INITIAL STUDY AND MITIGATED NEGATIVE DECLARATION

580 DUBUQUE AVENUE PROJECT

Lead Agency:

City of South San Francisco
Economic & Community Development Department
315 Maple Avenue
South San Francisco, CA 94080

JANUARY 2022

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INTRODUCTION TO THIS DOCUMENT

This document serves as the Initial Study and Mitigated Negative Declaration for the 580 Dubuque Avenue project, prepared in accordance with the California Environmental Quality Act (CEQA; Public Resources Code Sections 15000 et seq.).

Per CEQA Guidelines (Section 15070), a Mitigated Negative Declaration can be prepared to meet the requirements of CEQA review when the Initial Study identifies potentially significant environmental effects, but revisions in the project and/or incorporation of mitigation measures agreed to by the applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur and there is no substantial evidence in light of the whole record that the project as revised may have significant effect on the environment.

This document is organized in three sections as follows:

- **Introduction and Project Information.** This section introduces the document and presents the project description including location, setting, and specifics of the lead agency and contacts.
- **Mitigated Negative Declaration.** This section lists the impacts and mitigation measures identified in the Initial Study and proposes findings that would allow adoption of this document as the CEQA review document for the proposed project.
- **Initial Study Checklist.** This section discusses the CEQA environmental topics and checklist questions and identifies the potential for impacts and proposed mitigation measures to avoid these impacts.

Full project application materials are available for review upon request from the Planning Department at City of South San Francisco (see contact info below).

PUBLIC REVIEW

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

Christopher Espiritu, Senior Planner
City of South San Francisco
Economic & Community Development Department
315 Maple Avenue
South San Francisco, CA 94080
Phone: 650-877-8535
Email: Christopher.Espiritu@ssf.net

PROJECT INFORMATION

All figures for the project information are included together on pages 7 through 13.

PROJECT ENTITLEMENTS

Development of the project would require the following approvals from the City of South San Francisco: General Plan Amendment (land use map and text amendments), East of 101 Area Plan Amendment, Downtown Station Area Specific Plan Amendment (land use map and text amendments), Zoning Map

Amendments, Conditional Use Permits (Parking Reduction, Floor Area Ratio Increase), Design Review, and a Transportation Demand Management Plan.

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 consistency review.

The California Department of Toxic Substances Control (DTSC) is the lead regulatory agency for remediation of the project site. A California Land Reuse and Revitalization Act Agreement was executed between the applicant and DTSC on January 23, 2020, which outlines requirements for redevelopment of the site. A Response Plan is required to be approved by DTSC prior to the start of construction activities at the site, which will detail remediation activities. A Certificate of Completion would be issued by DTSC once actions are completed at the site to their satisfaction.

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

Lead Agency

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Economic & Community Development Department
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South San Francisco, CA 94080

Contact Person

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Project Sponsor

South City Ventures, LLC
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Project Location and Existing Uses

The 1.89-acre project site (Assessor's Parcel Number 015-021-998) is located in the City of South San Francisco, California at the southern end of Dubuque Avenue, north of the Grand Avenue overpass as it intersects with U.S. 101. It is bordered by Dubuque Avenue and the U.S. 101 highway on the west, the Caltrain right-of-way and South San Francisco Caltrain station property on the east and south, and development and parking on the 720 Dubuque Avenue parcel to the north. **Figure 1** shows the project location.

The project site is located adjacent to the Caltrain station and within walking distance of the downtown area (approximately 0.25 miles away), which offers an array of multi-family residential, dining, and retail activities centered along Grand Avenue. SamTrans provides bus service on the west side of U.S. 101,

with bus stops located approximately 0.25 miles from the project site, and commute.org provides shuttle service from the Caltrain station to/from the BART and WETA ferry station.

The site is within the boundaries of the Downtown Station Area Specific Plan (DSASP). However, it was not specifically contemplated for development in the DSASP as it was in use as part of the Caltrain station property at the time, prior to the station relocation and upgrade. The site is also within the boundaries of the current East of 101 Area Plan (1994) and South San Francisco General Plan (1999); however these plans will be superseded by the General Plan 2040 update currently underway. The applicant has been coordinating with the City related to the General Plan update efforts and the project is intended to be consistent with the General Plan 2040 update.

As a part of the Caltrain station relocation and upgrade, the project site was recently used for construction staging. All former site improvements have been previously removed from the site and the project site is currently vacant and fenced.

The site is relatively level, with varying elevations above mean sea level of approximately 17 to 17.5 feet. The depth to groundwater is approximately 7 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, mostly due to historic railroad use of the site and undocumented fill. The main contamination of concern is mainly low levels of lead and other metals in the soil. Removal of impacted soil is proposed as part of the project as further discussed in Section 9: Hazards and Hazardous Materials.

There are currently two applicable covenants in place: a Covenant Restricting Residential Use, which specifies that the lot cannot be developed to include residential, lodging, hospitals, child and elderly care facilities, schools, or recreational uses, and a Railroad Proximity Covenant, acknowledging that there are significant rail yard operations at adjacent sites that result in noise, vibrations, emissions, and other disturbances.

General Plan Designation / Zoning

Current General Plan (1999) Designation: Business Commercial

Proposed General Plan (1999) Designation: Transit Office/R&D Core

Preliminary General Plan 2040 Designation: East of 101 Transit Core[1]

Current Zoning: Freeway Commercial (FC)

Proposed Zoning: Downtown Station Area Specific Plan District; Transit Office/R&D Core (TO/RD) Subdistrict

Surrounding Land Uses

The project site is located proximate to multiple transportation infrastructure elements, including the Caltrain station property to the east and south, raised Grand Avenue overpass to the south, and U.S. 101 to the west. The only adjacent non-transportation infrastructure use is the adjacent property to the north at 720 Dubuque Avenue, which includes a restaurant, parking lots, and a large vacant warehouse building (formerly Lowes). The project site is at the western edge of the East of 101 area, which is a large

[1] As identified in the Preferred Land Use Scenario (PLUS) under consideration by the City as of December 2021.

employment area including industrial, office, research and development, and commercial uses. To the west, across Dubuque Avenue is U.S. 101, with commercial and multi-family residential uses fronting along Airport Boulevard on the other side of the freeway and residential neighborhoods beyond.

PROJECT DESCRIPTION

Overview and Building Massing

The proposed project would involve construction of a new approximately 295,000-square-foot,[2] 8-story, office / research and development (R&D) building with a maximum height of approximately 155 feet from the ground surface (approximate elevation of 18.5 feet above mean sea level) to the highest rooftop element. Project site improvements would also include sidewalks, landscaping, and lighting along Dubuque Avenue. Ground floor amenities would include a fitness center, conference space and a café with an adjacent outdoor terrace near the building's entry lobby. The applicant is targeting life science tenants and designing for an employment density of 1 employee per 350 gross square feet. At this rate, 842 employees would be anticipated.

According to the project application, the project design is intended "to bring high-quality architectural design and significant public realm improvements to reimagine the project site and the surrounding area as a destination accessible by foot, bicycle, or public transit… [T]he building's aim is to act as a landmark structure signifying the strength of biotechnology development in the area and reclamation of a postindustrial landscape."

The building would be recessed at ground level, with stepped massing that pushes the building mass towards the eastern property line of the site. The ground floor would include full height storefront windows to showcase amenities (a fitness center, conference space, and a café space) with an adjacent outdoor terrace that will create public gathering spaces along the building's northwesterly-facing entry lobby. A two-story podium level above the entrance would scale down the mass at the pedestrian entrance and above that level the massing steps and shifts to create a terrace space on level 4. There would also be two notched terraces at the top levels. The building's façade would be a mix of glass, glazing, and solid metal panels. Perforated fins would be used for further visual interest.

The project is designed to achieve LEED Gold Certification, exceeding the baseline requirements of the California Green Building Code. Additionally, the project will include a robust Transportation Demand Management Plan to achieve 40%[3] alternative mode use.

Access & Parking

The project site is accessible by automobile, train, and bus, and would include on-site facilities for pedestrians and bikes.

Rail: The project site is located immediately adjacent to the South San Francisco Caltrain Station, part of a regional rail corridor that provides connectivity between San Francisco and Gilroy. The project site is also located approximately 1.8 and 2.5 miles from the San Bruno and South San Francisco BART Stations respectively, which are served by BART's Red and Yellow Lines.

[2] All references to square footage, height, and distance are approximate unless otherwise noted.

[3] Note that while a 40% reduction is proposed, this analysis conservatively analyzed a lower 35% reduction. A 40% reduction would result in fewer trips and related potential for impacts and is fully covered by this analysis.

Bus: The project site is located approximately 0.3 miles from the Airport/East Grand Ave SamTrans bus stop and approximately 0.4 miles from the Airport/Baden bus stop, serviced by the 292 and 397 bus lines. It is also located within 0.5 miles of the Linden Ave/Miller Ave bus stop, serviced by the 130 and 141 bus lines.

Automobile/Truck: Project site access is provided via a shared driveway with the Caltrain station from Dubuque Avenue along the western edge of the project site, with drop-offs at the northern portion of the site and vehicular access to the parking garage (and truck access) at the southern side.

Bicycle and Pedestrian Access: Pedestrian and bicycle access to the project site is currently limited. There are no existing pedestrian sidewalks or bike lanes along the shared driveway. The applicant would coordinate with the Peninsula Corridor Joint Powers Board (JPB), which operates Caltrain and currently owns the parcels to the south and east of the project site, to provide pedestrian access between the project site and the Caltrain station.

Structured parking would be provided in 4 stories below grade, with approximately 350 parking spaces to serve the office/R&D tenant. No parking is required under City of South San Francisco Municipal Code for the café use based on its size.

The project includes installation of stop signs and directional signage at internal intersections and at the shared driveway intersection with Dubuque Avenue as shown on project plans.

Utilities

The project site is located within existing utility service areas and utilities are generally available in surrounding roadways and properties. (See section 19: Utilities and Service Systems for additional discussion of utilities.) In addition to on-site improvements and connections to utility lines along Dubuque Avenue, off-site utility improvements are proposed as a part of the project as follows:

- The project proposes to improve the existing Cal Water main in Dubuque Avenue including upsizing approximately 1,000 linear feet of the current 6-inch and 8-inch ductile iron water main within Dubuque Avenue to 12-inch ductile iron pipe. Cal Water would provide the design for the upsizing project and would perform all of the off-site work up to the proposed meter.

- The nearest publicly owned sewer system, which is owned and maintained by the city, is located on the private parcel to the north of the project. The project would construct a 6-inch sanitary sewer line within an existing easement on the neighboring property.

- The project would require coordination with Pacific Gas and Electric (PG&E) to extend power from the pole approximately 100 feet north of the project site on Dubuque Avenue or to install a new joint pole at the project site frontage. The project would also require coordination with PG&E for an extension of the high pressure main for natural gas, as the nearest gas distribution main is located approximately 230 feet north of the project frontage. Although the project will include a stubbed connection to the natural gas main, it is designed to operate with 100% electric energy.

Construction

Project construction activities are anticipated to span approximately 2 years with a target start in early 2022 or later.[4] Site preparation and foundation work would run approximately the first 9 months, followed by building construction over about 12 months and finishing/paving/landscaping over about 3 months. A total of about 325 workers are anticipated to be onsite throughout the construction process.

Once leased, tenant improvements would follow to the interior of the building and are likely to take an additional approximately 3 months or more. The building is expected to be operational as early as mid-2024.

The project would involve removal of contaminated soil and excavation for subsurface parking extending to depths of up to about 60 feet below ground surface. Construction dewatering would be necessary during excavation as further discussed in Section 7: Geology and soils and Section 10: Hydrology and Water Quality.

[4] While this analysis was performed with an assumption of a construction start in early 2022, if construction is initiated later, impacts would be the same or lessened (due to increasing emissions controls) from those analyzed here.

