notice of Proposed Construction or Alteration*, and submit the notice to the FAA. The regulations apply to buildings and other structures or portions of structures, such as mechanical equipment, flag poles, and other projections that may exceed the aforementioned elevations.

Exhibit IV-10 depicts the approximate elevations at which the 14 CFR Part 77 notification requirements would be triggered; see **Exhibit IV-11** for a close-up view of the northern half and **Exhibit IV-12** for a close-up view of the southern half of the area. These exhibits are provided for informational purposes only. Official determinations of the areas and elevations within which the federal notification requirements apply are subject to the authority of the FAA. The FAA is empowered to require the filing of notices for proposed construction based on considerations other than height. For example, in some areas of complex airspace and high air traffic volumes, the FAA may be concerned about the potential for new construction of any height to interfere with electronic navigation aids. In these areas, the FAA will want to review all proposed construction projects.

The FAA has developed an on-line tool for project sponsors to use in determining whether they are required to file a Notice of Proposed Construction or Alteration. Sponsors of proposed projects are urged to refer to this website to determine whether they are required to file Form 7460-1 with the FAA:

https://oeaaa.faa.gov/oeaaa/external/gisTools/gisAction.jsp?action=showNoNoticeRequiredToolForm

4.5.3 AIRSPACE MAPPING

Part 77, Subpart C, establishes obstruction standards for the airspace around airports including approach zones, conical zones, transitional zones, and horizontal zones known as "imaginary surfaces." **Exhibit IV-13** depicts the Part 77 Civil Airport Imaginary Surfaces at SFO. The imaginary surfaces rise from the primary surface, which is at ground level immediately around the runways. The surfaces rise gradually along the approach slopes associated with each runway end and somewhat more steeply off the sides of the runways. The FAA considers any objects penetrating these surfaces, whether buildings, trees or vehicles travelling on roads and railroads, as obstructions to air navigation. Obstructions may occur without compromising safe air navigation, but they must be marked, lighted, and noted on aeronautical publications to ensure that pilots can see and avoid them.

Close-up views of the north and south sides of the Part 77 surfaces are provided in **Exhibit IV-14** and **Exhibit IV-15**, respectively. Additionally, **Exhibit IV-16** provides an illustration of the outer approach and transitional surfaces located on the southeast side of the Part 77 surfaces.

Together with its tenant airlines, SFO has undertaken a mapping effort to illustrate the critical aeronautical surfaces that protect the airspace required for multiple types of flight procedures such as those typically factored into FAA aeronautical studies, as shown on **Exhibit IV-17** and **Exhibit IV-18**. These aeronautical surfaces include those established in accordance with FAA Order 8260.3B, *U.S. Standard for Terminal Instrument Procedures (TERPS)*, and a surface representing the airspace required for One-Engine Inoperative (OEI) departures from Runway 28L (to the west through the San Bruno Gap).[16] The exhibits depict the lowest elevations from the combination of the OEI procedure surface and all TERPS surfaces. The surfaces are defined with Required Obstacle Clearance (ROC) criteria to ensure safe separation of aircraft using the procedures from the underlying obstacles. Any proposed structures penetrating these surfaces are likely to receive Determinations of Hazard (DOH) from the FAA through the 7460-1 aeronautical study process. These surfaces indicate the maximum height at which structures can be considered compatible with Airport operations.

[16] See Appendix F, Section F.3.2 for a discussion of one-engine inoperative procedures.

