

OYSTER POINT HOTEL PROJECT

ENVIRONMENTAL CHECKLIST

TO DETERMINE WHETHER THE PROJECT IS WITHIN THE SCOPE OF THE
ENVIRONMENTAL IMPACT REPORT FOR THE OYSTER POINT SPECIFIC PLAN
EIR

SCH# 2010022070

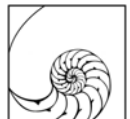
Lead Agency:

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



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October 2022

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Attachments

- A: Mitigation Monitoring and Reporting Program
- B: Fehr & Peers Transportation Assessment

I. Project Characteristics

- | | |
|--|---|
| 1. Project Title: | Oyster Point Hotel Project |
| 2. Lead Agency Name and Address: | City of South San Francisco
Economic & Community Development Department
315 Maple Avenue
South San Francisco, CA 94083-0711 |
| 3. Contact Person and Phone Number: | Christy Usher, Senior Planner
City of South San Francisco, Economic & Community
Development Department
315 Maple Avenue
South San Francisco, CA 94083-0711
Phone: 650-829-6633 |
| 4. Project Location: | 367 Marina Boulevard, South San Francisco, CA
Assessor's Parcel Number: 015-011-350 |
| 5. Project Sponsors' Names and Addresses: | Oyster Point Holdco, LLC
Contact: Randy McPherson
444 W. Ocean Blvd., Suite 650
Long Beach, CA 90802
Phone: 602-327-1305
rmcpherson@ensemble.net |
| 6. Existing General Plan Designations: | Coastal Commercial |
| 7. Existing Zoning: | Oyster Point Specific Plan District (OPSPD) |
| 8. Requested Approvals: | Precise Plan Approval |

II. Executive Summary

The project site is within the area planned for development as a part of the 2011 Oyster Point Specific Plan and associated 2011 Environmental Impact Report (State Clearinghouse Number 2010022070). The current project is located on the eastern peninsula portion of the 85-acre OPSP area, including the area identified in the in the OPSP as the Future Hotel Site.

Consistent with the OPSP and its associated EIR, a 350-room hotel is currently being proposed. The current project proposes up to 275,200 square feet of area, including approximately 12,000 square feet of restaurant space plus other amenities common for a hotel use including an entry lobby with lounge, meeting rooms, fitness facilities, roof top bar, and the associated back of house facilities to service the amenities. This total square footage also includes an additional 14,200 square feet of building space proposed as a future expansion phase to include an event ballroom and additional meeting space. The exterior space includes parking and circulation elements, landscaping, and outdoor terraces and event spaces.

California Environmental Quality Act (CEQA) Guidelines Section 15168 provides that when a Programmatic EIR has been prepared and certified, later activities (such as the proposed project) determined by the lead agency as being within the scope of the that EIR do not require subsequent environmental review, unless the criteria set forth in CEQA Guidelines Section 15162 triggering subsequent environmental review are met. This document serves as substantial evidence that the proposed project is within the scope of the OPSP EIR and that subsequent environmental review is not required since the project would not have effects that were not examined in the program EIR, and no substantial changes or new information has arisen that would result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts.

This document also examines the proposed project's consistency with the OPSP EIR pursuant to CEQA Guidelines Section 15183, which allows for streamlining the environmental review process for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

III. Background, Purpose, and Organization

Background

The project site is within the 2011 Oyster Point Specific Plan (OPSP) area. The OPSP was originally approved in March 2011, together with amendments to the South San Francisco General Plan and the South San Francisco Zoning Ordinance (Chapter 20.230), and the associated EIR was certified (2011 EIR). The OPSP included replacing the existing 403,212 square feet of light industrial/office space known as the Oyster Point Business Park with an up to 2,300,000 square foot office/research and development (R&D) development, improvements to the site circulation, utilities, and the landfill cap, provision of a flexible use recreation area and bay-front open space, and replacement of uses in the Oyster Point Marina area, potentially including one or two hotels with an aggregate of up to 350 rooms.

The OPSP, being a specific plan, was analyzed in the 2011 EIR (State Clearinghouse Number 2010022070) as a whole on a programmatic level. The 2011 EIR additionally analyzed the Phase 1 development on a project level, as project-level details were proposed for that phase at the time. Development of office/R&D in the Phase 1 area, including refuse relocation and regrading of this hotel site, consistent with the 2011 EIR has previously been approved and was completing construction at the time of this report.

The 2011 EIR for the OPSP is hereby incorporated by reference and can be obtained from the City of South San Francisco Economic & Community Development Department at 315 Maple Avenue in South San Francisco, and on the City of South San Francisco website at: <http://weblink.ssf.net> under Planning Division/Environmental Reports/Oyster Point Specific Plan.

Purpose

This Environmental Checklist examines the environmental effects of the proposed project to determine whether the proposed project is within the scope of the 2011 EIR for the OPSP or whether further environmental review is required. This document has been prepared in accordance with the relevant provisions of CEQA and the CEQA Guidelines as implemented by the City of South San Francisco.

CEQA Guidelines section 15168 provides that later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared and specifies how a program EIR is used with those later activities.

(1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.

(2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the

later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.

(3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.

(4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.

(5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

CEQA Guidelines section 15183 provides that projects consistent with the development density established by existing zoning policies or community plan for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project- specific significant effects that are peculiar to the project or its site. In such cases, the City must limit its examination of environmental effects to those that the agency determines, in an initial study or other analysis:

- (1) Are peculiar to the project or the parcel on which the project would be located,
- (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,
- (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or
- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.