Figure 1: Project Location
Source: Project Plan Set, dated July 16, 2021

Figure 2: Visual Model
Source: Project Plan Set, dated July 16, 2021

Figure 3: Site Plan

Source: Project Plan Set, dated July 16, 2021

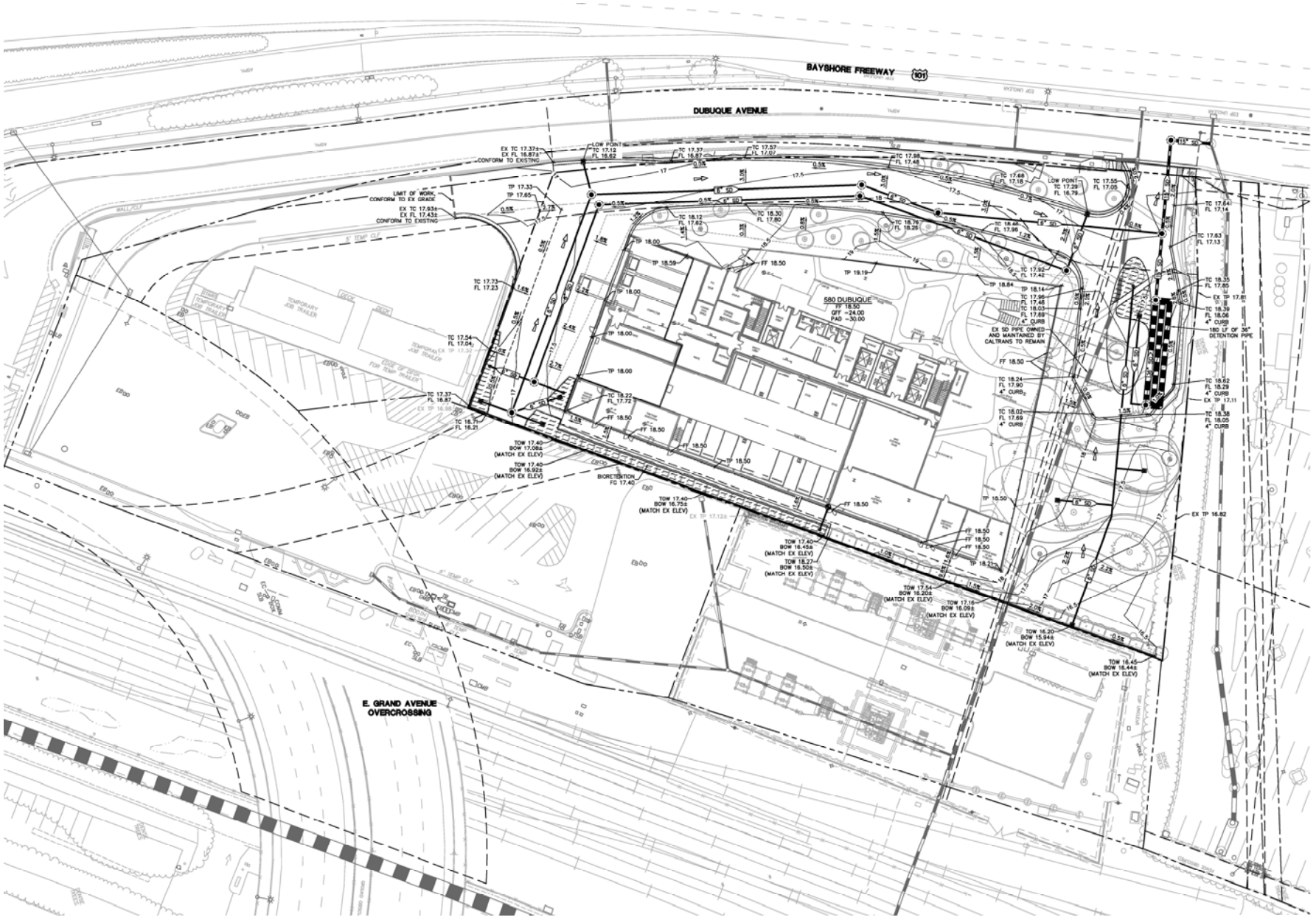

Figure 4: Grading and Drainage Plan

Source: Project Plan Set, dated July 16, 2021

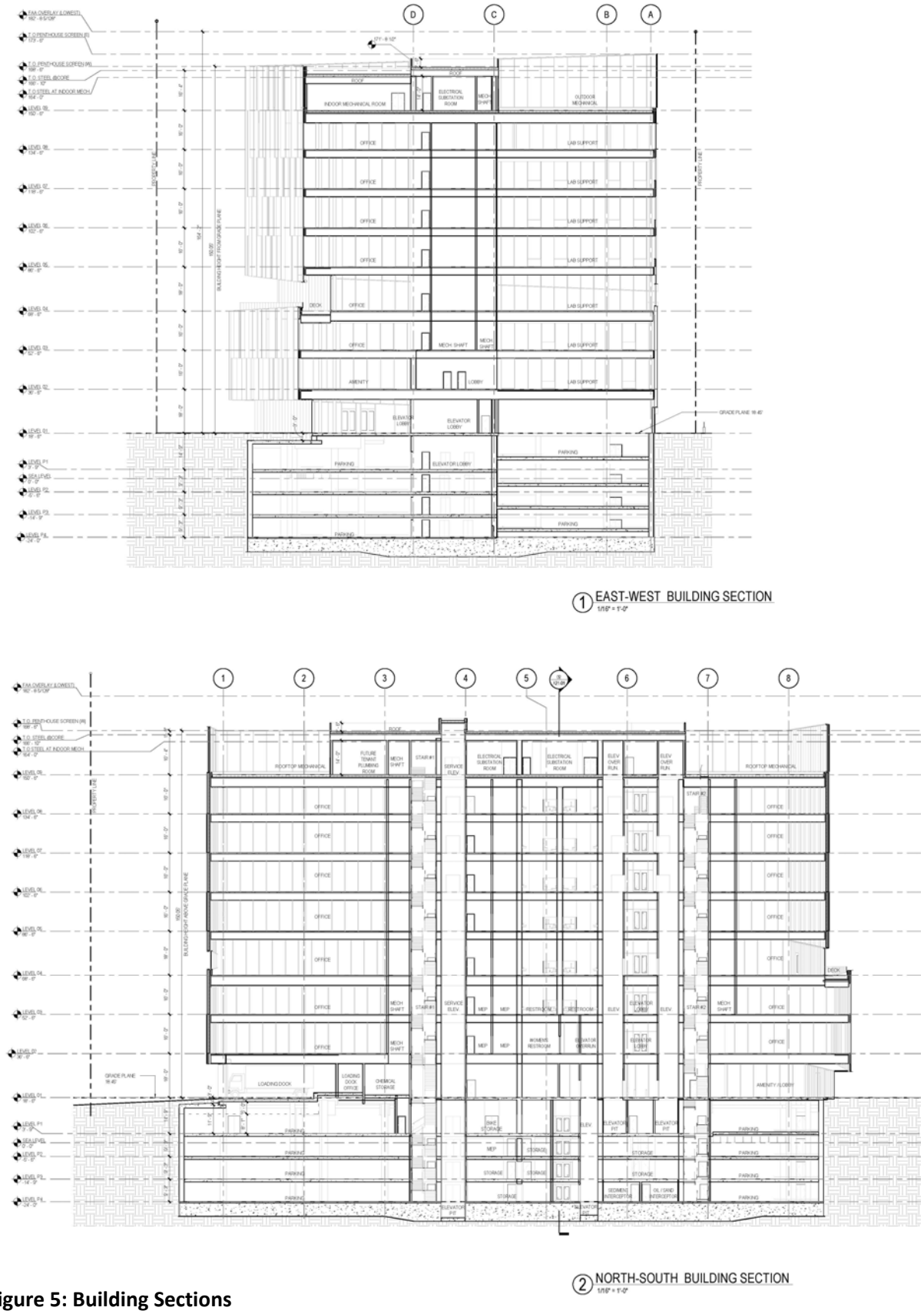

Figure 5: Building Sections

Source: Project Plan Set, dated July 16, 2021

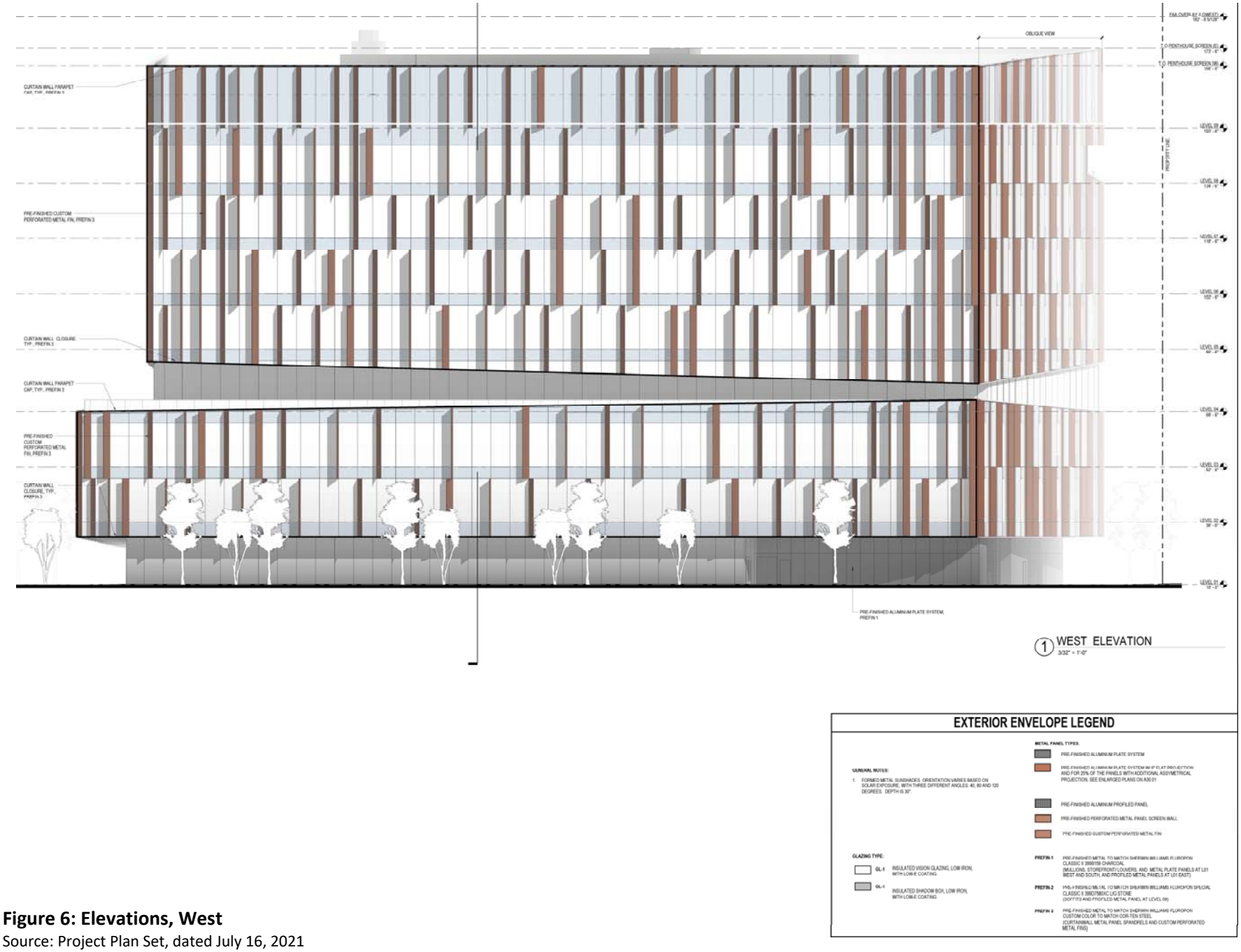

Figure 6: Elevations, West
Source: Project Plan Set, dated July 16, 2021

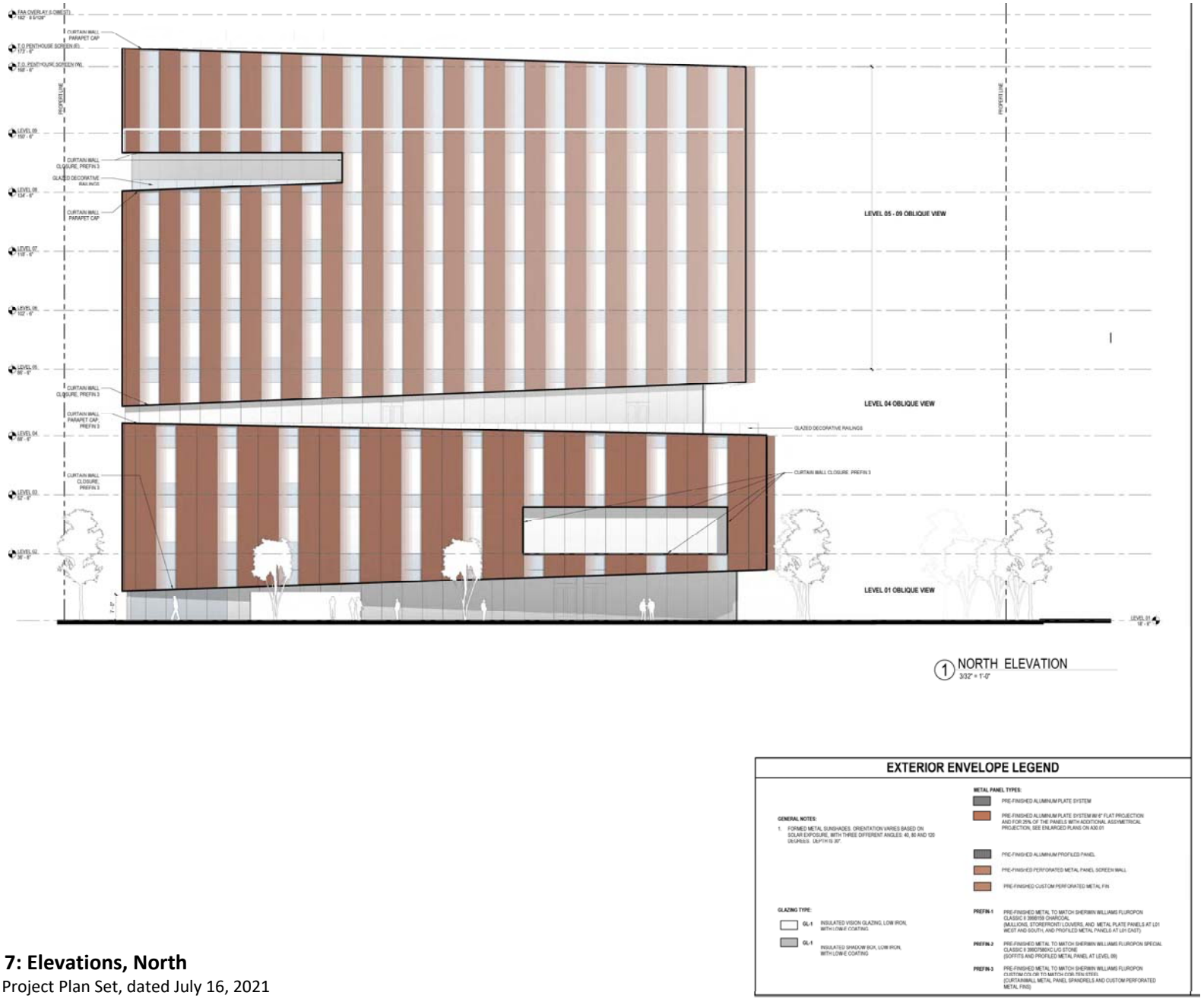

Figure 7: Elevations, North
Source: Project Plan Set, dated July 16, 2021

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MITIGATED NEGATIVE DECLARATION

PROJECT DESCRIPTION, LOCATION, AND SETTING

This Mitigated Negative Declaration has been prepared for the 580 Dubuque Avenue project. See the Introduction and Project Information section of this document for details of the project.

POTENTIALLY SIGNIFICANT IMPACTS REQUIRING MITIGATION

The following is a list of potential project impacts and the mitigation measures recommended to reduce these impacts to a less than significant level. Refer to the Initial Study Checklist section of this document for a more detailed discussion.

Potential Impact	**Mitigation Measures**
Air Quality, Construction Emissions: Construction of the project would result in emissions and fugitive dust. While the project emissions 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.	
	Mitigation Measure **Air-1: Basic Construction Management Practices.** The project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures": i) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. ii) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. iii) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, unless the City Engineer determines that an alternative cleaning method would achieve the same standard of air pollution prevention and also reduce the potential for stormwater pollution. iv) All vehicle speeds on unpaved roads shall be limited to 15 mph. v) All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used. vi) Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California airborne toxics control measure Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.

