

# 201 HASKINS WAY PROJECT

CITY OF SOUTH SAN FRANCISCO

STATE CLEARINGHOUSE NO.: 2018042047



DRAFT EIR PUBLICATION DATE: OCTOBER 12, 2018

DRAFT EIR PUBLIC HEARING DATE: NOVEMBER 15, 2018

DRAFT EIR PUBLIC COMMENT PERIOD: OCTOBER 12, 2018 - NOVEMBER 26, 2018

FINAL EIR CERTIFICATION HEARING DATE: MARCH 13, 2019





# RESPONSES TO COMMENTS ON THE DEIR 201 HASKINS WAY PROJECT



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## RESPONSES TO COMMENTS ON DEIR

### TABLE OF CONTENTS

<b>1</b>	<b>Introduction .....</b>	<b>1.1</b>
	Environmental Review Process .....	1.1
	Document Organization .....	1.2
<b>2</b>	<b>Comments and Responses.....</b>	<b>2.1</b>
	Introduction .....	2.1
	Responses to Specific Comments.....	2.1
	A-PC, Planning Commission Meeting November 5, 2018 .....	2.2
	<i>Responses to A-PC</i> .....	2.7
	A-BCDC, Walt Deppe, Bay Conservation and Development Commission .....	2.12
	<i>Responses to A-BCDC</i> .....	2.13
	A-Caltrans, Patricia Maurice, California Department of Transportation, District 4.....	2.16
	<i>Responses to A-Caltrans</i> .....	2.20
	A-SFO, John Bergener, San Francisco International Airport .....	2.26
	<i>Responses to A-SFO</i> .....	2.27
	A-SMC, Mark Chow, County of San Mateo Department of Public Works .....	2.29
	<i>Responses to A-SMC</i> .....	2.30
	I-Dilena, Randy Dilena, Dilena Family LLC.....	2.32
	<i>Responses to I-Dilena</i> .....	2.34
	I-Mayer, Bill Mayer, M & M Development Co.....	2.38
	<i>Responses to I-Mayer</i> .....	2.40
<b>3</b>	<b>Draft EIR Revisions .....</b>	<b>3.1</b>

## Figures

No figures presented.

## Tables

Table 2.1:	Comparison of Sea-Level Rise Projections.....	2.14
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# 1 INTRODUCTION

The purpose of this Responses to Comments (RTC) document is to present comments submitted on the Draft Environmental Impact Report (Draft EIR) for the proposed 201 Haskins Way Project (the proposed project), to respond in writing to comments on physical environmental issues, and to revise the Draft EIR as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21091 (d)(2)(A) and (B), the Planning Division has considered the comments received, evaluated the environmental issues raised, and herein provides written responses that fully address the comments on significant physical environmental issues raised by the commenters. This RTC document also provides limited responses to general comments on the Draft EIR received during the public review period that were not related to physical environmental issues for informational purposes. Where appropriate, this RTC document also includes EIR text changes made in response to comments or at the initiation of City of South San Francisco (City) staff.

The Draft EIR together with this RTC document constitute the Final Environmental Impact Report (Final EIR) for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines Section 15132.

## Environmental Review Process

The City Planning Division prepared the Draft EIR for the 201 Haskins Way Project in accordance with CEQA and the CEQA Guidelines in Title 14 of the California Code of Regulations. The Draft EIR was published and posted on the City's website on October 12, 2018. A Notice of Availability was distributed to state and local agencies, neighbors, and other interested parties to solicit public comment. The Draft EIR was available for public comment from October 12, 2018 to November 26, 2018. The notice solicited comments on the adequacy and accuracy of information presented in the Draft EIR. Comments were made in written form during the public comment period and as oral testimony received at the public hearing on the Draft EIR before the Planning Commission held on November 15, 2018. The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the Draft EIR. Meeting minutes of proceedings from the public hearing on the Draft EIR and all written comments are included in their entirety in this document.

The City has distributed this RTC document to the Planning Commission. The Planning Commission will hold a hearing on February 21, 2019 to consider the adequacy of the Final EIR. If the Planning Commission finds the EIR to be in compliance with CEQA requirements, it will recommend certification of the document as a Final EIR to the City Council. Certification of the Final EIR will be considered by the City Council on March 13, 2019. The Final EIR will consist of the Draft EIR and this RTC document, which includes the comments received during the public review period, responses to the comments on environmental issues, and any revisions to the Draft EIR that result from staff-initiated text changes and text changes in responses to comments. The City decision-makers will consider the certified Final EIR, along with other information received during the public process, to determine whether to approve, modify, or disapprove the proposed project, and to specify the mitigation measures that will be required

as conditions of project approval in a Mitigation Monitoring and Reporting Program. The EIR also identified improvement measures to address certain less-than-significant impacts of the proposed project, and these improvement measures may be adopted as conditions of approval by City decision-makers.

If the City decision-makers decide to approve the proposed project with any of the significant effects that are identified in the Final EIR and not avoided or reduced to less-than-significant levels, they must indicate that any such unavoidable significant effects are acceptable due to overriding economic, legal, social, technological, or other considerations as described in CEQA Guidelines Section 15093. This is known as a Statement of Overriding Considerations, in which the City balances the benefits of a proposed project against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (CEQA Guidelines Section 15093). If an agency adopts a Statement of Overriding Considerations, the statement must be included in the record of project approval.

## Document Organization

This RTC document consists of the following chapters:

**Chapter 1, Introduction**, discusses the purpose of the RTC document, the environmental review process for the EIR, and the organization of the RTC document.

**Chapter 2, Responses to Comments**, presents the comments from the public hearing meeting minutes and written comments. The comments are organized by agencies (A) and individuals (I) in alphabetical order and are coded in the following way:

- Comments from agencies are designated by “A-” and an acronym of the agency’s name.
- Comments from individuals are designated by “I-” and the commenter’s last name.

A number at the end of the code keys each comment to the order of the comments presented within each written communication or item in the Planning Commission meeting minutes. Thus, each discrete comment has a unique comment code.

Following the Planning Commission hearing meeting minutes and each comment letter are the City’s responses. The responses generally provide clarification of the Draft EIR text. They may also include revisions or additions to the Draft EIR. Such changes are shown as indented text, with new text underlined and deleted material shown as strikethrough text.

**Chapter 3, Revisions to the Draft EIR**, presents text changes to the Draft EIR made as a result of a response to comments and/or staff-initiated text changes identified by City staff to update, correct, or clarify the Draft EIR text. Staff-initiated text changes are identified by an asterisk (\*) in the margin. These changes and minor errata do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the Draft EIR pursuant to CEQA Guidelines Section 15088.5 is not required.



## 2 RESPONSES TO COMMENTS

### Introduction

This chapter contains responses to the Commissioner comments from the November 15, 2018 Planning Commission hearing and to written comments on the Draft EIR received during the public comment period. The City of South San Francisco received six letters or emails commenting on the 201 Haskins Way Project Draft EIR during the comment period. No public comments were presented at the Planning Commission hearing.

The comments are organized by agencies (A) and individuals (I) in alphabetical order as follows:

A-PC: Planning Commission Meeting November 15, 2018

A-BCDC: Walt Deppe, San Francisco Bay Conservation and Development Commission

A-Caltrans: Patricia Maurice, California Department of Transportation, District 4

A-SFO: John Bergener, San Francisco International Airport

A-SMC: Mark Chow, County of San Mateo Department of Public Works

I-Dilena: Randy Dilena, Dilena Family LLC

I-Mayer: Bill Mayer, M & M Development Co.

Where revisions to the Draft EIR are appropriate to respond to comments, such changes are shown in full below and consolidated in Chapter 3, Revisions to the Draft EIR. Staff-initiated text changes regarding typographical errors are also presented in Chapter 3.

### Responses to Specific Comments

Comments on the Draft EIR are presented below. Comments from the Planning Commission hearing are summarized, and each comment summary is followed by a corresponding response. The Planning Commissioners' comments are presented in meeting minutes prepared for the public hearing. Comments in letters and emails that raise environmental issues are bracketed and numbered, and each written communication is followed by responses to the comments raised.

In some instances, responding to a comment received on the Draft EIR resulted in a revision to the text of the Draft EIR. In other cases, the information provided in the responses is deemed adequate in itself, and modification of the Draft EIR text was not necessary.



**MINUTES  
NOVEMBER 15, 2018  
CITY OF SOUTH SAN FRANCISCO  
REGULAR PLANNING COMMISSION**

**CALL TO ORDER / PLEDGE OF ALLEGIANCE**

**TIME: 7:00 P.M.**

**ROLL CALL / CHAIR COMMENTS**

**PRESENT:** Chairperson Nagales, Vice Chairperson Murphy, Commissioners Evans, Faria, Shihadeh, Tzang, and Wong

**STAFF PRESENT:** Sailesh Mehra, Planning Manager/Secretary to the Planning Commission, Tony Rozzi, Principal Planner, Ryan Wassum, Associate Planner, Michele Clary, Clerk to the Planning Commission, and Naree Chan, Assistant City Attorney

**AGENDA REVIEW**

None.

**ORAL COMMUNICATIONS**

None

**CONSENT CALENDAR**

1. **Approval of the regular meeting minutes of October 4, 2018.**
- 1a. **Approval of the regular meeting minutes of October 18, 2018.**

**MOTION**

Commissioner Faria moved and Commissioner Tzang seconded a motion to approve the Consent Calendar. The question was called and the motion carried unanimously.

**PUBLIC HEARING**

2. **Report regarding a Study Session and Public Comments on the Draft Environmental Impact Report for a two-story 25,000 sq. ft. building at 400-450 East Jamie Court, a five-story 311,368 sq. ft. office/research and development building, and a five-level parking garage on an 18.2-acre site at 201 Haskins Way. (Ryan Wassum, Associate Planner)**

Chair Nagales opened the public hearing at 7:03 p.m.

Associate Planner Wassum presented the staff report.

Toon Jordan, Alexandria Real Estate Equities, discussed the proposal to add to the existing campus, Phase 1 and Phase 2, architecture, site layout, outdoor amenities, and renderings.

Julie Barlow, SWCA Environmental Consultants, explained the purpose to solicit comments on the draft EIR and presented a summary of the environmental impacts.

Mike Aronson, Kittelson Associates, reviewed the conclusion of significant unavoidable impacts of Transportation and Circulation Impacts.

Ms. Barlow reminded residents that comments could be submitted through November 26th.

Vice Chair Murphy asked if the EIR would be updated for Phase 2. Associate Planner Wassum stated the EIR analyzed full build out of the parcels.

Commissioner Tzang asked the impact of Phase 1. Mr. Aronson discussed the impacts of Phase 1 and Phase 2 and explained that one of three impacts on Grand would be eliminated if Phase 2 were not developed. He confirmed that the intersections would operate independently.

Commissioner Faria discussed issues with Allerton, conditions prior to the overpasses, and maneuverability limitations.

In response to Vice Chair Murphy, Planning Manager Mehra confirmed that the City could require project specific traffic mitigation. He explained the traffic analysis and congestion relief analysis and efforts to reduce congestion.

Chair Nagales asked the time of delays. Mike Aronson, applicant's traffic engineer, stated significant delay was considered 80 seconds per vehicle. He stated the models replicated current travel conditions.

Commissioner Tzang asked the difference between Alternative A and B. He asked if the reduced project significantly reduced the site development. He asked if there were other alternatives. Associate Planner Wassum explained that if the parcels were built out at the existing zoning they would be 459,000 square feet but if rezoned to BTP at 1.0 FAR, it would increase by 150,000 square feet.

Teresia Nemeth, Alexandria, explained that the information was for Phase 1 and 2 at the existing zoning.

Commissioner Faria asked the estimated population of the campus. Ms. Nemeth estimated one person per 400-500 square feet of office/R&D space. She stated traditional office would allow more people. She stated they complied, met and exceeded TDMs on their other projects.

Commissioner Wong stated the amenities were important and suggested taking care due to the wind.

Commissioner Shihadeh commended Alexandria for its efforts and agreed with the design.

Chair Nagales stated his concerns regarding the wind and shadow had been resolved.

Commissioner Faria clarified that he wanted to ensure tenants could access the property.

Planning Manager Mehra reiterated that comments would be received until November 26, 2018.

Chair Nagales closed the public hearing at 7:49 p.m.

## 2. Report regarding a request for a Conditional Use Permit to operate a Cannabis Delivery-Only Operation at 500 S. Airport Boulevard, Suite H in the Business Commercial (BC) Zoning District in accordance with Title 20 of the South San Francisco Municipal Code and determination that the project is categorically exempt under CEQA. (Tony Rozzi, Principal Planner)

Chair Nagales opened the public hearing at 7:50 p.m.

Principal Planner Rozzi presented the staff report.

Dalvin Martin discussed their desire to open a delivery only cannabis business. He discussed safety practices.

Genevieve Martin explained the ordering process and discretion to be used. She discussed their plan to contribute proceeds to the baseball program.

In response to Commissioner Shihadeh, Mr. Martin stated the transactions were cash only. Commissioner Shihadeh discussed risks and liability with cash transactions.

Commissioner Evans asked whether vehicles would be marked. Principal Planner Rozzi stated the vehicles would be plainly marked. Commissioner Evans requested assurance on how security would be handled. Principal Planner Rozzi discussed the option of revocation if there were issues. Sgt. Rudis discussed the Police Department's input in the ordinance and review of the site for mitigation of security risks. He stated he was confident in the security plan.

Commissioner Faria asked if there was tracking of deliveries. Sgt. Rudis stated they would maintain delivery and sale logs and would investigate complaints. Ms. Martin discussed regulations regarding deliveries.