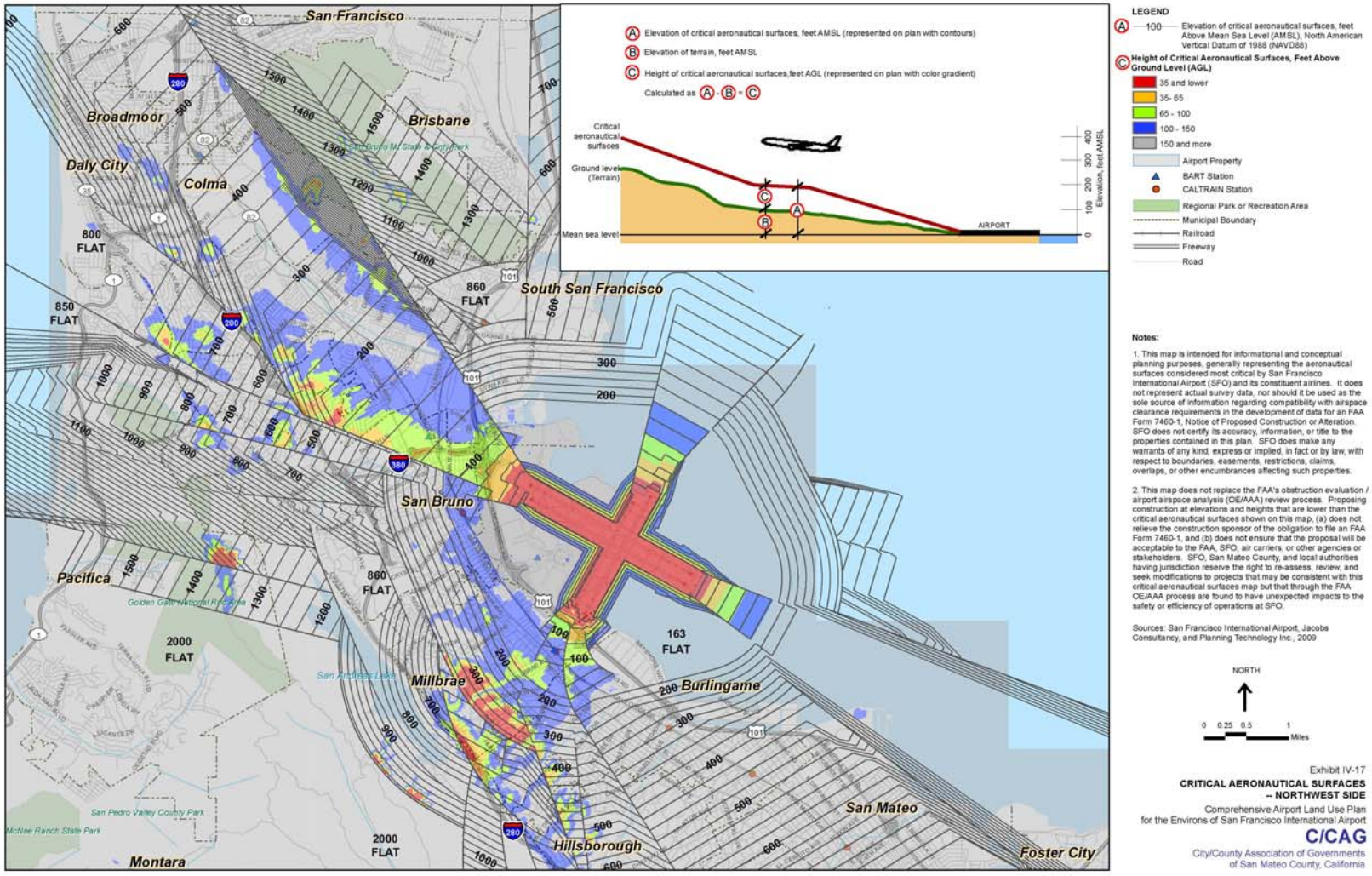

Exhibit IV-17
CRITICAL AERONAUTICAL SURFACES -- NORTHWEST SIDE
Comprehensive Airport Land Use Plan for the Environs of San Francisco International Airport
C/CAG
City/County Association of Governments of San Mateo County, California

Exhibit IV-19, which is provided for information purposes only, depicts a profile view of the lowest critical airspace surfaces along the extended centerline of Runway 10L-28R – the TERPS Obstacle Departure Procedure (ODP) surface, representing standard all-engines departures, and the approximate OEI surface developed by SFO through independent study in consultation with the airlines serving SFO. The exhibit also shows the terrain elevation beneath the airspace surfaces and various aircraft approach and departure profiles, based on varying operating assumptions. The exhibit illustrates a fundamental principle related to the design of airspace protection surfaces. The surfaces are always designed below the actual aircraft flight profile which they are designed to protect, thus providing a margin of safety. Note that the ODP climb profile is above the ODP airspace surface, and the OEI climb profile is above the OEI airspace surface.

4.5.4 AIRSPACE PROTECTION POLICIES

The following airspace protection policies (AP) shall apply to the ALUCP.

AP-1 COMPLIANCE WITH 14 CFR PART 77, SUBPART B, NOTICE OF PROPOSED CONSTRUCTION OR ALTERATION

AP-1.1 Local Government Responsibility to Notify Project Sponsors

Local governments should notify sponsors of proposed projects at the earliest opportunity to file Form 7460-1, *Notice of Proposed Construction or Alteration*, with the FAA for any proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10. Under Federal law, it is the responsibility of the project sponsor to comply with all notification and other requirements described in 14 CFR Part 77. This requirement applies independent of this ALUCP.

AP-1.2 FAA Aeronautical Study Findings Required Before Processing Development Application

The sponsor of a proposed project that would exceed the FAA notification heights, as shown approximately on Exhibit IV-10, shall present to the local government permitting agency with his or her application for a development permit, a copy of the findings of the FAA's aeronautical study, or evidence demonstrating that he or she is exempt from having to file an FAA Form 7460-1. It is the responsibility of the local agency to consider the FAA determination study findings as part of its review and decision on the proposed project.

AP-2 COMPLIANCE WITH FINDINGS OF FAA AERONAUTICAL STUDIES

Project sponsors shall be required to comply with the findings of FAA aeronautical studies with respect to any recommended alterations in the building design and height and any recommended marking and lighting of their structures for their proposed projects to be deemed consistent with this ALUCP.

AP-3 MAXIMUM COMPATIBLE BUILDING HEIGHT

In order to be deemed consistent with the ALUCP, the maximum height of a new building must be the lower of (1) the height shown on the SFO critical aeronautical surfaces map (Exhibits IV-17 and IV-18), or (2) the maximum height determined not to be a "hazard to air navigation" by the FAA in an aeronautical study prepared pursuant to the filing of Form 7460-1.