Potential Impact	Mitigation Measures
	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.
Biological Impact: Trees in the vicinity of the project site could host the nests of common birds that are protected under the federal Migratory Bird Treaty Act and the California Fish and Wildlife Code, so the following mitigation would be applicable to ensure no significant impacts occur with respect to these species during nesting.	
	Mitigation Measure **Bio-1: Pre-Construction Nesting Bird Survey.** Initiation of construction activities during the avian nesting season (February 15 through September 15) shall be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the project area shall be conducted within 14 days prior to initiation of construction activities. If active nests are found, a 100-foot buffer area shall be established around the nest in which no construction activity takes place. The buffer width may be modified upon recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity based upon published protocols and/or guidelines from the U.S. or California Fish and Wildlife Services (USFWS, CDFW) or through consultation with USFWS and/or CDFW. The biologist may also determine that construction activities can be allowed within a buffer area with monitoring by the biologist and stoppage of work in that area if adverse effects to the nests are observed. The buffer shall be maintained until after the nestlings have fledged and left the nest. These surveys would remain valid as long as construction activity is consistently occurring in a given area and would be completed again if there is a lapse in construction activities of more than 14 consecutive days during the nesting season.
Cultural Resources Impact: There are no known cultural resources at the site. However, given the moderate to high potential for unrecorded archeological resources and proposed disturbance of native soils which also have the potential to contain paleontological resources, mitigation measures Cul-1 through Cul-4 shall be implemented to address the potential for unexpected discovery of such resources.	

Potential Impact	Mitigation Measures
	Mitigation Measures **Cul-1: Sampling and/or Monitoring Plan**. Prior to ground disturbance, a qualified archaeologist shall draft project specific recommendations for sampling and/or monitoring for subsurface paleontological, archaeological, and/or tribal resources during excavation as determined necessary based on cords searches and previous studies of the site. Next steps could include additional exploration prior to construction, monitoring of site disturbance by a qualified professional, or no additional action other than that specified in Cul-2, Cul-3, and Cul-4. The plan and supporting reasoning shall be submitted to the City of South San Francisco for approval and the applicant shall be responsible for implementing the plan and any follow-up actions determined to be necessary. **Cul-2: 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 paleontological, archaeological, and/or tribal artifacts that might be encountered during construction activities, and procedures to follow in the event of a discovery. This training shall be provided for any personnel with the potential to be involved in activities that could disturb native soils. **Cul-3: Halt Construction Activity, Evaluate Find and Implement Mitigation**. In the event that previously unidentified paleontological, archaeological, or tribal resources are uncovered during site preparation, excavation or other construction activity, the project applicant shall cease or ensure that all such activity within 25 feet of the discovery is ceased until the resources have been evaluated by a qualified professional, who shall be retained by the project applicant, and specific measures are implemented by the project applicant to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code. **Cul-4: 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 shall cease or ensure that all such activity within 25 feet of the discovery is ceased until the remains have been evaluated by the County Coroner, which evaluation shall be arranged by the project applicant, and appropriate action taken by the project applicant in accordance with section 7050.5 of the California Health and Safety Code and, if the remains are Native American, in accordance with section 5097.98 of the California Public Resources Code.
Geological Impact: The San Francisco Bay Area is a seismically active region. The project site includes undocumented fill. Construction activities require substantial excavation and dewatering. To mitigate the potential for damage to structures or people, Mitigation Measure Geo-1 shall be implemented.	

Potential Impact	Mitigation Measures
	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.
Hazardous Site Impact: The site is impacted by contamination from historic and adjacent uses, mostly due to historic railroad use of the site and undocumented fill. The main contamination of concern is mainly low levels of lead and other metals in the soil. Removal and mitigation of impacted soil is proposed as part of project construction activities and would be performed per requirements of the regulatory agency, the California Department of Toxic Substances Control, as outlined in Haz-1.	
	Mitigation Measure **Haz-1: Response Plan Implementation and Completion.** The applicant shall coordinate with DTSC to implement a Response Plan pursuant to the previously-approved CLRRA Agreement (Docket No HSA-FY19/20-013) to appropriately mitigate soil contamination. Evidence of plan approval by DTSC shall be submitted to the City prior to initiation of earth-moving at the site and a Certificate of Completion (or other no further action documentation) shall be submitted prior to issuance of Occupancy Permits. While details will be coordinated with DTSC, the following components are anticipated to be included in the Response Plan: 1. Soil Management. The proposed construction activities will disturb soil during the excavation, site grading, construction of new foundations, and installation of utility lines. During excavation activities, dust control measures will be implemented. The soil management objectives for the site are to control exposure of potentially hazardous constituents in soil to construction workers, nearby residents and/or pedestrians, and future users of the site, all implemented pursuant to the DTSC-approved plan. The components of the Response Plan will establish and maintain required health and safety procedures to control worker and public exposure to site contaminants during construction including but not necessarily limited to the elements listed below. 2. Dust Control. During handling of potentially contaminated soils, an enhanced dust control plan with provisions to protect construction workers and the public will be implemented through engineering controls, to control generation of dust and resulting off-site migration of contaminants in site soil. Dust control measures will include: • Covering soil stockpiles with plastic sheeting. • Watering uncovered ground surface at the site to prevent visible dust from becoming air-borne.

Potential Impact	Mitigation Measures
	• Misting or spraying of soil as required during excavation and loading. • Placement of gravel and/or rubble plates on unpaved site access roads as feasible. • Covering of trucks hauling contaminated soil from the site with a tarpaulin or other cover. • Reducing to as low as feasible the soil drop from an excavator's bucket onto soil piles or into transport trucks. • Deployment of windbreaks as necessary. • Posting on-site vehicle speed limits. • Street sweeping of public streets as required when soils are visible. • Termination of excavation and loading activities if winds exceed 15 mph. • Addition of soil stabilizers and other responses as needed. 3. Health and Safety Plan. The potential health risk to on-site construction workers and the public will be minimized by developing and implementing a comprehensive Health and Safety Plan prepared by a certified industrial hygienist representing the contractor. The purpose of the Health and Safety Plan is to provide field personnel with an understanding of the potential chemical and physical hazards, protection of any off-site receptors, procedures for entering the project site, health and safety procedures, and emergency response to hazards should they occur. All project personnel shall undergo the identified health and safety training, and read and adhere to the procedures established in the Health and Safety Plan. A copy of the Health and Safety Plan shall be kept on site during field activities and reviewed and updated as necessary. The Health and Safety Plan will describe the specific personal hygiene and monitoring equipment that will be used during construction to protect and verify the health and safety of the construction workers and the general public from exposure to constituents in the soil and groundwater. 4. Health and Safety Officer. A site health and safety officer identified in the Health and Safety Plan will be on site at all times during excavation activities to ensure that all health and safety measures are maintained. The health and safety officer will have authority to direct and stop (if necessary) all construction activities in order to ensure compliance with the health and safety plan. 5. Groundwater Management. Construction dewatering is anticipated based on development plans, however, per analytic results of groundwater sampling, it is anticipated the groundwater from the site will be able to be discharged into the sanitary sewer system with no additional treatment. While not anticipated to be included as a required element of the Response Plan, any construction dewatering must adhere to a discharge permit obtained from the South San Francisco Department of Public Works Water Quality Control Division, Environmental Compliance Program or the Regional Water Quality Control Board. In the event of the presence of regulated levels of contamination, measures will be taken to comply with applicable

Potential Impact	Mitigation Measures
	requirements. 6. Contingency Plans for Unknown/Unexpected Conditions. The following tasks shall be implemented during excavation activities if unanticipated hazardous materials are encountered. Such materials may include unaccounted for underground storage tanks and associated product lines, sumps, and/or vaults, former monitoring wells, and/or soil with significant petroleum hydrocarbon odors and/or stains. • Stop work in the area where the suspect material is encountered and cover with plastic sheets. • Notify the site safety officer and site superintendent. • Have an appropriate professional conduct a site inspection and determine appropriate follow-up actions, which would include appropriate handling and removal of the identified hazard. • Review the existing health and safety plan for revisions, if necessary, and have appropriately trained personnel on-site to work with the affected materials as required by applicable requirements.
Traffic Hazard Impact: Under existing conditions, the curved alignment of Dubuque Avenue combined with the existing fence/retaining wall impacts the visibility of northbound traffic for drivers exiting onto Dubuque Avenue from the shared project and Caltrain station parking lot driveway. Additionally, signs attached to the fence and vegetation at the corner of the property to the north obstruct sight distance between southbound Dubuque Avenue traffic and vehicles exiting the shared project and Caltrain driveway under existing conditions. Because the proposed project would add traffic to the existing driveway on Dubuque Avenue, the project would exacerbate an existing traffic hazard, resulting in a potentially significant safety impact. Implementation of the safety improvements identified in Mitigation Measure Trans-1 would result in adequate sight distance at this intersection.	
	Mitigation Measure **Trans-1: Shared Dubuque Avenue Driveway Safety Improvements.** The applicant shall coordinate the following safety improvements for the intersection of Dubuque Avenue and the shared Caltrain / project driveway to provide adequate sight distance between northbound Dubuque Avenue traffic and vehicles exiting the shared Dubuque Avenue driveway. a) The applicant shall coordinate with the City to decrease the speed limit on Dubuque Avenue to 25 mph. b) The applicant shall coordinate with the City to reduce the height of the fence along the retaining wall on Dubuque Avenue to the south of the project site to improve visibility of approaching northbound traffic. Additionally, the applicant shall coordinate with the City and adjacent properties as reasonably feasible to address existing sight distance obstructions at the intersection of Dubuque Avenue and the shared Caltrain / project driveway as follows: c) Coordinate with Caltrain to relocate or reduce the height of the existing

Potential Impact	Mitigation Measures
	"Caltrain Station Parking" sign located on the south side of the shared Dubuque Avenue driveway to provide adequate sight distance between northbound Dubuque Avenue traffic and vehicles exiting the shared Dubuque Avenue driveway. d) Coordinate with the property owner to the north to clear obstructing signs from the fence and vegetation from the corner of their property to provide adequate sight distance between southbound Dubuque Avenue traffic and vehicles exiting the shared Dubuque Avenue driveway.
Tribal Cultural Resources Impact: There are no recorded tribal cultural resources at the site. However, given the moderate to high potential for unrecorded Native American resources, mitigation measures Cul-1 through Cul-4, above, shall be implemented to address the potential for unexpected discovery of such resources.	
	Mitigation Measures Cul-1 through Cul-4, detailed above.

LEAD AGENCY DETERMINATION

On the basis of this evaluation, it can be concluded that:

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

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

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

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

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

INITIAL STUDY CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

There are no impacts that would remain significant with implementation of the identified mitigation measures.

EVALUATION OF ENVIRONMENTAL EFFECTS

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

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

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

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

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

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

Under CEQA Section 21099(d), "Aesthetic… impacts of a residential, mixed-use residential, or employment center project on an infill site located within a transit priority area shall not be considered significant impacts on the environment."

Accordingly, aesthetics is no longer considered in determining if a project has the potential to result in significant environmental effects for projects that meet all three of the following criteria:

1. The project is in a transit priority area. CEQA Section 21099(a)(7) defines a "transit priority area" as an area within one-half mile of an existing or planned major transit stop. A "major transit stop" is defined in CEQA Section 21064.3 as a rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the a.m. and p.m. peak commute periods.

2. The project is on an infill site. CEQA Section 21099(a)(4) defines an "infill site" as either (1) a lot within an urban area that was previously developed; or (2) a vacant site where at least 75 percent of the site perimeter adjoins (or is separated by only an improved public right-of-way from) parcels that are developed with qualified urban uses.

3. The project is residential, mixed-use residential, or an employment center. CEQA Section 21099(a)(1) defines an "employment center" as a project situated on property zoned for commercial uses with a floor area ratio of no less than 0.75 and located within a transit priority area.

The proposed project meets all three of the above criteria because the project (1) is in a transit priority area due to the location adjacent to the South San Francisco Caltrain (rail) Station;[5] (2) is on an infill site

[5] Metropolitan Transportation Commission, 2021, Transit Priority Area, accessed at: https://www.arcgis.com/home/item.html?id=370de9dc4d65402d992a769bf6ac8ef5

that has been previously developed and is fully adjoined by urban uses and public rights-of-way within South San Francisco; and (3) is an employment center with a projected FAR of 3.19. Thus, this section does not consider aesthetics, including the aesthetic impacts of light and glare, in determining the significance of project impacts under CEQA.

Nevertheless, the City recognizes that the public and decision makers may be interested in information about the aesthetic effects of a proposed project; therefore, the information contained in this section related to aesthetics, light, and glare is provided solely for informational purposes and is not used to determine the significance of environmental impacts pursuant to CEQA.

a) Scenic Vistas

The project vicinity is predominantly developed with business park and industrial uses and is not considered a scenic resource or vista in any vicinity plans. The East of 101 Area Plan (Policy 5.3) states that a design goal of development in the Plan Area should be to "Protect visually significant features of the East of 101 Area, including views of the Bay and San Bruno Mountain."[6] CEQA generally protects against significant adverse impacts to public views of scenic vistas, taking into consideration whether the view is from a location at which people gather specifically to enjoy views and the environmental context (i.e., if the area is a natural area or a developed urban area). While views of the Bay and San Bruno Mountain are considered scenic vistas for purposes of this analysis, there are no designated public viewing locations in the vicinity of the project. Views from public roadways are discussed below to indicate the potential for changed views from public locations.

Views toward the Bay (to the east of the project site) and San Bruno Mountain (to the northwest of the project site) from area roadways that would cross the site are already substantially blocked at road level by existing area development, topography, and landscaping.

While areas of the adjacent development could experience some blockage of views of the Bay or San Bruno Mountain, these are not public viewing locations where people gather specifically to enjoy views. Obstruction of private views is not considered a significant environmental impact under CEQA.

As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact with respect to aesthetics. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

b) Scenic Highways

U.S. 101 is not a designated or eligible State Scenic Highway corridor in the vicinity of the project nor are there any scenic corridors identified in the area.[7] The project would not be visible from a designated or eligible State Scenic Highway. As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact in this regard. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

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6 East of 101 Area Plan, July 1994, p. 13

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

c) Visual Character

As a project located in an urbanized area, the applicable criteria would have been whether the project would conflict with applicable zoning and other regulations governing scenic quality. The project is seeking a Zoning Map amendment to allow for office/R&D as part of the Transit Office/R&D Core (TO/RD) subdistrict rather than the uses currently allowed (regional-serving retail uses, commercial lodging, visitor services and similar uses that benefit from proximity to the U.S 101). The project is generally consistent with the visual character of other office/R&D development in the vicinity. Other than those discussed elsewhere in this section, there are no other policies or regulations specific to scenic character that would be applicable to the project site.

