Exhibit D

Draft Environmental Impact Report

499 Forbes Boulevard Office Project

Draft Environmental Impact Report

SCH#2019110287

prepared by

City of South San Francisco
Planning Division
City Hall Annex, P.O. Box 711
South San Francisco, California 94083
Contact: Christopher Espiritu, Senior Planner

prepared with the assistance of

Rincon Consultants, Inc.
449 15th Street, Suite 303
Oakland, California 94612

May 2020

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Environmental Scientists | Planners | Engineers
rinconconsultants.com

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Acronyms and Abbreviations

APN	Assessor Parcel Number
BAAQMD	Bay Area Air Quality Management District
BART	Bay Area Rapid Transit
BTP	Business Technology Park
CARB	California Air Resources Board
CEQA	California Environmental Quality Act
EIR	Environmental Impact Report
GHG	greenhouse gas
HBW VMT	Home-based work Vehicle Miles Traveled
LOS	Level of Service
MMBtu	million British Thermal Units
NOD	Notice of Determination
NOP	Notice of Preparation
OPR	Office of Planning and Research
SB	Senate Bill
SSFMC	City of South San Francisco Municipal Code
TDM	Transportation Demand Management
TSM	transportation system management
VMT	Vehicle Miles Traveled
WETA	South San Francisco Bay Ferry

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Executive Summary

This document is an Environmental Impact Report (EIR) that analyzes the environmental effects of the proposed 499 Forbes Boulevard Office Project (proposed project or project). This section summarizes the characteristics of the proposed project, project alternatives, and potential environmental impacts and mitigation measures.

Project Synopsis

Project Applicant

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Project Description

This EIR has been prepared to examine the potential environmental effects of the 499 Forbes Boulevard Project. The following is a summary of the full project description, which can be found in Section 2, *Project Description*.

The project would involve the demolition of an existing 54,000 square-foot manufacturing and warehouse structure and construction of a five-story, 128,737 square-foot office building approximately 85 feet in height, and a five-story parking structure with 308 parking stalls, approximately 60 feet in height. The new office building would be constructed within roughly the same footprint as the existing manufacturing and warehouse structure. Additional parking would consist of a 14-stall surface parking lot that would be repaved and landscaped at the western edge of the site. The project would also involve conversion of a 0.28-mile portion of existing railroad tracks located northeast of the proposed buildings into a bicycle and pedestrian trail.

Project Objectives

1. Develop an underutilized site into an office/research & development campus at 499 Forbes Boulevard that provides public and private amenities, and numerous transportation alternatives to the single-occupancy-vehicle to encourage, incentivize, and reduce vehicle trips and parking demand on-site and in the project vicinity.

2. Construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents.
3. Build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

Alternatives

As required by the California Environmental Quality Act (CEQA), this EIR examines alternatives to the proposed project. Studied alternatives include the following three alternatives. Based on the analysis, Alternative 3 was determined to be the environmentally superior alternative.

- Alternative 1: No Project
- Alternative 2: Research and Development Building
- Alternative 3: Reduced Size Office Building

Alternative 1 (No Project) assumes that the project site would remain in its current state and condition into the foreseeable future. The proposed office building and parking structure would not be constructed, and the existing railroad tracks would not be converted to a pedestrian and bicycle trail. Under this alternative, there would be no impacts associated with demolition and construction activities or operation of an office building.

Alternative 2 (Research and Development Building) assumes that the project site would be developed with a five-story building (128,737 square feet), used exclusively for research and development, instead of office. This alternative assumes the same parking structure would be constructed as that under the proposed project and that the existing railroad tracks would be converted to a trail as a part of the City's Rails-to-Trails program. Under this alternative, impacts associated with demolition and construction activities would be similar to those under the proposed project. However, operational impacts would be different from those associated with the proposed project.

Alternative 3 (Reduced Size Office Building) assumes that the project site would be developed with a three-story office building (approximately 77,000 square feet) and a two-story parking structure (approximately 158 parking stalls). This alternative also assumes the existing railroad tracks would be converted to a trail as a part of the City's Rails-to-Trails program. Under this alternative, impacts associated with demolition and construction activities would be similar to those under the proposed project, but because the new structures would be smaller and require a shorter construction period than the proposed project, construction impacts would be reduced compared to the proposed project. Because the reduced size would also reduce the number of employee vehicle trips, operational impacts would also be less compared to the proposed project.

Refer to Section 6, *Alternatives*, for the complete alternatives analysis.

Areas of Known Controversy

The EIR scoping process did not identify areas of known controversy for the proposed project. Section 1, *Introduction,* gives a summary of responses to the Notice of Preparation of a Draft EIR.

Issues to be Resolved

The City of South San Francisco has not identified issues to be resolved beyond the choice among alternatives.

Issues Not Studied in Detail in the EIR

Table 5 in Section 1.4 summarizes issues from the environmental checklist addressed in the Initial Study (Appendix IS). As indicated in the Initial Study, substantial evidence indicates that no significant impacts would occur to the following issue areas with the incorporation of mitigation identified in the Initial Study (see Table 1 below): Aesthetics, Agricultural Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire. Impacts to Transportation were found to be potentially significant and they are further analyzed in Section 4.1 of this EIR.

Summary of Impacts and Mitigation Measures

Table 1 summarizes the environmental impacts of the proposed project, proposed mitigation measures, and residual impacts (the impact after application of mitigation, if required). In addition, Table 2 summarizes the standard Conditions of Approval that would apply to the proposed project and residual impacts after the application of the Conditions of Approval. Impacts are categorized as follows:

- **Significant and Unavoidable.** An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per CEQA Guidelines Section 15093.
- **Less than Significant with Mitigation Incorporated.** An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under CEQA Guidelines Section 15091.
- **Less than Significant.** An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact:** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Table 1 Summary of Environmental Impacts, and Residual Impacts

Impact	Mitigation Measure (s)	Residual Impact
Initial Study Impacts and Mitigation Measures (see Appendix IS)		
Biological Resources		
Impact a. Would the project 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 Wildlife or U.S. Fish and Wildlife Service?	**BIO-1: Nesting Bird Avoidance and Minimization Efforts.** To the extent feasible, the project applicant shall schedule demolition and construction activities to avoid the nesting season. The nesting season for most birds, including most raptors in the San Francisco Bay area, extends from February 1 through August 31. If demolition and construction activities will occur during the breeding season, then a qualified biologist shall conduct a pre-construction nesting bird survey no more than 14 days prior to initiation of ground disturbance and vegetation removal. The biologist shall conduct the nesting bird pre-construction survey in the disturbance footprint and a 50-foot buffer where access can be authorized. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in San Mateo County. If nests are found, the biologist shall determine and demarcate an avoidance buffer (the size of which depend upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) with bright orange construction fencing, flagging, construction late, or other means to mark the boundary. All construction personnel shall be notified of the existence of the buffer zone and shall be instructed to avoid entering the buffer zone during the nesting season. No construction activities shall occur inside this buffer, and no access in the buffer allowed until the avian biologist confirms that breeding/nesting is complete, and the young have fledged the nest, or the nest has become otherwise inactive (e.g. depredated). Encroachment into the buffer shall occur only at the discretion of the qualified biologist.	Less than significant
Cultural Resources		
Impact b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	**CR-1: Unanticipated Archaeological Resources.** If archaeological resources are encountered during ground-disturbing activities, work within 50 feet of the find should be halted and an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology (National Park Service 1983) should be contacted immediately to evaluate the find. If necessary, the evaluation may require preparation of a treatment plan and archaeological testing for CRHR eligibility. If the discovery proves to be significant under CEQA and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.	Less than significant
Geology and Soils		
Impact a(3). Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?	**GEO-1: Seismic Design.** As recommended by the project's Geotechnical Investigation (Rockridge Geotechnical 2019), a geotechnical engineer shall collect shear wave velocity measurements and use such information for final project design. Alternatively, Site Class D designation shall be used for project design.	Less than significant

Impact	Mitigation Measure (s)	Residual Impact
Impact d. Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	**GEO-2: Foundation Settlement.** The project's building shall be supported on a stiffened foundation system, such as conventional reinforced concrete mat or interconnected continuous footings (i.e., a stiffened grid). If the estimated total settlements are not acceptable to the project team or the stiffened foundation system cannot be economically designed to limit differential settlement to a value that can be tolerated by the structure, then the proposed new structure shall be supported on spread footings bearing on improved soil provided that he soil improvement extends to a depth that would reduce differential settlement of the structure under both static and seismic conditions to a tolerable amount. The foundation system for the project's garage shall consist of spread footings bearing on improved ground. Drill displacement sand-cement columns or rammed aggregate piers would be the most appropriate ground improvement methods for this project.	Less than significant
EIR Impacts and Mitigation Measures		
Transportation		
Impact TRA-1. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	**TRA-1: Crosswalk Improvements.** The applicant shall design crosswalk and accessibility improvements at Forbes Boulevard and Allerton Avenue. These improvements shall include a marked crosswalk and necessary accessibility improvements per City standards across the western portion of the Allerton Avenue and Forbes Boulevard intersection to enable direct pedestrian connections to the closest existing first- and last-mile shuttle stop at Allerton Avenue and Cabot Road. The City shall not issue a building permit unless it has reviewed and approved the improvements prior to building permit approval, and the applicant shall implement these improvements during construction, which are then subject to final approval by the City.	Less than Significant
Impact TRA-2. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	As part of the proposed project, the applicant shall design and implement the following off-site improvements to support the project's first- and last-mile TDM strategies necessary to achieve the estimated nine percent reduction in VMT per employee (Appendix TIA). The applicant shall show these improvements on the plans submitted to the City for building permit approvals and the applicant shall implement them prior to certificate of occupancy of the new office building as follows: ▪ Implement eastbound and westbound Class II buffered bicycle lanes along Forbes Boulevard between Allerton Avenue and Eccles Avenue, spanning approximately 2,000 linear feet. ▫ The improvement consists primarily of restriping the curbside vehicle travel lane in each direction to a Class II buffered bicycle lane, installing signage, and implementing bicycle traffic signal detection upgrades at Eccles Avenue as required. ▪ Accommodate potential future on-street shuttle stop along the project site's Forbes Boulevard frontage. Provide a minimum 5-foot long by 8-foot wide (as measured perpendicular to the curb) sidewalk in the public right-of-way, adjacent to the project frontage and approximately 50-feet downstream from the Forbes Boulevard and Allerton Avenue intersection. The existing curb alignment would not	Significant and Unavoidable

Impact	Mitigation Measure (s)	Residual Impact
	be substantially altered, and the final configuration shall be reviewed by City staff. ▪ Coordinate with Commute.org and/or Genentech's gRide transportation program to determine the feasibility of serving the above shuttle stop.	

Table 2 Summary of Environmental Impacts, Standard Conditions of Approval, and Residual Impacts

Impact	Standard Condition (s) of Approval	Residual Impact
Initial Study Impacts and Standard Conditions of Approval (see Appendix IS)		
Air Quality		
Impact b. Would the project 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?	**Standard Condition of Approval.** All proposed projects shall comply with the BAAQMD recommended Basic Construction Mitigation Measures, listed below to meet the best management practices threshold for fugitive dust: a) All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day. b) All haul trucks transporting soil, sand, or other loose material off-site shall be covered. c) All visible mud or dirt track-out onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited. d) All vehicle speeds on unpaved roads shall be limited to 15 mph. e) 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. f) 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. g) All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified visible emissions evaluator. h) 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.	Less than significant

Impact	Standard Condition (s) of Approval	Residual Impact
Greenhouse Gas Emissions		
Impact b. Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	**Standard Condition of Approval.** For Commercial Projects: Prior to issuance of any building or construction permits, the developer shall revise the development plans to include the following Climate Action Plan requirements, subject to review and approval by the Chief Planner or designee: a) Electric Vehicle Charging Installations Measure 2.1, Action 5: Require new large-scale nonresidential developments to provide conduit for future electric vehicle charging installations and encourage the installation of conduits or electric vehicle charging stations for all new development. b) Heat Island Reductions Measure 3.4, Action 1: Encourage the use of high-albedo surfaces and technologies as appropriate, as identified in the voluntary CALGreen standards. c) Alternative Energy Facilities Measure 4.1, Action 2: Require the construction of any new nonresidential conditioned space of 5,000 square feet or more, or the conversion of unconditioned space 5,000 square feet or more, to comply with one of the following standards: i. Meet a minimum of 50% of modeled building electricity needs with on-site renewable energy sources. To calculate 50% of building electricity needs for the new conditioned space, the applicant shall calculate building electricity use as part of the Title 24 compliance process. Total electricity use shall include total use for the new conditioned space excluding process energy. ii. Participate in a power purchase agreement to offset a minimum of 50% of modeled building electricity use. Building electricity use shall be calculated using the method identified above. iii. Comply with CALGreen Tier 2 energy efficiency requirements to exceed mandatory energy efficiency requirements by 20% or more. For additions to existing development of 5,000 square feet or more, CALGreen Tier 2 shall be calculated as part of the Title 24 compliance process. Existing building space already permitted shall not be subject to CALGreen Tier 2 requirements. d) Solar Wiring Installation Measure 4.1, Action 3: Require all new development to install conduit to accommodate wiring for solar. e) Water Demand Reduction Measure 6.1, Action 2: Revitalize implementation and enforcement of the Water Efficient Landscape Ordinance by undertaking the following: i. Establishing a variable-speed pump exchange for water features. ii. Restricting hours of irrigation to occur between 3:00 a.m. and two hours after sunrise. iii. Installing irrigation controllers with rain sensors. iv. Landscaping with native, water-efficient plants. v. Installing drip irrigation systems. vi. Reducing impervious surfaces.	Less than significant

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1 Introduction

This document is an Environmental Impact Report (EIR) that assesses the environmental effects of developing an office building and parking structure at 499 Forbes Boulevard, South San Francisco, California. The proposed 499 Forbes Boulevard Project (hereafter referred to as the "proposed project" or "project") would involve demolition of an existing 54,000 square-foot manufacturing and warehouse structure and the construction of a five-story, 128,936 square-foot office building approximately 85 feet in height, a five-story, 308-stall parking structure approximately 60 feet in height, and conversion of a 0.28-mile portion of existing railroad tracks into a pedestrian and bicycle path.

This section discusses (1) the project and EIR background; (2) the legal basis for preparing an EIR; (3) the scope and content of the EIR; (4) issue areas found not to be significant by the Initial Study; (5) the lead, responsible, and trustee agencies; and (6) the environmental review process required under the California Environmental Quality Act (CEQA). The proposed project is described in detail in Section 2, *Project Description*.