Commissioner Tzang asked about the five-year term and additional mitigation. He also asked if the City could limit the number of facilities. Principal Planner Rozzi explained the five-year term was identified as a reasonable middle ground for leases and revocation hearings could be set at any time. He stated the City Council reserved the right to cap the number of businesses. Commissioner Tzang suggested a cap be established.

Commissioner Evans asked if all employees would undergo background checks. Sgt. Rudis explained the required background checks. Commissioner Evans asked about the \$5,000 for drug education. Sgt. Rudis discussed the programs in the schools.

In response to Commissioner Faria, Sgt. Rudis stated only employees were allowed in the facility.

Commissioner Tzang suggested the business should not be advertised in the educational program.

Principal Planner Rozzi requested the addition of a condition requiring compliance with Section 20.410.010, commercial cannabis operation security requirements.

Commissioner Wong asked about the 600-foot radius. Sgt. Rudis stated they could not deliver to a school or public space and the business had to be located 600 feet away from schools. Commissioner Wong asked if a school could locate within 600 feet of the cannabis location. Principal Planner Rozzi stated it would be at the City's discretion and the amount of goodwill was subjective. He explained that Measure LL sales tax funds would be allocated at the City's discretion. Mr. Martin discussed reconciliation of the cash sales. Ms. Martin explained the software utilized to track sales. Commissioner Wong asked about security during deliveries. Mr. Martin explained the security beacons. Principal Planner Rozzi confirmed that the CUP required approval every five-years.

Chair Nagales asked the process for retaining the receipts for one year. Ms. Martin stated the State required issuance of a receipt. Principal Planner Rozzi stated the purchaser was required to retain the receipt as well. Chair Nagales suggested information be added to the receipt. He asked if deliveries would go to businesses. Ms. Martin stated they could only delivery to home addresses. Principal Planner Rozzi stated they could deliver to commercial locations as well. Mr. Martin explained the process of determining identity and ensuring appropriate distance from schools. He explained their advertising campaign.

Commissioner Shihadeh asked about the sales tax. Assistant City Attorney Chan explained that Measure LL was an excise tax at 1%. Principal Planner Rozzi stated the Planning Commission could consider amending the conditional use permit conditions so that the operating agreement reflected the first \$5,000 was due July 1, 2019, then January 1 of each year; that the applicant be required to comply with Section 20.410.010 regarding security requirements; and that receipts indicate the customer must retain the receipt per State requirements.

#### **MOTION**

Commissioner Wong moved and Commissioner Evans seconded a motion to approve the CUP as amended. The question was called and the motion carried 6-0-1, Commissioners Tzang abstaining.

Chair Nagales called a recess at 8:36 p.m. The meeting reconvened at 8:44 p.m. with all Commissioners present.

#### **ADMINISTRATIVE BUSINESS**

- 4. Joint Study Session of the Planning Commission and Design Review Board. (Sailesh Mehra, Planning Manager)**

Design Review Board Members Present – David Nelson, Mike Nilmeyer, Frank Viera, Sean Winchester, and Chris Mateo

Planning Manager Mehra presented the staff report including a broad overview of current development.

Justin Lovell, Public Works, discussed mobility in downtown, results of the parking study and options in increase mobility.

Assistant City Attorney Chan discussed the Housing Accountability Act and SB35 and explained the relationship between SB35 and the City's RHNA requirements.

Planning Manager Mehra discussed potential residential design guidelines and Design Review Board Bylaws.

Chair Nagales explained the purpose of the DRB, intent of the joint study session and intent of the bylaws.

Planning Manager Mehra stated he would provide the DRB with a snapshot of pending applications.

Chairperson Nagales discussed the Housing Accountability Act and City's inability to consider community fit. Planning Manager Mehra discussed development requirements in the Downtown Station Area Specific Plan and opportunity to develop design standards.

Principal Planner Rozzi discussed consultant review of the Zoning Code and need to codify design styles.

Member Dave Nelson agreed with the need to quantify style, size, setbacks and landscaping for design sensibility.

Member Mike Nilmeyer discussed issues with multi-family residential projects. He stated he understood the need for more housing units but questioned the impacts. He suggested the need for articulations, drop off and pick up zones and landscaping.

Member Frank Viera suggested projects fit into the character of the neighborhood and questioned the public's ability to comment on projects. He requested complete applications, current zoning requirements on the plans, engineering, topography, inclusion of a selection of neighborhood pictures and information on authorization and what was built.

Member Sean Winchester stated the idea of the Housing Accountability Act was pure but there were pitfalls. He stated he understood the need for residential design guidelines but did not want to limit style.

Member Chris Mateo expressed disappointment in the argument for higher density but wanted more neighborhood studies, streetscape elevations, and larger discussions about job/housing imbalance.

Commissioner Tzang stated the City had been erecting pretty buildings lately and discussed the City's image. He discussed his experience with project submittal in other jurisdictions and frustration with denial due to neighborhood opinion. He suggested a list of acceptable features be provided.

Planning Manager Mehra suggested differentiating single family and duplex additions from larger projects.

Member Frank Viera explained the suggestion to retain neighborhood character.

Vice Chair Murphy discussed her historic preservation background and suggested use of preservation tools such as historic districts.

Senior Planner Gross discussed the intent of the Downtown Station Area Specific Plan. He suggested policy discussion to consider impacts and challenges and conducting one or two study sessions each year.

Commissioner Tzang asked why projects could not go through Planning Commission prior to consideration of the design.

Senior Planner Gross suggested modifying developer allowances since developers were building to the maximum

allowable. He explained efforts to have processes to allow review prior to the entitlement phase.

Member Dave Nelson suggested a requirement for on-grade, usable space for multi-family residential.

Commissioner Shihadeh agreed with the need for guidelines particularly since investors were building and leaving town. He expressed concern that DRB approvals were not followed.

Commissioner Faria discussed the input by the Housing Subcommittee. He explained the changes to plans through the process.

Commissioner Wong stated the Housing Subcommittee was helpful. He discussed the potential of determining neighborhood character and obtaining community input. He suggested staggered membership on the DRB.

Commissioner Evans discussed the importance of the DRB and Planning Commission working collaboratively. She suggested they also communicate with and educate the community.

Planning Manager Mehra concurred with the need to share information. He discussed the ability to require daylight plane and articulations. He stated developers would build to the allowable regulations.

Commissioner Faria suggested a Planning Commissioner attend DRB hearings to hear their opinions.

3:15:38 suggested each body report to the other to keep clear lines of communication.

#### **ITEMS FROM STAFF**

Planning Manager Mehra commended the outgoing DRB members.

#### **ITEMS FROM THE PUBLIC**

None.

#### **ADJOURNMENT**

Chair Nagales adjourned the Planning Commission meeting at 10:18 p.m.

Sailesh Mehra  
Secretary to the Planning Commission  
City of South San Francisco

SM/mc

Mark Nagales, Chairperson  
Planning Commission  
City of South San Francisco

*NORM FARIA* *ADJ. CHAIR*

## **A-PC: PLANNING COMMISSION MEETING NOVEMBER 15, 2018**

### **Comment PC-1**

The City of South San Francisco Planning Commission (Commission) asks about the impact of Phase 1 and Phase 2 on East Grand Avenue. The Commission states that physical mitigation at the intersection of Allerton Avenue and East Grand Avenue is not readily feasible, and that queuing diversions would occur. The Commission provides overpasses as an example of physical mitigation. The Commission also states that a lack of physical mitigation for traffic in the East of 101 Area would affect emergency services getting into these areas at certain times.

### ***Response to Comment PC-1***

Traffic impacts at the intersection of Allerton Avenue and East Grand Avenue are discussed in the EIR on p. 4.9.43, which addresses existing conditions with the proposed project, and on pp. 4.9.61-4.9.62, which address cumulative conditions. The EIR identifies physical mitigation for the intersection, but the mitigation is not considered feasible due to secondary impacts on bicycle facilities and adjacent businesses. Therefore, Impact TR-2 and Impact C-TR-9 would remain significant and unavoidable. The City of South San Francisco is currently conducting an East of 101 Access Study to identify alternative ways to reduce traffic congestion in the East of 101 Area, including at the Allerton Avenue and East Grand Avenue intersection. The City also intends to update its Capital Improvement Program (CIP) and East of 101 Traffic Impact Fee (TIF). The updated CIP and TIF may include multimodal transportation projects to reduce traffic and may also include road improvements. The 201 Haskins Way Project would be required to pay the TIF that is in effect at the time building permits are issued for each construction phase, which contributes to transportation improvements to the extent that the TIF funds such improvements.

As stated in the EIR on p. 4.9.50, the project would not introduce any design features that would impede emergency access to the site. Although the project may contribute to traffic delays on roads providing access to the site, it is expected that emergency vehicles would use standard emergency techniques, such as use of the opposite direction lanes, to bypass traffic queues.

### **Comment PC-2**

The Commission asks for information about time of delay. The Commission states that the time of delay that would occur as a result of changes to level of service is significant.

### ***Response to Comment PC-2***

Projected increases in traffic delay and changes in level of service (LOS) are described in Section 4.9, Transportation and Circulation, of the EIR. This section also describes project impacts where the project's contribution to delay increases would result in an exceedance of the City's thresholds of significance.

For existing plus project conditions, as shown in Tables 4.9.10 and 4.9.11 on EIR pp. 4.9.41-4.9.42, traffic from the proposed project would cause significant impacts at one intersection, Littlefield

Avenue/East Grand Avenue, in the AM peak hour and at two intersections, Allerton Avenue/East Grand Avenue and Gateway Boulevard/South Airport Boulevard/Mitchell Avenue, during the PM peak hour. These impacts are identified as significant impacts in Impacts TR-1, TR-2 and TR-3 on EIR pp. 4.9.42-4.9.44. Impacts TR-1 and TR-3 would be reduced to less-than-significant levels with Mitigation Measures MM-TR-1 (add northbound right-turn lane on Littlefield Road) and MM-TR-3 (widen and restripe three of the four approaches). Impact TR-2 would remain significant and unavoidable as the City has determined that physical mitigation at the intersection of Allerton Avenue and East Grand Avenue is not feasible. All other study intersections would continue to operate at acceptable levels in the existing plus project scenario.

As discussed in the EIR in Section 4.1 Approach to Environmental Analysis, on p. 4.1.9, the traffic modeling system used to evaluate 2040 cumulative conditions involved a travel demand forecasting model to estimate traffic volumes based on a projection of future development in the East of 101 and downtown areas prepared by City staff. The model's development assumptions include projects that are under construction but not yet occupied, approved projects, projects currently under review, and potential future development not associated with a specific building project.

For 2040 cumulative conditions, Tables 4.9.15 and 4.9.16 on EIR pp. 4.9.54-4.9.55 list significant cumulative impacts at 11 study intersections in the AM and/or PM peak hours. These impacts are identified as significant impacts in Impacts C-TR-3 through C-TR-13 on EIR pp. 4.9.56-4.9.64. Physically feasible mitigation measures were identified for five locations: Impact C-TR-5 at the intersection of East Grand Avenue and Grand Avenue Overcrossing, Impact C-TR-6 at the intersection of Gateway Boulevard and East Grand Avenue, Impact C-TR-7 at the intersection of Harbor Way/Forbes Boulevard and East Grand Avenue, Impact C-TR-10 at the intersection of Airport Boulevard/Produce Avenue/San Mateo Avenue, and Impact C-TR-13 at the intersection of South Airport Boulevard and Utah Avenue. The City is considering including the improvements contemplated under these mitigation measures in the updated TIF and CIP. However, since the City does not have a mechanism in place for funding the mitigation measures at these five locations, the impacts would remain significant and unavoidable. Feasible mitigation measures were not identified for six locations: Impact C-TR-3 at the intersection of Airport Boulevard and Grand Avenue, Impact C-TR-4 at the intersection of Dubuque Avenue and Grand Avenue, Impact C-TR-8 at the intersection of Littlefield Avenue and East Grand Avenue, Impact C-TR-9 at the intersection of Allerton Avenue and East Grand Avenue, Impact C-TR-11 at the intersection of Gateway Boulevard/South Airport Boulevard/Mitchell Avenue, and Impact C-TR-12 at the intersection of South Airport Boulevard and U.S. 101 Northbound Hook Ramps/Wondercolor Lane. The cumulative impacts at these six locations would remain significant and unavoidable.

### **Comment PC-3**

The Commission asks about the difference between Alternative A and B, and whether Alternative B would reduce the site development and transportation impacts.



### **Response to Comment PC-3**

As described in the EIR on p. 5.1, the existing land uses and site conditions at the project site would not change under Alternative A. Alternative B, the Reduced Development Alternative, would involve development of research and development uses in compliance with existing City zoning code and regulations for the site under the Mixed Industrial and Business Commercial zoning districts. As shown in the EIR in Table 5.1 on p. 5.3, Alternative B would involve development of 459,514 gross square feet of research and development use compared to 677,600 gross square feet under the proposed project.

As described in the EIR on pp. 5.2 and 5.4, Alternative B would reduce the project's significant impact at one intersection, but not to a less-than-significant level. This alternative would reduce the project's contribution to significant cumulative transportation impacts to a less-than-significant level at six intersections, one freeway segment, and one freeway ramp, and queue-related traffic impacts. With Alternative B, the proposed project would still contribute considerably to significant cumulative transportation impacts at 12 locations that would remain significant and unavoidable. See also Table 5.5 on EIR pp. 5.21-5.24.