As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact with respect to aesthetics. This informational discussion agrees with the statutory conclusion that the project impact would not be significant. Additionally, the City will review the proposed design as part of the approval process, which can include considerations beyond those strictly environmental-focused.

d) Light and Glare

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

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

The project would result in development and lighting treatments typical of the existing commercial and industrial urban settings and consistent with lighting standards to minimize lighting on adjacent areas and would therefore not result in new sources of substantial adverse light or glare. As noted above, this topic is being discussed as an informational item only because the CEQA Guidelines have determined this type of project would not have a significant impact with respect to aesthetics. This informational discussion agrees with the statutory conclusion that the project impact would not be significant.

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

a-e) Agriculture and Forestry Resources

The project site is located in a developed urban area adjacent to a highway. No part of the site is zoned for, mapped as, or currently being used for agricultural or forestry purposes or is subject to the Williamson Act.[8] There would be ***no impact*** to agricultural and forestry resources as a result of this project.

[8] City of South San Francisco prepared by Atkins, October 2014, South San Francisco Downtown Station Area Specific Plan Environmental Impact Report (SCH no. 2013102001), p. 5-1.

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

This section utilizes information from the Air Quality & Greenhouse Gas Assessment prepared for this analysis by Illingworth & Rodkin, Inc. and dated November 19, 2021, included in full as Attachment A.

a) Air Quality Plan

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

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

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

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

The project would be required to comply with all applicable rules and regulations related to emissions and health risk and would not result in a new substantial source of emissions or toxic air

contaminants (see items b-d below) or otherwise conflict with the primary goals of the 2017 Clean Air Plan.

Many of the Clean Air Plan's control measures are targeted to area-wide improvements, large stationary source reductions, or large employers and these are not applicable to the proposed project. However, the project would be consistent with all rules and regulations related to construction activities and the proposed development would meet current standards of energy and water efficiency (Energy Control Measure EN1 and Water Control Measure WR2) and recycling and green waste requirements (Waste Management Control Measures WA3 and WA4). Additionally, the project does not conflict with applicable control measures aimed at improving access/connectivity for bicycles and pedestrians (Transportation Control Measure TR9) or any other control measures.

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

b) Air Quality Standards/Criteria Pollutants

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

Past, present, and future development projects contribute to the region's adverse air quality impacts on a cumulative basis. By its very nature, air pollution is largely a cumulative impact. No single project is sufficient in size to, by itself, result in nonattainment of ambient air quality standards. Instead, a project's individual emissions contribute to existing cumulatively significant adverse air quality impacts.[9]

BAAQMD updated its Guidelines for air quality analysis in coordination with adoption of new thresholds of significance on June 2, 2010.[10] The most recent version of the Guidelines is dated May 2017.

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

Construction and operational emissions for the project were modeled using the California Emissions Estimator Model ("CalEEMod") version 2020.4.0. Project details were entered into the model including the proposed land uses, Transportation Demand Management Plan trip reductions,

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

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

Peninsula Clean Energy carbon intensity factors, demolition/earthwork volumes, and construction schedule. Model defaults were otherwise used. The CARB EMission FACtors 2021 (EMFAC2021) model was used to predict emissions from construction traffic, which includes worker travel, vendor trucks, and haul trucks. The CalEEMod results and EMFAC inputs are included in Attachment A.

Construction Emissions

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

BAAQMD's adopted thresholds are average daily emissions during construction of 54 pounds per day of NOx, ROG or $PM_{2.5}$ and 82 pounds per day of PM_{10}.

The results from emissions modeling for project construction are summarized in **Table 1** (and included in full in Attachment A).

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

Description	Reactive Organic Gases	Nitrogen Oxides	Particulate Matter (PM_{10})*	Fine Particulate Matter ($PM_{2.5}$) *
Maximum Average Daily Emissions	16.67	24.91	1.23	1.03
BAAQMD Daily Thresholds	*54*	*54*	*82*	*54*
Exceeds Threshold?	*No*	*No*	*No*	*No*

* Applies to exhaust emissions only

Source: Illingworth & Rodkin 2021, Table 4 in Attachment A.

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

Mitigation Measure

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

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

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

iii) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day, unless the City

Engineer determines that an alternative cleaning method would achieve the same standard of air pollution prevention and also reduce the potential for stormwater pollution.

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

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

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

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

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

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

Operational Emissions

Emissions from operation of the project, including mobile sources (e.g. employee vehicle trips) and stationary sources (e.g. emergency generators), could cumulatively contribute to air pollutant levels in the region. These air pollutants include ROG and NOx that affect ozone levels (and to some degree – particulate levels), PM_{10}, and $PM_{2.5}$.

BAAQMD's adopted thresholds are emissions during operations of 54 pounds per day or 10 tons per year of NOx, ROG or $PM_{2.5}$ and 82 pounds per day or 15 tons per year of PM_{10}.

Results of operational emissions modeling are included in full in Attachment A and summarized in **Table 2**, below.

As shown in **Table 2** below, the project's operational emissions would not exceed applicable thresholds and the project would not result in individually or cumulatively significant impacts from operational criteria pollutant emissions.

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

Description	Reactive Organic Gases	Nitrogen Oxides	Particulate Matter (PM_{10})	Fine Particulate Matter ($PM_{2.5}$)
Project Emissions, Daily	12.81	8.74	7.80	2.18
BAAQMD Daily Significance Thresholds	*54*	*54*	*82*	*54*
Exceeds Daily Threshold?	*No*	*No*	*No*	*No*
Project Emissions, Annual	2.34	1.60	1.42	0.40
BAAQMD Annual Significance Thresholds	*10*	*10*	*15*	*10*
Exceeds Annual Threshold?	*No*	*No*	*No*	*No*

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

As vehicular emissions have improved over the years, carbon monoxide hotspots have become less of a concern. BAAQMD presents traffic-based criteria as screening criteria for carbon monoxide impacts, as follows.[11] The project would implement a Transportation Demand Management Plan per South San Francisco Municipal Code to reduce project trips. The project is therefore consistent with the Congestion Management Plan (CMP) of the San Mateo City/County Association of Governments (C/CAG), which is the first threshold. The other two screening thresholds are whether the project would increase traffic volumes at affected intersections to more than 44,000 vehicles per hour or to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (such as a tunnel or underground parking garage). These hourly traffic volumes are very high and much higher than those in the vicinity. For example, Grand Avenue is one of the highest volume roadways in the vicinity, which carries less than 35,000 vehicles per day under existing conditions. Spread over a day, that would be substantially less than 44,000 vehicles per hour and the project would only generate up to 222 peak hour trips (see section 17: Transportation). The project's underground parking garage would serve only project vehicles with expected parking for 350 vehicles, which is again substantially fewer than the threshold of 24,000 vehicles per hour. Therefore, conditions in and around the project would be well below screening levels and the project would not result in individually or cumulatively significant impacts from CO emissions.

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

c) Sensitive Receptors

A toxic air contaminant (TAC) is defined by California law as an air pollutant that may cause or contribute to an increase in mortality or an increase in serious illness, or which may pose a present or potential hazard to human health. In the Bay Area, a number of urban or industrialized communities exist where the exposure to TACs is relatively high compared to other communities.

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

According to the BAAQMD CEQA Guidelines, the project site is not in an impacted community.[12]

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

Certain population groups, such as children, the elderly, and people with health problems, can be particularly sensitive to air pollution. With respect to air pollutants, examples of sensitive receptors include health care facilities, retirement homes, school and playground facilities, and residential areas. The project itself is not considered a sensitive receptor. The closest sensitive receptors to the project site are the multi-family residences approximately 350 feet to the west on the other side of U.S. 101. These sensitive receptors are within 1,000 feet from the proposed project, which is the screening distance recommended by BAAQMD. A community health risk assessment was performed as included in full in Attachment A and summarized below.

BAAQMD's adopted thresholds for the purpose of assessing impacts of a proposed project on exposure of sensitive receptors to risks and hazards, are a project-specific cancer risk exceeding 10 in one million, a non-cancer risk exceeds a Hazard Index of 1.0 (or cumulative risk of 100 in one million or a Hazard Index of 10.0 respectively is exceeded), and/or the annual average $PM_{2.5}$ concentration would exceed 0.3 $\mu g/m^3$ (or 0.8 $\mu g/m^3$ cumulatively). Examples of sensitive receptors are places where people live, play or convalesce and include schools, hospitals, residential areas and recreation facilities.

A construction-period Community Health Risk Assessment was performed (included in Attachment A), which used the recommended EPA dispersion model AERMOD to determine the potential health risks related to diesel exhaust from construction equipment.

Based on this modeling, for the maximally exposed individual, the increased 30-year inhalation cancer risk from construction activities would be 8.4 in 1 million (compared to a threshold of 10.0 in 1 million), the maximum chronic hazard index would be <0.01 (compared to a threshold of 1.00) and the annual average $PM_{2.5}$ concentration would be 0.06 $\mu g/m^3$ (compared to the threshold of 0.30 $\mu g/m^3$). Construction-period project health risks to off-site sensitive receptors would not exceed threshold levels.

Operational health risks from the project would include project traffic and the proposed diesel emergency generator. For the maximally exposed individual, the increased 30-year inhalation cancer risk from operational activities would be 0.47 in 1 million (compared to a threshold of 10 in 1 million), the maximum chronic hazard index would be <0.01 (compared to a threshold of 1) and the annual average $PM_{2.5}$ concentration would be <0.01 $\mu g/m^3$ (compared to the threshold of 0.30 $\mu g/m^3$). Operational-period project health risks to off-site sensitive receptors would not exceed threshold levels.

Cumulative sources of health risk in the area also include area construction, high-volume roadways, and stationary sources such as diesel generators, boilers, auto body shops, and gas stations. For the

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

maximum exposed individual, the total combined cumulative inhalation cancer risk would be 48.09 in 1 million (compared to a threshold of 100 in 1 million), the maximum chronic hazard index would be <0.14 (compared to a threshold of 10) and the annual average $PM_{2.5}$ concentration would be 0.73 $\mu g/m^3$ (compared to the threshold of 0.80 $\mu g/m^3$). Cumulative health risks to off-site sensitive receptors would not exceed threshold levels.

Exposure risks for the maximally exposed individual are below threshold levels; therefore, the impact related to exposure to sensitive receptors to substantial pollutant concentrations would be ***less than significant***.

d) Other Emissions

Odors from construction activities are associated with construction equipment exhaust and the application of asphalt and architectural coatings. Odors emitted from construction activities would be temporary and not likely to be noticeable much beyond a project site's boundaries. The proposed office/R&D use is consistent with the type of development in the East of 101 area and is not a use type considered by BAAQMD to be a source of substantial objectionable odors.[13] Therefore, the potential for objectionable odor impacts to adversely affect a substantial number of people is ***less than significant***.

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

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

a) Special Status Species and Habitat

The project site is maintained as a vacant site, surrounded by urbanized uses, that has recently been used as a construction staging area for Caltrain improvements and can generally be described as an unpaved dirt lot with little to no vegetation. While no trees are planted on the project site, there is a row of trees on the adjoining property, adjacent to the property line to the north. (Consistency with the City's Tree Preservation Ordinance is discussed under topic "e" below.)

Special-status species are unlikely to occur in the project vicinity due to its highly disturbed and urbanized nature. Plant and animal species that may occur in such areas would be common species associated with urban, developed, and ruderal conditions throughout the San Francisco Bay area. The project site does not include structures or trees that could host bat roosts.

Other than the potential for nesting birds discussed below, the only areas with the potential for significant biological resources in the DSASP area are along Colma Creek and the Bay fringe, neither of which describe the project site.[14]

[14] City of South San Francisco prepared by Atkins, October 2014, South San Francisco Downtown Station Area Specific Plan Environmental Impact Report (SCH no. 2013102001), p. 5-1.

Special-status and non-status nesting birds have the potential to nest in trees, shrubs, herbaceous vegetation, and on bare ground and man-made structures within and adjacent to the project site. The federal Migratory Bird Treaty Act and Fish and Game Code of California protect bird species year-round, as well as their eggs and nests during the nesting season. The list of migratory birds includes almost every native bird in the United States. While there are no trees or structures on the site, project construction activities have the potential to impact nests in nearby areas if construction is initiated during the breeding bird season). Indirect visual and acoustic disturbance from construction to off-site nesting birds in adjacent areas has the potential to result in nest abandonment, which is considered a potentially significant impact.

Mitigation Measure

Bio-1: **Pre-Construction Nesting Bird Survey**. Initiation of construction activities during the avian nesting season (February 15 through September 15) shall be avoided to the extent feasible. If construction initiation during the nesting season cannot be avoided, pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the project area shall be conducted within 14 days prior to initiation of construction activities. If active nests are found, a 100-foot buffer area shall be established around the nest in which no construction activity takes place. The buffer width may be modified upon recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity based upon published protocols and/or guidelines from the U.S. or California Fish and Wildlife Services (USFWS, CDFW) or through consultation with USFWS and/or CDFW. The biologist may also determine that construction activities can be allowed within a buffer area with monitoring by the biologist and stoppage of work in that area if adverse effects to the nests are observed. The buffer shall be maintained until after the nestlings have fledged and left the nest. These surveys would remain valid as long as construction activity is consistently occurring in a given area and would be completed again if there is a lapse in construction activities of more than 14 consecutive days during the nesting season.

With implementation of mitigation measure Bio-1, which requires avoidance of nesting season or a nesting survey and buffers from any nests as appropriate, the impact related to special-status and non-status bird species would be ***less than significant with mitigation***.

b, c) Riparian Habitat and Wetlands

No wetlands, riparian habitats, or other sensitive habitats are present at the site.[15, 16] Therefore, the project would have ***no impact*** with respect to riparian habitats and wetlands.

d) Wildlife Corridors or Nursery Sites

The project site is surrounded by roadways and other developed areas and does not connect undeveloped areas or otherwise have the potential to act as a substantial wildlife corridor or

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

[16] City of South San Francisco prepared by Atkins, October 2014, South San Francisco Downtown Station Area Specific Plan Environmental Impact Report (SCH no. 2013102001), p. 5-1.

nursery site. Therefore, the project would have ***no impact*** with respect to wildlife nursery sites or movement.

e) Local Policies and Ordinances

No tree removal is proposed with the project as there are no trees on site. There is a row of trees on the adjoining property at the northern property line of the project site, however, the proposed structure is set back about 94 feet from that property line, so sub-floor building excavation and building construction is unlikely have the potential to impact those trees. The applicant is required to comply with the City's Tree Preservation Ordinance (Title 13, Chapter 13.30 of the City's Municipal Code) if determined applicable for protection of the trees at the property line.