1.1 Environmental Impact Report Background

The City of South San Francisco distributed a Notice of Preparation (NOP) of the EIR for a 30-day agency and public review period starting on November 15, 2019 and ending on December 16, 2019. The City received four letters in response to the NOP during the public review period. The NOP and written responses received are presented in Appendix NOP of this EIR, and the Initial Study is presented in Appendix IS. Table 3 summarizes the content of the letters and where the EIR addresses the issues raised.

1.2 Purpose and Legal Authority

The proposed project would require discretionary approval by the City of South San Francisco Planning Commission; therefore, the project is subject to the environmental review requirements of CEQA. In accordance with *CEQA Guidelines* Section 15121 (California Code of Regulations, Title 14), the purpose of this EIR is to serve as an informational document that:

> "will inform public agency decision makers and the public generally of the significant environmental effects of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project."

This EIR has been prepared as a project EIR, pursuant to *CEQA Guidelines* Section 15161. A project EIR is appropriate for a specific development project. As stated in the *CEQA Guidelines*:

> "This type of EIR should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the project, including planning, construction, and operation."

This EIR serves as an informational document for the public and City of South San Francisco decision makers. The process includes public hearings before the Planning Commission to consider certification of a Final EIR and approval of the proposed project.

Table 3 NOP Comments and EIR Response

Commenter	Comment/Request	How and Where it was Addressed
Agency Comments		
Native American Heritage Commission	The Lead Agency must determine if there are historical resources within the area of potential effects. AB 52 applies to the project and requires tribal consultation regarding tribal cultural resources. The Native American Heritage Commission recommends consultation with California Native American tribes traditionally and culturally affiliated with the geographic are of the project as early as possible.	Cultural resources, tribal cultural resources, and Assembly Bill (AB) 52 consultation requirements are described in the Initial Study (Appendix IS), Sections 5 and 18.
	SB 18 applies to projects that require an amendment of a General Plan or Specific Plan, or the designation of open space.	The project would not require a General Plan or Specific Plan amendment and would not designate open space.
	Recommends contacting the regional California Historical Research Information System Center for an archaeological record search, preparation of a professional report detailing the findings of a field and record survey and contacting the Native American Heritage Commission for a Sacred Lands File search and Native American Tribal Consultation List.	A California Historical Resources Information System search was completed on November 6, 2019. A Northwest Information Center records search identified 14 cultural resource studies and two previously recorded cultural resources within 0.5 mile of the project site. Potential impacts to cultural resources, methodology, and record searches are described in the Initial Study (Appendix IS), Section 5.
	Lack of surface evidence of archaeological resources does not preclude their subsurface existence.	Mitigation Measure CR-1 was included in the Initial Study (Appendix IS) regarding unanticipated archeological resources.
California Department of Transportation (Caltrans)	Recommends the inclusion of the intersections at the Northbound (NB) and Southbound US-101 ramps for Airport Boulevard, Grand Avenue, and Oyster Point Boulevard. Inclusion of on-ramp and off-ramp storage capacity analyses to determine if the proposed development would impact the ramps' queue.	Potential impacts to transportation and methodology are described in Section 4, *Environmental Impact Analysis*.
San Francisco International Airport (SFO)	The Lead Agency must be consistent with the ALUCP requirements for land use criteria within runway end safety zones as defined as ALUCP SP-1 through SP-3.	Consistency with Airport Land Use Compatibility Plan (ALUCP) requirements for the San Francisco International Airport is discussed in the Initial Study (Appendix IS), Section 9.
	Project should be consistent with ALUCP NP-1 through NP-4 regarding noise policies for the area.	Consistency with the ALUCP requirements regarding noise is discussed in the Initial Study (Appendix IS), Section 13.

Commenter	Comment/Request	How and Where it was Addressed
County of San Mateo, Department of Public Works	Storm water runoff from the project site must not be directed to drain into the City of South San Francisco storm drain lines which ultimately enter the District's flood control channel. Copies of the as-built drawings when completed shall be provided for review and records.	Potential impacts to hydrology and water quality, are described in the Initial Study (Appendix IS), Section 10.
	The Lead Agency shall review any green infrastructures proposed by the project for compliance with requirements of Provision C.3.d of the NPDES Municipal Regional Stormwater Permit.	Potential impacts to hydrology and water quality are described in the Initial Study (Appendix IS), Section 10.

1.3 Scope and Content

This EIR addresses impacts identified by the Initial Study to be potentially significant. The following issue was found to include potentially significant impacts that are studied in this EIR:

- Transportation

In preparing the EIR, use was made of pertinent City policies and guidelines, certified EIRs and adopted CEQA documents, and other background documents. A full reference list is contained in Section 7, *References and Preparers*.

The alternatives section of the EIR (Section 6) was prepared in accordance with Section 15126.6 of the *CEQA Guidelines* and focuses on alternatives capable of eliminating or reducing significant adverse effects associated with the project, while feasibly attaining most of the basic project objectives. The alternatives section identifies the "environmentally superior" alternative among those assessed. The alternatives evaluated include the CEQA-required "No Project" and two alternatives for the project site.

The level of detail contained throughout this EIR is consistent with the requirements of CEQA and applicable court decisions. *CEQA Guidelines* Section 15151 provides the standard of adequacy on which this document is based. The *Guidelines* state:

> An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences. An evaluation of the environmental effects of the proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection, but for adequacy, completeness, and a good faith effort at full disclosure.

1.4 Issues Not Studied in Detail in the EIR

The environmental checklist addressed in the Initial Study (Appendix IS) identified issues that will not be addressed in this EIR. As indicated in the Initial Study, there is no substantial evidence that significant impacts would occur in any of the following issue areas:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Hazards and Hazards Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

1.5 Lead, Responsible, and Trustee Agencies

The *CEQA Guidelines* define lead, responsible, and trustee agencies. The City of South San Francisco is the lead agency because it holds principal responsibility for approving the project. A responsible agency refers to a public agency other than the lead agency with discretionary approval over the project. There are no responsible agencies for the proposed project. A trustee agency refers to a state agency having jurisdiction by law over natural resources affected by a project. There are no trustee agencies for the proposed project.

1.6 Environmental Review Process

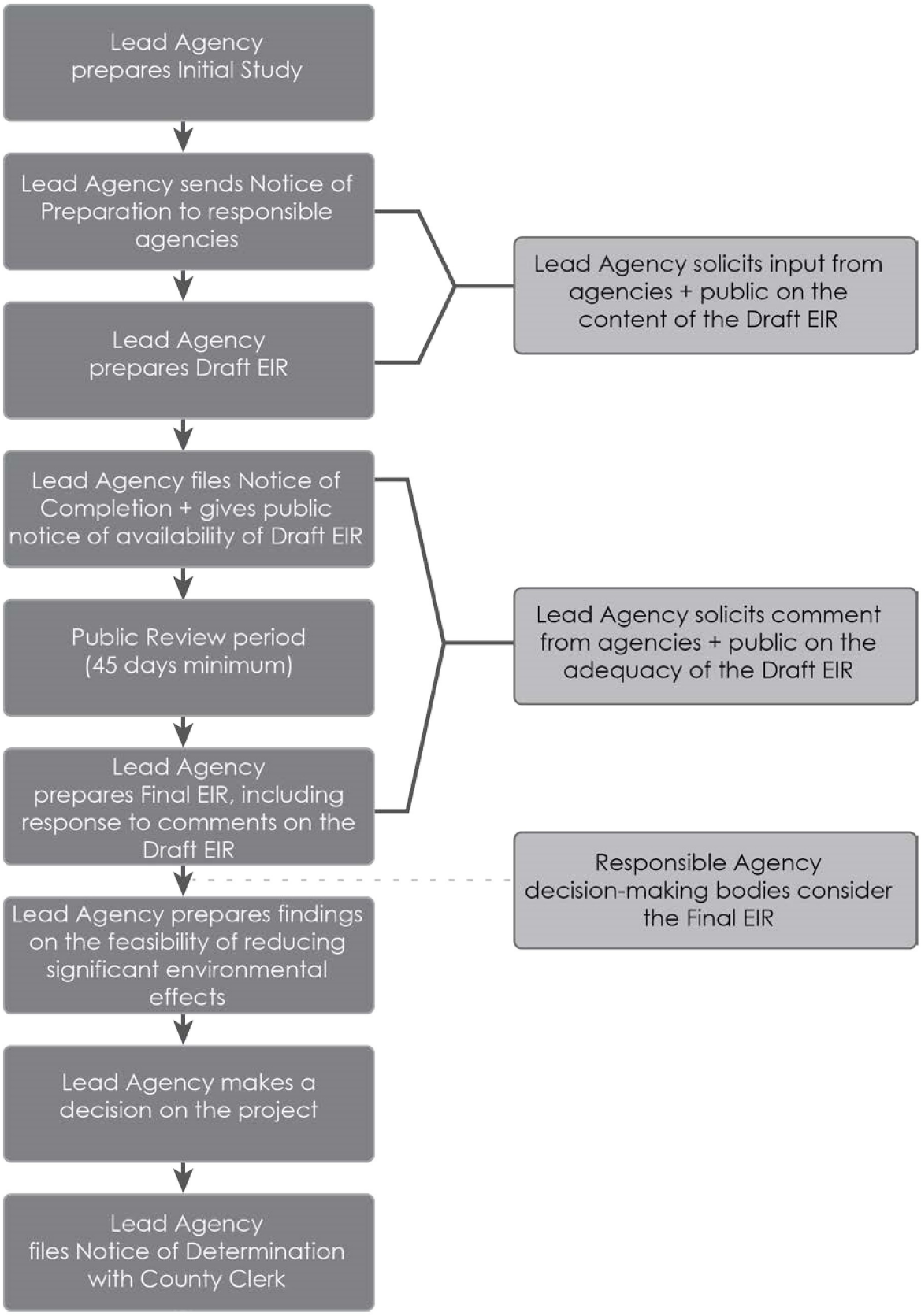
The environmental impact review process, as required under CEQA, is summarized below and illustrated in Figure 1. The steps are in sequential order as follows.

1. **Notice of Preparation and Initial Study**. After deciding that an EIR is required, the lead agency (City of South San Francisco) must file a NOP soliciting input on the EIR scope to the State Clearinghouse, other concerned agencies, and parties previously requesting notice in writing (*CEQA Guidelines* Section 15082; Public Resources Code [PRC] Section 21092.2). The NOP must be posted in the County Clerk's office for 30 days. The NOP may be accompanied by an Initial Study that identifies the issue areas for which the project could create significant environmental impacts.
2. **Draft EIR Prepared.** The Draft EIR must contain: a) table of contents or index; b) summary; c) project description; d) environmental setting; e) discussion of significant impacts (direct, indirect, cumulative, growth-inducing and unavoidable impacts); f) a discussion of alternatives; g) mitigation measures; and h) discussion of irreversible changes.
3. **Notice of Completion.** The lead agency must file a notice of completion with the State Clearinghouse when it completes a Draft EIR and prepare a Public Notice of Availability of a Draft EIR. The lead agency must place the notice of completion in the County Clerk's office for 30 days (PRC Section 21092) and send a copy of the notice of completion to anyone requesting it (*CEQA Guidelines* Section 15087). Additionally, public notice of Draft EIR availability must be given through at least one of the following procedures: a) publication in a newspaper of general circulation; b) posting on and off the project site; and c) direct mailing to owners and occupants of contiguous properties. The lead agency must solicit input from other agencies and the public and respond in writing to all comments received (PRC Sections 21104 and 21253). The minimum public review period for a Draft EIR is 30 days. When a Draft EIR is sent to the State

Clearinghouse for review, the public review period must be 45 days unless the State Clearinghouse approves a shorter period (PRC 21091).

4. **Final EIR.** A Final EIR must include a) the Draft EIR, b) copies of comments received during public review, c) list of persons and entities commenting; and d) responses to comments.
5. **Certification of Final EIR.** Prior to making a decision on a proposed project, the lead agency must certify that a) the Final EIR has been completed in compliance with CEQA, b) the Final EIR was presented to the decision-making body of the lead agency, and c) the decision making body reviewed and considered the information in the Final EIR prior to approving a project (*CEQA Guidelines* Section 15090).
6. **Lead Agency Project Decision.** The lead agency may a) disapprove the project because of its significant environmental effects, b) require changes to the project to reduce or avoid significant environmental effects, or c) approve the project despite its significant environmental effects, if the proper findings and statement of overriding considerations are adopted (*CEQA Guidelines* Sections 15042 and 15043).
7. **Findings/Statement of Overriding Considerations**. For each significant impact of the project identified in the EIR, the lead agency must find, based on substantial evidence, that a) the project has been changed to avoid or substantially reduce the magnitude of the impact; b) changes to the project are within another agency's jurisdiction and such changes have or should be adopted; or c) specific economic, social, or other considerations make the mitigation measures or project alternatives infeasible (*CEQA Guidelines* Section 15091). If an agency approves a project with unavoidable significant environmental effects, it must prepare a written Statement of Overriding Considerations that sets forth the specific social, economic, or other reasons supporting the agency's decision.
8. **Mitigation Monitoring Reporting Program.** When the lead agency makes findings on significant effects identified in the EIR, it must adopt a reporting or monitoring program for mitigation measures adopted or made conditions of project approval to mitigate significant effects.
9. **Notice of Determination (NOD).** The lead agency must file a NOD after deciding to approve a project for which an EIR is prepared (*CEQA Guidelines* Section 15094). A local agency must file the NOD with the county clerk. The NOD must be posted for 30 days and sent to anyone requesting notice previously. Posting of the NOD starts a 30-day statute of limitations on CEQA legal challenges (PRC Section 21167[c]).

Figure 1 Environmental Review Process



2 Project Description

This section describes the proposed project, including the project applicant, the project site and surrounding land uses, major project characteristics, project objectives, and discretionary actions needed for approval.

2.1 Project Applicant

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2.2 Lead Agency Contact Person

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2.3 Project Location

The project site is 2.96 acres (128,737 square feet) and is located near the intersection of Forbes Boulevard and Allerton Avenue, east of US-101 in South San Francisco. The site address is 499 Forbes Boulevard, South San Francisco, California. The site consists of one roughly rectangular parcel (Assessor's Parcel Number [APN] 015-082-040) and another long, narrow parcel extending north from the main parcel and encompassing part of a decommissioned railroad track (APN to be determined). Figure 2 shows the regional location of the project site and Figure 3 provides an aerial image of the project site in its neighborhood context.

2.4 Existing Site Characteristics

2.4.1 Site History and Current Conditions

The larger project parcel (2.96 acres, addressed as 499 Forbes Boulevard) contains a one-story, 54,000 square-foot manufacturing and warehouse structure and a surface parking lot with perimeter landscaping. The existing manufacturing and warehouse structure, built in 1968, was historically used as a Columbus Salame meat processing, packaging, and distribution facility but is currently vacant. The site is generally flat and almost entirely paved. The long, narrow project parcel to the north includes a decommissioned railroad track and is now overgrown with ruderal vegetation.