### **Comment PC-4**

The Commission asks about the estimated population of the campus. As detailed in EIR Table 4.11.1: Proposed Project Employment, on p. 4.11.43, the proposed project would generate a total of approximately 723 net new employees during Phase 1 development and 1,315 net new employees upon project buildout. The Commission states that the discussed traffic projections are speculative and that the whole East of 101 Area would be impacted due to the anticipated growth and development. The Commission asks whether the City's travel model reflects current travel behavior, and the City's Transit Demand Management (TDM) program. The Commission notes that potential TDMs are going to be created under new projects, and although infrastructure mitigations may not be feasible, the City has the tools to do some mitigation at the project level through TDM. The Commission notes that the City is conducting an East of 101 Traffic and Congestion Relief Analysis, including study and audit of compliance with TDMs, reducing single-occupancy vehicles, increasing shuttle participation, and increasing ferry services. The Commission states that changes in travel behavior would improve conditions. The Commission expresses concern regarding last-mile transportation options, and expresses support for reducing single-occupancy vehicles and increasing alternative modes of transit, such as the Caltrain plaza improvements project and coordination with private biotech partners. The Commission expresses support for efforts to mitigate traffic congestion and support for robust TDM programs.

### **Response to Comment PC-4**

The transportation evaluation in the EIR assumes existing travel behavior to ensure a conservative assessment of potential transportation impacts. The City's travel model uses trip generation rates which replicate existing traffic volumes; therefore, the model implicitly represents current travel behavior. The current travel behavior includes a number of employers and building owners in the East of 101 Area who have implemented TDM programs consistent with City requirements, the existing transit shuttle and private bus services, and employees' choices of commute times in response to regional traffic congestion.

The current travel behavior also includes a number of businesses without TDM programs. Implementation of a complete TDM program under the proposed project would be expected to provide traffic reductions beyond the average existing travel behavior assumed in the City's travel model, although additional traffic reductions were not assumed in the EIR analysis in order to ensure a conservative analysis of impacts without mitigation. Additional TDM and traffic reduction measures planned by the City would reduce cumulative impacts and project impacts compared to those presented in the EIR.

### **Comment PC-5**

The Commission expresses concern about potential wind impacts on outdoor employee amenities and potential shadow impacts.

#### ***Response to Comment PC-5***

The EIR analyzes wind and shadow impacts in Section 4.11.1, Aesthetics, on pp. 4.11.18-4.11.13. As discussed in the EIR, the proposed project would not alter wind conditions in a manner that would substantially, adversely affect public safety, and wind impacts would be less than significant. Also, the proposed project would not create new shadow in a manner that would substantially, adversely affect the use of public open space, and shadow impacts would be less than significant.

### **Comment PC-6**

The Commission expresses support for the project design and employee-serving amenities.

#### ***Response to Comment PC-6***

The comment in itself does not raise any specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this Responses to Comments document under CEQA Guidelines Section 15088. Although comments on the merits of the proposed project do not raise issues concerning the adequacy or accuracy of the EIR's coverage of environmental impacts under CEQA, such comments, including recommendations for modifications to the proposed project, may be considered and weighed by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

### **Comment PC-7**

The Commission expresses concern regarding tenant access to the property. The Commission states that landowners and tenants would be discouraged from renting space in the East of 101 Area if the area is impacted by traffic.

#### ***Response to Comment PC-7***

The potential to lose business tenants or hinder business profitability in the East of 101 Area due to poor traffic conditions is a socioeconomic issue rather than a physical environmental issue. CEQA does not require analysis of socioeconomic issues such as market conditions or tenant preferences; thus, these

issues are generally beyond the scope of the CEQA environmental review process. The focus of CEQA is to address whether and how a proposed project's physical change to the environment could result in adverse physical impacts to the environment, such as impacts of a project on air quality, water quality, or wildlife habitat. CEQA Guidelines Section 15360 defines "environment" for the purposes of CEQA as "the *physical* conditions which exist within the area which will be affected by the proposed project..." (*emphasis added*). As stated in CEQA Guidelines Section 15131(a),

"Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

Thus, the CEQA Guidelines provide that social or economic impacts may not be treated as significant effects on the environment.

Evidence of economic impacts (e.g., property value decreases, changing tenant demographics) that do not contribute to, or are not caused by, adverse physical changes to the environment is not substantial evidence of a significant effect on the environment. However, a social or economic change related to a physical change may be considered in determining whether the physical change is a significant impact. Additionally, an EIR or other CEQA document must consider the reasonably foreseeable indirect environmental consequences or physical changes resulting from a project's economic or social changes. In short, social and economic effects are only relevant under CEQA if they would result in or are caused by an adverse physical impact on the environment.

To the extent that physical environmental impacts would occur as a result of traffic, these impacts have been analyzed in detail in the EIR in Section 4.9, Transportation and Circulation. Further analysis of secondary socioeconomic impacts would be largely speculative and would not necessarily predict reasonably foreseeable outcomes. Given recent and ongoing proposals to expand research and development uses by property owners and developers, the City has planned for future growth in the East of 101 Area based on a reasonable projection of this development pattern.

The comments do not present any evidence that the construction and operation of the proposed project would result in any significant environmental impacts not disclosed in the Draft EIR or lead to any economic or social changes that would in turn result in a significant adverse physical environmental impact. There is no evidence presented by the comment that the proposed project in combination with other past, present, or reasonably foreseeable future projects would result in businesses or tenants moving elsewhere that could have significant physical environmental effects.

Nonetheless, the analysis of physical traffic impacts provided in the EIR may be considered and weighed with other relevant factors by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process.

**From:** [Deppe, Walt@BCDC](mailto:Deppe, Walt@BCDC)  
**To:** [Wassum, Ryan](#)  
**Subject:** 201 Haskins Way Project DEIR Clarifications  
**Date:** Monday, November 26, 2018 5:30:55 PM

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Dear Mr. Wassum,

Thank you for providing the opportunity to comment on the DEIR for the 201 Haskins Way Project (State Clearinghouse No. 2018042047). While we are not submitting a more detailed comment letter, BCDC staff have the following comment regarding Sea Level Rise based on our preliminary review of the DEIR. Please note that these clarifications are not comprehensive comments on the project, and additional information will be needed as any portion of the project that requires action from BCDC moves through the permitting process to determine consistency with BCDC's laws and policies.

**Sea Level Rise.** The Ocean Protection Council and California Natural Resources Agency released a State of California Sea Level Rise Guidance document earlier this year, which provides guidance on sea level rise risk analysis and planning based on probabilistic projections. It would be helpful to include information based on this Guidance as part of the discussion in Section 4.6, to understand how any proposed improvements to address sea level rise relate to the Guidance. Additionally, please note that BCDC will evaluate any portion of the project that requires action from BCDC for consistency with our laws and policies through the permitting process, including as they pertain to sea level rise. The San Francisco Bay Plan Climate Change policies state, in part, that "when planning shoreline areas or designing larger shoreline projects, a risk assessment should be prepared..." and that "...within areas that a risk assessment determines are vulnerable to future shoreline flooding that threatens public safety, all projects...should be designed to be resilient to a mid-century sea level rise projection. If it is likely the project will remain in place longer than mid-century, an adaptive management plan should be developed to address the long-term impacts that will arise based on a risk assessment using the best available science-based projection for sea level rise at the end of the century." The Bay Plan Public Access policies also state, in part, "[p]ublic access should be sited, designed, managed and maintained to avoid significant adverse impacts from sea level rise and shoreline flooding" and that "[a]ny public access provided as a condition of development should either be required to remain viable in the event of future sea level rise or flooding, or equivalent access consistent with the project should be provided nearby."

Thank you,

Walt Deppe  
Coastal Program Analyst  
San Francisco Bay Conservation & Development Commission  
455 Golden Gate Ave., Suite 10600  
San Francisco, CA 94102  
415.352.3622  
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## **A-BCDC, WALT DEPPE, SAN FRANCISCO BAY CONSERVATION AND DEVELOPMENT COMMISSION**

### **Response to Comment BCDC-1**

The comment requests information regarding the latest State of California Sea-Level Rise Guidance document published by the Ocean Protection Council (OPC) and California National Resources Agency. The comment notes that the Bay Conservation and Development Commission (BCDC) will evaluate any portion of the project that requires action from BCDC including consistency with sea-level rise laws and policies through the permitting process. The comment states that an adaptive management plan based on a risk assessment should be developed if the project will remain longer than mid-century. The comment also notes that public access should be maintained to avoid significant sea-level rise or shoreline flooding impacts, and that any public access provided as condition of development should either be required to remain viable in the event of future sea-level rise or flooding or be provided as equivalent access should be provided nearby.

As discussed in the EIR in Section 4.6, Hydrology and Water Quality, on p. 4.6.12, CEQA does not generally require lead agencies to consider how existing environmental conditions might impact a project's occupants, except where the project would significantly exacerbate an existing environmental condition.<sup>1</sup> Accordingly, hazards resulting from a project that would place development in a future sea-level rise inundation area are not considered impacts under CEQA unless the project would significantly exacerbate the flood inundation hazards. Nonetheless, the City has provided an analysis of projected sea-level rise on the proposed project for informational purposes.

The EIR, on pp. 4.6.4-4.6.7, analyzes sea-level rise projections provided by the National Research Council in 2012. Recently, the Working Group of the California OPC's Science Advisory Team released a report entitled "Rising Seas in California: An Update on Sea-Level Rise" in April 2017.<sup>2</sup> The 2017 OPC report found that the scientific understanding of sea-level rise is advancing at a rapid pace; the rate of ice loss from the Greenland and Antarctic ice sheets is increasing, and California is particularly vulnerable to sea-level rise caused by ice loss from West Antarctica; and new scientific evidence has highlighted the potential for extreme sea-level rise. Further, there have been multiple new policy and legislative directives and mandates focused on improving climate adaptation and resiliency in California at both the state and local level, including:

- Governor Brown's Executive Order B-30-15 directing state agencies to factor climate change into their planning and investment decisions;
- Senate Bill 379, which requiring local governments to incorporate climate adaptation and resiliency strategies into their General Plans; and

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<sup>1</sup> *California Building Industry Association v. Bay Area Air Quality Management District*, 62 Cal.4th 369. Opinion Filed December 17, 2015.

<sup>2</sup> Griggs, G, Árvai, J, Cayan, D, DeConto, R, Fox, J, Fricker, HA, Kopp, RE, Tebaldi, C, Whiteman, EA (California Ocean Protection Council Science Advisory Team Working Group), 2017. *Rising Seas in California: An Update on Sea-Level Rise Science*. Published in April 2017 by the California Ocean Science Trust. Available online at: [http://www.opc.ca.gov/webmaster/ftp/pdf/agenda\\_items/20180314/Item3\\_Exhibit-A\\_OPC\\_SLR\\_Guidance-rd3.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf). Accessed December 5, 2018.

- Senate Bill 246, which established the Integrated Climate Adaptation and Resiliency Program, managed by the Governor’s Office of Planning and Research, to coordinate local and state climate adaptation strategies.

With this increased policy direction and improved understanding of possible impacts, the OPC prepared a 2018 Sea-Level Rise Guidance report to help state and local agencies prepare for, and adapt to, sea-level rise.<sup>3</sup> In a good faith effort to keep up with the most current sea-level rise science for decision-makers and the public, the discussion below provides the latest sea-level rise projections studied by the OPC and the policies adopted in March 2018, for informational purposes only.

The EIR, on pp. 4.6.4-4.6.7, presents a projected sea-level rise of 24 inches above sea level (ASL) by 2050 and 66 inches ASL by 2100 plus a 100-year storm surge of 44 inches ASL (for a total of 68 inches ASL in 2050 and 110 inches ASL in 2100, respectively) based on the 2012 Natural Resources Conservation Service (NRCS) report. This represented an analysis of extreme, highly risk-averse projections at the time. According to 2018 OPC guidance, the current extreme risk-averse projection of sea level rise is 32 inches ASL in 2050 and 122 inches ASL in 2100, as shown in **Table 2.1, Comparison of Sea-Level Rise Projections**. With the addition of 44 inches of 100-year storm surge, the current projections would suggest a total inundation of 76 inches ASL in 2050 and 166 inches ASL in 2100.

**Table 2.1. Comparison of Sea-Level Rise Projections**

Risk Aversion	Year 2050		Year 2100	
	2012 NRCS	2018 OPC	2012 NRCS	2018 OPC
<b>Low</b>	12.3 cm (5 inches)	1.1 feet (13 inches)	42.2 cm (17 inches)	2.4 – 3.4 feet (29 – 41 inches)
<b>Medium</b>	28 cm (11 inches)	1.9 feet (23 inches)	91.9 cm (36 inches)	5.7 – 6.9 feet (68 – 83 inches)
<b>High</b>	60.8 cm (24 inches)	<b>2.7 feet (32 inches)</b>	166.4 cm (66 inches)	<b>10.2 feet (122 inches)</b>

Note: NRCS study originally provided projection data in centimeters and OPC data was provided in feet. Projections converted to inches in parentheses for ease of comparison. Highest projections shown in **bold**.

Sources: NRCS (2012), OPC (2018)

At this time, no formal mapping or Geographic Information System data of new inundations zones has been published by BDCD or the County of San Mateo, so the effect of this new projected sea-level rise is discussed qualitatively here. As detailed on EIR p. 4.6.20, the low-lying areas that would be most inundated under sea-level rise projections would primarily be landscaping and parking areas on the west side of the 400-450 East Jamie Court parcel. The lowest structures on the project site, the existing 400-450 East Jamie Court buildings, are 23 feet (276 inches ASL) with an existing 11-foot-6-inch basement parking level (138 inches ASL). Therefore, the existing foundations would remain above the most extreme sea-level rise and storm surge even under the latest and most conservative projections. The existing basement would potentially be 28 inches below inundation during a 100-year storm in the year 2100 using the most extreme sea-level rise projections. However, analysis of the effect of sea-level rise on existing buildings and facilities is not required in the EIR.