The project would have a ***less than significant*** impact regarding conflicts with local policies and ordinances, including tree preservation.

f) Conservation Plans

There are no habitat conservation plans applicable to the project site. Therefore, the project would have ***no impact*** with respect to conservation plans.

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

a) Historic Resources

A records search was performed by the Northwest Information Center (Attachment B), which indicated that the project site is located adjacent to, and may contain part of, one historic structure, the South San Francisco Freight Spur and Loading Platform. However, the site is currently vacant and does not contain this historic-age structure. It was removed by the Joint Powers Board prior to the initiation of this project. There is no potential to impact historic resources, thus the project would have **no impact** on historic resources.

b, c) Archaeological Resources and Human Remains

The records search performed by the Northwest Information Center indicated that while there are no recorded cultural resources present in the project area, there is a moderate to high potential for the inadvertent discovery of previously unrecorded Native American and historic-period archaeological resources based on the characteristics of the site and history of the region. A record search of the Native American Heritage Commission Sacred Lands File was completed for the project and indicated there are no recorded sacred lands present in the vicinity of the site (see Attachment B). While no tribes have requested consultation for projects in this area, notice was sent to the provided list of seven local tribes on October 29, 2021, per recommendation of the Native American Heritage Commission (see Attachment B). No requests for consultation were received.

Although previous studies included field surveys of the project site, significant excavation and below-grade levels are proposed, which will disturb previously-undisturbed soils well below the field survey levels. Construction activities associated with the project would include excavation extending 48 to 60 feet below the surface in the area of the parking garage. Given the moderately high potential for unrecorded archeological resources and Native American resources, the following mitigation measures Cul-1, through Cul-4 shall be implemented.

Mitigation Measures

Cul-1: Sampling and/or Monitoring Plan. Prior to ground disturbance, a qualified archaeologist shall draft project specific recommendations for sampling and/or monitoring for subsurface paleontological, archaeological, and/or tribal resources during excavation as determined necessary based on cords searches and previous studies of the site. Next steps could include additional exploration prior to construction, monitoring of site disturbance by a

qualified professional, or no additional action other than that specified in Cul-2, Cul-3, and Cul-4. The plan and supporting reasoning shall be submitted to the City of South San Francisco for approval and the applicant shall be responsible for implementing the plan and any follow-up actions determined to be necessary.

Cul-2: 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 paleontological, archaeological, and/or tribal artifacts that might be encountered during construction activities, and procedures to follow in the event of a discovery. This training shall be provided for any personnel with the potential to be involved in activities that could disturb native soils.

Cul-3: Halt Construction Activity, Evaluate Find and Implement Mitigation. In the event that previously unidentified paleontological, archaeological, or tribal resources are uncovered during site preparation, excavation or other construction activity, the project applicant shall cease or ensure that all such activity within 25 feet of the discovery is ceased until the resources have been evaluated by a qualified professional, who shall be retained by the project applicant, and specific measures are implemented by the project applicant to protect these resources in accordance with sections 21083.2 and 21084.1 of the California Public Resources Code.

Cul-4: 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 shall cease or ensure that all such activity within 25 feet of the discovery is ceased until the remains have been evaluated by the County Coroner, which evaluation shall be arranged by the project applicant, and appropriate action taken by the project applicant in accordance with section 7050.5 of the California Health and Safety Code and, if the remains are Native American, in accordance with section 5097.98 of the California Public Resources Code.

Implementation of Mitigation Measures Cul-1, Cul-2, Cul-3, and Cul-4 would reduce the impacts associated with possible disturbance of unidentified cultural resources at the project site to a level of ***less than significant with mitigation***.

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

a, b) Energy

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

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

As detailed in section 17: Transportation, as an infill project located adjacent to the Caltrain station (a regional rail system), the project is considered to result in low levels of vehicle travel relative to regional averages and would help meet regional efforts to reduce vehicle travel and therefore related vehicular consumption of fuel energy. This would be supported through implementation of a Transportation Demand Management Plan to reduce employee trips, which is proposed to meet and exceed City transportation demand reduction code requirements.

As detailed in Section 3: Air Quality and Section 8: Greenhouse Gas Emissions, the project is also consistent with regional and local climate actions plans, as currently applicable. The project incorporates energy and energy-related efficiency measures meeting all applicable requirements, including water and waste efficiency. The project would be required to comply with all standards of Title 24 of the California Code of Regulations and the California Green Building Standards Code (CALGREEN), as applicable, aimed at the incorporation of energy-conserving design and construction, and would exceed these requirements through achieving LEED Gold Certification.

While representing a change from the former train-related use, the project is consistent with the type of office/R&D development in the area and allowed under the proposed land use designation and zoning.

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

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

This section utilizes information from the Geotechnical Investigation prepared for the applicant by Langan Engineering and Environmental Services, dated November 15, 2021, and the Draft Dewatering Assessment also prepared by Langan and dated May 7, 2021, both of which are available as part of project application materials.

a) Seismic Hazards

The major active faults in the area are the San Andreas, San Gregorio, and Hayward Faults. The closest fault traces are located approximately 3.2 miles from the project site. The project site is not within an Alquist-Priolo Seismic Hazard Zone, and no known active or potentially active faults traverse the site. Therefore, the project has ***no impact*** related to rupture along a fault.

Similarly, the project site is generally flat and is not located proximate to steep slopes and would therefore not be subject to landslide hazards (***no impact***).

However, the San Francisco Bay Area is a seismically active region, and the site is likely to encounter strong seismic ground shaking during the lifetime of the project, which can result in seismic-related ground failure depending on the characteristics of the site and development.

The Geotechnical Investigation determined the potential geological hazards based on site soils to include the potential for seismic hazards, including liquefaction-induced settlement and seismic densification and the presence of loose, undocumented fill. Geotechnical considerations include the need to provide adequate bearing for the building loads, design and installation of shoring to support the basement excavation, and construction considerations, as summarized below.

The project site is not within a mapped liquefaction hazard zone, but the project's Geotechnical Investigation assessed the potential for liquefaction given the characteristics of the site soils. While there are some liquefaction-susceptible soils at the site, these are entirely within the depth of proposed excavation and would therefore be removed from under the proposed building and would not be represent a liquefaction risk to the proposed project. The same is true of near-surface fill consisting of loose to medium-dense fill subject to cyclic densification and settlement during a seismic event – these would also be removed from the footprint during excavation. If any at-grade portions of the building are necessary, these could be supported with deep foundations as appropriate to address these concerns. Outside the building basement footprint, seismic settlement of up to 3 inches could occur, which would require appropriate design of utilities and pavements.

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

Mitigation Measure

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

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

b) Soil Erosion

Construction activities, particularly grading and site preparation, can result in erosion and loss of topsoil. While the project site is already generally flat, due to proposed soil remediation measures to address contamination, approximately 5 to 9 feet of soil would be removed across 60% of the site with disposal of the contaminated soil off site. The project also proposes substantial additional excavation for up to 4 floors of subsurface parking. While intentional removal of soil from the site would not be considered erosion, the disturbance of the site could result in the potential for unintended erosion.

The project would be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity, Construction General Permit Order 2009-0009-DWQ (Construction General Permit), administered by the State Water Resources Control Board (SWRCB). Coverage under the

NPDES Permit would require implementation of a Stormwater Pollution Prevention Plan (SWPPP) and various site-specific best management practices (BMPs) to reduce erosion and loss of topsoil during site demolition and construction. Compliance with the NPDES permit and BMPs during demolition and construction such as straw wattles, silt fencing, concrete washouts, and inlet protection during construction would reduce impacts resulting from loss of topsoil. The project would be required to comply with South San Francisco Municipal Code ("SSFMC") Section 15.56.030, which would require the development of the project site to control filling, grading, and dredging which may increase flood damage.

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

c, d) Unstable or Expansive Soil

As discussed under topic "a" above, the soils at the project site and in the surrounding areas contain loose, undocumented fill requiring geotechnical considerations related to the need to provide adequate bearing for the building loads, design and installation of shoring to support the basement excavation, and construction considerations. Characteristics of site soils would largely be addressed through the proposed excavation, which would remove unstable soils in the building basement footprint.

The Geotechnical Investigation determined the project site to be at low risk for lateral spreading due to its flat nature and the absence of any nearby steep slopes. The Geotechnical Investigation did not identify the potential for expansive soils at the site.

The project would require substantial excavation and related dewatering activities, which could result in on- and off-site subsidence or collapse if not handled appropriately. To minimize the need for dewatering, the project is proposing shoring using a 3.3-foot thick continuous deep soil mixing (DSM) wall for temporary excavation support. Because DSM walls are continuous, they act to temporarily cut off groundwater infiltration through the sides of the excavation, resulting in the need for less dewatering. When combined with tiebacks and/or internal bracing as proposed, DSM walls can also result in greater lateral support to prevent caving or deformations due to pressures from nearby soils and structures. Langan performed a series of groundwater drawdown simulations to address potential conditions that could be encountered during excavation and in all cases, the potential for settlement would be 1.2 inches or less at 25 feet from the excavation and declining farther from the site.

The Langan reports conclude that the potential geological hazards related to unstable or expansive soil, including off-site subsidence or collapse due to excavation and dewatering, can be addressed through appropriate design and construction, which would occur as part of the design-level geotechnical recommendations and structural plans as specified in mitigation measure Geo-1.

Mitigation Measure Geo-1 requiring compliance with geotechnical investigation construction methodologies would also reduce the potential impact related to unstable or expansive soil or collapse.

Compliance with a design-level Geotechnical Investigation and Structural Design Plans, as required by Mitigation Measure **Geo-1** would reduce the potential impact of unstable or expansive soil

hazards including off-site subsidence or collapse due to excavation and dewatering to a level of ***less than significant with mitigation***.

e) Septic Tanks

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

f) Unique Geologic Feature or Paleontological Resource

The project site is a relatively level infill site and does not contain unique geologic features.

The area east of Highway 101 is underlain by deposits of Bay mud, which have some sensitivity for paleontological vertebrates, though there are no known paleontological resources in the vicinity of the project site.[17, 18]

The project site falls within a highly urbanized area and the site is underlain by about 7 to 9 feet of fill; however, the excavation for the parking garage would dig to a depth of up to about 60 feet, which is likely to encounter native soils that have not been previously disturbed. Therefore, the project has a potential to encounter paleontological resources, which would be addressed through the following measures.

Mitigation Measures Cul-1, Cul-2, Cul-3, and Cul-4 would also reduce the potential impact related to unknown paleontological resources.

Implementation of mitigation measures Cul-1, Cul-2, Cul-3, and Cul-4 would reduce the impacts associated with possible disturbance of previously-unidentified paleontological resources to ***less than significant with mitigation***.

[17] South San Francisco General Plan, 1999.

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

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

This section utilizes information from the Air Quality & Greenhouse Gas Assessment prepared for this analysis by Illingworth & Rodkin, Inc. and dated November 19, 2021, included in full as Attachment A.

a) Greenhouse Gas Emissions

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

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

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

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

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

Table 3: Greenhouse Gas Emissions

Description	metric tons CO_2e per year
Project Emissions, Operational	1,976
Project Emissions, Construction (averaged over 40 years)	42
Project Emissions, Total	**2,018**
Project Service Population (employees)	842
Project Emissions, Total (per Service Population)	**2.4**
BAAQMD Project Service Population Significance Threshold 2020	*4.6*
Exceeds 2020 Threshold?	*No*
Projected Service Population Significance Threshold 2030	*2.8*
Exceeds 2030 Threshold?	*No*

Source: Illingworth &Rodkin 2021, from Table 9 and surrounding text in Attachment A.

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

Project emissions are reported for the intended operational year of 2025. Operation in later years, such as 2030, would have lower emissions due to anticipated vehicular emissions controls.

Service Population was calculated at approximately 350 square feet per employee as the target employment density for the project.

b) Greenhouse Gas Reduction Plans

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

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

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

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

Therefore, the project would have a ***less than significant*** impact in relation to consistency with GHG reduction plans.

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

This section utilizes information from the Environmental Site Assessment and Site Characterization Report prepared for the applicant by AllWest Environmental, dated March 23, 2017 and February 23, 2018 respectively, and the draft Soil and Groundwater Management Plan prepared by Langan Engineering and Environmental Services, Inc., dated January 15, 2021, which are available as part of project application materials. There have been no substantial changes to the site related to Hazardous Materials since preparation of these reports.

This section also relies on information from the January 2020 California Land Reuse and Revitalization Act (CLRRA) Agreement between the applicant and DTSC, Docket No. HSA-FY19/20-013, included as Attachment C to this document.

a) Routine Use of Hazardous Materials

It is likely that equipment used at the site during construction activities could utilize substances considered by regulatory bodies as hazardous, such as diesel fuel and gasoline. However, all construction activities would be required to conform with Title 49 of the Code of Federal Regulations, US Department of Transportation, State of California, and local laws, ordinances and procedures.

While specific tenants have not yet been identified, any commercial uses would involve household hazardous waste such as cleaners. R&D laboratories additionally are likely to handle materials considered to be biological hazards and/or chemical hazards. The San Mateo County Environmental

Health Division enforces regulations pertaining to safe handling and proper storage of hazardous materials to prevent or reduce the potential for injury to health and the environment. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials.

With compliance with applicable regulations, project construction and operations are not anticipated to create a significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials (***less than significant***).

b, d) Hazardous Materials Site and Accidental Release

The site is listed as a Voluntary Cleanup hazardous materials site for past contamination related to historic use of the site by Union Pacific Railroad from approximately the 1940s and ceasing by the early 1990s (DTSC's Envirostor Site Code: 202240).

Contamination at historic railroad sites can come from hazardous materials used in the construction of railroad tracks and associated structures; materials storage; chemicals that may have been used for dust suppression and weed control along the rail lines including pesticides, herbicides, petroleum hydrocarbons; and toxic preservatives that were used on the wooden rail ties. Additionally, the project site contains undocumented fill, which can contain contaminants from wherever the fill was sourced from.