Figure 2 Regional Location

Figure 3 Regional Location

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Fig 2 Project Location

The project site historically maintained four underground storage tanks (UST) consisting of three 1,000-gallon gasoline tanks and one 10,000-gallon diesel tank. The diesel tank was removed in 1994 and closure was granted in 2003 by the San Mateo County Department of Environmental Health. The three 1,000-gallon gasoline USTs were adjacent to one another near the loading docks in the southeast portion of the project site and were removed in 1986. Closure for these three USTs was granted in 2004, but according to a 2006 Phase 1 environmental site assessment prepared for the site, residual contamination remained in the soil (Appendix HAZ). The project site was officially granted full closure from all hazardous materials programs as of March 2015.

2.4.2 Land Use Designation and Zoning

The South San Francisco General Plan designates the project site as Business and Technology Park. Allowed uses under this designation include campus-like environments for corporate headquarters, research and development facilities, and offices. All development under this designation is subject to high design and landscape standards (City of South San Francisco 1999).

The project site is zoned Business Technology Park (BTP). According to South San Francisco Municipal Code (SSFMC) Section 20.110.001, the BTP zoning district is intended for the following:

> business and professional offices, visitor service establishments, and retail uses with an emphasis on larger and regional-serving uses west of 101. A wide range of nonresidential uses are appropriate including administrative, financial, business, professional, medical and public offices and visitor-oriented and regional commercial activities such as warehouse clubs and other large-format retail uses.

2.4.3 Surrounding Land Uses

The project site is near the eastern edge of South San Francisco, at the northwest corner of the intersection of Forbes Boulevard and Allerton Avenue. The surrounding neighborhood has only non-residential uses, including several buildings occupied by Genentech, a biotechnology company, and office, manufacturing, and warehouse buildings for other businesses. Offices, warehouses, and distribution centers for food packaging companies occur north of the project site, across the decommissioned railroad tracks in the long, narrow, smaller project parcel and that extend west of the site. A large surface parking lot and the Genentech shuttle station abut the project site to the east, and the office and warehouses for a food distribution company border the project site to the west. A vacant lot is south of the project site, directly across Forbes Boulevard. To the northeast of the project site, a U.S. Department of Agriculture Animal and Plant Health Inspection building is situated approximately 0.2 mile away. The project site is approximately 0.5 mile west of San Francisco Bay.

2.5 Project Characteristics

The project would involve the construction of two new structures: a five-story, 128,737 square-foot office structure and a five-story, 97,859 square-foot parking structure with 308 parking spaces. The existing one-story structure would be demolished as a part of project implementation. The new office structure would be approximately 85 feet in height and would occupy the same general footprint as the demolished structure, on the southern portion of the site near Forbes Boulevard. The parking structure would be 60 feet in height and located in the northern portion of the site closer to the railroad tracks. Additional surface parking spaces (14 stalls) would be located at the western edge of the project site, and bicycle parking would be provided throughout. Landscaped

areas would account for approximately 42,819 square feet of the project site, mainly along the perimeter, between the two new structures, and at the rear of the site. A terraced outdoor seating area would be located at the northwest corner of the site, near the existing rail line.

The project would also involve improvement of the existing railroad tracks as part of the City's Rails-to-Trails program, for which an approximately 1,500-linear foot, or 0.28-mile, segment of existing railroad track would be converted to a bicycle and pedestrian trail. The trail would be adjacent to the project site and would extend northeast, where it would terminate at Forbes Boulevard. The railroad right-of-way (APN to be determined) would be merged with the parcel for 499 Forbes (APN 015-082-040). A connection would be made between the newly built trail and an outdoor amenity space at the northwest corner of the site. A Bocce court would be constructed in the northwest corner of the site and would serve as a trail amenity.

Vehicle access to the project site would be provided via a single, 26-foot-wide drive aisle and curb cut from Forbes Boulevard. The project would also involve modification to an existing roadway median on Forbes Boulevard for a new left turn lane. Figure 4 provides the site plan for the proposed project.

2.6 Project Objectives

1. Develop an underutilized site into an office/research & development campus at 499 Forbes Boulevard that provides public and private amenities as well as transportation alternatives to encourage, incentivize, and reduced vehicle trips and parking demand on-site and in the project vicinity.
2. Construct a flexible facility that will allow for office/research & development uses that will create quality Jobs for South San Francisco residents.
3. Build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

2.7 Required Approvals

The following permits and approvals are required from the City of South San Francisco prior to construction of the proposed project:

- Conditional Use Permit for reduced parking and increased floor area
- Design Review for the proposed office/R&D building, parking garage site and trail improvements;
- Tentative Parcel Map to merge existing two parcels into one; and
- Transportation Demand Management Plan for a nonresidential project resulting in more than 100 average daily trips.

Figure 4 Proposed Site Plan

Source: Woods Bagot, 2020.

3 Environmental Setting

This section provides a general overview of the environmental setting for the proposed project. More detailed description of the environmental setting as it relates to Transportation can be found in Section 4, *Environmental Impact Analysis*.

3.1 Regional Setting

The project site is in South San Francisco in San Mateo County. Incorporated in 1908, South San Francisco encompasses approximately 4,298 acres. US-101, State Route 82, and Interstate-280 traverse the city going north and south. Low-density residential neighborhoods and industrial and commercial areas characterize the city, which is largely developed with a few scattered undeveloped or vacant parcels. Over 10 percent of the city is dedicated to parks and open space (City of South San Francisco 1999).

The estimated (2019) population of the city is 67,078 persons, and the current housing stock includes an estimated 22,059 units. Average household size is approximately 3.15 persons per unit (California Department of Finance 2019).

The most prevalent mode of travel in the city is driving (City of South San Francisco 1999). Travel by Bay Area Rapid Transit (BART) or Caltrain are the second most-used modes of travel. The predominant roadway corridor is US-101, which crosses through the eastern portion of the city from the north to the south. State Route 82 and Interstate 280 also cross north and south through the western portion of the city.

3.2 Project Site Setting

The project site is developed with an unoccupied one-story, manufacturing and warehouse structure, a concrete surface parking lot, minimal landscaping around the perimeter of the site, and a decommissioned railroad track. The site is generally flat and almost entirely paved. As shown in Figure 3*,* the project site is bordered by a bus parking lot, office and manufacturing warehouses, and biotechnology offices, with Forbes Boulevard located immediately south of the site.

3.3 Cumulative Development

The project's cumulative impact to transportation discussed in Section 4, *Environmental Impact Analysis*. *CEQA Guidelines* Section 15130 states that an adequate discussion of cumulative impacts should include either a list of past, present, and probable future projects producing related or cumulative impacts, or a summary of projections contained in an adopted local, regional, or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. For this EIR, which focuses on consideration of the project's potential impact related to transportation, cumulative traffic projections were estimated based on corresponding land use and trip generation forecasts from the City of South San Francisco's Travel Demand Model, updated in July 2018. The cumulative analysis includes transportation demand resulting from reasonably foreseeable land use changes and conditions associated with funded transportation

projects at year 2040. Cumulative impacts of the proposed project in combination with these changes and projects are discussed in Section 4, *Environmental Impact Analysis,* of this EIR.

4 Environmental Impact Analysis

This section discusses the possible environmental effects of the 499 Forbes Boulevard Project for the specific issue areas identified through the scoping process as having the potential to experience significant effects. "Significant effect" is defined by the *CEQA Guidelines* Section 15382 as:

> a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment but may be considered in determining whether the physical change is significant.

The assessment of each issue area begins with a discussion of the environmental setting related to the issue, followed by the impact analysis. In the impact analysis, the first subsection identifies the methodologies used and the "significance thresholds," which are those criteria adopted by the City and other agencies, universally recognized, or developed specifically for this analysis to determine whether potential effects are significant. The next subsection describes each impact of the proposed project, mitigation measures for significant impacts, and the level of significance after mitigation. Each effect under consideration for an issue area is listed separately in bold text, with the discussion of the effect and its significance. Each bolded impact statement also contains a statement of the significance determination for the environmental impact as follows:

- **Significant and Unavoidable**. An impact that cannot be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires a Statement of Overriding Considerations to be issued if the project is approved per *CEQA Guidelines* Section 15093.
- **Less than Significant with Mitigation Incorporated**. An impact that can be reduced to below the threshold level given reasonably available and feasible mitigation measures. Such an impact requires findings under *CEQA Guidelines* Section 15091.
- **Less than Significant**. An impact that may be adverse but does not exceed the threshold levels and does not require mitigation measures. However, mitigation measures that could further lessen the environmental effect may be suggested if readily available and easily achievable.
- **No Impact.** The proposed project would have no effect on environmental conditions or would reduce existing environmental problems or hazards.

Following each environmental impact discussion is a list of mitigation measures (if required) and the residual effects or level of significance remaining after implementation of the measure(s). In cases where the mitigation measure for an impact could have a significant environmental impact in another issue area, this impact is discussed and evaluated as a secondary impact. The impact analysis concludes with a discussion of cumulative effects, which evaluates the impacts associated with the proposed project in conjunction with expected land use and transportation conditions in South San Francisco, described in Section 3, *Environmental Setting*. The Executive Summary of this EIR summarizes all impacts and mitigation measures that apply to the proposed project.

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4.1 Transportation

This section discusses potential project impacts related to transportation. This section is based primarily on a Transportation Impact Analysis (TIA) prepared by Fehr & Peers in 2020, included as Appendix TIA.

4.1.1 Setting

a. Regulatory Setting

State

STATE SENATE BILL 743

Senate Bill (SB) 743 was signed into law by Governor Brown in 2013 and tasked the State Office of Planning and Research (OPR) with establishing new criteria for determining the significance of transportation impacts under CEQA. SB 743 requires the new criteria to "promote the reduction of greenhouse gas (GHG) emissions, the development of multimodal transportation networks, and a diversity of land uses." It also states alternative measures of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates, or automobile trips generated."

On September 27, 2013, California Governor Jerry Brown signed SB 743 into law and started a process that changes transportation impact analysis as part of CEQA compliance. SB 743 requires the OPR to identify new metrics for identifying and mitigation transportation impacts within CEQA. SB 743 changes the way that public agencies evaluate the transportation impacts of projects under CEQA, recognizing that roadway congestion, while an inconvenience to drivers, is not itself an environmental impact (PRC Section 21099, subdivision (b)(2)). In addition to new exemptions for projects consistent with specific plans, the recently adopted CEQA Guidelines replace congestion-based metrics, such as auto delay and level of service, with vehicle miles traveled (VMT) as the basis for determining significant impacts, unless the Guidelines provide specific exceptions. *CEQA Guidelines* Section 15064.3(c) requires that cities adopt a VMT methodology by July 1, 2020. As of the date of this EIR, the City of South San Francisco has not adopted a qualitative analysis for VMT, and the City's Traffic Model does not currently calculate VMT.

To aid in SB 743 implementation, the following state guidance has been produced:

- OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018).
- *California Air Resources Board* (CARB) *2017 Scoping Plan-Identified VMT Reductions and Relationship to State Climate Goals* (CARB 2019).
- Local Development – Intergovernmental Review Program Interim Guidance, Implementing the California Department of Transportation [Caltrans] Strategic Management Plan 2015-2020 Consistent with SB 743 (Caltrans 2016).

The guidance from CARB provides recommendations for VMT reduction thresholds that would be necessary to achieve the State's GHG reduction goals. CARB finds per-capita light-duty vehicle[1]

[1] A light-duty vehicle is any motor vehicle with a gross vehicle weight rating of 10,000 pounds or less, including any standard passenger vehicle.

travel would need to be approximately 16.8 percent lower than existing levels, and overall per-capita vehicle travel would need to be approximately 14.3 percent lower than existing levels. CARB also acknowledges that identified Sustainable Communities Strategy targets are not sufficient to meet climate goals. As stated in the report, "…the full reduction needed to meet our climate goals is an approximately 25 percent reduction in statewide per capita on-road light-duty transportation-related GHG emissions by 2035 relative to 2005." This estimate was made with a model that does not fully capture emerging transportation trends such as a growing e-commerce market, greater use of Uber and Lyft, plus future transitions to autonomous vehicles. As such, the level of VMT reduction necessary to reach the State's GHG reduction goals may exceed 25 percent.

OPR considered this research when developing recommended VMT thresholds. In its *Technical Advisory on Evaluating Transportation Impacts in CEQA* (OPR 2018), OPR recommends that a per capita or per employee VMT that is 15 percent below that of existing development may be a reasonable threshold. This threshold is based on the abovementioned research documents from CARB as well as evidence that suggests a 15 percent reduction in VMT is achievable at the project level in a variety of place types and would help the State towards achieving its climate goals (California Air Pollution Control Officers Association 2010).

Regional

San Mateo City/County Association of Governments (C/CAG)

C/CAG is the Congestion Management Agency for San Mateo County authorized to set State and federal funding priorities for improvements affecting the San Mateo County Congestion Management Program roadway system. The C/CAG-designated Congestion Management Program roadway system in South San Francisco includes SR 82 (El Camino Real), U.S. 101, I-380, and I-280. C/CAG has set the level of service standards for U.S. 101 segments in the vicinity of the Project site.

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

Peninsula Traffic Congestion Relief Alliance (Commute.org)

The Alliance is a joint powers authority dedicated to implementing transportation demand management programs in San Mateo County and providing alternatives to single-occupant auto travel, including both commuter and community shuttles. A Board of Directors consisting of elected officials from each of its 17-member cities and one representative from the County Board of Supervisors governs the Alliance. The Alliance manages 26 shuttle routes in San Mateo County. In South San Francisco, the Alliance runs seven first- and last-mile weekday peak hour and direction commuter routes that connect the South San Francisco Caltrain and BART stations, and the South San Francisco Bay Ferry (WETA) terminal with the East of 101 employment area.

Local

The City of South San Francisco General Plan, Transportation Element establishes the following overarching policies for the city:

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

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

Policy 4.2-I-10: Design roadway improvements and evaluate development proposals based on [Level of Service (LOS)] standards

Policy 4.2-I-11: In all street projects include infrastructure that improves transportation options for pedestrians, bicyclists, and users of public transportation of all ages and abilities. Incorporate this infrastructure into all construction, reconstruction, retrofit, maintenance, alteration, and repair of streets, bridges, and other portions of the transportation network.

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

South San Francisco East of 101 Mobility 20/20 Plan

The City of South San Francisco Mobility 20/20 Plan (adopted in 2019) analyzed existing and future land use in the East of 101 Area, with the goal of providing a framework for multimodal improvements to the area's transportation network. Its findings and recommendations will be incorporated into Shape SSF, the City's 2040 General Plan Update. The plan envisions reducing vehicle miles traveled and drive-alone mode share while expanding throughput capacity along major corridors serving the area's core employment areas.