<sup>3</sup> California National Resources Agency and California Ocean Protection Council, 2018. State of California Sea-Level Rise Guidance – 2018 Update. Available online at: [http://www.opc.ca.gov/webmaster/ftp/pdf/agenda\\_items/20180314/Item3\\_Exhibit-A\\_OPC\\_SLR\\_Guidance-rd3.pdf](http://www.opc.ca.gov/webmaster/ftp/pdf/agenda_items/20180314/Item3_Exhibit-A_OPC_SLR_Guidance-rd3.pdf). Accessed December 5, 2018.

As described on EIR p. 4.7.14, the southern portion of the existing 400-450 East Jamie Court parcel is under BCDC's jurisdiction, but development of Phase 1 of the proposed project would not impact the portion of the 400-450 East Jamie Court parcel affected by the BCDC Permit.<sup>4</sup> Therefore, no BCDC permitting action is required during Phase 1 development. Nonetheless, the proposed Phase 1 office/R&D uses in the 25,000-square-foot building addition at 400 East Jamie Court would be at a foundation level of 23 feet ASL (276 inches ASL) and would remain outside the effects of a 100-year storm surge in combination with projected sea-level rise even under 2018 projections.

As discussed in the EIR on p. 4.6.20, it is unlikely that project buildout associated with Phase 2 would occur in the projected inundation areas, since the majority of that anticipated flooded area either lies within the 10-foot street-facing setback or is located within the access way into the existing building garage. Since no new buildings are anticipated to be placed in areas subject to flooding, construction of the proposed project would not impede or redirect flood flows. Nonetheless, Phase 2 of the proposed project would be reviewed for consistency with the BCDC Permit. If, at that time, development within the BCDC shoreline band is proposed, the developer would coordinate with BCDC to determine the necessary permitting requirements, such as preparation and implementation of a formal Sea-Level Rise Risk Analysis report or Adaptive Management Plan.

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<sup>4</sup> In 2003, BCDC issued a permit (BCDC Permit No. M02-70, originally issued on July 17, 2003, and currently consisting of Corrected Permit No. M02-70, dated October 30, 2003, and Amendment No. Two, dated June 26, 2006; as corrected and amended, the "BCDC Permit") regarding the use of certain portions of the 400-450 East Jamie Court parcel for public Bayshore access. Development of Phase 1 of the proposed project would not impact the portion of the 400-450 East Jamie Court parcel affected by the BCDC Permit. Phase 2 of the proposed project would be reviewed for consistency with the BCDC Permit.

**DEPARTMENT OF TRANSPORTATION**

DISTRICT 4

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a California Way of Life.*

November 26, 2018

SCH # 2018042047

GTS # 04-SM-2018-00211

GTS ID: 10341

PM: SM – 101 – 22.049

Ryan Wassum, Associate Planner  
City of South San Francisco  
315 Maple Avenue  
South San Francisco, CA 94083

**201 Haskins Way Project – Draft Environmental Impact Report (DEIR)**

Dear Ryan Wassum:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced Project. In tandem with the Metropolitan Transportation Commission's (MTC) Sustainable Communities Strategy (SCS), Caltrans' mission signals a modernization of our approach to evaluate and mitigate impacts to the State Transportation Network (STN). Caltrans' *Strategic Management Plan 2015-2020* aims to reduce Vehicle Miles Traveled (VMT) in part, by tripling bicycle and doubling both pedestrian and transit travel by 2020. Our comments are based on the October 12, 2018 DEIR.

***Project Understanding***

The project would rezone seven parcels from Mixed Industrial (MI) district to Business Technology Park (BTP) district and one parcel from Business Commercial (BC) to BTP district. The project would allow development at a floor area ratio (FAR) of 1.0 or approximately 677,600 gross square feet (gsf) of new BTP office use, which would be built out in two phases. The proposed project site is part of the City of South San Francisco's "East of 101" planning area. Regional access to this project is provided from US Route (US) 101 via ramps at East Grand Avenue, approximately 1.25 miles from the project site. Part of the mitigation for this project includes the reconfiguration and adjustment of signal timing of various local streets near and directly adjacent to US 101 ramps.

***Travel Demand Analysis***

The submitted DEIR discusses deficiencies in the local and regional transportation system in a narrative form. Please submit the official Traffic Impact Analysis (TIA) to substantiate the DEIR's claim of the project's less than significant impact on state facilities.

Inadequate storage on US 101 ramps could result in queues backing up on the mainline causing conflicts such as speed differentials; these types of operational conflicts are not exempt from

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evaluation and mitigation under the California Environmental Quality Act (CEQA). Please provide 95th percentile queue evaluation and determine if the available storage capacity is adequate for the turning movements at:

- Gateway Boulevard (Blvd.) and Oyster Point Blvd./ US 101 southbound (SB) off-ramp,
- Airport Blvd. and Grand Avenue intersection,
- Dubuque Avenue and Grand Avenue intersection,
- US 101 northbound (NB) Off-Ramp/Poletti Way and East Grand Avenue intersection,
- Airport Blvd./Produce Avenue and San Mateo Avenue/South Airport Blvd. off-ramps and intersections,
- South Airport Blvd. and US 101 NB Ramps.

Determine if the queues spill back onto the freeway mainline. If the TIA determines that the project has an impact on the ramps/intersections listed above, the project can pay its fair share contribution towards Caltrans' Airport Blvd/Produce Avenue Ramp Modification and Utah Avenue/San Mateo Avenue overcrossing connection projects, which will significantly reconfigure access to US 101 in that area and includes multimodal improvements.

For the on-ramps listed below, provide on-ramp storage capacity evaluations for both AM and PM peak hours. Determine if the on-ramps are congested during peak hours and if queues from the on-ramps spill back onto the City streets near the freeway on-ramps.

- South Airport Blvd Hook NB On-Ramp,
- Airport Blvd/Grand Avenue NB On-Ramp,
- Oyster Point Blvd NB On-ramp,
- SB Dubuque Avenue on Ramp,
- SB Produce Avenue On-Ramp.

Please clarify the "Future 101 NB/Gateway Blvd & Oyster Point" referred to in the Synchro 9 worksheet for intersection #1 and if there are any plans for a new NB ramp.

### ***Project Coordination***

Please coordinate the proposed project with Caltrain's NB Grand Avenue off-ramp improvements and Caltrans' Airport Blvd./Produce Avenue Ramp Modification project.

### ***Impact Fees and Multimodal Accessibility***

The project's primary and secondary effects on pedestrians, bicyclists, travelers with disabilities, and transit users should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access for pedestrians and bicyclists to transit facilities must be maintained. The impacts on US 101 mentioned in the DEIR should be mitigated by contributing impact fees to multi-modal projects in the area. This could include fair share contributions to the US 101 managed lanes project in the project vicinity, the potential San Mateo County project to

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install Class II bike facilities on Grand Avenue between Airport Blvd. and Gateway Blvd., identified in the *Caltrans District 4 Bike Plan* (2018) as SM-101-X05, or other multimodal projects as appropriate, such as those identified in SamTrans' ongoing US 101 Express Bus Feasibility Study. We encourage a sufficient allocation of fair share contributions toward multimodal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares to reduce VMT. Caltrans welcomes the opportunity to work with the City and local partners to secure the funding for needed mitigation. Traffic mitigation- or cooperative agreements are examples of such measures.

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### ***Vehicle Trip Reduction***

From Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the project site is identified as **Place Type 4c: Suburban Communities (Dedicated Use Areas)** where location efficiency factors, such as community design, are weak and regional accessibility varies. Given the place type and size of the project, it should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions. Such measures are critical to facilitating efficient site access. The measures listed below will promote smart mobility and reduce regional VMT.

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- Project design to encourage walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;
- Real-time transit information system;
- Transit subsidies on an ongoing basis;
- Ten percent vehicle parking reductions;
- Charging stations and designated parking spaces for electric vehicles;
- Carpool and clean-fuel parking spaces;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Showers, changing rooms and clothing lockers for employees that commute via active transportation;
- Emergency Ride Home program;
- Employee transportation coordinator;
- Secured bicycle storage facilities;
- Fix-it bicycle repair station(s);
- Bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area; and
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement.

Transportation Demand Management programs should be documented with annual monitoring reports by an onsite TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets. Also, reducing parking supply can encourage active forms of

Ryan Wassum, City of South San Francisco  
 November 26, 2018  
 Page 4

transportation, reduce regional VMT, and lessen future transportation impacts on State facilities. These smart growth approaches are consistent with the MTC's Regional Transportation Plan/SCS goals and would meet *Caltrans Strategic Management Plan* sustainability goals.

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For additional TDM options, please refer to the Federal Highway Administration's *Integrating Demand Management into the Transportation Planning Process: A Desk Reference* (Chapter 8). The reference is available online at:  
<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>.

### ***Lead Agency***

As the Lead Agency, the City of South San Francisco is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures. Since this project meets the criteria to be deemed of statewide, regional or areawide significance per CEQA Section 15206, the DEIR should be submitted to both the San Mateo County Transportation Authority and the Metropolitan Transportation Commission for review and comment.

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### ***Encroachment Permit***

Please be advised that any work or traffic control that encroaches onto the State right-of-way (ROW) requires an encroachment permit that is issued by Caltrans. To obtain an encroachment permit, a completed encroachment permit application, environmental documentation, and six (6) sets of plans clearly indicating the State ROW, and six (6) copies of signed and stamped traffic control plans must be submitted to: Office of Encroachment Permits, California DOT, District 4, P.O. Box 23660, Oakland, CA 94623-0660. To download the permit application and obtain more information, visit <http://www.dot.ca.gov/hq/traffops/developserv/permits/>.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Jake Freedman at (510) 286-5518 or [jake.freedman@dot.ca.gov](mailto:jake.freedman@dot.ca.gov).

Sincerely,



PATRICIA MAURICE  
 District Branch Chief  
 Local Development - Intergovernmental Review

c: State Clearinghouse

## **A-CALTRANS, PATRICIA MAURICE, CALIFORNIA DEPARTMENT OF TRANSPORTATION, DISTRICT 4**

### **Response to Comment Caltrans-1**

The comment requests the official Traffic Impact Analysis (TIA). All elements of the transportation analysis are documented in EIR Section 4.9, Transportation and Circulation, and in the associated Appendix B, Transportation Technical Appendices. There is no separate TIA report that presents additional information.

### **Response to Comment Caltrans-2**

The comment requests queue evaluation at seven locations.

EIR Table 4.9.5, on p. 4.9.12; Table 4.9.12, on p. 4.9.45; and Table 4.9.17, on p. 4.9.65, summarize the results of queue evaluations of significant movements at four of the seven requested locations: Gateway Boulevard and Oyster Point Boulevard/U.S. 101 SB Off-Ramp; Airport Boulevard and Grand Avenue; the intersection of Airport Boulevard/Produce Avenue with San Mateo Avenue and South Airport Boulevard; and South Airport Boulevard and the U.S. 101 NB Ramps.

For existing plus project conditions, Impact TR-4 on EIR p. 4.9.46 identifies an existing queue that exceeds available storage on the SB off-ramp at Gateway Boulevard/Oyster Point Boulevard, but the proposed project would add less than one percent of total traffic and the project impact would not be significant. Impacts TR-6 and TR-7 on EIR pp. 4.9.46-4.9.47 identify locations where project traffic would have a significant impact on queues at the intersection of Airport Boulevard and Grand Avenue and the intersection of Airport Boulevard/Produce Avenue with San Mateo Avenue/South Airport Boulevard. Mitigation measures were identified and funding for improvements at these locations is included in the City's current TIF program, in which the project sponsor or sponsors would participate; therefore, Impacts TR-6 and TR-7 would be less than significant after mitigation.

For cumulative conditions, Impact C-TR-14 on EIR p. 4.9.66 identifies a queue that would exceed available storage on the SB off-ramp at Gateway Boulevard/Oyster Point Boulevard, but the proposed project would add less than one percent of total traffic and therefore the project contribution would not be cumulatively considerable. Impacts C-TR-15, C-TR-17 and C-TR-18 on EIR pp. 4.9.66-4.9.70 identify significant impacts on queues at the intersection of Airport Boulevard and Grand Avenue, at the intersection of Airport Boulevard/Produce Avenue with San Mateo Avenue/South Airport Boulevard, and at the intersection of South Airport Boulevard and U.S. 101 NB Ramps/Wondercolor Lane. The proposed project would contribute considerably to these significant impacts. No feasible mitigation measures were identified to fully mitigate queues exceeding available storage lengths at these three locations; therefore, Impacts C-TR-15, C-TR-17 and C-TR-18 would remain significant and unavoidable.

The remaining three locations listed in the comment are the intersection of Dubuque Avenue and Grand Avenue, the intersection of the U.S. 101 NB off-ramp/Poletti Way and East Grand Avenue, and the U.S. 101 SB off-ramp to Produce Avenue/South Airport Boulevard.