Due to the known potential for contamination at the site, various tests of the groundwater and soils have been performed at the site over the years, with the following conclusions:

- **Soils**: The primary contaminants of concern in site soils were mainly low levels of metals, including antimony, arsenic, cobalt, copper, lead, nickel, and zinc. The lead and copper concentrations at some locations may qualify those soils as hazardous waste (Class 1 and Class 2). Additional soil contaminants were sampled that exceeded residential – but not commercial – screening levels including petroleum hydrocarbons (fuels). Given the proposed non-residential development planned for the site, these are not further specified here. Arsenic and asbestos were detected in the soil at levels consistent with background levels in natural soils in the area.
- **Groundwater**: No contaminants were detected in the groundwater above commercial screening levels for groundwater not used as a drinking water resource or for aquatic habitat. Limited groundwater samples at the site identified benzene above residential – but not commercial – direct exposure screening levels, so this is not further discussed for the proposed non-residential project. Some metals were detected at levels exceeding thresholds for aquatic habitats, but it was determined these standards would not be applicable to the site given the distance from the site to the nearest aquatic habitat along Colma Creek so they are not further discussed.

DTSC (California Department of Toxic Substances Control) is the lead regulatory agency for remediation of the project site. A CLRRA Agreement was executed between the applicant and DTSC on January 23, 2020 (Docket No. HSA-013), which outlines requirements for remediation of the site pursuant to CLRRA (see Attachment C). A Response Plan is required to be approved by DTSC pursuant to CLRRA prior to the start of construction activities at the site, which will detail remediation activities. The applicant anticipates this will include excavation and proper handling and disposal of contaminated site soils as part of project development, then appropriate mitigation of any remaining materials. A Certificate of Completion would be issued by DTSC once actions are completed at the site pursuant to CLRRA. While these actions are required per coordination with the regulatory agency, DTSC, the following mitigation measure Haz-1 shall be implemented to ensure appropriate tracking of actions by the City.

Mitigation Measure

Haz-1: **Response Plan Implementation and Completion**. The applicant shall coordinate with DTSC to implement a Response Plan pursuant to the previously-approved CLRRA Agreement (Docket No. HSA-FY19/20-013) to appropriately mitigate soil contamination. Evidence of plan approval by DTSC shall be submitted to the City prior to initiation of earth-moving at the site and a Certificate of Completion (or other no further action documentation) shall be submitted prior to issuance of Occupancy Permits. While details will be coordinated with DTSC, the following components are anticipated to be included in the Response Plan:

1. **Soil Management.** The proposed construction activities will disturb soil during the excavation, site grading, construction of new foundations, and installation of utility lines. During excavation activities, dust control measures will be implemented. The soil management objectives for the site are to control exposure of potentially hazardous constituents in soil to construction workers, nearby residents and/or pedestrians, and future users of the site, all as implemented pursuant to the DTSC-approved plan. The components of the Response Plan will establish and maintain required health and safety procedures to control worker and public exposure to site contaminants during construction including but not necessarily limited to the elements listed below.

2. **Dust Control.** During handling of potentially contaminated soils, an enhanced dust control plan with provisions to protect construction workers and the public will be implemented through implementation of engineering controls, to control generation of dust and resulting off-site migration of contaminants in site soil. Dust control measures will include:

   - Covering soil stockpiles with plastic sheeting.
   - Watering uncovered ground surface at the site to prevent visible dust from becoming air-borne.
   - Misting or spraying of soil as required during excavation and loading.
   - Placement of gravel and/or rubble plates on unpaved site access roads as feasible.
   - Covering of trucks hauling contaminated soil from the site with a tarpaulin or other cover.
   - Reducing to as low as feasible the soil drop from an excavator's bucket onto soil piles or into transport trucks.
   - Deployment of windbreaks as necessary.
   - Posting on-site vehicle speed limits.
   - Street sweeping of public streets as required when soils are visible.
   - Termination of excavation and loading activities if winds exceed 15 mph.
   - Addition of soil stabilizers and other responses as needed.

3. **Health and Safety Plan**. The potential health risk to on-site construction workers and the public will be minimized by developing and implementing a comprehensive Health and Safety Plan prepared by a certified industrial hygienist representing the contractor. The purpose of the Health and Safety Plan is to provide field personnel

with an understanding of the potential chemical and physical hazards, protection of any off-site receptors, procedures for entering the project site, health and safety procedures, and emergency response to hazards should they occur. All project personnel shall undergo the identified health and safety training, and read and adhere to the procedures established in the Health and Safety Plan. A copy of the Health and Safety Plan shall be kept on site during field activities and reviewed and updated as necessary.

The Health and Safety Plan will describe the specific personal hygiene and monitoring equipment that will be used during construction to protect and verify the health and safety of the construction workers and the general public from exposure to constituents in the soil and groundwater.

4. **Health and Safety Officer.** A site health and safety officer identified in the Health and Safety Plan will be on site at all times during excavation activities to ensure that all health and safety measures are maintained. The health and safety officer will have authority to direct and stop (if necessary) all construction activities in order to ensure compliance with the health and safety plan.

5. **Groundwater Management**. Construction dewatering is anticipated based on development plans, however, per analytic results of groundwater sampling, it is anticipated the groundwater from the site will be able to be discharged into the sanitary sewer system with no additional treatment. While not anticipated to be included as a required element of the Response Plan, any construction dewatering must adhere to a discharge permit obtained from the South San Francisco Department of Public Works Water Quality Control Division, Environmental Compliance Program or the Regional Water Quality Control Board. In the event of the presence of regulated levels of contamination, measures will be taken to comply with applicable requirements.

6. **Contingency Plans for Unknown/Unexpected Conditions.** The following tasks shall be implemented during excavation activities if unanticipated hazardous materials are encountered. Such materials may include unaccounted for underground storage tanks and associated product lines, sumps, and/or vaults, former monitoring wells, and/or soil with significant petroleum hydrocarbon odors and/or stains.

    - Stop work in the area where the suspect material is encountered and cover with plastic sheets.
    - Notify the site safety officer and site superintendent.
    - Have an appropriate professional conduct a site inspection and determine appropriate follow-up actions, which would include appropriate handling and removal of the identified hazard.
    - Review the existing health and safety plan for revisions, if necessary, and have appropriately trained personnel on-site to work with the affected materials as required by applicable requirements.

Implementation of Mitigation Measure Haz-1 would reduce the impacts associated with upset or accidental release related to a hazardous materials site to a level of ***less than significant with mitigation***.

Routine use of hazardous materials as a part of construction activities and operations are discussed under this Section 9(a) above.

c) Hazardous Materials Near Schools

No school is located within one-quarter mile of the project site. No hazardous materials with the potential for release during operation would be handled on or emitted from the site. Construction activities are discussed above. Therefore, the project would have ***no impact*** with respect to hazardous materials near schools.

e, f) Airport Hazards

The closest airport is the San Francisco International Airport (SFO), approximately 2 miles from the project site. The project site is within the boundary of the SFO Airport Land Use Compatibility Plan (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, so the main applicable restrictions are height limitations. Development on the project site is limited to maximum heights between 182.67 and 223.63 feet above mean sea level, but could be modified through consultation with the Federal Aviation Administration (FAA).[19] Factoring in the height of the site, the applicant estimates that the proposed project would reach maximum heights of 173.5 feet above mean sea level, all of which would be below the lowest FAA height limit at the site of 182.67 feet. The project appears to be consistent with height limitation identified in the ALUCP. Notification and consultation with the FAA would be required under CFR part 77.9 and would ensure that the project complies with regulatory requirements for air hazards. Therefore, this impact would be ***less than significant***.

g) Emergency Response Plan

The project would not include any changes to existing public roadways that provide emergency access to the site or surrounding area. 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. Any construction activities can result in temporary intermittent roadway obstructions, but these would be handled through standard procedures with the City, such as approval of encroachment permits, 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***.

h) Wildland Fire

The project site is a highly developed industrial/commercial area, and no wildlands are intermixed within this urban area. The closest wildlands area is San Bruno Mountain County Park located over

[19] Interpreted through coordination with FAA on project plans, consistent with: 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

3,000 feet away, which is considered to have moderate to high (not very high) fire hazard. 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 is not located in or near a Local or State Responsibility area with a Very High Fire Hazard Severity Zone designation.[20, 21] 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.

[20] 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/.

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

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

This section utilizes information from the Draft Dewatering Assessment prepared by Langan and dated May 7, 2021, which is available as part of the project application materials.

a) Water Quality and Discharge

Construction Period

Construction activities have the potential to impact water quality through erosion and through debris and oil/grease carried in runoff, which could result in pollutants and siltation entering stormwater runoff and downstream receiving waters if not properly managed. The project would be required to obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the State Water Resources Control Board. Coverage under this permit requires preparation of a Stormwater Pollution Prevention Plan (SWPPP) for review and approval by the City.[22] At a minimum, the SWPPP would include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. Furthermore, the County of San Mateo's Water Pollution Prevention Program would require the project site to implement BMPs during project construction to reduce pollution carried by stormwater such as keeping sediment on site using perimeter barriers and storm drain inlet protection and proper

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

management of construction materials, chemicals, and wastes on site. Additional BMPs required by South San Francisco Municipal Code Section 14.04.180 would also be implemented during project construction. Per standard City procedures, compliance with SWPPP requirements and BMPs would be verified during the construction permitting process.

As discussed in more detail in Section 7: Geology and Soils, project construction activities would require substantial excavation and related dewatering activities, which would need to then be discharged. To minimize the need for dewatering, the project is proposing shoring using continuous deep soil mixing (DSM) walls for temporary excavation support, which act to temporarily cut off groundwater infiltration through the sides of the excavation, resulting in the need for less dewatering. As discussed in more detail in Section 9: Hazards and Hazardous Materials, no contaminants were detected in the groundwater above commercial screening levels for groundwater not used as a drinking water resource or for aquatic habitat. Per the analytic results of the groundwater sampling, it is anticipated the groundwater from site dewatering will be able to be discharged into the sanitary sewer system with no additional treatment to meet water quality and discharge requirements. Any construction dewatering must adhere to a discharge permit obtained from the South San Francisco Department of Public Works Water Quality Control Division, Environmental Compliance Program or the Regional Water Quality Control Board. In the event of the presence of unexpected levels of contamination, the groundwater will be pumped into appropriate containers and samples obtained for chemical analyses and appropriate treatment prior to disposal.

Mitigation Measures Geo-1 and **Haz-1** would require construction techniques to minimize necessary dewatering and appropriate handling of dewatering and would also reduce the potential impact related to water quality and discharge.

Compliance with a design-level Geotechnical Investigation and Structural Design Plans, as required by Mitigation Measure **Geo-1** and implementation of groundwater management as required by Mitigation Measure **Haz-1** would reduce the potential impact related to water quality and discharge to a level of ***less than significant with mitigation***.

Operational Period

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

Federal Clean Water Act regulations require municipalities to obtain National Pollution Discharge Elimination System (NPDES) permits which outline programs and activities to control surface stormwater pollution. Municipalities, such as the City of South San Francisco, must eliminate or reduce "non-point" pollution, consisting of all types of substances generated as a result of urbanization (e.g. pesticides, fertilizers, automobile fluids, sewage, litter, etc.), to the "maximum extent practicable" (as required by Clean Water Act Section 402(p)(3)(iii)). Clean Water Act Section 402(p) and USEPA regulations (40 CFR 122.26) specify a municipal program of "best management practices" to control stormwater pollutants. Best Management Practices (BMP) refers to any kind of procedure or device designed to minimize the quantity of pollutants that enter the storm drain system. To comply with these regulations, each incorporated city and town in San Mateo County

joined with the County of San Mateo to form the San Mateo County Water Pollution Prevention Program (SMCWPPP) in applying for a regional NPDES permit, which includes Provision C.3. [23] The C.3 requirements are intended to protect water quality by minimizing pollutants in runoff, and to prevent downstream erosion by: designing the project site to minimize imperviousness, detain runoff, and infiltrate runoff where feasible; treating runoff prior to discharge from the site; ensuring runoff does not exceed pre-project peaks and durations; and maintaining treatment facilities. Project applicants must prepare and implement a Stormwater Control Plan containing treatment and source control measures that meet the "maximum extent practicable" standard as specified in the NPDES permit and the SMCWPPP C.3 Guidebook. Project applicants must also prepare a Stormwater Facility Operation and Maintenance Plan and execute agreements to ensure the stormwater treatment and flow-control facilities are maintained in perpetuity.

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

b) Groundwater Recharge and Supplies

The project is located on a designated urban area within the Westside groundwater basin.[24]

The California Water Service (Cal Water) supplies water to the City of South San Francisco and would serve the project site. Cal Water's Urban Water Management Plan (UWMP) anticipates future growth in the region. The majority of the water supply to the Cal Water South San Francisco District (i.e., approximately 80 percent from 2005-2019) is treated water purchased from the City and County of San Francisco's Regional Water System (RWS), which is operated by the San Francisco Public Utilities Commission (SFPUC) and originates largely (85%) from the Hetch Hetchy watershed (surface water). Groundwater makes up approximately 20 percent of the water supply for the South San Francisco District, which comes from the "Westside Basin", which underlies the South San Francisco District. The Basin is currently categorized by the California Department of Water Resources as a very low priority basin and as such, the Basin is not subject to the requirements of the California Sustainable Groundwater Management Act though the Basin has been actively managed for years, including the establishment of pumping limitations.[25]

The site is currently undeveloped and therefore consists entirely of pervious surfaces. The project would result in an increase of approximately 1.5 acres of impervious surface (78% of the site). The project would construct new above and below ground drainage system that includes catch-basins, storm drain pipe, bio-retention areas, and flow-through planters to capture, treat, and discharge runoff from the entire site. The proposed drainage system would maintain the existing flow discharge pattern.

As discussed in more detail in Section 7: Geology and Soils, project construction activities would require substantial excavation and related dewatering activities. Per the Draft Dewatering Assessment, dewatering of up to approximately 6.4 million gallons could be required for project

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

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

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

construction, which the study concludes would result in the formation of a cone of depression outside the site boundaries within the upper aquifer that would recover over a period of time estimated to be about 900 days to full recovery after dewatering activities cease. Because groundwater at the site is not used for drinking water or for aquatic habitat and draw-down from dewatering activities would be temporary, this would not be considered a significant impact on groundwater supplies.

As discussed under Section 10(a) above, the project would comply with stormwater drainage requirements, including bio-retention/treatment areas to address both quality and volumes of runoff and is consistent with expected use of the site in basin planning. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge, and would have a ***less than significant*** impact related to groundwater.

Because groundwater in the vicinity of the project site is not used as a drinking water source and is derived from the Bay, the potential to deplete groundwater supplies is considered a less than significant impact and no mitigation is required.

c) Drainage Pattern Alteration

The site is currently undeveloped and therefore consists entirely of pervious surfaces across the 1.9-acre site. The project would result in approximately 1.5 acres of impervious surface (78% of the site).