Key identified project opportunities include US-101 interchange improvements and secondary north-south arterial connections to Brisbane's Sierra Point to the north and the San Francisco International Airport area to the south via a new causeway spanning San Bruno Channel. The bicycle and pedestrian network would be substantially upgraded with separated bikeways, expanded sidewalks, and new pedestrian crosswalks. Transit enhancements include transit-only lanes along the Oyster Point Boulevard corridor complimented by new or upgraded direct service connections between job centers and regional transit stations.

While the City of South San Francisco has not yet adopted VMT thresholds, the Mobility 20/20 Plan includes a qualitative assessment of the effects that four development scenarios would have on VMT. Table 4 provides a summary of that analysis.

Table 4 Vehicle Miles Traveled Evaluation

Number	Scenario	Evaluation
1	Maintain Current Infrastructure	Likely to increase VMT per employee due to limited improvements to transit and active transportation.
2	Maximize auto capacity	Likely to increase VMT per employee due to expanded roadway capacity and limited improvements to transit and active transportation.
3	Maximize TDM	Likely to decrease VMT per employee due to improved transit and active transportation facilities and reduced drive-alone mode split.
4	Optimize auto capacity & TDM	Likely to decrease VMT per employee due to improved transit and active transportation facilities and reduced drive-alone mode spit.

Source: City of South San Francisco 2019

East of 101 Area Plan

The City of South San Francisco East of 101 Area Plan, Circulation Element establishes the following overarching policies for the specified area:

Policy CIR-1: Level of Service D shall be the minimum acceptable operating standard for intersections in the East of 101 Area.

Policy CIR-14: Bicycle lanes and/or paths should be incorporated into roadway widening and new construction projects where feasible.

Policy CIR-15: The City of South San Francisco shall support transportation demand management (TDM) and transportation system management (TSM) programs in coordination with the Multi-City Transportation System Management Agency, or any other applicable transportation management agencies.

City of South San Francisco Bicycle Master Plan

The City of South San Francisco Bicycle Master Plan sets forth goals, policies, and programs for bicycle transit throughout the city. Goals, policies, and programs are reiterated below:

Goal 1: Promote and Encourage Bicycle Transportation

Policy 1.2: Reduce reliance on travel by single occupant passenger vehicles.

1.2-1: All major developments shall be required to establish and maintain a Transportation Demand Management Plan as prescribed in the South San Francisco Municipal Code Title 20 Zoning Regulations.

Goal 3: Improve Bicycle Access

Policy 3.1: The city shall expand the existing bikeway network and improve access throughout the community with a special emphasis on connections to places of work, transit, commercial centers, and community amenities.

City of South San Francisco Pedestrian Master Plan

The City of South San Francisco Pedestrian Master Plan sets forth goals, policies, and programs to promote and encourage walking.

Policy 3.2: Pedestrian facilities and amenities should be provided at schools, parks, and transit stops, and shall be required to be provided at private developments, including places of work,

commercial shopping establishments, parks, community facilities and other pedestrian destinations.

South San Francisco Complete Streets Policy

The City of South San Francisco adopted its Complete Street Policy (2012) to serve all street users:

> **Resolution 86-2012:** Create and maintain complete streets that provide safe, comfortable, and convenient travel along and across streets including streets, roads, highways, bridges, and other portions of the transportation system through a comprehensive, integrated transportation network that serves all categories of users, including pedestrians, bicyclists, persons with disabilities, motorists, movers of commercial goods, users and operators of public transportation, seniors, children, youth, and families.

South San Francisco Transportation Demand Management Ordinance

The City of South San Francisco TDM Ordinance (Ordinance 1432 Section 2, 2010) seeks to reduce the amount of traffic generated by nonresidential development and minimize drive-alone commute trips. The ordinance establishes a performance target of 28 percent minimum alternative mode share for all nonresidential projects resulting in more than 100 average daily trips and identifies a higher threshold for projects requesting a floor area ratio bonus.

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

b. Environmental Setting

First- and Last-Mile Connections

An individual's trip is understood as the entire journey from origin to destination. Individuals may use a number of modes (types) of transport to complete the journey – they may walk, drive, ride a bicycle, take a train, or - in many cases - combine a number of modes. Bus and rail services often form the core of a trip, but users complete the first and last portion on their own. For example, they must first walk, bike, drive or roll themselves to and from the nearest station. This is referred to as the first- and last-mile of the user's trip.

Existing Major Roadways

- **U.S. 101** is an eight-lane freeway and principle north-south roadway connection between San Francisco, San Jose, and intermediate San Francisco Peninsula cities. In South San Francisco, US-101 is located approximately one mile west of the project site and serves the East of 101 area with three primary access points. Near the project, US-101 carries about 220,000 vehicles per day and defines the East of 101 area's western edge and barrier to east-west bicycle and pedestrian connectivity. Access points include:
  - *Northern Access – Oyster Point Boulevard:* Northbound on- and off-ramps intersect Dubuque Avenue at and immediately south of Oyster Point Boulevard. Southbound on-ramps are at Dubuque Ave, adjacent to the Northbound off-ramp. The southbound off-ramp intersects Gateway Boulevard/Oyster Point Boulevard as the intersection's fifth leg.

- *Central Access – East Grand Avenue:* Northbound off-ramps are at East Grand Avenue/Poletti Way and on-ramps are to the west at Grand Avenue/Airport Boulevard. Southbound off-ramps are at Airport Boulevard/Miller Avenue. There is no southbound freeway access at this location.
- *Southern Access –Gateway Boulevard*: Northbound on- and off-ramps are at South Airport Boulevard/Wondercolor Lane; southbound on- and off-ramps are immediately south of the San Mateo Avenue/Produce Avenue/South Airport Boulevard intersection.

- **East Grand Avenue** is an east-west arterial street. It has six travel lanes west of Gateway Boulevard, four travel lanes east of Gateway Boulevard, and two travel lanes east of Haskins Way. US-101 freeway ramps at East Grand Avenue enable project site access from the south. East Grand Avenue carries about 17,000 vehicles per day.
- **Airport Boulevard** runs roughly parallel to US-101 in South San Francisco. Freeway ramps south of Grand Avenue provide alternate project access from the south. Airport Boulevard carries approximately 24,000 vehicles per day.
- **Gateway Boulevard** is a four-lane north-south arterial that connects East Grand Avenue with South Airport Boulevard and Oyster Point Boulevard. Class II bicycle lanes exist between East Grand Avenue and South Airport Boulevard. The corridor provides project access from the north via US-101 ramps at Oyster Point Boulevard. Gateway Boulevard carries approximately 12,000 vehicles per day.
- **Forbes Boulevard** is a four-lane street extending north from East Grand Avenue, then running east into the Genentech campus, terminating at DNA Way. East of Allerton, Forbes Boulevard has two lanes and Class II buffered bicycle lanes. Principle project access is provided via Forbes Boulevard, immediately west of the Allerton Avenue intersection.
- **Allerton Avenue** is a two-lane road with Class II buffered bicycle lanes connecting East Grand Avenue with Forbes Boulevard along the western edge of the Genentech Campus. The project site is adjacent to the northerly endpoint at Forbes Boulevard.

Existing Transit Facilities

The project site is not served directly by regional rail, ferry, or bus transit services, but regional rail service (Caltrain and BART), ferry service, and bus service (SamTrans) is provided in the greater project vicinity. BART and Caltrain stations and the WETA ferry terminal are located beyond of a comfortable half-mile, ten-minute walking distance, and no SamTrans bus service exists east of US-101 in South San Francisco. The project therefore relies on supplementary public shuttle services to connect employees with regional transit. Existing first- and last-mile shuttle service is available for the East of 101 area. However, shuttle access is provided by an existing stop 0.2 mile away, at the intersection of Allerton Avenue and Carlton Court which is served by all Utah/Grand area shuttles. These routes connect with Caltrain, BART, and the WETA ferry terminal. While all Oyster Point area shuttle routes pass the project site on Forbes Boulevard, none stop within walking distance of the site.

The following transit services operate within San Francisco and are accessible from the project site with a bicycle or first- and last-mile shuttle connection:

- **Bay Area Rapid Transit (BART)** provides regional rail service between the East Bay, San Francisco, and San Mateo County, connecting between San Francisco International Airport and Millbrae Intermodal Station to the south, San Francisco to the north, and Oakland, Richmond, Pittsburgh/Bay Point, Dublin/Pleasanton and Fremont in the East Bay. The South San Francisco

Station is located approximately four miles northwest of the project at Mission Road and McLellan Drive. BART trains operate on 15-minute headways during peak hours, and 20-minute headways during off-peak hours.

- **Caltrain** provides passenger rail service on the Peninsula between San Francisco and San Jose, and limited service trains to Morgan Hill and Gilroy during weekday commute periods. The South San Francisco Caltrain Station is currently located approximately one mile west of the project at 590 Dubuque Avenue, on the east side of US-101, immediately north of East Grand Avenue. By 2020, Caltrain plans to relocate the South San Francisco Caltrain Station several hundred feet to the south near the Grand Avenue/Airport Boulevard intersection and provide more direct pedestrian access to the East of 101 area via a tunnel with access at East Grand Avenue and Poletti Way. The South San Francisco Caltrain Station serves local and limited trains, with 23 northbound and 23 southbound weekday trains. The South San Francisco Caltrain Station provides weekday service from 5:40 a.m. to 12:00 a.m., with 60-minute headways during off-peak times.
- **Water Emergency Transportation Authority (WETA)** provides weekday commuter ferry service between Oakland/Alameda ferry terminals and the South San Francisco Ferry Terminal at Oyster Point. There are three morning departures from Oakland/Alameda to South San Francisco, and three evening departures from South San Francisco to Oakland/Alameda. The South San Francisco Ferry terminal is located approximately 1 mile from the project site.
- **San Mateo County Transit District (SamTrans)** provides bus and rail service (through Caltrain) in San Mateo County, but does not serve the East of 101 employment area. The closest bus stops to the project site are approximately 1.5 miles to the west at the intersection of Airport Boulevard and Grand Avenue and are served by Routes 292 and 397.

Existing Pedestrian Facilities

Pedestrian facilities include sidewalks, crosswalks, trails, and pedestrian signals. In the project vicinity, continuous sidewalks exist along the north side of Forbes Boulevard only, except east of the Allerton Avenue intersection where continuous sidewalks exist on both sides of the roadway for approximately 900 feet. At the intersection of Forbes Boulevard and Allerton Avenue, an all-way "stop" controlled intersection immediately adjacent to the project site, marked, high visibility "ladder" crosswalks are provided on two of the three intersection legs. Sidewalks exist on the east side of Allerton Avenue between Forbes Boulevard and Cabot Road, which provides continuous pedestrian connectivity between the project site and the nearest existing shuttle stop.

A segment of the San Francisco Bay Trail runs along the shoreline in the East of 101 area, providing a continuous off-street shared-use trail connection between Brisbane's Sierra Point to the north and South Airport Boulevard at the San Bruno Canal to the south. The Bay Trail is a public pedestrian and bicycle trail that is planned to extend around the entire San Francisco Bay. To the north of the project site, the Bay Trail connects to the South San Francisco Ferry Terminal to Forbes Boulevard, allowing bicyclists and pedestrians traveling between the Ferry Terminal and the project site to avoid circuitous and steeper routing via Gull Drive. Currently, there are gaps in the trail to the north of Brisbane, and just south of South San Francisco.

Existing Bicycle Facilities

Bicycle facilities consist of separated bikeways, bicycle lanes, routes, trails, and paths, as well as bike parking, bike lockers, and showers for cyclists. Caltrans recognizes four classifications of bicycle facilities (Appendix TIA):

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

The area surrounding the project site has a partially complete bicycle network that provides first- and last-mile connectivity to the South San Francisco Ferry Terminal but lacks dedicated bicycle connections to the Caltrain station and residential uses west of US-101. Bicycle facilities in the project vicinity are as follows:

- **East Grand Avenue** has Class II bicycle lanes between Littlefield Avenue and Allerton Avenue and between Haskins Way and the South Campus entrance; Class II bike lanes are planned for the remainder of East Grand Avenue and Grand Avenue.
- **Forbes Boulevard** has Class II buffered bicycle lanes between Allerton Avenue and DNA Way.
- **Allerton Avenue** has Class II buffered bicycle lanes between Forbes Boulevard and East Grand Avenue.
- **The San Francisco Bay Trail (Bay Trail)** is a Class I shared pedestrian, bicycle, and non-motorized vehicle pathway along the Oyster Point shoreline and Point San Bruno, part of a planned 400-mile regional trail system encircling the San Francisco Bay shoreline.

4.1.2 Impact Analysis

a. Methodology and Significance Thresholds

Methodology

As described in the TIA, traffic counts were collected during the morning and evening peak periods in November 2019 at the approaches and departures of four freeway on- and off- ramps listed below (Appendix TIA):

1. US-101 Southbound Off-Ramp at Oyster Point Boulevard
2. US-101 Northbound Off-Ramp at East Grand Avenue

Given guidance from OPR, the home-based work vehicle miles traveled (HBW VMT) per employee metric was utilized to measure the project VMT and compare the proposed project's transportation efficiency to the regional average. For the purposes of this analysis, the Bay Area region was selected as the geographic boundary. Existing per capita VMT data, expressed as HBW VMT per employee, was extracted from similar existing land uses in the East of 101 area as a proxy for the project to reasonably assess the project VMT. C/CAG has set forth guidelines to reduce the number of net new vehicle trips generated by new land development. The C/CAG bi-county travel demand

model was used to obtain employee population data and total HBW VMT from the appropriate East of 101 transportation analysis zone.

Vehicle Miles Traveled

As described in the TIA, since the City has not yet adopted a VMT threshold, an interim project threshold was developed based on the metrics and methods described in the OPR's VMT Technical Overview (OPR 2018). As documented in Section 4.1.1.a, *Regulatory Setting*, while OPR suggests a reduction in VMT of 15 percent below the regional average, analysis of GHG reduction goals performed by CARB indicates that a reduction of at least 16.8 percent of light-duty[2] vehicle VMT is necessary to reach statewide goals. Most project trips would be light-duty vehicles.

Significance Thresholds

CEQA Guidelines Appendix G provides the following general thresholds to determine that significant impacts to transportation could occur if a project action would:

1. Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities
2. Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)
3. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)
4. Result in inadequate emergency access

b. Project Impacts and Mitigation Measures

Threshold a:	Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

IMPACT TRA-1 THE PROPOSED PROJECT WOULD CONFLICT WITH PLANS ADDRESSING BICYCLE AND PEDESTRIAN FACILITIES. THIS IMPACT WOULD BE LESS THAN SIGNIFICANT WITH MITIGATION.