Impact C-TR-4, discussed on EIR pp. 4.9.57-4.9.58, identifies the project's cumulatively considerable contribution to significant cumulative impacts at the intersection of Dubuque Avenue and Grand Avenue. Evaluation of queues at this intersection was included in Appendix B, but as this location does not directly affect freeway off-ramp or mainline operations, it was not included in the EIR tables as a study location. The queue information in Appendix B indicates that there would be queues exceeding available storage lengths on the eastbound through movement with 2040 traffic volumes without and with the project. Mitigation Measure MM-C-TR-4, identified on EIR pp. 4.9.57-4.9.58, would also reduce the queueing issues, but the mitigation measure would not eliminate the significant impact. In addition, as noted on EIR p. 4.9.24, a TDM program would be required to be prepared and implemented pursuant to Chapter 20.400 of the South San Francisco Municipal Code. However, it cannot be guaranteed that the required TDM would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively-considerable level. The impact would remain significant and unavoidable.

The U.S. 101 NB off-ramp at Poletti Way and East Grand Avenue terminates at uncontrolled through and right-turn movements at that intersection. There is stop-sign control only for westbound vehicles on East Grand Avenue turning right to Poletti Way. Since there are no traffic controls associated with the off-ramp movements, the analysis did not indicate any queues at the intersection that would affect the off-ramp traffic. The next controlled location for off-ramp traffic is the intersection of East Grand Avenue and Grand Avenue Overcrossing, approximately 700 feet to the east. The 95<sup>th</sup> percentile queues on East Grand Avenue at this intersection, based on the analysis included in Appendix B, were not projected to exceed 250 feet. Therefore, no queue impacts are projected at that location.

Evaluation of the U.S. 101 SB off-ramp to Airport Boulevard/Produce Avenue was not included in the EIR, as project traffic would not be expected to use this off-ramp for access and the off-ramp to Grand Avenue would provide more direct access to the project site. The City's traffic model, which was used for all traffic distribution assumptions to maintain consistency with other City studies, indicated that no project traffic would use this off-ramp to access the 201 Haskins site.

### **Response to Comment Caltrans-3**

The comment states that the project should pay a fair share contribution towards Caltrans' Airport Boulevard/Produce Avenue ramp modification project and the Utah Avenue/San Mateo Avenue overcrossing connection projects. The project would be required to contribute to the South San Francisco East of 101 Area TIF in effect at the time of building permit issuance. The current East of 101 TIF includes contributions to intersection improvements at the intersection of South Airport Boulevard and San Mateo Avenue, and also to the preparation of a Project Study Report for the Utah Avenue overcrossing. The City intends to update its CIP and the East of 101 TIF, and those updates may include fair share contributions towards the Airport Boulevard/Produce Avenue ramp modification project and the Utah Avenue/San Mateo Avenue overcrossing connection project.

### **Response to Comment Caltrans-4**

The comment requests on-ramp storage capacity evaluations at five on-ramps.

Three of these five on-ramps would not be expected to be significantly impacted by project traffic (South Airport Blvd Hook NB On-Ramp, Oyster Point Blvd NB On-Ramp, and SB Dubuque Avenue On-Ramp). The City's traffic model, which was used for all traffic distribution assumptions to maintain consistency with other City studies, indicated that no traffic to and from the 201 Haskins project site would use these on-ramps.

For the two on-ramps that would be impacted by project traffic (Airport Boulevard/Grand Avenue NB On-Ramp and SB Produce Avenue On-Ramp), the EIR provides a planning-level analysis of ramp capacity, consistent with City of South San Francisco development impact analysis practice, on pp. 4.9.13, 4.9.47-4.9.48, and 4.9.72. There is no established methodology for the evaluation of storage capacity at metered on-ramps in the Highway Capacity Manual, and no methodology has been documented by the City of South San Francisco or by Caltrans for evaluation of storage capacity of metered on-ramps in the context of a development project impact analysis.

A review of existing congestion on the affected on-ramps was conducted based on the Google Maps "typical traffic" feature. Average traffic speed conditions were reviewed for midweek days (Tuesday through Thursday). For the Airport Boulevard/Grand Avenue NB On-Ramp, very slow traffic speeds are reported for most of the length of the ramp approaching the ramp meter between 6:30 and 10:00 AM and between 4:20 and 8:00 PM. The very slow speeds do not extend to the City streets during any time period, indicating that queues are generally maintained within the ramp storage area. For the SB Produce Avenue On-Ramp, very slow speeds are not reported for any time period, indicating that there is generally no significant queuing at the ramp meter. However, slow speeds extending back to the Airport Boulevard/San Mateo Avenue intersection are reported periodically during the AM and PM peak periods.

A general assessment of ramp meter storage issues can be made based on the range of acceptable metering rates used by Caltrans of 240 to 900 vehicles per hour per lane.

The Airport Boulevard/Grand Avenue NB On-Ramp has one metered lane with approximately 640 feet of storage and therefore a maximum metered capacity of 900 vehicles per hour and a storage capacity of 22 vehicles. For existing conditions, Table 4.9.13 on EIR p. 4.9.48 indicates that the maximum existing hourly volume on the ramp is 783 vehicles and the maximum with project buildout would be 918. This indicates that, with project buildout, up to 18 vehicles during the peak hour may need to be stored on the ramp. This demand would be within the available ramp capacity. For cumulative conditions, Table 4.9.19 on EIR p. 4.9.72 indicates that the maximum hourly volume on the ramp with project buildout would be 1,768 vehicles, which is within the maximum hourly ramp capacity of 2,000 vehicles under non-metered conditions. This would be within the capacity of the ramp without ramp metering but would exceed the maximum metering rate of 900 vehicles per hour. The City of South San Francisco has a Memorandum of Understanding (MOU) with Caltrans and the City and County Association of Governments that specifies that a ramp meter in South San Francisco will be turned off and not operated if queues are backing up to City streets. Identification of these conditions could be accomplished automatically through use of entrance ramp queue detectors or through manual observation of ramp operations and queues. Operations consistent with this MOU would prevent ramp meter queues from impacting City streets and intersections.

The SB Produce Avenue On-Ramp has three metered lanes with approximately 100 feet of storage and two lanes extending back an additional 680 feet. The ramp therefore has a maximum metered capacity of 2,700 vehicles per hour and a storage capacity of 57 vehicles. For existing conditions, Table 4.9.13 on EIR p. 4.9.48 indicates that the maximum existing hourly volume on the ramp is 1,950 vehicles and the maximum with project buildout would be 2,075 vehicles. This indicates that, with project buildout, the meters could operate at rates as low as 700 vehicles per hour per lane and volumes would be within the available ramp capacity. For cumulative conditions, Table 4.9.19 on EIR p. 4.9.72 indicates that the maximum hourly volume on the ramp with project buildout would be 3,358 vehicles, which exceeds the maximum hourly ramp capacity of 3,300 vehicles under non-metered conditions. Impact C-TR-21 on EIR p. 4.9.73 identifies this volume as a significant and unavoidable impact based on total ramp capacity, and it would remain a significant and unavoidable impact with consideration of ramp metering and vehicle storage.

For all on-ramps controlled by ramp meter signals during peak hours, the City will work with Caltrans to ensure that ramp meters are operated to avoid queues that spill back onto City streets, consistent with the current MOU regarding ramp meter operations.

### **Response to Comment Caltrans-5**

The comment requests clarification of an intersection name label in Appendix B. The intersection in the Synchro model files provided by the City is labeled “101 SB/Oyster Pt. Blvd. Off Ramp & Gateway Blvd./Future 101 NB Ramp/Gateway Blvd./Oyster Point.” A more correct label would be “Gateway Blvd. & Oyster Point Blvd./U.S. 101 SB Off-Ramp Flyover.” The “Future” label refers to the north leg of the intersection, which is the future Britannia Cove driveway.

### **Response to Comment Caltrans-6**

The comment requests coordination of the project with Caltrans freeway ramp projects. The City of South San Francisco will be the responsible party for implementation of intersection improvement mitigation measures associated with the project, and the City also coordinates with Caltrans on ramp projects affecting City streets. The project sponsor would not be directly responsible for this coordination, but would work with City staff as needed to implement mitigation measures that it is responsible for.

### **Response to Comment Caltrans-7**

The comment states that the EIR should evaluate the project’s effects on pedestrians, bicycles, travelers with disabilities, and transit users. The EIR addresses these issues on pp. 4.9.50-4.9.52. The analysis shows that impacts on pedestrians and bicyclists would not be significant, and that impacts on transit users would be less than significant with implementation of Mitigation Measures MM-TR-13 and MM-TR-14. The project would not impact existing access for pedestrians and bicycles to transit facilities, and would enhance transit access through implementation of pedestrian and transit stop improvements on and adjacent to the project site. In addition, the City of South San Francisco intends to update its Pedestrian and Bicycle Master Plan, CIP and East of 101 TIF. The project would participate in funding of any pedestrian and bicycle improvements through payment of the TIF that is in effect at the time building permits are issued for each construction phase, to the extent that the TIF funds such improvements.

### **Response to Comment Caltrans-8**

The comment states that the project should contribute fees to multimodal projects. The City of South San Francisco intends to update its Pedestrian and Bicycle Master Plan, CIP and East of 101 TIF. The updated CIP and TIF may include multimodal transportation projects as well as road improvements. The project would pay the TIF that is in effect at the time that building permits are issued for each construction phase, and would participate in funding multimodal improvements to the extent that the TIF funds such improvements.

### **Response to Comment Caltrans-9**

The comment states that the project should include a robust TDM Plan. The project would be required to implement a TDM plan as described in the EIR on p. 3.37 and in Section 4.9, Transportation and Circulation, on pp. 4.9.24, 4.9.33, 4.9.44, 4.9.52, and 4.9.57, among other locations. As explained on EIR p. 4.9.57, City ordinances require that the TDM program achieve a minimum of 35 percent alternative mode usage (not necessarily equal to the same percent reduction in peak hour vehicle traffic) in order to obtain a floor area ratio of 1.0, and provide monitoring of performance. The ordinance does not specify required features of a TDM program. The TDM program would be refined during the entitlement process and is likely to include some of the features listed in the comment.

### **Response to Comment Caltrans-10**

As noted in the comment, the City of South San Francisco is the Lead Agency for the proposed project. As such, the City decision-makers will consider all of the mitigation measures identified in the EIR, and will adopt a Mitigation Monitoring and Reporting Program (MMRP) requiring implementation of all feasible measures that are within the City's authority. The City is in the process of updating its East of 101 Area TIF and CIP. The City is considering including Mitigation Measure MM-C-TR-3 in the updated TIF and CIP. The project sponsor(s) would be required to pay the applicable TIF in effect at the time the building permit(s) is issued. Measures that would require improvements or changes to properties outside the City's jurisdiction, such as roadways within the jurisdiction of Caltrans, cannot be implemented by the City. In addition, the City cannot require implementation of measures for which there is no funding mechanism. CEQA does not provide the City with authority to require payment of a fair share of the cost applicable to the proposed project that would not be sufficient to carry out the improvements for which there is no adopted impact fee program. Therefore, while the EIR identifies feasible mitigation measures for most of the significant project-level and cumulative transportation impacts presented in the EIR, the City may not have the authority to implement all of these measures or require fair share payments. In addition, some mitigation measures may be found to be infeasible for social, economic, technical, legal, or other reasons.

The comment correctly notes that the proposed project meets the definition of a project of statewide, regional, or areawide significance in CEQA Guidelines Section 15206. Notices of Availability of the Draft EIR were mailed to the Metropolitan Transportation Commission, the Association of Bay Area Governments, two copies to the City/County Association of Governments (the San Mateo County Transportation Authority is a member), and the Regional Clearinghouse, in addition to the State



Clearinghouse at the Governor's Office of Planning and Research, all in accordance with Sections 15206 and 15086(a)(5). The notice also was posted in the offices of the San Mateo County Clerk.



San Francisco International Airport

A-SFO

November 15, 2018

Mr. Ryan Wassum  
Associate Planner  
City of South San Francisco  
Planning Division  
P.O. Box 711  
South San Francisco, CA 94083

**Subject:** *Draft Environmental Impact Report for the 201 Haskins Way Project in Oyster Point*

Dear Mr. Wassum:

Thank you for the opportunity for San Francisco International Airport (SFO or the Airport) to review and comment on the Draft Environmental Impact Report (EIR) for South San Francisco (the City) Oyster Point's 201 Haskins Way project. SFO recognizes the project will involve rezoning seven parcels from the Mixed Industrial district to Business Technology Park and Business Commercial districts. As outlined within the City's 1999 General Plan and subsequent updates, this is part of the City's "East of 101" planning area and is designated Light Industrial, and is assumed that there will be no residential or other overnight uses to be included in these rezonings of this site.

As noted in the Draft EIR, land use development within an Airport Influence Area (AIA) is overseen by the Airport Land Use Compatibility Plan (ALUCP), a revised version of which was adopted by the City/County Association of Governments of San Mateo County (C/CAG) in October, 2012. The ALUCP addresses issues related to compatibility between airport operations and proposed new land use developments, considering noise impacts, safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification.

The entire East of 101 area, and therefore the project site, lies wholly within AIA Area B, as does much of downtown South San Francisco. Within Area B, the C/CAG Board, acting within their Airport Land Use Commission (ALUC) capacity, will exercise its statutory duties to review all proposed land use policy actions. Therefore, the Draft EIR should note throughout the document, where there is mention of ALUC's authority of land use review, that the project site lies within Area B. Airport staff encourages the City to work closely with ALUC to determine project consistency with the ALUCP and other regulatory review procedures.

Additionally, AIA Area B lies entirely within AIA Area A, and therefore real estate disclosure requirements from Area A will also apply to this project should proposed uses change in any way to include residential or overnight uses, subject to the approval of ALUC.

The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to this project or future projects, please do not hesitate to contact me at (650) 821-7867 or at [john.bergener@flysfo.com](mailto:john.bergener@flysfo.com).