There is an existing storm drainpipe on the project site owned and maintained by Caltrans, located within an existing 5-foot-wide stormwater easement. The project is not proposing any alterations to the existing storm drainpipe. The proposed building is located outside of the existing stormwater easement. In compliance with City requirements, the project would implement low-impact development stormwater management best practices to minimize runoff and encourage stormwater infiltration, including using concrete-lined flow-through planters to manage stormwater on the project site. An on-site storm drain detention system will be provided to limit flows into the public storm drain system to pre-project conditions, in accordance with City requirements.

As discussed under this Section 10(a) above, through compliance with applicable regulations, runoff from site would be the same or reduced from that existing and would not cause erosion, siltation, pollution, or flooding and as discussed above, changes to on-site conditions would meet applicable requirements and would not exceed capacity of the stormwater drainage system or result in on- or off-site flooding. Project impacts related to alteration of drainage patterns would be ***less than significant***.

d) Inundation

The project site is approximately 1 to 1.5 miles from the San Francisco Bay and approximately 5 miles from the Pacific Ocean, and according to state hazard mapping is not located in a tsunami hazard area.[26]

The nearest body of water that could experience seiche (water level oscillations in an enclosed or partially enclosed body of water) is the San Francisco Bay located approximately 1 mile northeast and 1.5 miles east of the project site. A seiche would not experience run up higher than a tsunami

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

and as discussed above, the site is not located in a tsunami hazard area and is therefore not in an area at risk for seiche inundation either. No other large bodies of water with the potential to inundate the project site by a seiche are located near the site.

The project is not located within a Federal Emergency Management Agency (FEMA) Flood Zone and is therefore not at substantial risk of flooding from 100-year or more common storms.[27]

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

e) Implementation of Plans

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

As discussed under this Section 10(b) above, the local groundwater basin is not required to comply with the Sustainable Groundwater Management Act. The project would not otherwise conflict with Cal Water's Urban Water Management Plan or groundwater management and the project impact with respect to implementation of plans would be ***less than significant***.

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

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

a) Physical Division of a Community

The project site is in an urbanized area surrounded by developed parcels and infrastructure. While currently vacant, the site is a development parcel and does not act as a connection point for other parcels. The project would not involve any physical changes that would have the potential to divide an established community and there would therefore be **no impact** in this regard.

b) Conflict with Land Use Plan

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

The site is currently designated Business Commercial under the existing General Plan and zoned for Freeway Commercial (FC) use, under which R&D and office uses are not principally permitted. The project would seek a General Plan amendment to Transit Office/R&D Core and a rezoning to Downtown Station Area Specific Plan District; Transit Office/R&D Core Subdistrict. The site is within the boundaries of the DSASP. However, it was not specifically indicated for development in the DSASP as it was in use as part of the Caltrain station property at the time, prior to the station relocation and upgrade. While the proposed project would require a Conditional Use Permit for Parking/Loading Reduction, and Incentive-Based FAR Bonus, these are allowable development standard approvals under the City's planning process and would therefore not be considered conflicts with the zoning. The site is also within the boundaries of the East of 101 Area Plan (1994), and the project seeks an amendment to remove the site from that plan.

The South San Francisco General Plan (1999) and East of 101 Area Plan (1994) are intended to be replaced by the General Plan 2040 update that is currently underway. The applicant has been coordinating with the City related to the General Plan update efforts and the project is intended to be consistent with the General Plan 2040 update, which is expected to designate the site as part of the East of 101 Transit Core. The proposed project currently conforms to the updated height, density and use controls under the General Plan 2040 - Preferred Land Use Alternative.[28]

[28] https://shapessf.com/preferredalternative/, last accessed November 18, 2021.

Therefore, the project would have a ***less than significant*** impact with regard to land use plan conflicts under the existing General Plan, DSASP, East of 101 Area Plan, and zoning map, each as amended, and under the General Plan 2040 and related planning documents as currently proposed in the City's Preferred Land Use Alternative.

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

a, b) Mineral Resources

The site contains no known mineral resources and has not been delineated as a locally important mineral recovery site on any land use plan.[29] The project would have ***no impact*** related to mineral resources.

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

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

a-b) Excessive Noise or Vibration

Noise and vibrations from construction depend on the noise generated by various pieces of construction equipment, the timing and duration of noise generating activities, and the distance between construction noise sources and noise sensitive receptors. Construction noise impacts primarily occur when construction activities occur during noise-sensitive times of the day (early morning, evening, or nighttime hours), the construction occurs in areas immediately adjoining noise sensitive land uses, or when construction involves particularly noisy techniques, such as driven piles. The closest noise-sensitive receptors to the project site are the multi-family residences approximately 350 feet to the west on the other side of U.S. 101.

The South San Francisco Noise Ordinance (Chapter 8.32 of the Municipal Code, Section 8.32.050) restricts construction activities to the hours of 8:00 AM to 8:00 PM on weekdays, 9:00 AM to 8:00 PM on Saturdays, and 10:00 AM to 6:00 PM on Sundays and holidays. This ordinance also limits noise generation of any individual piece of equipment to 90 dBA at 25 feet or at the property line. The project is not anticipated to require pile driving and the project's construction activities would comply with the Noise Ordinance. With compliance with Noise Ordinance requirements, temporary construction-period noise and vibration impacts are considered ***less than significant***.

Operationally, the project itself would not be considered a source of substantial vibration though future R&D tenants could be vibration-sensitive. While not an impact under CEQA, the applicant completed an independent analysis of the vibrations of the nearby trains on the project design and found that the design of the building could adequately mitigate any problems for target future users.

Operation of an office/R&D use would not be considered a noise-sensitive receptor and does not produce substantial levels of off-site vibration or noise. Rooftop equipment would be required to comply with the City's Noise Ordinance, would be shielded as appropriate, and in any case, would not have the potential to generate noise levels above those of the U.S. 101 at receptors across the highway from the project site. Traffic-related noise impacts generally have the potential to occur

with at least a doubling of traffic volumes on roadways adjacent to areas with noise sensitive uses that are already at or above acceptable noise conditions. The project is located proximate to U.S. 101 and would not require substantial trips to pass by noise sensitive uses other than on high-volume roadways such as U.S. 101, which carries substantially more than the volume of project traffic under existing conditions and would therefore not experience a doubling in volume with the addition of project traffic. Therefore, noise and vibration impacts from operation of the project would be ***less than significant***.

c) Airport Noise

The closest airport to the project site is the San Francisco International Airport, approximately 2 miles to the south. The project site is within the boundary of the Airport Land Use Compatibility Plan (ALUCP), but is not within the area substantially impacted by airplane flyover noise (i.e., the Community Noise Equivalent Level 70 Noise Contours).[30] Impacts related to excessive aircraft noise exposure would be ***less than significant***.

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

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

a) Substantial Population Growth

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

The applicant projects an employment density of 350 gross square footage per employee. Based on this, the project is estimated to introduce 842 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, though is expected to show consistency with the proposed project at this site.

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. The project's addition of 842 employees would increase jobs in the City and region incrementally. Compared to the total jobs projection for the entire Bay Area, the addition of 842 jobs would not be substantial or unplanned. The location of an employment center adjacent to regional transit (Caltrain) would be consistent with Plan Bay Area 2050 goals to reduce vehicle travel while meeting area demand for growth. Therefore, the project impact with respect to indirect population growth would be ***less than significant***.

b) Displacement of Housing or People

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

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

a-e) Public Services

The proposed project is located on a developed site within the City of South San Francisco that is within the public services area, which includes South San Francisco Fire Department Station 62 located 0.9 miles away from the project site, and the South San Francisco Police Department located 1 mile away. The project would not directly add population, and an office/R&D use would not be anticipated to substantially increase utilization of public services, such that new or physically altered facilities would be required. The minimal increases in demand for services expected with the worker population and potential indirect population growth (see section 14: Population and Housing), would be offset through payment of development fees and annual taxes, a portion of which go toward ongoing provision of and improvements to public services. Therefore, the impact to public services would be ***less than significant***.

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

a-b) Recreation

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

Some employees at the site could use area facilities, including the nearby Jack Drago Park (approximately 0.3 miles to the southeast). All development that does not include qualifying publicly-accessible parks and recreation amenities is required to pay in-lieu fees to the City, which helps fund City facilities and programs. The use of public recreational facilities would not be anticipated to increase substantially due to use by project employees such that physical deterioration would occur or construction or expansion would be necessary. Therefore, the impact related to recreation would be ***less than significant***.

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

This section utilizes information from the Transportation Analysis prepared for this analysis by Hexagon Transportation Consultants, Inc., included in full as Attachment D.

a) Circulation System Plans and Facilities

The Transportation Analysis assessed pedestrian, bicycle, and transit access and circulation and consistency with applicable regulations.

Pedestrians: Sidewalks and crosswalks are provided on most streets in the immediate vicinity of the proposed project. Sidewalks exist along the east side of Dubuque Avenue, on Grand Avenue and Airport Boulevard. As part of the South San Francisco Caltrain Reconstruction Project that is currently in progress, an underpass is being constructed that would provide a direct connection for pedestrians and bicyclists between areas to the west and east of the Caltrain tracks. This underpass would also provide a connection to the new Caltrain station platform. As the project is located adjacent to the Caltrain station, the new Caltrain station platform and underpass would provide an alternative pedestrian connection between the project, downtown destinations, and areas to the east of the Caltrain tracks.

A significant impact would occur if the proposed project conflicted with applicable or adopted policies, plans or programs related to pedestrian facilities or otherwise decreased the performance or safety of pedestrian facilities. The South San Francisco General Plan requires project applicants to provide sidewalks and street trees as part of frontage improvements for new development. The project would provide a clear walkway between the existing sidewalk on Dubuque Avenue and the main building entrance on the north side of the building. A pedestrian walkway with landscaping and lighting would be constructed along the western edge of the property along the access road that would run parallel to Dubuque Avenue. The project will coordinate with Caltrain/Joint Powers Board who currently own the parcels to the south and east of the project site to provide pedestrian access between the project site and the Caltrain station. Therefore, the project would have a ***less than significant*** impact on the existing and planned pedestrian facilities.

Bicyclists: Bicycle access to the project site is currently limited as there are no existing bike lanes on Dubuque Avenue. In the vicinity of the project, Class II bike lanes are located on Airport Boulevard (north of Miller Avenue), along Poletti Way, Gateway Boulevard (between E Grand Avenue and Airport Boulevard), along Sister Cities Boulevard, and along Oyster Point Boulevard (east of Gateway Boulevard).

An impact to bicyclists would occur if the proposed project disrupted existing bicycle facilities or conflicted with or created inconsistencies with adopted bicycle system plans, guidelines, and policies. According to the South San Francisco Bicycle Master Plan, Class III Bicycle Routes are proposed along Dubuque Avenue between E Grand Avenue and Oyster Point Boulevard. Class III Bicycle Routes are recommended on roadways frequently used by bicyclists that do not have the necessary right-of-way (ROW) for installing bicycle lanes. Bicycle Routes are identified by either signs or shared lane markings and they typically have a shared wide outside lane for vehicles and bicycles. Because additional ROW from the project site is not necessary to implement the planned bicycle facility along Dubuque Avenue, the project would not conflict with existing and planned bicycle facilities. Therefore, the impact to bicycle facilities would be ***less than significant***.

Transit: Existing transit service to the study area is provided by Caltrain, San Mateo County Transit District (SamTrans), Bay Area Rapid Transit (BART), Water Emergency Transit (WETA), and commuter shuttles. The project site is located adjacent to the Caltrain station. Since the project is located adjacent to the Caltrain station, it is expected to generate trips via transit services. According to state CEQA guidelines, the addition of new transit riders should not be treated as an adverse impact because such development also improves regional flow by adding less vehicle travel onto the regional network. Additionally, the currently-underway Caltrain station improvement project at the adjacent station has been planned to accommodate increases in ridership. Therefore, the project is anticipated to have a ***less than significant*** impact on transit facilities and services.

A TDM program is required for the proposed project to meet the South San Francisco Municipal Code, and has been proposed to include a vehicle trip reduction rate reduction of 40 percent. TDM program measures further promote alternative modes, including pedestrian, bicycle, carpool, and transit options.

The project's preliminary TDM program is available as part of the project application. The TDM program outlines the targeted 40% reduction, program and service measures, planning and design measures, monitoring, reporting, and assurance of success of the plan. The following measures are provided as part of the project's TDM program:

- Direct Route to Transit
- Bicycle Parking, long and short term
- On-site Amenities
- Carpool/Vanpool Parking
- Carpool/Vanpool RideMatch
- Reimbursing Travel Expenses
- Guaranteed Ride Home Program
- Transportation Coordinator and Kiosk
- Carpool/Vanpool Incentives
- Showers and Clothes Lockers
- Shuttle Program
- Transportation Management Association
- Reduced Parking
- Pedestrian Connections
- Commuter Benefit Options
- Passenger Loading Zone

Roadways: Per Senate Bill 743 discussed under this Section 17(b) below, auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion are no longer considered as a basis for determining significant impacts under CEQA. The following discussion is provided for informational purposes and is based on the Local Traffic Operations Report prepared by Hexagon Transportation Consultants, Inc., which is available as part of the project application.

The proposed project would generate an average of 2,159 new daily trips, with 222 new trips during the AM peak hour and 220 new trips during the PM peak hour. These trip rates factor in a reduction of 35%[31] due to the location and implementation of a TDM program. The Local Traffic Operations Report concluded that with implementation of improvements included in the City's Transportation Improvement Fee Program, the project would not cause any study intersections or freeway segments to degrade from acceptable operations to unacceptable operations. The project would be responsible for paying the Citywide Transportation Fee to contribute toward this fee program. While some intersections / freeway segments operate at conditions considered unacceptable under existing and/or cumulative conditions, the project's contribution to those intersections would be less than 2% of the total traffic through the intersection.

b) Vehicle Miles Traveled

Senate Bill (SB) 743 changes CEQA transportation impact analysis significance criteria to eliminate auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA (although a jurisdiction may choose to maintain these measures under its General Plan). The changes in CEQA Guidelines to implement SB 743 present vehicles miles traveled (VMT) as an appropriate measure of transportation impacts.