Roadway Facilities

As described above in Section 4.1.1.a, *Regulatory Setting*, Policy CIR-1 of the East of 101 Area Plan requires that new projects not cause intersections to operate below LOS D. In December 2019, California's Third District Court of Appeal ruled that under SB 743, automobile delay shall no longer be treated as a significant impact in CEQA analysis (*Citizens for Positive Growth & Preservation v. City of Sacramento* 2019 WL 6888482). Nevertheless, this analysis provides a discussion of the project's effects on LOS for informational purposes, because it is relevant to consistency with the City's General Plan policies related to the circulation system, including Policy CIR-1. An analysis of impacts related to VMT as required under SB 743 follows, under Impact TRA-2.

The existing traffic operations analysis in the TIA shows several major intersections in the East of 101 area near the project site operate at levels of service below the City's General Plan standard of LOS D. However, the new vehicle trips generated by operation of the proposed project would not cause any intersection to change from acceptable to unacceptable LOS (for example, from LOS D to

[2] A light-duty vehicle is any motor vehicle with a gross vehicle weight rating of 10,000 pounds or less, including any standard passenger vehicle.

LOS E). Under the proposed project, all intersections would continue to operate under their current LOS. Therefore, the project's impacts to roadway facilities would be less than significant.

Transit Facilities

As described in the TIA, LOS was also found to be a reasonable proxy to evaluate the project's effect on transit operations in the project vicinity (Appendix TIA). For example, with substantially greater congestion, it becomes more difficult for bus drivers to merge back into a traffic lane after pulling over to a bus stop.

Transit operations in the project vicinity consist of first- and last-mile public, Commute.org shuttles. The existing traffic operations analysis in the TIA shows several major intersections in the East of 101 area near the project site operate at levels of service below the City's General Plan standard of LOS D, including two intersections that are traversed by first- and last-mile, public Commute.org shuttles that serve the area around the project site. However, as described above, the TIA concludes that new trips generated by the proposed project would not cause studied intersections to change from acceptable to unacceptable LOS. Therefore, the impacts related to local transit and shuttle services would be less than significant.

Bicycle and Pedestrian Facilities

The proposed project would include parking spaces for 59 bicycles. In addition, bicycle and pedestrian access to the project site would be provided via a pathway that connects the main entrance of the structure directly to Forbes Boulevard. Secondary access to the project site would be provided via a proposed, Class I, shared-use bicycle and pedestrian trail, north of the proposed buildings where a vacant portion of railroad tracks exists currently. As discussed in the TIA, on-site connectivity would be consistent with the City's multimodal site design objectives (Appendix TIA). Additional off-site improvements would be needed, however, to meet the City's Pedestrian Master Plan access policies and General Plan Complete Streets policies. Specifically, because the proposed project would involve removal of the existing driveway at Forbes Boulevard, an accessible crosswalk would need to be installed to provide full pedestrian connectivity. Implementation of Mitigation Measure TRA-1 would require installation of the crosswalk and reduce impacts to a less than significant level.

Mitigation Measures

TRA-1 Crosswalk Improvements

The applicant shall design crosswalk and accessibility improvements at Forbes Boulevard and Allerton Avenue. These improvements shall include a marked crosswalk and necessary accessibility improvements per City standards across the western portion of the Allerton Avenue and Forbes Boulevard intersection to enable direct pedestrian connections to the closest existing first- and last-mile shuttle stop at Allerton Avenue and Cabot Road. The City shall not issue a building permit unless it has reviewed and approved the improvements prior to building permit approval, and the applicant shall implement these improvements during construction, which are then subject to final approval by the City.

Significance After Mitigation

With implementation of Mitigation Measure TRA-1, project impacts related to the circulation system would be less than significant.

Threshold b:	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

IMPACT TRA-2 THE PROPOSED PROJECT WOULD GENERATE PER-EMPLOYEE VMT AT A GREATER RATE THAN THE CITY'S ESTABLISHED THRESHOLD FOR THIS PROJECT. THIS IMPACT WOULD BE SIGNIFICANT AND UNAVOIDABLE.

As described in the TIA, a significance threshold of 11.8 VMT based on a reduction of 16.8 percent below the Bay Area regional average of 14.2 VMT per employee was utilized to assess impact significance for VMT (Appendix TIA). The project would generate 15.8 VMT per employee under existing conditions. Table 5 provides a comparison of VMT within the Bay Area and the East of 101 Area. Because the project would generate VMT greater than the 11.8 VMT per-employee significance threshold, impacts would be significant.

Table 5 Project Vehicle Miles Traveled Impact Determination

Location	Total HBW VMT	Total Employment	HBW VMT per employee
Bay Area Region	60,734,355	4,269,979	14.2
East of 101 Area	291,819	18,521	15.8
VMT Per Employee Threshold			**11.8**
Exceeds Threshold?			**Yes**

HBW VMT = home-based work VMT

Source: Appendix TIA

As a component of the City's on-going SB 743 implementation, the City may develop and adopt a set of preferred VMT mitigation measures and methodologies for quantifying the reductions resulting from these mitigation measures. These mitigation measures for significant VMT impacts could include TDM strategies, travel demand targets, and enforcement mechanisms based on the City's current TDM ordinance. As described in Section 2.7, *Required Approvals,* the project would be required to implement an approved TDM Plan. In addition, under the City's TDM ordinance, 35 percent of the trips to and from the site would be required to be by persons not driving alone (referred to as non-drive alone mode share in Appendix TIA).

However, reductions in the number of single drivers are not necessarily interchangeable with VMT reductions on a percentage point-for-percentage point basis for two reasons. First, a non-drive alone mode includes passenger-vehicle modes that may not result in VMT reductions on their own. Second, the 35 percent target does not influence the distance vehicles must travel to and from the project site. As a single-use, employment center, all home-based trips must begin and end outside the East of 101 area, requiring longer travel on auto-oriented roadways or via limited transit service.

The TIA found that the project's proposed TDM Plan would likely meet the 35 percent alternative mode of transportation target. However, the TDM Plan would not achieve the necessary VMT per-employee reduction necessary alone. Therefore, Mitigation Measure TRA-2 would be required to further reduce impacts related to VMT.

Mitigation Measures

TRA-2 Vehicle Miles Traveled Reduction

As part of the proposed project, the applicant shall design and implement the following off-site improvements to support the project's first- and last-mile TDM strategies necessary to achieve the estimated nine percent reduction in VMT per employee (Appendix TIA). The applicant shall show these improvements on the plans submitted to the City for building permit approvals and the applicant shall implement them prior to certificate of occupancy of the new office building as follows:

- Implement eastbound and westbound Class II buffered bicycle lanes along Forbes Boulevard between Allerton Avenue and Eccles Avenue, spanning approximately 2,000 linear feet.
  - The improvement consists primarily of restriping the curbside vehicle travel lane in each direction to a Class II buffered bicycle lane, installing signage, and implementing bicycle traffic signal detection upgrades at Eccles Avenue as required.
- Accommodate potential future on-street shuttle stop along the project site's Forbes Boulevard frontage. Provide a minimum 5-foot long by 8-foot wide (as measured perpendicular to the curb) sidewalk in the public right-of-way, adjacent to the project frontage and approximately 50-feet downstream from the Forbes Boulevard and Allerton Avenue intersection. The existing curb alignment would not be substantially altered, and the final configuration shall be reviewed by City staff.
- Coordinate with Commute.org and/or Genentech's gRide transportation program to determine the feasibility of serving the above shuttle stop

Significance After Mitigation

The bicycle facility required under TRA-2 would close a gap between existing bicycle lanes to the east and a planned Class I shared-use pathway between Eccles Avenue and the South San Francisco Caltrain station. When implemented, the bicycle lanes would provide dedicated bicycle facilities between the project site and two regional transit stations: Downtown South San Francisco Caltrain Station and the South San Francisco Ferry Terminal, enabling first- and last-mile bicycle connections to regional transit Therefore, with implementation of Mitigation Measure TRA-2, the project would implement first- and last-mile alternative mode of transportation strategies outlined in the project's proposed TDM Plan. However, this mitigation measure is unlikely to reduce the Project impact on VMT by 25 percent to reach a less-than-significant level. Therefore, this impact would be significant and unavoidable.

Threshold c:	Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?
Threshold d:	Would the project result in inadequate emergency access?

IMPACT TRA-3 THE PROPOSED PROJECT WOULD NOT SUBSTANTIALLY INCREASE HAZARDS DUE TO A GEOMETRIC DESIGN FEATURE OR RESULT IN INADEQUATE EMERGENCY ACCESS. IMPACTS WOULD BE LESS THAN SIGNIFICANT.

Under current conditions, emergency access to the project site is provided via existing roadways in the project vicinity. The project would occur on a previously developed parcel and would not alter

or affect existing street and intersection networks and driveways. The project would not include hazardous design features, such as sharp curves or dangerous intersections, nor would it create hazardous conditions by introducing incompatible uses. Therefore, the project would not result in increased hazards from design features and emergency access would not be affected. Impacts would be less than significant.

c. Cumulative Impacts

As described in the TIA, cumulative conditions include transportation demand resulting from reasonably foreseeable land use changes and conditions associated with funded transportation projects until the year 2040 (Appendix TIA). Based on the City of South San Francisco's TDM, cumulative traffic projections were estimated based on corresponding land use and trip generation forecasts. Included in the analysis of cumulative impacts are the long-range land use changes anticipated in Plan Bay Area 2040, as represented in the C/CAG Model. Under "Cumulative Plus Project" conditions, the project would increase levels of service incrementally in the East of 101 area. The increase in average delay would be minimal and encompasses the buildout of the Genentech Master Plan campus and long-range land use changes.

A long-range cumulative VMT analysis was not performed since city or regional-scale sustainable land use and transportation policy changes are necessary to substantially reduce HBW VMT per employee. Overall, the existing land use and transportation characteristics of the East of 101 area contribute to the East of 101 Area's higher-than-average VMT per employee. As a single-use employment center, all home-based trips begin or end outside the East of 101 area, requiring longer travel along auto-oriented roadways or via transit service that is currently not competitive with the automobile (Appendix TIA).

OPR provides the following guidance regarding cumulative impacts analysis and VMT:

> When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term environmental goals and relevant plans would have no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa (OPR 2018).

As described above in Section 4.1.2.b, *Project Impacts and Mitigation Measures*, the proposed project would result in significant and unavoidable impacts related to VMT (Impact TRA-2). Because the analysis for this project was based on a VMT per employee metric, the significant impact implies that the project would also have a cumulatively considerable contribution to a significant cumulative impact. There are no feasible mitigation measures that would reduce the significant cumulative impact.

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5 Other CEQA Required Discussions

This section discusses growth-inducing impacts and irreversible environmental impacts that would be caused by the proposed project.

5.1 Growth Inducement

CEQA Guidelines Section 15126(d) requires a discussion of a proposed project's potential to foster economic or population growth, including ways in which a project could remove an obstacle to growth. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental effects. The proposed project's growth inducing potential is therefore considered significant if project-induced growth could result in significant physical effects in one or more environmental issue areas.

5.1.1 Economic and Population Growth

The project would not directly induce local residential growth because it would not involve the construction of new housing. However, the project would increase employment in the city with the addition of approximately 451 employees on a campus-like office environment (Appendix TDM). This increase in jobs in the city could indirectly result in population growth.

As described in the Initial Study Section 14, *Population and Housing* (Appendix IS), because the proposed office building would be consistent with applicable zoning regulations and the site's General Plan land use designation, the population growth it would create is included in the General Plan buildout analysis. The City's General Plan estimates that total employment in the city would increase by 31,226 jobs, from 21,654 in 1998 to 52,880 in 2020. The 451 new jobs anticipated to be created by the project would therefore be approximately 0.01 percent of the City's General Plan employment growth estimate. Furthermore, Plan Bay Area projects the Bay Area will add 1,275,530 total jobs by 2040 (Association of Bay Area Governments 2017); the 451 new jobs created by the project would be 0.03 percent of the expected growth in the Bay Area. Given that the project would result in only an incremental increase in jobs, the project would not induce population growth beyond the growth forecasts for the city or the Bay Area.

The project would also generate short-term employment opportunities during construction activities. However, the increase in jobs during construction would be small and temporary in nature. Moreover, construction activities would be expected to draw workers primarily from the existing regional work force. This incremental increase in employment opportunities in the city would therefore not substantially induce population growth through the provision of new jobs.

As discussed in Section 2, *Project Description,* the project would involve the demolition of an existing manufacturing and warehouse structure and the construction of an office building, an associated parking structure, and a recreational trail. The project is in an urbanized area and would not significantly affect scenic resources, air quality, GHG emissions, native biological habitats, known cultural resource remains, hydrology, or other environmental resources with implementation of mitigation measures (Appendix IS). Therefore, the new jobs created by the project would not result in significant long-term physical environmental effects.

During project construction and operation, the incremental population increase would likely contribute to the local economy as demand for general goods increases, which in turn could result in incremental economic growth for various sectors. However, construction workers and office employees on the project site would be expected to primarily use existing commercial services in the city and would therefore create only a relatively minor need for expanded services. The project would therefore not induce economic expansion to the extent that significant environmental impacts directly associated with the project's contribution would occur.

5.1.2 Removal of Obstacles to Growth

The project site is fully developed and served by existing municipal services and infrastructure and the project would not require an extension of services or infrastructure that would induce population growth. The project would not involve roadway extensions or other changes that would induce growth or remove obstacles to growth. Subsequent projects in the area would also be subject to CEQA compliance. Therefore, the proposed project would not have a significant effect in removing obstacles to growth.

5.2 Irreversible Environmental Effects

CEQA Guidelines Section 15126(c) requires that EIRs contain a discussion of significant irreversible environmental changes. This section addresses non-renewable resources, the commitment of future generations to the proposed uses, and irreversible impacts associated with the proposed project.

The project would involve demolition of an existing vacant warehouse building in the city of South San Francisco, construction of two new structures, one office building, and one parking structure, and conversion of existing railroad tracks into a pedestrian and bicycle path. Project construction and operation would involve an irreversible commitment of construction materials and energy, including non-renewable energy resources to construct and operate the proposed office structure. Consumption of these resources would occur with any development in the region and would therefore not be unique to the project.

The project would also irreversibly increase local demand for non-renewable energy resources such as petroleum products and natural gas. However, increasingly efficient building design, automobile engines, and a proposed TDM Plan would offset this demand to some degree. As described in the Initial Study Section 6, *Energy* (Appendix IS) the project would be subject to the energy conservation requirements of the California Green Building Standards Code. The California Green Building Standards Code requires specific requirements related to recycling, construction materials, and energy efficiency standards, which apply to construction of non-residential structures and water-efficient plumbing fixtures and fittings, outdoor water use, electric vehicle-charging parking spaces, and other energy-efficient measures in all new non-residential structures to minimize wasteful, inefficient, and unnecessary energy consumption. Consequently, the project would not use unusual amounts of energy or construction materials and impacts related to consumption of non-renewable and slowly renewable resources would be less than significant. Consumption of these resources would occur with any development in the region and would not be unique to the project.