Sincerely,

John Bergener  
Airport Planning Director  
Bureau of Planning and Environmental Affairs

cc: James Castaneda, Airport Land Use Committee  
Sandy Wong, Airport Land Use Commission  
Nixon Lam, SFO, Environmental Affairs Manager

**AIRPORT COMMISSION** CITY AND COUNTY OF SAN FRANCISCO

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## A-SFO, JOHN BERGENER, SAN FRANCISCO INTERNATIONAL AIRPORT

### Response to Comment SFO-1

The comment notes correctly that the entire East of 101 Area, and therefore the project site, lies wholly within Airport Influence Area B, which lies entirely within Airport Influence Area A. Where there is mention of the Airport Land Use Commission's (ALUC) authority of land use review, the comment requests that the EIR should note that the project site lies within Area A and Area B. The comment also notes that the ALUC has authority of land use review in Area B and the project is subject to real estate disclosure requirements in Area A, should proposed uses change in any way to include residential or overnight uses, which would be subject to approval of the ALUC.

The comment does not raise any specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this Responses to Comments document under CEQA Guidelines Section 15088. The regulatory authority of the ALUC is described in the EIR in Section 4.7, Land Use and Planning, on pp. 4.7.2-4.7.3 and in Section 4.11.4, Hazards and Hazardous Materials, on pp. 4.11.29-4.11.30. As discussed in Section 4.7 of the EIR on pp. 4.7.13-4.7.14, the proposed project would be required to be referred to the ALUC for a determination of consistency and the proposed project would not obviously conflict with the ALUCP.

To further clarify the applicability of these areas in the EIR where airport land use impacts are addressed, the following text has been added as a new paragraph after the second complete paragraph on EIR p. 4.7.3 (new text is underlined). (This revision is also shown on p. 3.2 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

As shown in 2012 SFO ALUCP Exhibits IV-1 and IV-2, the project site is located within the boundary for Airport Influence Area A and Area B. Within Area A, real estate disclosure requirements apply to the project site should uses change in any way to include residential or overnight uses, which would be subject to approval by the ALUC. The project would not involve proposed residential or overnight uses. Within Area B, the C/CACG Board, acting within their ALUC capacity, would review the proposed rezoning action to determine project consistency with the ALUCP and other regulatory review procedures.

The first sentence of the first paragraph under "Comprehensive Airport Land Use Compatibility Plan" on EIR p. 4.7.13 has been revised as follows (new text is underlined). (This revision is also shown on p. 3.2 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

Because the proposed project is located within Airport Influence Area B and would involve a rezoning, the project would be required to refer to the ALUC for a determination of consistency with the relevant policies of the 2012 SFO ALUCP. Based on the existing and ongoing development of office/R&D uses in the East of 101 Area, no substantial inconsistencies with safety policies are anticipated. There are three airport/land use compatibility issues addressed in

the 2012 SFO ALUCP that relate to the proposed project: (a) consistency with noise compatibility policies; (b) safety criteria; and (c) airspace compatibility criteria.

In addition, the following text has been added as a new paragraph after the second complete paragraph on EIR p. 4.11.30 in Section 4.11.4, Hazards and Hazardous Materials (new text is underlined). (This revision is also shown on p. 3.4 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

As shown in 2012 SFO ALUCP Exhibits IV-1 and IV-2, the project site is located within the boundary for Airport Influence Area A and Area B. Within Area A, real estate disclosure requirements apply to the project site should uses change in any way to include residential or overnight uses, which would be subject to approval of the ALUC. The project does not involve proposed residential or overnight uses. Within Area B, the C/CACG Board, acting within their ALUC capacity, would review the proposed rezoning action to determine project consistency with the ALUCP and other regulatory review procedures.

The paragraph under Impact HZ-5 on EIR p. 4.11.37 has been revised as follows (new text is underlined). (These revisions are also shown on p. 3.4 of Chapter 3, Revisions to the Draft EIR.) These revisions do not change any of the analyses or conclusions of the EIR.

The closest airport is SFO, approximately 1 mile south of the project site. The project site is within the Airport Influence Area A boundary and Area B boundary of the ALUCP. The project does not involve proposed residential or overnight uses; therefore, real estate disclosure requirements under Airport Influence Area A are not required at this time. Because the proposed buildings under either the Phase 1 development or project buildout would have an area of greater than 100,000 sf and would require a rezoning of the project site, the proposed project is subject to advisory review by the ALUC. Within Area B, the C/CACG Board, acting within their ALUC capacity, would review the proposed rezoning action to determine project consistency with the ALUCP and other regulatory review procedures. With the proposed buildings at a maximum height of approximately 99 feet, the proposed project would not exceed the 2012 SFO ALUCP height limit of 161 feet. Due to proximity to the airport, however, the project would be required to submit a Notification of Proposed Construction or Alteration under 14 CFR Part 77 to allow the Federal Aviation Administration to chart the new structures in their database and provide a formal determination of the effect of the proposed structures on navigable airspace. Overall, the proposed project would be compatible with the ALUCP and the proposed structures would remain below the established height limits of the project site, and would not pose a safety hazard for people working in the project area. Therefore, this impact would be less than significant. No mitigation is necessary.






County of San Mateo  
Department of Public Works  
Utilities-Flood Control-Watershed Protection

A-SMC

201 HASKINS WAY PROJECT  
201 Haskins Way, South San Francisco

**To:** Ryan Wassum, Associate Planner, Planning Division, P.O. Box 711, City of South San Francisco.

**From:**  Mark Chow, P.E, Principal Civil Engineer, Utilities-Flood Control-Watershed Protection Section

**e-cc:** Ann Stillman, P.E., Deputy Director, Engineering & Resource Protection Division

Krzysztof Lisaj, P.E., Senior Civil Engineer, Utilities-Flood Control-Watershed Protection

Tiffany Deng, P.E., Associate Civil Engineer, Utilities-Flood Control-Watershed Protection

**Date:** November 26, 2018

**Subject:** 201 Haskins Way Project Draft Environmental Impact Report Review, 201 Haskins Way, South San Francisco, Submittal #1

**Reviewer:** Tiffany Deng

**Submittal/Review No.:** 1 (Final)

The County of San Mateo Department of Public Works, in its capacity as the administrator of the San Mateo County Flood Control District (District) which includes the Colma Creek Flood Control Zone (Zone), has reviewed the project details for the subject project and offers the following comments:

**Flood Control Zone Comments**

1. Our records show that the proposed project site is located outside of the Zone. Since the project site is located outside of the Zone boundaries and does not contribute financially to the Zone's revenue and maintenance of the District's facilities, storm water runoff from this site must not be directed to drain into City of South San Francisco storm drain lines which ultimately enter the District's flood control channel. We request that you provide us with a copy of the as built drawings when completed for our review and record. 1
2. The District anticipates that the City of South San Francisco will be reviewing any green infrastructures (e.g. bio-retention facilities) proposed by the project for compliance with requirements of Provision C.3.d of the NPDES Municipal Regional Stormwater Permit (Order No. R2-2015-0049) from the San Francisco Bay Regional Water Quality Control Board. 2

## **A-SMC, MARK CHOW, COUNTY OF SAN MATEO DEPARTMENT OF PUBLIC WORKS**

### **Response to Comment SMC-1**

The comment states that the project site is located outside the Colma Creek Flood Control Zone, which is administered by the San Mateo County Flood Control District. The comment maintains that because the project does not contribute to the zone's revenue, stormwater runoff from the project site must not be directed into storm drain lines which ultimately enter the district's flood control channel, and requests a copy of as-built drawings. The comment does not raise any specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this Responses to Comments document under CEQA Guidelines Section 15088. As described in EIR Section 4.6, Hydrology and Water Quality, on p. 4.6.3, and Section 4.10, Utilities and Service Systems, on p. 4.10.7, the stormwater facilities serving the project site are directed to an existing 48-inch-diameter storm drain on Haskins Way, into a catch basin, then through an outfall pipe to San Francisco Bay. From project site to discharge point, this system does not flow through the Colma Creek Flood Control Zone.<sup>5</sup> The project sponsor has provided San Mateo County Department of Public Works staff with a copy of existing storm drain system drawings that identify the system that serves the project site.

### **Response to Comment SMC-2**

The comment correctly notes that the City is responsible for reviewing the proposed green infrastructures (such as the proposed bio-retention facilities) for compliance with requirements of Provision C.3.d of the National Pollutant Discharge Elimination System (NPDES) Municipal Regional Stormwater Permit (Order No. R2-2015-0049) from the San Francisco Bay Regional Water Quality Control Board.

The comment does not raise any specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this Responses to Comments document under CEQA Guidelines Section 15088. The NPDES permit requirements applicable to the proposed project and the San Mateo Countywide Water Pollution Prevention Program are described in EIR Section 4.6, Hydrology and Water Quality, on pp. 4.6.8-4.6.9. Analysis of the proposed project in regard to stormwater-related water quality is presented on EIR pp. 4.6.13-4.6.17 and in regard to stormwater infrastructure in Section 4.10, Utilities and Service Systems, on p. 4.10.21.

To further acknowledge this permitting requirement, the last paragraph on EIR p. 4.6.16, which continues on p. 4.6.17, has been revised as follows (new text is underlined). (This revision is also shown on pp. 3.1-3.2 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

During operation of the proposed project, no ground-disturbing activities would occur and no activities would cause polluted discharges to surface waters. Under both phases of development

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<sup>5</sup> San Mateo County Department of Public Works, 2016. Colma Creek Flood Control Channel Maintenance Project Initial Study/Mitigated Negative Declaration, Figure 1 – Colma Creek Watershed. Available online at: [https://publicworks.smcgov.org/sites/publicworks.smcgov.org/files/ColmaCreekFloodControlChannelMaintenance\\_ISMND\\_June2016\\_0.pdf](https://publicworks.smcgov.org/sites/publicworks.smcgov.org/files/ColmaCreekFloodControlChannelMaintenance_ISMND_June2016_0.pdf). Accessed December 7, 2018.

(including the conceptual Phase 2 development plan), the proposed project would be designed to protect water quality through the management of stormwater runoff as part of green infrastructure through low-impact development (LID) in compliance with requirements of Provision C.3.d of the NPDES Municipal Regional Stormwater Permit (Order No. R2-2015-0049) as administered by the City. This approach implements engineered controls to allow stormwater, filtering, and storage and flood control. Controlled stormwater would flow through paved areas into designated bioretention areas or storm drains. Portions of roof areas would also be designed as green roofs that would provide filtration. Stormwater received through all proposed roof areas would be routed to the ground level through downspouts and conveyed to bioretention areas. The bioretention areas would be designed to allow water to evaporate, and provide pre-treatment of pollutants such as trash, debris, and larger sediments, as well as filtration of other pollutants. After collection, filtered stormwater would be allowed to infiltrate into groundwater or to storm drainage conveyances. Because of the presence of shallow bedrock and the influence of Bay waters and subsurface Bay Mud, it is unlikely that the existing project site provides substantial groundwater infiltration from stormwater. Nonetheless, the BMPs specified in a SWPPP would balance the rate of stormwater flows and impervious surfaces against the existing site conditions.

**From:** [Randy Dilena](#)  
**To:** [Wassum, Ryan](#)  
**Subject:** 201 Haskins Way Project - Draft Environment Impact Report  
**Date:** Friday, November 23, 2018 2:33:24 PM  
**Importance:** High

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Attention: Ryan Wassum, Associate Planner  
City of South San Francisco  
Economic and Community Development Department  
315 MAPLE ST  
S SAN FRANCISCO, CA 94083  
[Via Email]

**Re: 201 Haskins Way Project – Draft Environment Impact Report**

Dear Ryan,

I hope you enjoyed a very nice Thanksgiving Day holiday. It was a pleasure meeting you at the Project Information Meeting on November 13. I want to take this opportunity to also thank you for sending us a printable version of the Draft Environmental Impact Report (EIR) for the proposed 201 Haskins Way Project (dated October 12, 2018). Due to conflicts in our scheduling, we were unable to attend the Draft EIR Public Hearing on November 15, 2018. Instead, we are submitting our comments to you in writing here prior to the November 26, 2018 deadline.

As a reminder, I am writing to you on behalf of Dilena Family LLC – the organization that owns what is known as 451 East Jamie Court. This address is comprised of APN 015-102-240 and APN 015-102-290, which has been included in the proposed rezoning areas. The following is a collection of comments we have pertaining to content in the draft EIR:

As we all know, the responsibility of each City of South San Francisco representative involved in such a project as this is to be certain each “significant impact” has been reduced or avoided. As immediate neighbors of this development, we want to express our general pleasure with the planning of this project and its intended objectives - especially the objective to allow for the continued operations of existing uses of neighboring properties.

**Noise and Vibration (Section 4.8)** - As owners of the two parcels directly adjoining the Phase 1 proposal, we are extremely concerned with the impact of construction equipment vibration levels and noise to our building structure and to the occupants of our building. Our concern stems from the fact the draft EIR specifically warns...

1. equipment vibration levels will have “significant potential damage” to our nearby structure,
2. that “the impact of construction-related ground-bourne vibration is considered potentially significant”, and,
3. that any mitigation will involve a “study of potential vibration-sensitive buildings and the preparation of a mitigation plan” and that this plan will be “developed and implemented during the final phases of the project.” (ref page 4.8.30)

In order to adequately ensure that such a significant impact can be reduced or avoided, we sincerely request that this “mitigation plan” be prepared, evaluated and approved BEFORE the first phase of any project begins. Should such mitigation not be readily achievable, the proximity of Phase 1 buildings to our nearby structure (currently calculated to be approximately 10 feet, 3 inches) should be reconsidered if found necessary to avoid “significant” damage to our nearby structure.