The City of South San Francisco provides VMT screening criteria for development projects. The criteria are based on the type of project, characteristics, and/or location. If a project meets the City's screening criteria, the project is determined to result in less-than-significant impacts, and a detailed VMT analysis is not required. The City's policy states that projects within 0.5 miles of an existing or planned high-quality transit corridor or major transit station should be presumed to have no impact on VMT. However, this presumption would not apply if the project FAR is less than 0.75, includes parking that is higher than required by the City, is inconsistent with Plan Bay Area, or replaces affordable residential units with a smaller number of market-rate units. The project site is directly adjacent to the South San Francisco Caltrain Station. The project is proposing an FAR of 3.19, and is seeking a parking reduction to provide fewer than the Municipal Code-required number of vehicle parking spaces. The project is also consistent with the land use zoning that is proposed under the City's 2040 General Plan Update and would develop a vacant site.

Therefore, a detailed VMT analysis is not required and the impact with respect to VMT would be ***less than significant***. Additionally, South San Francisco Municipal Code requires preparation and implementation of a TDM program. As discussed above, the applicant's preliminary TDM program includes a targeted vehicle trip reduction rate reduction of 40 percent. Successful implementation of TDM program measures could serve to further reduce project VMT.

[31] Note that while a 40% reduction is proposed, this analysis conservatively analyzed a lower 35% reduction. A 40% reduction would result in fewer trips and related potential for impacts and is fully covered by this analysis.

c) Traffic Hazards

The Transportation Analysis evaluated the sight distance at each project driveway and the proximity of the accesses to adjacent intersections. Vehicles would access the project site from an existing driveway on Dubuque Avenue that would also provide access to the Caltrain station parking lot. Visitor drop-offs would occur at the entry plaza located at the northwest corner of the project site. Parking access would be provided along the south end of the building. According to the South San Francisco Municipal Code, the speed limit on Dubuque Avenue is 30 mph. There is no existing on-street parking located on the entire length of Dubuque Avenue in either direction. The project would not construct any new driveways on Dubuque Avenue. The project proposes to install stop signs at each intersecting point for new internal driveways as well as for vehicles exiting the shared driveway at the intersection with Dubuque Avenue (see Figure 3).

A project traffic hazard safety impact is considered significant if the proposed project would provide inadequate design features that present safety concerns within the project site or on the adjacent streets.

Field observations showed that the existing curved alignment of Dubuque Avenue combined with the existing fence/retaining wall impacts the visibility of northbound traffic for drivers exiting onto Dubuque Avenue from the shared project and Caltrain station parking lot driveway. Additionally, signs attached to the fence and vegetation at the corner of the property to the north obstruct sight distance between southbound Dubuque Avenue traffic and vehicles exiting the shared project and Caltrain driveway under existing conditions. Because the proposed project would add traffic to the existing driveway on Dubuque Avenue, the project would exacerbate and existing traffic hazard and result in a potentially significant safety impact. Mitigation Measure Trans-1, below, would improve the safety at the intersection of Dubuque Avenue and the shared Caltrain/project driveway.

Mitigation Measure

Trans-1: **Shared Dubuque Avenue Driveway Safety Improvements**. The applicant shall coordinate the following safety improvements for the intersection of Dubuque Avenue and the shared Caltrain / project driveway to provide adequate sight distance between northbound Dubuque Avenue traffic and vehicles exiting the shared Dubuque Avenue driveway.

a) The applicant shall coordinate with the City to decrease the speed limit on Dubuque Avenue to 25 mph.

b) The applicant shall coordinate with the City to reduce the height of the fence along the retaining wall on Dubuque Avenue to the south of the project site to improve visibility of approaching northbound traffic.

Additionally, the applicant shall coordinate with the City and adjacent properties as reasonably feasible to address existing sight distance obstructions at the intersection of Dubuque Avenue and the shared Caltrain / project driveway as follows:

c) Coordinate with Caltrain to relocate or reduce the height of the existing "Caltrain Station Parking" sign on the south side of the shared Dubuque Avenue driveway to provide adequate sight distance between northbound Dubuque Avenue traffic and vehicles exiting the shared Dubuque Avenue driveway.

d) Coordinate with the property owner to the north to clear obstructing signs from the fence and vegetation from the corner of their property to provide adequate sight distance between southbound Dubuque Avenue traffic and vehicles exiting the shared Dubuque Avenue driveway.

With implementation of Mitigation Measure Trans-1, the shared Caltrain/project Dubuque Avenue driveway would have adequate sight distance and the project impact related to traffic hazards would be ***less than significant with mitigation***.

d) Emergency Access

The proposed project would not reroute or change any of the city streets in its vicinity that would impact emergency vehicle access to properties along Dubuque Avenue. The existing site access roadway along the western property boundary would accommodate emergency vehicles. The project would have ***no impact*** with regard to inadequate emergency access.

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

a) Tribal Cultural Resources

A record search of the Native American Heritage Commission Sacred Lands File was completed for the project and indicated there are no known sacred lands present in the vicinity of the site (see Attachment B). While no tribes have requested consultation for projects in this area, notice was sent to the list of seven local tribes provided by the Native American Heritage Commission (see Attachment B) on October 29, 2021. No requests for consultation were received.

The records search performed by the Northwest Information Center indicated that there is a moderate to high potential for the inadvertent discovery of previously unrecorded Native American resources based on the characteristics of the site and history of the region (see Attachment B).

Although previous studies included field survey of the project site, significant excavation and below-grade levels are proposed, which will disturb previously-undisturbed native soils well below the field survey levels. Construction activities associated with the project would include excavation extending up to approximately 60 feet below the surface in the area of the parking garage.

Mitigation Measures Cul-1, Cul-2, Cul-3, and Cul-4 would require proper handling of any discoveries and would also reduce the potential impact related to unknown tribal cultural resources.

Compliance with the protection procedures specified in Mitigation Measures Cul-1, Cul-2, Cul-3, and Cul-4 would require that if any previously-unknown tribal cultural resources and/or human remains are discovered, these would be handled appropriately and the impact of the project would be ***less than significant with mitigation***.

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

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

Water

As discussed in Section 10: Hydrology and Water Quality, the City of South San Francisco's East of 101 Area is served by Cal Water through a combination of local groundwater and water purchased from SFPUC's Hetch Hetchy System. Cal Water's Urban Water Management Plan (UWMP), which plans for provision of water, anticipates future growth in the region that includes the project, as allowed under existing land use and zoning designation. The project is not required to prepare a separate Water Supply Assessment under Senate Bill 610 because the project is not one of the listed uses and is projected to have less than 1,000 employees and can instead rely upon the planning within the current UWMP, which indicates available supply for area development.

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

updated regularly to reflect changes in regulations, projected demands, and water conservation and supply reliability measures.

The project includes water infrastructure improvements to upsize approximately 1,000 linear feet of 6-inch and 8- inch ductile iron water main within Dubuque Avenue to 12-inch ductile iron pipe. This improvement is a part of the proposed project and has been included in this analysis. Cal Water would provide the design for the upsizing project and would perform all of the off-site work up to the proposed meter. The project proposes separate domestic service, fire service, irrigation service systems, and onsite water improvements, consisting of an 8-inch water main that would loop around the building.

Impacts with respect to water would be ***less than significant***. [32, 33, 34]

Wastewater

The wastewater collection system that serves the project site is owned and operated by the City of South San Francisco. There is currently no existing sanitary sewer system on the project site. The nearest publicly owned sewer system, which is owned and maintained by the City, is located on the private parcel to the north of the project. The project would construct a 6-inch sanitary sewer line within an existing easement on the neighboring property. The impact related to required wastewater capacity would be ***less than significant***.

Stormwater

As discussed in Section 10: Hydrology and Water Quality, the proposed drainage system would maintain the existing flow discharge pattern and connect to the existing storm drain system operated and maintained by the City of South San Francisco. There is an existing storm drainpipe on site owned and maintained by Caltrans, located within an existing 5-foot-wide stormwater easement. The project does not propose any alterations to the existing storm drainpipe. The proposed building is located outside of the existing stormwater easement. In compliance with City requirements, the project would implement low-impact development stormwater management best practices to minimize runoff and encourage stormwater infiltration, including using concrete-lined flow-through planters to manage stormwater on the project site. As development on a currently vacant site, the project would result in an increase of approximately 1.5 acres of impervious surface (78% of the site) and would construct a new above and below ground drainage system that includes catch-basins, storm drainpipe, bio-retention areas, and flow-through planters to capture, treat, and discharge runoff from the entire site. Impacts with respect to stormwater would be ***less than significant***.

Electricity, Natural Gas, and Telecommunications

As discussed in section 6: Energy, the project would not result in the wasteful, inefficient, or unnecessary consumption of energy. In addition, the project would not require the construction of new electric power, natural gas, or telecommunications facilities because it is located in an urban area already served by those utilities. The project would require coordination with Pacific Gas and

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

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

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

Electric (PG&E) to extend power from the pole approximately 100 feet north of the project site on Dubuque Avenue or to install a new joint pole at the project site frontage. Although the project is designed to operate with 100% electric energy as of commencement of operations, it will include a stubbed natural gas connection for flexibility. Accordingly, the project would also require coordination with PG&E for an extension of the high pressure main for natural gas, as the nearest gas distribution main is located approximately 230 feet north of the project frontage. As an infill site in applicable service areas, the project impacts with respect to electricity, natural gas, and telecommunications would be ***less than significant***.

d, e) Solid Waste and Solid Waste Reduction

South San Francisco Scavenger Company, Inc. (SSFSC) manages all trash and recycling services in South San Francisco. SSFSC collects, receives, processes, and recycles (or transfers for landfill disposal) over 250,000 tons of waste a year.[35] Of all solid waste generated, approximately 84 percent is sent to the Corinda Los Trancos Landfill (Ox Mountain) in Half Moon Bay, California. The Corinda Los Trancos Landfill (Ox Mountain) accepts up to 3,598 tons per day and is anticipated to have available capacity until 2034.[36]

The proposed project would generate solid waste during construction and operation. Handling of debris and waste generated during construction would be subject to SSFMC Section 8.16 coordination with Scavengers Company; and SSFMC Section 15.22.030 diversion of at least 65 percent of construction or demolition waste.

The project would generate approximately 12.66 tons of waste per year, or approximately 0.03 tons per day. The estimate is conservative as it does not factor in any recycling or waste-diversion programs. The 0.03 tons of solid waste generated daily by the project would represent less than 0.001 percent of the permitted landfill throughput.[37]

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

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

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

[37] Solid waste estimated from CalEEMod default values in Attachment A.

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

a-d) Wildfire Risk and Emergency Response

The project site is located within an urbanized area of the City of South San Francisco and is surrounded by existing industrial/commercial development and infrastructure. Neither the project site nor the City of South San Francisco is identified as being within a state responsibility area or a very high fire hazard severity zone.[38, 39] The proposed project would have ***no impact*** related to wildfire.

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

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

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

a) Environmental Quality. With the implementation of mitigation measures Bio-1 to protect nesting birds during construction and Cul-1 through Cul-4 to address the potential discovery of currently unknown cultural, tribal cultural, or paleontological resources at the site, 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 would not impact rare or endangered wildlife species, or eliminate important examples of the major periods of California history or prehistory.

b) Cumulative Impacts. The project would not result in adverse impacts that are individually limited but cumulatively considerable, including effects for which project-level mitigation were identified to reduce impacts to less than significant levels. All potential effects of the project were assessed in the context of area development, including specifically assessment of emissions impacts analyzed against cumulative thresholds per the Air District recommendations. Project-specific impacts would be less than significant with implementation of mitigation measures identified in this document, including mitigation measure Air-1 to address construction period dust and emissions, and would not result in considerable contribution to significant cumulative impacts.

c) Adverse Effects on Human Beings. The project would not result in substantial adverse effects on human beings, either directly or indirectly. Mitigation Measures Air-1, Geo-1, Haz-1, and Trans-1 would minimize the potential for safety impacts related to construction-period emissions, disturbance of site contaminants, appropriate techniques for safety during excavation and dewatering and building construction, and adequate sight distance at the driveway connection to Dubuque Avenue. Therefore, the potential adverse effects on human beings would be less than significant with mitigation.

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SOURCES

1. AllWest Environmental, March 23, 2017, Environmental Site Assessment.
2. AllWest Environmental, February 23, 2018, Site Characterization Report.
3. Bay Area Air Quality Management District, May 2017, California Environmental Quality Act Air Quality Guidelines.
4. Bay Area Air Quality Management District, June 2, 2010, News Release http://www.baaqmd.gov/~/media/Files/Communications%20and%20Outreach/Publications/News%20Releases/2010/ceqa_100602.ashx
5. California Department of Forestry and Fire Protection, 2007, San Mateo County Fire Hazard Severity Zones in State Responsibility Areas, available at https://osfm.fire.ca.gov/divisions/wildfire-planning-engineering/wildland-hazards-building-codes/fire-hazard-severity-zones-maps/.
6. California Department of Forestry and Fire Protection Fire and Resource Assessment Program, November 24, 2008, San Mateo County Very High Fire Hazard Severity Zones in Local Responsibility Area, available at: https://osfm.fire.ca.gov/media/6800/fhszl_map41.pdf.
7. California Department of Transportation, State Scenic Highway Mapping System, available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways
8. California Regional Water Quality Control Board San Francisco Bay Region, San Francisco Bay Basin Water Quality Control Plan (Basin Plan), November 2019.

9. California Water Service (Cal Water), adopted June 2021, 2020 Urban Water Management Plan: South San Francisco District.
10. 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.
11. City of South San Francisco, 1994, East of 101 Area Plan.
12. City of South San Francisco, 1999, General Plan.
13. City of South San Francisco prepared by Atkins, October 2014, South San Francisco Downtown Station Area Specific Plan Environmental Impact Report (SCH no. 2013102001).
14. DTSC and South City Ventures LLC, California Land Reuse and Revitalization Act (CLRRA) Agreement, January 2020, Docket No. HSA-FY19/20-013.
15. Federal Emergency Management Agency (FEMA), April 2019, Flood Insurance Rate Map (FIRM), Map Number 06081C0042F.
16. Langan Engineering and Environmental Services, November 12, 2020, Preliminary Geotechnical Site Assessment.
17. Langan Engineering and Environmental Services, May 7, 2021, Draft Dewatering Assessment.
18. Langan Engineering and Environmental Services, August 2, 2021, Preliminary Geotechnical Site Assessment Supplemental Discussion.
19. Langan Engineering and Environmental Services, January 15, 2021, Draft Soil and Groundwater Management Plan
20. Metropolitan Transportation Commission, 2021, Transit Priority Areas, accessed at: https://www.arcgis.com/home/item.html?id=370de9dc4d65402d992a769bf6ac8ef5
21. University of California Museum of Paleontology (UCMP) Online Database. 2019. UCMP specimen search portal, http://ucmpdb.berkeley.edu/.