The project would also require a commitment of law enforcement, fire protection, water supply, wastewater treatment, and solid waste disposal services. However, as discussed in the Initial Study, Sections 15 and 19 (Appendix IS), impacts to these service systems would be less than significant.

Additional vehicle trips associated with the project would incrementally increase local traffic and regional air pollutant and GHG emissions. However, as discussed in the Initial Study Sections 3, *Air Quality,* and 8, *Greenhouse Gas Emissions* (Appendix IS), impacts associated with pollutants and emissions would be less than significant.

CEQA requires decision makers to balance the benefits of a project against its unavoidable environmental risks in determining whether to approve a project. The analysis contained in this EIR concludes that the project would result in significant and unavoidable impacts related to transportation. However, the proposed project would result in benefits for the City of South San Francisco. The project would develop an underutilized site into an office building that would provide new employment opportunities for City residents. Moreover, the new building would be constructed in an area of the City where office uses are encouraged, the east of 101 area, and would be consistent with surrounding uses and development patterns.

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6 Alternatives

As required by *CEQA Guidelines* Section 15126.6, this EIR examines a range of reasonable alternatives to the proposed project that would attain most of the basic project objectives but would avoid or substantially lessen the significant adverse impacts.

As discussed in Section 2, *Project Description*, the project objectives are:

1. Develop an underutilized site into an office/research & development campus at 499 Forbes Boulevard that provides public and private amenities, as well as, numerous transportation alternatives to the single-occupancy-vehicle to encourage, incentivize, and reduced vehicle trips and parking demand on-site and in the project vicinity.
2. Construct a flexible facility that will allow for office/research & development uses that will create quality jobs for South San Francisco residents.
3. Build an economically viable project that will enhance property values in the City's East of 101 area and be consistent with the goals of the South San Francisco General Plan and Zoning Ordinances.

Included in this analysis are three alternatives, including the CEQA-required "no project" alternative, that involve changes to the project that may reduce the project-related environmental impacts as identified in this EIR. Alternatives have been developed to provide a reasonable range of options to consider that would help decision makers and the public understand the general implications of revising or eliminating certain components of the proposed project.

The following alternatives are evaluated in this EIR:

- Alternative 1: No Project
- Alternative 2: Research and Development Building
- Alternative 3: Reduced Size Office Building

Detailed descriptions of the alternatives are included in the impact analysis for each alternative. The potential environmental impacts of each alternative are analyzed in Sections 6.1, 6.2, and 6.3, respectively.

6.1 Alternative 1: No Project Alternative

6.1.1 Description

The No Project Alternative assumes that no new structures would be built on the project site and that the existing structure would remain. The site would remain underutilized. In addition, there would be no improvements to the railroad tracks for the City's Rails-to-Trails program.

6.1.2 Impact Analysis

The No Project Alternative assumes that the proposed office structure, associated parking structure, surface parking, and improvements to the railroad tracks are not constructed. As such, this alternative would have generally reduced impacts with respect to aesthetics, air quality, biological resources, GHG emissions, hydrology and water quality, traffic, and noise. Project construction

impacts would be avoided because no development would occur on the project site. No mitigation measures would be required for the No Project Alternative.

The No Project Alternative would not meet any of the project objectives. This alternative would not redevelop an underutilized site, would not develop public and private amenities, create jobs, or enhance property values in the city's East of 101 area. Furthermore, this alternative would not preclude future development of the site.

a. Aesthetics

Like the proposed project, the No Project Alternative would result in less than significant aesthetics impacts. The project site is not located near a state designated scenic highway and would not affect scenic vistas. The existing use would remain consistent with surrounding land uses and zoning of the project site and would not substantially change the existing lighting environment of the neighborhood or introduce substantial glare. Under this alternative, the existing vacant structure would remain unused and the existing rail tracks would continue to be overgrown with vegetation. The vacant site could become an attractive nuisance and easily vandalized. Overall, because of the existing unmaintained state of the project site, aesthetic impacts under the No Project Alternative would be slightly greater than under the proposed project.

b. Agriculture and Forestry Resources

Similar to the proposed project, the No Project Alternative would not involve construction or conversion of designated farmland to non-agricultural uses and would not result in a conflict with agricultural zoning, a Williamson Act contract, or conversion forest land or timberland to non-forest uses. Therefore, no impacts would occur, same as the proposed project.

c. Air Quality

The No Project Alternative would not require construction activities on the site. Under this alternative, no new air quality emissions would be introduced within the project vicinity. Because the site currently contains a vacant warehouse, there would also be no operational air quality emissions. Furthermore, the No Project Alternative would involve neither increased nor decreased vehicle use in the project vicinity and would therefore not substantially contribute to changes in air quality emissions from vehicle trips. There would be no impacts, and impacts would be reduced compared to the proposed project.

d. Biological Resources

The No Project Alternative would not involve construction activities which could disturb the limited biological resources on the site. Therefore, Mitigation Measure BIO-1 would not be required. Impacts would be less than significant and reduced compared to the proposed project.

e. Cultural Resources

Since the No Project Alternative would not involve construction, there would be no impacts related to the discovery of unidentified archaeological resources and human remains. Therefore, implementation of Mitigation CR-1 would not be required. There would be no impacts, and impacts would be reduced compared to the proposed project.

f. Energy

The No Project Alternative would not require the additional use of energy during project construction or operation. In addition, this alternative would not require additional energy associated with new transportation to or from the project site. There would be no impacts, and impacts would be reduced compared to the proposed project.

g. Geology and Soils

The No Project Alternative would result in reduced geology and soils impacts because construction of new structures would not occur. Under this alternative, there would be no impacts related to expansive soils or liquefaction, and the geotechnical design considerations in Mitigation Measures GEO-1 and GEO-2 would not be required. In addition, since this alternative would not involve ground disturbance, there would be no impacts to paleontological resources. There would be no impacts, and impacts would be reduced compared to the proposed project.

h. Greenhouse Gas Emissions

The No Project Alternative would not involve construction, new vehicle trips, or operational emissions that would contribute to GHG emissions. Emissions would remain the same as under existing conditions. Therefore, Under the No Project Alternative, there would be no impacts, and impacts would be reduced compared to the proposed project.

i. Hazards and Hazardous Materials

Since this alternative would not involve demolition or construction activities, impacts related to hazardous materials, including the transport and use of hazardous materials, accidental release of hazardous materials, and interference with an emergency response plan or evacuation plan would be reduced compared to impacts under the proposed project. No hazardous materials are currently used or stored at the project site. The site is not located within 0.25 mile of a school, listed on a database of known hazardous materials contamination sites, or within 2 miles of an airport. There would be no impacts, and impacts would be reduced compared to the proposed project.

j. Hydrology and Water Quality

The No Project Alternative would not involve alteration of the drainage pattern or increased impervious surfaces on the project site. Therefore, this alternative would neither increase nor decrease the amount of surface runoff that currently exits the site. However, because the existing site contains more impervious surfaces than would be provided under the proposed project, this alternative would result in greater impacts related to potential flooding, runoff, and groundwater recharge, although no mitigation measures would be required. The No Project Alternative would have similar impacts related to compliance with water quality control plans and sustainable groundwater management plans. Overall, hydrology and water quality impacts under the No Project Alternative would be less than significant and slightly greater compared to the proposed project.

k. Land Use and Planning

Like the proposed project, the No Project Alternative would not involve a physical division within an established community. However, because the site would remain vacant and underutilized, this alternative would not be consistent with applicable General Plan policies that call for fully utilized

land uses that contribute to economic growth. Land use and planning impacts under the No Project Alternative would be less than significant and slightly greater compared to the proposed project.

l. Mineral Resources

Similar to the proposed project, the No Project Alternative would not involve the use of mineral resources or construction in a mineral resource site. Therefore, there would be no impacts to mineral resources, same as impacts under the proposed project.

m. Noise

The No Project Alternative would not result in new noise sources because it would not involve construction activities or new uses at the project site. There would be no impacts, and impacts would be reduced compared to the proposed project.

n. Population and Housing

Like the proposed project, the No Project Alternative would be consistent with the land use and zoning designations for the site and would not result in the demolition or removal of existing housing within the city. However, because this alternative would not involve construction of new buildings, no new employment or housing would be created. Therefore, this alternative would not induce population growth directly or indirectly. No impacts would occur; impacts would be reduced compared to the proposed project.

o. Public Services

Similar to the proposed project, the No Project Alternative would not directly or indirectly induce population growth. Therefore, Alternative 1 would not substantially reduce the ability of public service providers (including police, fire protections, schools, parks, and other facilities) to maintain service levels. No impacts would occur; impacts would be reduced compared to the proposed project.

p. Recreation

Like the proposed project, the No Project Alternative would not directly increase the population of the City nor would it indirectly increase the population within the City as a result of increased jobs. The No Project Alternative would not redevelop the underused railroad tracks to the north of the project site as part of the City's Rails-to-Trails program and thus, would not contribute to the Mobility 20/20 Plan's goals of improving mobility in the East of 101 area. Similar to the proposed project, the No Project Alternative would not cause substantial physical deterioration of existing facilities or require the expansion of parkland facilities beyond planned future expansions. No impacts would occur; impacts would be reduced compared to the proposed project.

q. Transportation

The No Project Alternative would not involve the construction or operation of new uses at the project site. Therefore, no new traffic from or into the area would be generated and traffic would remain the same. There would be no impacts resulting from conflicts with transit, roadway, bicycle, and pedestrian facilities programs, plans, policies, and ordinances; conflicts with *CEQA Guidelines* Section 15064.3; hazardous design features, or inadequate emergency access. No impacts would

occur, and the No Project Alternative would therefore result in no impacts, or reduced compared to the proposed project.

r. Tribal Cultural Resources

The No Project Alternative would not involve the construction or operation of a project and as such, would have no impacts to Tribal Cultural Resources. No impacts would occur, and compared to the proposed project, the No Project Alternative would result in reduced impacts.

s. Utilities and Service Systems

The No Project Alternative would not involve construction of new structures on the project site. Therefore, water demand, wastewater generation, stormwater requirements, solid waste generation, and other utilities impacts would remain the same as existing conditions. There would be no impacts, and impacts would be reduced compared to the proposed project.

t. Wildfire

The No Project Alternative, similar to the proposed project, would not be in a state or local fire hazard severity zone. The No Project Alternative would not introduce new structures or uses to the project site that would need to be serviced by the city's Fire Department. Like the proposed project, the No Project Alternative would not interfere with emergency response or evacuation plans or exacerbate fire risk in the area. No impacts would occur, same as the proposed project.

6.2 Alternative 2: Research and Development Building

6.2.1 Description

Alternative 2 would involve demolition of the existing warehouse building and construction of a five-story structure (128,737 square feet), similar in size to the proposed project but used exclusively for research and development rather than office uses. Like the proposed project, a five-story parking structure would be constructed, and the existing railroad tracks would be converted to a trail as a part of the City's Rails-to-Trails program. This alternative would comply with City codes and zoning regulations. Vehicular access would be from Forbes Boulevard at the south of the site, similar to the proposed project. The research and development building would accommodate approximately 370 employees.[3]

6.2.2 Impact Analysis

a. Aesthetics

Under Alternative 2, the structures would be approximately the same size and in the same location as the proposed project, but views of San Bruno Mountain would remain approximately the same as the existing conditions. Alternative 2 would not affect views of scenic vistas, damage scenic resources, or substantially change the existing lighting environment of the area or introduce substantial glare. Overall, aesthetic impacts under Alternative 2 would be less than significant, same as for the proposed project.

[3] Employee number calculated based on the percent reduction of the structure square footage

b. Agriculture and Forestry Resources

Like the proposed project, Alternative 2 would not involve construction or conversion of designated farmland to non-agricultural uses and would not result in a conflict with agricultural zoning, a Williamson Act contract, or conversion forest land or timberland to non-forest uses. Therefore, as with the proposed project, no impacts would occur.

c. Air Quality

Alternative 2 would involve construction through the year 2022. Air quality emissions from construction would be the same as under the proposed project and below Bay Area Air Quality Management District (BAAQMD thresholds, based on the BAAQMD's CEQA Air Quality Guidelines (BAAQMD 2017). Emissions associated with construction activities for Alternative 2 would be virtually identical to the proposed project.

Operational air quality emissions under Alternative 2 would also be within BAAQMD thresholds, per the BAAQMD CEQA Air Quality Guidelines. Table 6 summarizes maximum annual operational emissions for each criteria pollutant, which includes area, energy, and mobile source emissions for Alternative 2. Operational air pollutant emissions under Alternative 2 would be reduced compared to the proposed project in part because there would be fewer vehicle trips. As with the proposed project, a TDM Plan for the project would be required to mitigate impacts related to transportation emissions. Alternative 2 would not result in substantially increased criteria air pollutants or CO emissions. Air quality emissions under Alternative 2 would therefore be less than significant and reduced compared to the proposed project.

Table 6 Alternative 2 Air Quality Thresholds of Significance - Operation

Pollutant/Precursor	Maximum Annual Emissions (tons/year)	Significance Threshold (tons/year)	Significant Impact?
ROG	0.7	10	No
NO_X	0.4	10	No
PM_{10}	0.5	15	No
$PM_{2.5}$	0.1	10	No

Source: Appendix ALT

d. Biological Resources

The project site is in an urbanized and built-up area with little habitat for sensitive plant or animal species. No native vegetation communities and no individuals or signs of special-status species were observed on the project site. Since Alternative 2 would involve construction within the project site, no new or increased impacts to riparian habitat, wetlands, or migratory fish or wildlife would occur. As with the proposed project, construction activities could result in impacts to nesting birds. Mitigation Measure BIO-1 would be required to reduce potential impacts to nesting birds. No additional mitigation measures would be required to reduce impacts. Impacts under Alternative 2 would therefore be less than significant with mitigation, same as the proposed project.

e. Cultural Resources

Alternative 2 would involve construction on the same project site as the proposed project and would involve approximately the same amount of ground disturbance as the proposed project.

Therefore, as with the proposed project, the unanticipated discovery of archaeological resources could occur during construction activities. Implementation of Mitigation Measure CR-1 and compliance with applicable federal and state regulations would ensure that these impacts would be less than significant. Impacts under Alternative 2 would be less than significant with mitigation, same as the proposed project.

f. Energy

As with the proposed project, Alternative 2 would involve demolition of the existing structure and construction and operation of two new structures on the project site. Construction activities associated with Alternative 2 would require the use of the same amount of energy as the proposed project.