**Transportation and Circulation (Section 4.9)** – The significant increase in traffic generated by the occupants of other new buildings in the East of 101 area, together with the recent unexpected closure of South Airport Boulevard, dramatically illustrated what can happen when new project developments are not matched with affective traffic mitigation measures. Such unexpected circulation developments like these dramatically impact everyone’s wellbeing and can cause immeasurable harm to the City and its businesses. We understand any new East of 101 development such as 201 Haskins Way will generate a “significant impact” to traffic. We therefore emphatically stress such added congestion must be thoroughly mitigated, reduced and/or avoided. After reading the Draft EIR submitted, we believe significantly more attention must be immediately focused on improving the circulation at the intersection of E. Grand Avenue and Littlefield Avenue – especially PM circulation.

3

Given that one of the stated “Project Objectives” (see page 3.3) is to “...Enhance vehicle... access in the area surrounding the project site...”, we are extremely concerned with how this project will negatively impact the movement of vehicles surrounding the site. For instance, by adding projected PM traffic from Phase 1 (see intersection 7 on page 4.9.38) to 2,040 PM traffic without Phase 1 (see intersection 7 on page 4.9.31), you will see that the number of vehicles involved will be 2,050 at peak hour, placing the intersection of E. Grand Avenue and Littlefield Avenue at “LOS F” (LOS = Level Of Service).

4

By their own admission, the Draft EIR authors mention (see page 4.9.61) that the addition of the Phase 1 buildout and occupancy will “...be a considerable contribution to the significant cumulative traffic impact at this location and require mitigation...” and that the possible mitigation measure “...is considered infeasible...”. To us, this is a statement that deflects the responsibility of the developer to mitigate this significant impact. At the very least, we believe the mitigation of this significant impact should be a requirement before any permit to develop the property be issued.

5

While we understand many of our other concerns can be addressed during the City design review stage, we believe the above mentioned comments could prove helpful to all concerned during this particular Draft EIR review stage. Again, as immediate neighbors of this development we are pleased with the overall concept of this project and its intended objectives. We look forward to being kept informed of when the City design review stage begins and remain hopeful the finished product will become an enhancement to the surrounding area and to our community.

6

Please let me know if you have any questions.

Thank you,  
Randy Dilena  
Dilena Family LLC

## **I-DILENA, RANDY DILENA, DILENA FAMILY LLC**

### **Response to Comment Dilena-1**

The comment expresses support for the proposed project based on its merits, including allowing for the continued operations of existing uses of properties in the Phase 2 area. This comment in itself does not raise any specific environmental issues about the adequacy or accuracy of the EIR's coverage of physical environmental impacts that require a response in this Responses to Comments document under CEQA Guidelines Section 15088.

Although comments on the merits of the proposed project do not raise issues concerning the adequacy or accuracy of the EIR's coverage of environmental impacts under CEQA, such comments, including recommendations for modifications to the proposed project, may be considered and weighed by the decision-makers as part of their decision to approve, modify, or disapprove the proposed project. This consideration is carried out independent of the environmental review process. In its deliberations, City decision-makers will determine whether mitigation measures identified in the EIR are feasible, and will require the project sponsor to implement those that are feasible as part of adopting a Mitigation Monitoring and Reporting Program.

### **Response to Comment Dilena-2**

The comment expresses concern with the impact of Phase 1 construction vibration and noise on neighboring building structures and occupants. In particular, the comment notes concern that the Draft EIR acknowledges potentially significant construction-related vibration impacts. The analysis of construction-related groundborne vibration impacts is provided in the EIR on pp. 4.8.28-4.8.30.

As noted on EIR pp. 4.8.7 and 4.8.18, impacts on building occupants are analyzed based on proximity to noise-sensitive uses such as residences, schools, daycare centers, hospitals, places of worship, and nursing homes. As analyzed on EIR pp. 4.8.28-4.8.29, the distance at which typical construction equipment would cause substantial vibration in regard to annoyance would be between approximately 0 to 41 feet, and there are no sensitive receptors on the project site or within 41 feet of the project site. The EIR concludes that no impacts from construction-related groundborne vibration with respect to human annoyance at off-site sensitive land uses would occur under the proposed project.

In regard to building structures, the comment correctly notes that the EIR identifies construction-related groundborne vibration as a potentially significant impact on nearby buildings. As described on EIR pp. 4.8.28-4.8.29, typical construction equipment would cause substantial vibration in regard to building damage at a distance between approximately 0 and 14 feet, and construction would occur adjacent to existing light industrial buildings. In particular, construction activities on the outer extent of the 201 Haskins Way parcel may be within 14 feet of these existing buildings, which are narrowly set back from the 201 Haskins Way parcel line. The EIR states that Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance, detailed on p. 4.8.30, would be required to mitigate this potentially significant impact. As analyzed on EIR pp. 4.8.30 and 4.8.31, the EIR concludes that impacts from construction-related groundborne vibration with respect to building damage would be less than

significant with implementation of Mitigation Measure MM-NO-2 under the proposed project. There is no evidence that the mitigation measure would be ineffective. Mitigation Measure MM-NO-2 is based on standard construction equipment and practices and presents typical solutions to the potential for vibration damage.

The comment also expresses concern that the proposed mitigation plan would be “developed and implemented during the final phases of the project,” referring to EIR p. 4.8.30. The comment requests that the mitigation plan be prepared and approved before the first phase of the project. Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance, on EIR p. 4.8.30, states that “[p]rior to issuance of a site permit, the project sponsor shall identify areas of potential building damage from construction vibration and determine the distance at which construction equipment would be used during implementation of the proposed project” and that the project sponsor shall prepare a mitigation plan and compliance monitoring program. As intended, preparation of the pre-construction due diligence, including the mitigation plan, would occur prior to issuance of construction permits. Therefore, the paragraph after Mitigation Measure MM-NO-2 on EIR p. 4.8.30 has been clarified, as follows (new text is underlined). (This revision is also shown on p. 3.3 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

Implementation of Mitigation Measure MM-NO-2 will involve preparation of a mitigation plan that will be developed and implemented during the final design phases of the project for approval by the City prior to issuance of building permits for each construction phase. Potential impacts associated with groundborne vibration would be identified, avoided and minimized. Therefore, with implementation of Mitigation Measure MM-NO-2, this impact would be reduced to a less-than-significant level.

In addition, the first sentence of the text of Mitigation Measure MM NO-2, on EIR p. 4.8.30, has been clarified as follows (new text is underlined and deleted text is ~~striketrough~~). (This revision is also shown on p. 3.3 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

#### **Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance**

Prior to issuance of a ~~site-building permit~~ for each construction phase, the project sponsor shall identify areas of potential building damage from construction vibration and determine the distance at which construction equipment would be used during implementation of the proposed project. For any equipment use that would be located near enough to a building to exceed the Caltrans/FTA building damage threshold of 0.5 in/sec, the project sponsor shall prepare a mitigation plan that provides a procedure for limiting vibration on potentially affected structures based on an assessment of each structure’s ability to withstand the loads and displacements due to construction vibrations. The project sponsor shall also prepare and implement a compliance monitoring program to ensure construction vibrations near buildings do not exceed the threshold of 0.5 in/sec, and identify site-specific control measures in consideration of equipment location and processes including, but not limited to, the following examples.

- Operate earth-moving equipment on the work site as far away from existing buildings and human-occupied sites as possible.

- Avoid simultaneous operation of vibration-causing construction equipment for demolition, earth-moving, or ground-impacting activities within approximately 50 feet existing buildings, where possible.
- Avoid operation of vibratory rollers and packers within approximately 50 feet of existing buildings, where possible.

The comment also requests that, should mitigation not be readily achievable, the proximity of Phase 1 structures to adjacent structures should be reconsidered if found necessary to avoid significant construction-related groundborne vibration impacts. As a part of the project review process, the project sponsor has retained an acoustic and vibration consultant to prepare a mitigation plan for construction vibration impacts. The plan delineates a vibration avoidance and monitoring zone of 30 feet from the eastern property line of 201 Haskins Way. The plan includes a detailed list of proposed construction equipment and vibration risk associated with each type of proposed equipment. The mitigation plan requires a pre-construction structural survey to document existing conditions of adjacent buildings, construction activity limitations within the 30-foot zone where feasible, and continuous vibration monitoring. Should plate compaction or other vibratory or impact equipment within the 30-foot zone be required, the plan requires pilot testing of such activities to confirm vibration limits can be met. Within the 30-foot zone, the plan also recommends avoidance of simultaneous operation of construction equipment and staging equipment and materials. Monitoring activities would include installation of real-time alarm equipment, and ongoing consultation and reporting as needed. With implementation of the mitigation plan, the proximity of Phase 1 structures to adjacent structures would not result in significant construction-related vibration impacts.

### **Response to Comment Dilena-3**

The comment states that more attention must be focused on improving the circulation at the intersection of East Grand Avenue and Littlefield Avenue. The EIR presents mitigation for this intersection on pp. 4.9.42-4.9.43 and 4.9.61-4.9.62. The mitigation for existing plus project conditions would provide acceptable operations at the intersection. The current East of 101 TIF includes funding for improvements at the intersection, and the project would be required to contribute to the TIF program. Mitigation was also identified for cumulative conditions; however, as discussed on EIR p. 4.9.62, the mitigation cannot be implemented without impacting established bicycle facilities and/or requiring the purchase of additional right-of-way from adjacent property owners that would result in impacts on existing buildings and businesses. The City's East of 101 Access Plan, currently being prepared, will identify additional measures to reduce traffic and congestion in the East of 101 Area.

### **Response to Comment Dilena-4**

The comment expresses concern about how the project would negatively impact the movement of vehicles, particularly at the intersection of East Grand Avenue and Littlefield Avenue. The impact noted in the comment is Impact TR-1, which is described on p. 4.9.42 of the EIR. As shown there, Phase 1 of the proposed project would cause operations to degrade from LOS D to LOS E in the AM peak hour, and buildout in Phase 2 would result in LOS F in the AM peak hour. The traffic volumes noted in the comment based on Figures 4.9.8 and 4.9.11 are not correct. Figure 4.9.8 on EIR p. 4.9.31 shows AM peak

hour volumes while Figure 4.9.11 on EIR p. 4.9.38 shows PM peak hour volumes and therefore does not relate to Figure 4.9.8; however, project-generated traffic added to the intersection would result in a significant impact, as discussed in Impact TR-1. The impact would occur in the AM peak hour, not the PM peak hour as stated in the comment. Implementation of Mitigation Measure MM-TR-1, EIR p. 4.9.42, would result in LOS D or better operations at this intersection, consistent with City policies. The current East of 101 TIF includes funding for improvements at the intersection, and the project would be required to pay the TIF program in effect at the time building permits are issued for each construction phase.

### **Response to Comment Dilena-5**

The comment states that mitigation of the future cumulative impact at East Grand Avenue and Littlefield Avenue (Impact C-TR-8) should be a requirement before any permit to develop the property is issued. This is a cumulative impact that would occur when other planned and potential development for the year 2040 planning horizon is constructed and occupied. Since the impact would not be caused primarily by the 201 Haskins Way project, it would not be appropriate to require implementation of the mitigation specifically prior to development of the proposed project. As discussed on EIR p. 4.9.61, the City has determined that the mitigation measure identified to reduce significant cumulative impacts under 2040 conditions is not feasible and is conducting an East of 101 Access Study to identify alternative ways to reduce traffic congestion in the East of 101 Area, including the intersection of East Grand Avenue and Littlefield Avenue. The EIR identifies this impact as significant and unavoidable. The City must evaluate whether economic, environmental, social, technological, and legal factors outweigh the significant and unavoidable environmental impact(s) of the project. In approving a project that will cause one or more significant environmental effects, the City must adopt a statement of overriding considerations indicating that even though a project would result in one or more unavoidable adverse impacts, specific economic, social or other stated benefits are sufficient to warrant project approval. The project would be required to pay the TIF in effect at the time building permits for each construction phase are issued, but mitigation measures found to be infeasible would not be included in a TIF and payment of the TIF would not reduce the significant impact. The proposed project would include implementation of a Transportation Demand Management (TDM) program, as explained in Chapter 3, Project Description, on EIR p. 3.37 and in multiple locations in Section 4.9, Transportation and Circulation, including EIR pp. 4.9.33, 4.9.44, 4.9.48, and elsewhere. However, as noted in the response to Comment Caltrans-2, implementation of the project's TDM does not guarantee that significant transportation impacts would be reduced to less-than-significant levels.

From: [William Mayer](#)  
To: [Wassum, Ryan](#)  
Cc: ["Toon Jordan"](#)  
Subject: 201 Haskins Construction  
Date: Sunday, October 21, 2018 10:03:10 AM

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Hello Ryan

I reviewed the draft EIR for 201 Haskins and it brought up a couple of questions/thoughts given our close proximity to the construction site:

- 1) I am concerned that construction vibration could cause damage to my property located within less than 100 feet of where the contractor will be digging and compacting the soil. When I read the report regarding vibration I thought about the Millennium Tower in San Francisco and the dispute between themselves and Caltrans regarding construction of the trans-bay terminal next door and the lawsuits underway.

At 151 Haskins we currently have some cracks in the concrete on our driveway and on the floor inside some of the warehouses due to normal settling since we built 33 years ago. In order to prevent or sustain any future claims I recommend that any issues currently existing within the structure (floors and concrete walls) and outside the structure on the driveways be documented by the city or the developer as benchmarks in case of potential damage caused by construction.