For the vast majority of parcels, the height limits established in local zoning ordinances are lower than the critical airspace surfaces. In those cases, the zoning district height regulations will control. Compliance with the zoning district height and the SFO critical aeronautical surfaces map, however, does not relieve the construction sponsor of the obligation to file a FAA Form 7460-1 *Notice of Proposed Construction or Alteration*, if required, and to comply with the determinations resulting from the FAA's aeronautical study.

For a project to be consistent with this ALUCP, no local agency development permits shall be issued for any proposed structure that would penetrate the aeronautical surfaces shown on Exhibits IV-17 and IV-18 or the construction of which **has not** received a Determination of No Hazard from the FAA, or which would cause the FAA to increase the minimum visibility requirements for any instrument approach or departure procedure at the Airport.

AP-4 OTHER FLIGHT HAZARDS ARE INCOMPATIBLE

Proposed land uses with characteristics that may cause visual, electronic, or wildlife hazards, particularly bird strike hazards, to aircraft taking off or landing at the Airport or in flight are incompatible in Area B of the Airport Influence Area. They may be permitted only if the uses are consistent with FAA rules and regulations. Proof of consistency with FAA rules and regulations and with any performance standards cited below must be provided to the Airport Land Use Commission (C/CAG Board) by the sponsor of the proposed land use action.

Specific characteristics that may create hazards to aircraft in flight and which are incompatible include:

(a) Sources of glare, such as highly reflective buildings or building features, or bright lights, including search lights or laser displays, which would interfere with the vision of pilots making approaches to the Airport.

(b) Distracting lights that that could be mistaken by pilots on approach to the Airport for airport identification lighting, runway edge lighting, runway end identification lighting, or runway approach lighting.

(c) Sources of dust, smoke, or water vapor that may impair the vision of pilots making approaches to the Airport.

(d) Sources of electrical interference with aircraft or air traffic control communications or navigation equipment, including radar.

(e) Land uses that, as a regular byproduct of their operations, produce thermal plumes with the potential to rise high enough and at sufficient velocities to interfere with the control of aircraft in

flight. Upward velocities of 4.3 meters (14.1 feet) per second at altitudes above 200 feet above the ground shall be considered as potentially interfering with the control of aircraft in flight.[17]

(f) Any use that creates an increased attraction for wildlife, particularly large flocks of birds, that is inconsistent with FAA rules and regulations, including, but not limited to, FAA Order 5200.5A, *Waste Disposal Sites On or Near Airports*, FAA Advisory Circular 150/5200-33B, *Hazardous Wildlife Attractants On or Near Airports*, and any successor or replacement orders or advisory circulars. Exceptions to this policy are acceptable for wetlands or other environmental mitigation projects required by ordinance, statute, court order, or Record of Decision issued by a federal agency under the National Environmental Policy Act.

4.5.5 iALP AIRSPACE TOOL

In consultation with C/CAG, SFO developed the iALP Airspace Tool, a web-based, interactive tool to evaluate the relationship of proposed buildings with the Airport's critical airspace surfaces. The iALP Airspace Tool is designed to assist planners, developers, and other interested persons with the implementation of the airspace protection policies of the SFO ALUCP. The tool helps users determine: (1) the maximum allowable building height at a given site, and/or (2) whether a building penetrates a critical airspace surface, and by how much, given the proposed building height.

A more detailed description of the iALP Airspace Tool and a tutorial explaining how to use it is presented in **Appendix J**. Use of this tool, however, does not relieve a project sponsor of the duty to comply with all federal regulations, including the obligation to file Form 7460-1, Notice of Proposed Construction or Alteration, with the FAA.

[17] This is a threshold established by the California Energy Commission in its review of power plant licensing applications. See *Blythe Solar Power Project: Supplemental Staff Assessment, Part 2*,. CEC-700-2010-004-REV1-SUP-PT2, July 2010. California Energy Commission. Docket Number 09-AFC-6, p. 25. This criterion is based on guidance established by the Australian Government Civil Aviation Authority (Advisory Circular AC 139-05(0), June 2004). The FAA's Airport Obstructions Standards Committee (AOSC) is studying this matter but has not yet issued specific guidance.

Response to Letter A: San Francisco International Airport (SFO)

This letter confirms and clarifies the regulations specific to this site in regards to its proximity to the San Francisco International Airport (SFO). The Draft EIR (page 4-15) recognizes that the project site is entirely within the SFO Airport Land Use Compatibility Plan (ALUCP) Compatibility Area B. As such, the compatibility criteria specific to noise, safety, and airspace protection as contained within the ALUCP are applicable to the project, and the Airport Land Use Committee will exercise its statutory duties to review the project. An assessment of the project's consistency with ALUCP compatibility criteria specific to safety and airspace protection is provided in the Draft EIR (page 4-15), and identified no inconsistencies. Criteria specific to noise is assessed in the Initial Study (Draft EIR Appendix B page 40), also identifying no inconsistency.

This letter does not provide specific comment on the environmental analysis in the Draft EIR and no revisions are required.