Alternative 2 would have reduced impacts related to operation. Table 7 summarizes gasoline and diesel fuel consumption and electricity and natural gas use under Alternative 2. Operational energy use would be reduced under Alternative 2 because there would be fewer vehicle trips during operation than under the proposed project. Gasoline and diesel energy consumption would be reduced by approximately 2,000 million British Thermal Units (MMBtu). Operational electricity and natural gas usage would be similar to the proposed project because research and development use could use a similar amount of electricity and natural gas as office use. Electricity consumption would be reduced by approximately 2,000 MMBtu. Overall, energy demand and energy use of Alternative 2 would be less than significant and reduced compared to the proposed project.

Table 7 Alternative 2 Operational Energy Usage

Source	Energy Consumption	
Vehicle Trips		
Gasoline	43,704.4 gallons	4,798.1 MMBtu[1]
Diesel	8,114.4 gallons	1,034.3 MMBtu[1]
Built Environment		
Electricity	1.1 GWh	3,719.2 MMBtu
Natural Gas Usage	0.03 U.S. Therms	0.0 MMBtu

[1] CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015).

Source: Appendix ALT

g. Geology and Soils

Alternative 2 would involve development on land that is potentially susceptible to liquefaction, could result in lateral spreading, and is located on expansive soil. Therefore, as with the proposed project, Alternative 2 would require Mitigation Measures GEO-1 and GEO-2 to reduce impacts to less than significant through seismic design and foundation improvements, like the proposed project. Overall, geology and soils impacts under Alternative 2 would be less than significant with mitigation, same as the proposed project.

h. Greenhouse Gas Emissions

Alternative 2 would involve similar construction activities as the proposed project. Therefore, GHG emissions would be similar to those described under the proposed project and are anticipated to be

within BAAQMD thresholds, per the BAAQMD's CEQA Air Quality Guidelines. Alternative 2 would comply with Plan Bay Area 2040, the City of South San Francisco's Climate Action Plan, and the same Standard Conditions of Approval as those set forth for the proposed project. Therefore, Alternative 2 would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions.

Operational GHG emissions would be lower under Alternative 2 than the proposed project, because there would be fewer employees than under the proposed project. The reduction in the number of employees would result in fewer vehicle trips to and from the project site. Furthermore, Alternative 2 would require the adoption of a TDM plan which would further reduce the number of vehicle trips to the project site. Per the City of South San Francisco Municipal Code (SSFMC) Chapter 20.400.002, any nonresidential project that could potentially generate 100 or more average daily trips would be required to submit and comply with a TDM plan. Alternative 2 would comply with a TDM plan to reduce vehicle use to the project site. As with the proposed project, no mitigation measures would be required, and impacts would be less than significant. However, Alternative 2 operational GHG emissions would be reduced compared to the proposed project.

i. Hazards and Hazardous Materials

Construction of Alternative 2 would require the demolition of the existing structure on the project site. The existing structure, may contain hazardous materials, including asbestos and/or lead-based paint due to its age. However, similar to the proposed project, demolition and construction activities on the project site would be required to adhere to BAAQMD, California Occupational Safety and Health Administration, and Department of Toxic Substances regulations related to the storage, removal, and disposal of hazardous materials. Compliance with such regulations would reduce impacts to a less than significant level.

Operation of the new research and development building under Alternative 2 could involve use and storage of hazardous materials. However, all hazardous materials must be handled, transported, and disposed of in compliance with all applicable federal, state, and local regulations. Hazardous materials would be required to be transported under U.S. Department of Transportation regulations (U.S. Department of Transportation Hazardous Materials Transport Act, 49 CFR), which stipulate the types, containers, labeling, and other restrictions to be used in the movement of such material on interstate highways. Impacts related to hazardous materials, including the accidental release of hazardous materials and interference with an emergency response plan or evacuation plan would be greater than the proposed project, as potential use of hazardous materials would increase. Overall, hazards and hazardous material impacts under Alternative 2 would be less than significant, but they would be greater than the proposed project.

j. Hydrology and Water Quality

Like the proposed project, Alternative 2 would result in ground disturbance of more than one acre and would therefore require a National Pollutant Discharge Elimination System Construction General Permit, including preparation of a Stormwater Pollution Prevention Plan describing best management practices specific to the project site and construction activities. Development of Alternative 2 would also be required to comply with SSFMC Sections 14.08.100 and 14.04.180, which include requirements related to wastewater discharge. These requirements would ensure that construction activities would not result in water quality violations, substantial erosion or siltation, or exceedances in stormwater drainage system capacity.

As with the proposed project, Alternative 2 would result in a net reduction of impervious surfaces. Therefore, impacts related to flooding, runoff, and groundwater recharge, compliance with water quality control plans and sustainable groundwater management plans would be less than significant. Overall, hydrology and water quality impacts under Alternative 2 would be similar to the proposed project.

k. Land Use and Planning

Similar to the proposed project, Alternative 2 would not physically divide an established community or significantly conflict with a land use plan, policy, or regulation. Alternative 2 would be consistent with zoning and development standards as set forth by SSFMC Section 20.110.003. The project site is zoned Business Technology Park and has a general plan designation of BTP. Alternative 2 would be consistent with the current zoning and general plan land use designation. Overall, land use and planning impacts under Alternative 2 would be less than significant, same as the proposed project.

l. Mineral Resources

Similar to the proposed project, Alternative 2 would not involve the use of mineral resources or construction in a mineral resource site. Therefore, impacts would be the same as under the proposed project.

m. Noise

Alternative 2 would involve similar demolition and construction activities within the project site as the proposed project would, and impacts related to construction noise would therefore be similar. Construction duration would remain the same. The project site is not near sensitive receptors, and thus would have less than significant noise impacts. As with the propose project, construction would be temporary, and noise related to construction would cease when construction is complete. Operational noise, as with the proposed project, would be that of an office-campus environment and from vehicle noise as it relates to traffic. Under Alternative 2, operational noise and groundborne vibration impacts would be less than significant, similar to the proposed project.

n. Population and Housing

Like the proposed project, Alternative 2 would be consistent with the land use and zoning designations for the site, would not result in the direct incremental increase in population of the City, and would not result in the demolition or removal of existing housing within the city. Alternative 2 would have the potential to indirectly increase population in the area due to the creation of new jobs. However, Alternative 2 would accommodate fewer employees and less population growth would be generated. Therefore, impacts under Alternative 2 would be less than significant and reduced compared to the proposed project.

o. Public Services

As under the proposed project, Alternative 2 would not directly increase the population of the City, and thus would not substantially reduce the ability of public service providers (including police, fire protection, schools, parks, and other facilities) to maintain service levels. Impacts would be less than significant, similar to the proposed project.

p. Recreation

The City of South San Francisco's General Plan Goal calls for the city to provide 0.5 acre of recreation space per 1,000 employees (City of South San Francisco 1999). The addition of approximately 10,000 square feet of gathering space, in the form of small open spaces, on the site for the project's employees would meet the goal. Alternative 2 would introduce fewer employees than the proposed project, and therefore there would be more park acreage per employee than under the proposed project. Furthermore, the incremental increase in population generated by the new jobs would not cause substantial physical deterioration of existing facilities or require the expansion of parkland facilities beyond planned future expansions. Therefore, overall impacts would be less than significant, same as the proposed project.

q. Transportation

As with the proposed project, Alternative 2 would involve removal of the existing driveway at Forbes Boulevard, and off-site improvements, including modifications to the road median, and an accessible crosswalk would be required to provide full pedestrian connectivity. Mitigation Measure TRA-1 would reduce impacts related to conflicts with plans and policies addressing the circulation system to a less than significant level.

Alternative 2 would accommodate fewer employees than the proposed project and therefore would generate fewer vehicle trips to and from the project site. However, as described above in Section 4.1.2, *Impact Analysis*, project VMT impacts were calculated based on existing per employee VMT data extracted from similar existing land uses in the East of 101 area. Given this per employee metric, the difference in number of employees under Alternative 2 would not affect VMT results. Therefore, VMT under Alternative 2 would be the same as VMT under the proposed project. Even with implementation of Mitigation Measure TRA-2, impacts would continue to be significant and unavoidable, similar to the proposed project.

Alternative 2 would not include hazardous design features, such as sharp curves or dangerous intersections, nor would it create hazardous conditions by introducing incompatible uses. There would be less than significant impacts related to hazards or emergency access, similar to the proposed project.

r. Tribal Cultural Resources

As stated in the Initial Study Section 18, *Tribal Cultural Resources* (Appendix IS), no tribes have requested consultation regarding development at the project site under AB 52. Impacts to tribal cultural resources under Alternative 2 would be the same as those under the proposed project.

s. Utilities and Service Systems

Under Alternative 2, water demand, wastewater generation, solid waste generation, and other utilities impacts would be similar to the proposed project, depending on the nature of the research and development use. Stormwater requirements would remain the same as under the proposed project as the overall footprint of the structures would be the approximately the same. CalWater would serve the project site and there would be adequate water supply to serve the project site. Based on Appendix D, default values set forth by the California Air Pollution Control Officers Association, Alternative 2, similar to the proposed project, would generate approximately 63 million gallons per year of wastewater (California Air Pollution Control Officers Association 2017). Similar to the proposed project, Alternative 2 would generate less than 1 percent of the SSFWQCP's remaining

capacity. Overall, utilities and service system impacts would be less than significant, same as the proposed project.

t. Wildfire

The project site is not in a state or local fire hazard severity zone. Alternative 2 would not introduce new structures or uses to the project site that would require additional service from the SSFFD. Like the proposed project, Alternative 2 would not interfere with emergency response or evacuation plans or exacerbate fire risk in the area. As with the proposed project, there would be no impacts related to wildfire.

6.3 Alternative 3: Reduced Size Office Building

6.3.1 Description

Alternative 3 would involve demolition of the existing vacant warehouse building and construction of a three-story office structure (approximately 77,000 square feet) and a two-story parking structure (approximately 158 parking stalls). The existing abandoned railroad tracks would be converted to a trail as a part of the City's Rails-to-Trails program, as with the proposed project. This alternative, like the proposed project, would comply with City codes and zoning regulations. The proposed use of the structures would be similar to surrounding uses in the project area. As with the proposed project, vehicular access would be provided from Forbes Boulevard, towards the south portion of the site. The new office building would accommodate approximately 270 employees[4].

6.3.2 Impact Analysis

a. Aesthetics

Alternative 3 would introduce two shorter structures than the proposed project but views of San Bruno Mountain would remain approximately the same as the existing conditions. Therefore, as with the proposed project Alternative 3 would not affect views of scenic vistas or damage scenic resources. As with the proposed project, this alternative would also be consistent with the zoning and land use designation of the project site and would not substantially change the existing lighting environment of the area or introduce substantial glare. Overall, aesthetic impacts under Alternative 3 would be less than significant, same as under the proposed project.

b. Agriculture and Forestry Resources

Similar to the proposed project, Alternative 3 would not involve construction or conversion of designated farmland to non-agricultural uses and would not result in a conflict with agricultural zoning, a Williamson Act contract, or conversion forest land or timberland to non-forest uses. Therefore, as with the proposed project, no impacts would occur.

c. Air Quality

The construction duration under Alternative 3 would be shorter than under the proposed project. Table 8 provides a summary of the estimated daily emissions (pounds) of pollutants associated with construction under Alternative 3. The proposed project would result in less than significant impacts

[4] Employee number calculated based on the percent reduction of the structure square footage

related to criteria pollutant emissions. Criteria pollutant emissions associated with Alternative 3 construction would be reduced compared to the proposed project.

Table 8 Alternative 3 Air Quality Thresholds of Significance – Construction

Pollutant/Precursor	Alternative 3 Maximum Daily Emissions (pounds/day)	Proposed Project Maximum Daily Emissions (pounds/day)	Significance Threshold (pounds/day)	Significant Impact?
ROG	4.4	16.0	54	No
NO_X	34.3	34.3	54	No
PM_{10}	8.0	8.0	82	No
$PM_{2.5}$	4.6	4.6	54	No

Source: Appendix ALT

Operational air quality emissions would also be reduced under Alternative 3. Table 9 summarizes the project's maximum annual operational emissions for each criteria pollutant. Alternative 3 operational emissions would not exceed BAAQMD thresholds for criteria pollutants. Under the proposed project, impacts related to operational emissions would be less than significant. Operational emissions would be less than significant and reduced compared to the proposed project.

Table 9 Alternative 3 Air Quality Thresholds of Significance – Operation

Pollutant/Precursor	Alternative 3 Maximum Annual Emissions (tons/year)	Proposed Project Maximum Annual Emissions (tons/year)	Significance Threshold (tons/year)	Significant Impact?
ROG	0.4	0.7	10	No
NO_X	0.2	0.4	10	No
PM_{10}	0.3	0.6	15	No
$PM_{2.5}$	0.1	0.2	10	No

Source: Appendix ALT

Vehicle use and vehicle trips would also be reduced under Alternative 3 because it would have fewer employees than the proposed project. The reduced vehicle trips would result in less CO emissions compared to the proposed project. Air quality impacts under the proposed project would be less than significant. Therefore, under Alternative 3, air quality impacts would be less than significant, and reduced compared to the proposed project.

d. Biological Resources

The project site is in a completely urbanized and built-up area with little habitat for sensitive plant or animal species. No native vegetation communities and no individuals or signs of special-status species were observed on the project site. Since Alternative 3 would involve construction within the project site, no new or increased impacts to riparian habitat, wetlands, or migratory fish or wildlife would occur. As with the proposed project, construction activities could result in impacts to nesting birds. Mitigation Measure BIO-1 would be required to reduce potential impacts to nesting birds. No

additional mitigation measures would be required to reduce impacts. Impacts under Alternative 2 would therefore be less than significant with mitigation, same as the proposed project.

e. Cultural Resources

Alternative 3 would involve construction on the same project site as the proposed project and would involve approximately the same amount of ground disturbance as the proposed project. Therefore, as with the proposed project, the unanticipated discovery of archaeological resources could occur during construction activities. Implementation of Mitigation Measure CR-1, and compliance with applicable federal and state regulations would ensure that these impacts would be less than significant. Impacts under Alternative 3 would be less than significant with mitigation, same as the proposed project.

f. Energy

As with the proposed project, Alternative 3 would involve demolition of the existing warehouse building and construction and operation of two structures on the project site. However, Alternative 2 would involve smaller buildings. Construction duration under this alternative would therefore be shorter than the proposed project. Furthermore, energy associated with construction vehicle trips would be reduced due to a shorter construction duration. The anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the project site of the proposed project, would be 80,303.8 gallons of diesel and 11,311.7 gallons of gasoline. Table 10 summarizes the anticipated energy consumption from construction equipment and vehicles, including construction worker trips to and from the project site under Alternative 3. Energy associated with construction under this alternative would be reduced but similar to the proposed project.