- 2) I am also concerned about dust and dirt that will be airborne and likely attach to our walls, roof and driveway. This might cause us to need to have the building power washed or painted after construction and the roof drains unclogged during/after construction. Again, in order to prevent any future disputes regarding damage claims I recommend that the project developer document the current conditions prior to construction.

I welcome the opportunity to discuss this with you and/or Toon from Alexandria so that we can develop a plan to prevent or resolve disputes down the road.

Thanks!

*Bill Mayer*

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## **I-MAYER, BILL MAYER, M & M DEVELOPMENT CO.**

### **Response to Comment Mayer-1**

The comment highlights concerns of potential property damage due to project-related construction vibration. Construction-related vibration impacts are discussed in Impact NO-2, EIR pp. 4.8.28-4.8.31. The EIR states that construction-related vibration could cause potentially significant impacts on buildings and structures. For this reason, the EIR applies Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance, on p. 4.8.30, which would require preparation and implementation of a mitigation plan to reduce impacts on nearby structures. Therefore, as concluded on EIR p. 4.8.30 (for Phase 1) and EIR p. 4.8.31 (for project buildout), with implementation of Mitigation Measure MM-NO-2, construction vibration impacts would be reduced to a less-than-significant level. See also the response to Comment Dilena-2.

The comment also asserts that there are existing cracks in the concrete driveways and warehouses due to normal settlement at the 151 Haskins Way parcel, adjacent to the Phase 1 project site at 201 Haskins Way and within the Phase 2 project area (see EIR Figure 3.2 on p. 3.6). The comment recommends that any existing issues be documented by the City or the developer as benchmarks in case of potential damage during construction of the proposed structures at 201 Haskins Way (Phase 1 of the proposed project). As described on EIR pp. 4.8.29-4.8.30, the mitigation plan that would be required under Mitigation Measure MM-NO-2 would involve evaluation of structures that may be within distances exceeding the building damage vibration threshold of 0.5 in/sec PPV. This plan would include documentation of existing conditions as a baseline to evaluate any changes in conditions during construction monitoring. To clarify this point, the last paragraph on EIR p. 4.8.29 has been revised, as follows (new text is underlined). (This revision is also shown on EIR pp. 3.2-3.3 of Chapter 3, Revisions to the Draft EIR.) This revision does not change any of the analyses or conclusions of the EIR.

Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance would involve the study of potential vibration-sensitive buildings and the preparation of a mitigation plan, which would apply to activities exceeding damage threshold at applicable distances and would include documentation of existing baseline conditions of potentially affected structures for monitoring and compliance purposes.

### **Response to Comment Mayer-2**

The comment expresses concern about construction-related air quality issues associated with dust and dirt on existing buildings and the need for future cleaning or painting. The comment also recommends that existing building conditions be documented by the City or the developer as benchmarks in case of potential dust and dirt impacts from project construction.

The EIR presents an analysis of air quality significance criteria based on CEQA Guidelines Appendix G with respect to conflict with or violation of regulatory plans or standards, emission of a cumulatively considerable net increase in pollutants in a non-attainment area, exposure of sensitive receptors to pollutants, and the creation of objectionable odors, as described on EIR p. 4.8.8. Dust on nearby



properties, as it pertains to cleaning or painting, is not an environmental impact under CEQA. Such issues may be pertinent to the City in its general oversight of project implementation, permitting, and compliance. This consideration is carried out independent of the environmental review process.

However, in the analysis of air quality impacts listed above, the EIR found that the project would require implementation of Mitigation Measure MM-AQ-1b: Implement BAAQMD Basic Construction Mitigation Measures, on EIR p. 4.2.15, with the goal of preventing and minimizing the generation of airborne pollution including particulate matter. The BAAQMD Basic Construction Mitigation Measures, which are established to reduce air quality impacts as defined by CEQA, would, to a certain extent, provide analogous reductions in the amount of offsite dust that could raise issues related to cleaning.

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### 3 REVISIONS TO THE DRAFT EIR

In response to comments made on the Draft EIR during the 45-day public comment period and to correct minor typographical errors, the following corrections have been made. The staff-initiated text changes to correct the typographical errors are indicated by an asterisk (\*).

- \* In Table 2.1: Summary of Project Impacts, Mitigation Measures, and Improvement Measures, the level of significance before mitigation identified for Impact C-TR-7 on EIR p. 2.22 has been revised to correctly indicate that the impact would be significant prior to mitigation, as discussed on EIR p. 4.9.60 (new text is underlined and deleted text is ~~striketrough~~):

Potential Environmental Impacts	Level of Significance before Mitigation	Recommended Mitigation Measures and Improvement Measures	Level of Significance after Mitigation
<b>Impact C-TR-7:</b> The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative impact at the intersection of Harbor Way/Forbes Boulevard and East Grand Avenue in both the AM and PM peak hours.	<del>LS</del> <u>S</u>	<p><b>Mitigation Measure MM-C-TR-7: Add a Fourth Westbound Through Lane on East Grand Avenue and Restripe Northbound and Southbound Approaches to the Intersection of Harbor Way/Forbes Boulevard/East Grand Avenue.</b></p> <p>The City of South San Francisco shall widen the westbound approach on East Grand Avenue at Harbor Way/Forbes Boulevard to provide a fourth through lane. Restripe southbound Forbes Boulevard from the planned improvements to provide one left-turn lane, two through lanes and one right-turn lane. Restripe northbound Harbor Boulevard from the planned improvements to provide two left-turn lanes, one through lane and one right-turn lane, with signal modifications as required.</p> <p>Measure not included in existing TIF and CIP. No City mechanism for funding and City cannot guarantee that this measure will be implemented.</p>	SU

- \* The following correction has been made to the second sentence of the first paragraph under “Approach to Analysis” on EIR p. 4.6.12 (new text is underlined and deleted text is ~~striketrough~~):

Construction of the proposed project does not include housing and therefore would not place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Therefore, criterion ~~(f)~~ (g) does not apply to the proposed project and is not discussed further under “Impact Evaluation.”

The last paragraph on EIR p. 4.6.16, which continues on p. 4.6.17, has been revised as follows (new text is underlined). This revision does not change any of the analyses or conclusions of the EIR.

During operation of the proposed project, no ground-disturbing activities would occur and no activities would cause polluted discharges to surface waters. Under both phases of development (including the conceptual Phase 2 development plan), the proposed project would be designed to

protect water quality through the management of stormwater runoff as part of green infrastructure through low-impact development (LID) in compliance with requirements of Provision C.3.d of the NPDES Municipal Regional Stormwater Permit (Order No. R2-2015-0049) as administered by the City. This approach implements engineered controls to allow stormwater, filtering, and storage and flood control. Controlled stormwater would flow through paved areas into designated bioretention areas or storm drains. Portions of roof areas would also be designed as green roofs that would provide filtration. Stormwater received through all proposed roof areas would be routed to the ground level through downspouts and conveyed to bioretention areas. The bioretention areas would be designed to allow water to evaporate, and provide pre-treatment of pollutants such as trash, debris, and larger sediments, as well as filtration of other pollutants. After collection, filtered stormwater would be allowed to infiltrate into groundwater or to storm drainage conveyances. Because of the presence of shallow bedrock and the influence of Bay waters and subsurface Bay Mud, it is unlikely that the existing project site provides substantial groundwater infiltration from stormwater. Nonetheless, the BMPs specified in a SWPPP would balance the rate of stormwater flows and impervious surfaces against the existing site conditions.

The following text has been added as a new paragraph after the second complete paragraph on EIR p. 4.7.3 (new text is underlined). This revision does not change any of the analyses or conclusions of the EIR.

As shown in 2012 SFO ALUCP Exhibits IV-1 and IV-2, the project site is located within the boundary for Airport Influence Area A and Area B. Within Area A, real estate disclosure requirements apply to the project site should uses change in any way to include residential or overnight uses, which would be subject to approval by the ALUC. The project would not involve proposed residential or overnight uses. Within Area B, the C/CACG Board, acting within their ALUC capacity, would review the proposed rezoning action to determine project consistency with the ALUCP and other regulatory review procedures.

The first sentence of the first paragraph under “Comprehensive Airport Land Use Compatibility Plan” on EIR p. 4.7.13 has been revised as follows (new text is underlined). This revision does not change any of the analyses or conclusions of the EIR.

Because the proposed project is located within Airport Influence Area B and would involve a rezoning, the project would be required to refer to the ALUC for a determination of consistency with the relevant policies of the 2012 SFO ALUCP. Based on the existing and ongoing development of office/R&D uses in the East of 101 Area, no substantial inconsistencies with safety policies are anticipated. There are three airport/land use compatibility issues addressed in the 2012 SFO ALUCP that relate to the proposed project: (a) consistency with noise compatibility policies; (b) safety criteria; and (c) airspace compatibility criteria.

The last paragraph on EIR p. 4.8.29 has been revised, as follows (new text is underlined). This revision does not change any of the analyses or conclusions of the EIR.

Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance would involve the study of potential vibration-sensitive buildings and the preparation of a mitigation plan, which would apply to activities exceeding damage threshold at applicable distances and would include documentation of existing baseline conditions of potentially affected structures for monitoring and compliance purposes.

The paragraph after Mitigation Measure MM-NO-2 on EIR p. 4.8.30 has been clarified, as follows (new text is underlined). This revision does not change any of the analyses or conclusions of the EIR.

Implementation of Mitigation Measure MM-NO-2 will involve preparation of a mitigation plan that will be developed and implemented during the final design phases of the project for approval by the City prior to issuance of building permits for each construction phase. Potential impacts associated with groundborne vibration would be identified, avoided and minimized. Therefore, with implementation of Mitigation Measure MM-NO-2, this impact would be reduced to a less-than-significant level.

The first sentence of the text of Mitigation Measure MM NO-2, on EIR p. 4.8.30, has been clarified as follows (new text is underlined and deleted text is ~~struckthrough~~). This revision does not change any of the analyses or conclusions of the EIR.

**Mitigation Measure MM-NO-2: Groundborne Vibration Minimization and Avoidance**

Prior to issuance of a ~~site-building~~ permit for each construction phase, the project sponsor shall identify areas of potential building damage from construction vibration and determine the distance at which construction equipment would be used during implementation of the proposed project. For any equipment use that would be located near enough to a building to exceed the Caltrans/FTA building damage threshold of 0.5 in/sec, the project sponsor shall prepare a mitigation plan that provides a procedure for limiting vibration on potentially affected structures based on an assessment of each structure's ability to withstand the loads and displacements due to construction vibrations. The project sponsor shall also prepare and implement a compliance monitoring program to ensure construction vibrations near buildings do not exceed the threshold of 0.5 in/sec, and identify site-specific control measures in consideration of equipment location and processes including, but not limited to, the following examples.

- Operate earth-moving equipment on the work site as far away from existing buildings and human-occupied sites as possible.
- Avoid simultaneous operation of vibration-causing construction equipment for demolition, earth-moving, or ground-impacting activities within approximately 50 feet existing buildings, where possible.
- Avoid operation of vibratory rollers and packers within approximately 50 feet of existing buildings, where possible.

- \* A page reference was omitted in the first sentence of the second full paragraph on EIR p. 4.11.13. The page reference has been added, as follows (new text is underlined and deleted text is ~~struckthrough~~):

As shown on Figure 3.4, p. ~~3-XX~~ 3.21, new sidewalks with street trees and landscaping buffers would be constructed along East Jamie Court, Haskins Way, and East Grand Avenue at project buildout (portions of Haskins Way and East Jamie Court during Phase 1 development, and the remaining areas during Phase 2 development, as depicted in the conceptual plan).

In addition, the following text has been added as a new paragraph after the second complete paragraph on EIR p. 4.11.30 in Section 4.11.4, Hazards and Hazardous Materials (new text is underlined). This revision does not change any of the analyses or conclusions of the EIR.

As shown in 2012 SFO ALUCP Exhibits IV-1 and IV-2, the project site is located within the boundary for Airport Influence Area A and Area B. Within Area A, real estate disclosure requirements apply to the project site should uses change in any way to include residential or overnight uses, which would be subject to approval of the ALUC. The project does not involve proposed residential or overnight uses. Within Area B, the C/CACG Board, acting within their ALUC capacity, would review the proposed rezoning action to determine project consistency with the ALUCP and other regulatory review procedures.

The paragraph under Impact HZ-5 on EIR p. 4.11.37 has been revised as follows (new text is underlined). These revisions do not change any of the analyses or conclusions of the EIR.

The closest airport is SFO, approximately 1 mile south of the project site. The project site is within the Airport Influence Area A boundary and Area B boundary of the ALUCP. The project does not involve proposed residential or overnight uses; therefore, real estate disclosure requirements under Airport Influence Area A are not required at this time. Because the proposed buildings under either the Phase 1 development or project buildout would have an area of greater than 100,000 sf and would require a rezoning of the project site, the proposed project is subject to advisory review by the ALUC. Within Area B, the C/CACG Board, acting within their ALUC capacity, would review the proposed rezoning action to determine project consistency with the ALUCP and other regulatory review procedures. With the proposed buildings at a maximum height of approximately 99 feet, the proposed project would not exceed the 2012 SFO ALUCP height limit of 161 feet. Due to proximity to the airport, however, the project would be required to submit a Notification of Proposed Construction or Alteration under 14 CFR Part 77 to allow the Federal Aviation Administration to chart the new structures in their database and provide a formal determination of the effect of the proposed structures on navigable airspace. Overall, the proposed project would be compatible with the ALUCP and the proposed structures would remain below the established height limits of the project site, and would not pose a safety hazard for people working in the project area. Therefore, this impact would be less than significant. No mitigation is necessary.