Table 10 Alternative 3 Construction Energy Usage

Source	Fuel Consumption (Gallons)	
	Gasoline	Diesel
Construction Equipment and Vendor/Hauling Trips	–	45,042.4
Construction Worker Vehicle Trips	8,468.6	–

Source: Appendix ALT

Operational impacts would also be reduced under Alternative 3. Table 11 summarizes the operational energy consumption of Alternative 3. Compared to the proposed project, gasoline and diesel energy consumption would be reduced by approximately 3,000 MMBtu and electricity consumption would be reduced by approximately 2,000 MMBtu.

Table 11 Alternative 3 Operational Energy Usage

Source	Energy Consumption	
Vehicle Trips		
Gasoline	30,311.8 gallons	3,327.8 MMBtu[1]
Diesel	5,627.8gallons	717.3 MMBtu[1]
Built Environment		
Electricity	1 GWh	3,513.54 MMBtu
Natural Gas Usage	0.01 U.S. Therms	0.01 MMBtu

[1] CaRFG fuel specification of 109,786 Btu/gallon used to identify conversion rate for fuel energy consumption for vehicle classes specified above (CARB 2015).

Source: Appendix ALT

Under the proposed project, impacts related to energy demand and energy use would be less than significant. Overall, energy demand and energy use under Alternative 3 would be less than significant and reduced compared to the proposed project.

g. Geology and Soils

Alternative 3 would involve development on land that is potentially susceptible to liquefaction, could result in lateral spreading, and is located on expansive soil. Therefore, as with the proposed project, Alternative 3 would require Mitigation Measures GEO-1 and GEO-2 to reduce impacts to less than significant through seismic design and foundation improvements. Overall, geology and soils impacts under Alternative 2 would be less than significant with mitigation, same as the proposed project.

h. Greenhouse Gas Emissions

Because Alternative 3 would involve constructing smaller buildings than the proposed project, it would require reduced construction activities and duration. Greenhouse gas emissions associated with construction activities would therefore be less than the proposed project. In addition, development of Alternative 3 would result in fewer new jobs than the proposed project. Therefore, Alternative 3 would generate fewer new vehicle trips during operation than the proposed project.

As with the proposed project, Alternative 3 would comply with Plan Bay Area 2040 and the City of South San Francisco's Climate Action Plan, given compliance with Standard Conditions of Approval. Moreover, Alternative 3 would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions and would be required to comply with a TDM Plan. Similar to the proposed project, under Alternative 3 impacts would be less than significant.

i. Hazards and Hazardous Materials

Like the proposed project, project operation under Alternative 3 would not involve use or storage of hazardous materials. Construction of Alternative 3 would require the demolition of the existing structure, which may hazardous materials due to its age. Similar to the proposed project, demolition and construction activities on the project site would be required to adhere to BAAQMD, Department of Toxic Substances, and California Occupational Safety and Health Administration requirements related to storage, transport, and removal of hazardous materials. Impacts would Alternative 3 would be less than significant. Moreover, as with the proposed project and Alternative

3, hazardous materials used during project operation must be handled, transported, and disposed of in compliance with all applicable federal, state, and local regulations. Hazards and hazardous material impacts would be less than significant, same as the proposed project.

j. Hydrology and Water Quality

Similar to the proposed project, Alternative 3 would result in ground disturbance of more than one acre and would therefore require a National Pollutant Discharge Elimination System Construction General Permit, including preparation of a Stormwater Pollution Prevention Plan describing best management practices specific to the project site and construction activities. Development of Alternative 3 would also be required to comply with SSFMC Sections 14.08.100 and 14.04.180, which include requirements related to wastewater discharge. These requirements would ensure that construction activities would not result in water quality violations, substantial erosion or siltation, or exceedances in stormwater drainage system capacity.

As with the proposed project, Alternative 3 would result in a net reduction of impervious surfaces. Therefore, impacts related to flooding, runoff, and groundwater recharge, compliance with water quality control plans and sustainable groundwater management plans would be less than significant. Overall, hydrology and water quality impacts under Alternative 3 would be less than significant, similar to the proposed project.

k. Land Use and Planning

Similar to the proposed project, Alternative 3 would not physically divide an established community or significantly conflict with a land use plan, policy, or regulation. Alternative 3 would not require a conditional use permit for a greater FAR and would be consistent with the BTP zoning designation and BTP general plan land use designation. Overall, land use and planning impacts under Alternative 3 would be less than significant, similar to the proposed project.

l. Mineral Resources

Similar to the proposed project, Alternative 2 would not involve the use of mineral resources or construction in a mineral resource site. Therefore, there would be no impacts to mineral resources, same as the proposed project.

m. Noise

Alternative 3 would involve the same demolition activities as the proposed project. However, construction under Alternative 3 would be shorter in duration compared to the proposed project. Operational noise and groundborne vibration would be typical of a campus-like office environment, similar to the proposed project. Traffic in the project vicinity would be the primary source of noise. Due to fewer employees under Alternative 3, vehicle use would be less than under the proposed project, and noise levels associated with traffic would therefore be reduced. The project site is not in close proximity to any sensitive receptors and thus, would have less than significant impacts. Overall, Alternative 3 would result in slightly reduced operational noise levels as under the proposed project.

n. Population and Housing

Similar to the proposed project, Alternative 3 would be consistent with the land use and zoning designations for the site, would not result in the direct increase in population of the City, and would

not result in the demolition or removal of existing housing within the city. Alternative 3 could indirectly increase the population within the project vicinity because it would provide new job opportunities. However, Alternative 3 would accommodate fewer employees than the proposed project and would therefore result in reduced population growth. Impacts under the proposed project would be less than significant. Therefore, impacts of Alternative 3 would be less than significant, and reduced compared to the proposed project.

o. Public Services

Similar to the proposed project, Alternative 3 would not directly increase the population of the City, which would not substantially reduce the ability of public service providers (including police, fire protection, schools, parks, and other facilities) to maintain service levels. However, Alternative 3 would accommodate fewer employees than the proposed project and would therefore result in reduced population growth. Therefore, impacts would be reduced compared to the proposed project and would be less than significant.

p. Recreation

The City of South San Francisco's General Plan Goal calls for the city to provide 0.5 acre of recreation space per 1,000 employees (City of South San Francisco 1999). The addition of approximately 10,000 square feet of gathering space, in the form of small open spaces, on the site for the project's employees would meet the goal. Moreover, Alternative 3 would introduce fewer employees than the proposed project and therefore, there would be more park acreage per employee than under the proposed project. Furthermore, the incremental increase in population generated by the new jobs would not cause substantial physical deterioration of existing facilities or require the expansion of parkland facilities beyond planned future expansions. Therefore, overall impacts would be less than significant, same as the proposed project.

q. Transportation

As with the proposed project, Alternative 3 would involve removal of the existing driveway at Forbes Boulevard and off-site improvements, including road median modifications, and an accessible crosswalk would be required to provide full pedestrian connectivity. Mitigation Measure TRA-1 would reduce impacts related to conflicts with plans and policies addressing the circulation system to a less than significant level.

Alternative 3 would accommodate smaller buildings and fewer employees than the proposed project and therefore would generate fewer vehicle trips to and from the project site. However, as described above in Section 4.1.2, *Impact Analysis*, project VMT impacts were calculated based on existing per employee VMT data extracted from similar existing land uses in the East of 101. Given this per employee metric, the difference in number of employees under Alternative 3 would not affect VMT results. Therefore, VMT under Alternative 3 would be the same as VMT under the proposed project. Even with implementation of Mitigation Measure TRA-2, impacts would continue to be significant and unavoidable, like the proposed project.

Moreover, Alternative 3 would not include hazardous design features, such as sharp curves or dangerous intersections, nor would it create hazardous conditions by introducing incompatible uses. There would be less than significant impacts related to hazards or emergency access, similar to the proposed project.

r. Tribal Cultural Resources

As stated in the Initial Study Section 18, Tribal Cultural Resources (Appendix IS), no tribes have requested consultation regarding development at the project site under AB 52. Impacts to tribal cultural resources under Alternative 3 would be similar to the proposed project.

s. Utilities and Service Systems

Water demand, wastewater generation, stormwater requirements, solid waste generation, and other utilities impacts would be reduced under Alternative 3 compared with the proposed project based on the reduced building size and fewer employees. Overall, utilities and service systems impacts would be less than significant, similar to the proposed project.

t. Wildfire

The project site is not in a state or local fire hazard severity zone. Alternative 3 would not introduce new structures or uses to the project site that would require additional service from the SSFFD. Similar to the proposed project, Alternative 3 would not interfere with emergency response or evacuation plans or exacerbate fire risk in the area. Impacts from wildfires would remain less than significant.

6.4 Alternatives Considered but Rejected

The project site is zoned BTP, Business Technology Park, and is considered an employment district. The following list includes some of the uses that are principally permitted:

a) Colleges and Trade Schools
b) Cultural Institutions
c) Banks and Credit Unions
d) Coffee Shops and Cafes
e) Restaurant, full or limited service
f) Convenience market
g) Medical and Dental offices
h) General Retail Sales

The following list includes some of the uses allowed with a minor use permit:

a) Day Care Centers
b) Clinic/Hospital
c) Automobile/Vehicle Rentals

The following list includes some of the uses allowed with a conditional use permit:

a) Schools, Public or Private
b) Automobile/Vehicle Sales and Leasing or Service
c) Pawnbrokers
d) Cannabis Indoor Cultivation or Testing
e) Indoor or Outdoor Sports and Recreation

The City considered alternative land uses that could be principally permitted on the site, or through a use permit, which would provide the property owner with some economic benefit. However, the proposed project and the development of a new office park meets the project objectives set forth by the applicant and property owner. Other permitted land uses in the BTP zoning district, as envisioned in the South San Francisco General Plan, would not be feasible since the intent of the project is to develop the office project as proposed. In addition, those other permitted land uses would include their own effects on CEQA topics such as transportation, air quality, and greenhouse gas emissions; but those effects on the environment are not the focus of this environmental review document.

6.5 Environmentally Superior Alternative

Table 12 indicates whether each alternative's environmental impact is greater than, less than, or similar to the proposed project for each of the issue area studied.

Table 12 Impact Comparison of Alternatives

Issue	Proposed Project Impact Classification	Alternative 1 No Project	Alternative 2 Research and Development Building	Alternative 3 Reduced Size Office Building
Aesthetics	Less than Significant	>	=	=
Agriculture and Forest Resources	No Impact	=	=	=
Air Quality	Less than Significant	<	<	<
Biological Resources	Less than Significant with Mitigation Incorporated	<	=	=
Cultural Resources	Less than Significant with Mitigation Incorporated	<	=	=
Energy	Less than Significant	<	<	<
Geology and Soils	Less than Significant with Mitigation Incorporated	<	=	=
Greenhouse Gas Emissions	Less than Significant	<	<	<
Hazards and Hazardous Materials	Less than Significant	<	>	=
Hydrology and Water Quality	Less than Significant	>	=	=
Land Use and Planning	Less than Significant	>	=	=
Mineral Resources	No Impact	=	=	=
Noise	Less than Significant	<	=	<
Population and Housing	Less than Significant	<	<	<
Public Services	Less than Significant	<	<	<
Recreation	No Impact	<	=	=
Transportation	Significant and Unavoidable	<	=	=
Tribal Cultural Resources	No Impact	<	=	=
Utilities and Service Systems	Less than Significant Impact	<	=	<
Wildfire	No Impact	=	=	=

< reduced level of impact compared to the proposed project

> increased level of impact compared to the proposed project

= Similar level of impact to the proposed project

Based on the alternatives analysis provided above, Alternative 1 would be the environmentally superior alternative. However, per CEQA *Guidelines* Section 15126.6(e)(2), if the No Project alternative is determined to be environmentally superior, the EIR shall also identify an environmentally superior alternative among the other alternatives. Therefore, Alternative 3 would be the environmentally superior alternative, as it would result in reduced impacts related to air quality, energy, and GHG emissions compared to the proposed project.

- **Alternative 1 (*No Project*)** assumes that no structure would be built on the project site and that the existing structure would remain. Under this alternative, project impacts would not occur and potentially significant impacts to transportation would be avoided. No construction would occur; therefore, no mitigation measures would be required. However, Alternative 1 would not fulfill the project objectives because no residence would be built on site for future use.
- **Alternative 2 (*Research and Development Building*)** assumes that the project site would be developed with a five-story building (128,737 square feet), used exclusively for research and development. This alternative assumes the same parking structure would be constructed as the proposed project and that the existing railroad tracks would be converted to a trail as a part of the City's Rails-to-Trails program. Alternative 2 would require the same mitigation measures to reduce impacts related to construction activities, including impacts to biological resources, archaeological resources, and geology and soils. However, this alternative would result in different operational impacts in some areas. Because the alternative would accommodate fewer employees than the proposed project, impacts related to air quality, energy, GHG emissions, population and housing, recreation, public services would be slightly reduced compared to the project. In addition, because this Alternative would involve operation of a Research and Development building, impacts related to the storage and use of hazardous materials would be slightly greater than under the proposed project. Finally, this Alternative would not result in reduced VMT impacts; as with the proposed project, transportation impacts would be significant and unavoidable.
- **Alternative 3 (*Reduced Size Office Building*)** assumes that the project site would be developed with a three-story office building (approximately 77,000 square feet) and two-story parking structure (approximately 158 parking stalls). This alternative also assumes that the existing railroad tracks would be converted to a trail as a part of the City's Rails-to-Trails program. In comparison to the proposed project, this alternative would result in fewer transportation impacts, as the reduced size of the office building would decrease the number of employees and vehicles traveling to and from the site. Alternative 3 would require the same mitigation measures to reduce impacts related to construction activities, including impacts to biological resources, archaeological resources, and geology and soils. However, this alternative would result in different operational impacts in some areas. Because the alternative would accommodate fewer employees than the proposed project, impacts related to air quality, energy, GHG emissions, population and housing, recreation, public services would be slightly reduced compared to the project. Finally, this Alternative would not result in reduced VMT impacts; as with the proposed project, transportation impacts would be significant and unavoidable.

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7.2 List of Preparers

This EIR was prepared by the City of South San Francisco, with the assistance of Rincon Consultants, Inc. Consultant staff involved in the preparation of the EIR are listed below.

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Appendix ALT

Alternatives Analysis

Appendix ARB

Arborist Report

Appendix AQ

Air Quality and Greenhouse Gas Emissions Analysis

Appendix CSP

Construction Site Plan

Appendix CUL

Cultural Resources Technical Memo

Appendix GEO

Geotechnical Report

Appendix HAZ

Phase I Environmental Site Assessment

Appendix IS

Initial Study

Appendix NOP

Notice of Preparation and Comment Letters

Appendix TIA

Transportation Impact Analysis

Appendix TMD

Preliminary Transportation Management Demand Plan

Appendix TRA

Access and Circulation Memo