Notably, If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an EIR is not required.

This Environmental Checklist demonstrates that none of the conditions described in CEQA Guidelines sections 15162 or 15168 have occurred because as proposed, the project would not result in new or substantially more severe significant environmental effects than what was analyzed in the 2011 EIR; therefore, no further environmental review is required. This Environmental Checklist also demonstrates that the proposed project qualifies for streamlining under CEQA

Guidelines section 15183 as there are no project-specific significant effects which are peculiar to the project or its site.

Organization

Section I, Project Characteristics presents a quick reference of the project details.

Section II, Executive Summary includes a summary of conclusions of this document.

Section III, Purpose and Organization (this section).

Section IV, Project Description details the proposed project.

Section V, Summary of CEQA Findings explains the findings of this document.

Section VI, Environmental Checklist details the potential environmental impacts of the project, including the impact findings of the 2011 EIR and relevant Mitigation Measures (MMs) and explains whether the current project would cause new or more significant environmental impacts than those identified in the 2011 EIR.

Attachment A includes full text of the MMs applicable to the current project in the proposed Mitigation Monitoring and Reporting Program.

IV. Project Description

Project Site and Vicinity

The approximately 85-acre OPSP site is located about 3/4 of a mile east of U.S. 101, at the eastern end (Bay side) of Oyster Point and Marina Boulevards. The OPSP is part of the City of South San Francisco's "East of 101" planning area, the traditional and continued core of South San Francisco's industrial and technological businesses. The East of 101 area consists of roughly 1,700 acres of land bound by San Francisco Bay on the east side, U.S. 101 and railway lines on the west, the City of Brisbane and San Francisco Bay on the north, and San Francisco International Airport on the south. The area has a mix of land uses, including industry, warehousing, retail, offices, hotels, marinas, and bioscience research and development facilities. The area is also currently separated from most of South San Francisco's residential uses by U.S. 101 (the closest of which are about 3,500 feet to the west) though some live-aboard boats are permitted at the two marinas located on Oyster Point and Oyster Cove marinas in the OPSP area.

The currently proposed project consists of one 4.7-acre parcel on the eastern peninsula of the 85-acre OPSP area, including the area identified in the OSPS as the Future Hotel Site (APN 015-011-350). The project site is flanked by the existing marina to the north and the San Francisco Bay to the south. The Bay Trail extends along the eastern and southern edges of the site. Existing commercial buildings and parking lots with access to the South San Francisco Ferry Terminal are located to the east. While currently vacant following recent landfill debris relocation and recapping/covering, a dedicated public open space is planned to the west between the project site and the Phase 1 office/R&D development under construction during preparation of this document. The location of the current project is shown in **Figure 1**.

The project site is currently vacant and maintained as an active construction site after relocation of some landfill material and the regrading of the remaining refuse and landfill cap and cover. While there had been existing buildings partially located at this site that were mentioned in the 2011 EIR, these were previously removed as part of the prior activities at the site.

Proposed Project

Figures follow the descriptive text showing the project site plan (**Figure 2**), site programming (**Figure 3**), grading and drainage (**Figure 4**), floor plans (**Figures 5 through 10**), and elevations (**Figures 11 through 14**).

The OPSP originally envisioned demolition of the existing building and construction of one or two hotels with a total of no more than 350 rooms plus up to 40,000 square feet of restaurant/retail uses.

In that same general area, the current project proposes preparation of the site for development by adding approximately 9 feet of fill on top of the landfill cap followed by the construction of one 350 room hotel. In addition to hotel rooms and related circulation and support, this square footage includes about 12,000 square feet of restaurant space plus other amenities common for a hotel use including an entry lobby with lounge, meeting rooms, fitness facilities, roof top bar, and the associated back of house facilities to service the amenities.

The exterior space includes parking and circulation elements, landscaping, and outdoor terraces and event spaces.

The above proposal totals approximately 261,000 square feet. An additional 14,200 square feet of building space is proposed as a future expansion phase to include an event ballroom and additional meeting space for a total square footage of 275,200.

Consistent with existing hotels in the vicinity, the project would be anticipated to primarily serve nearby business and the San Francisco International Airport.

Building Height and Massing

The proposed project would be 12 stories tall, reaching a height of 119 feet above grade, with allowable rooftop equipment and projections reaching a height of approximately 146 feet above grade (165 feet above sea level).

The proposed building footprint is 43,043 square feet, which would be expanded to 56,631 with the proposed future ballroom expansion, equating to about 28% of the site.

Access and Circulation

Vehicular Access: The project proposes three vehicular driveways along Marina Boulevard and a fourth connection that would act as a fire and service lane.

Bicycle & Pedestrian Circulation: Pedestrian links are proposed between the hotel and Marina Boulevard and the Bay Trail, which is located adjacent to the east of the project site.

Transit Facilities & Network Configuration: Except for the South San Francisco Ferry Terminal, the project site is not within walking distance of regional transit service, such as Caltrain and BART. Access to these services are provided by feeder shuttles operated by Commute.org. Currently, three commute.org shuttle routes provide service along and to the northern end of Oyster Point Boulevard and connect the project site with the South San Francisco BART and Caltrain stations and the South San Francisco Ferry terminal. During the weekday AM and PM peak period, each shuttle route operates on approximately 30-minute headways in the peak direction and are timed to connect with arriving or departing ferries and Caltrain service. Service is limited to weekday commute periods and directions.

Parking: Approximately 232 vehicle parking spaces would be provided, including 29 tandem spaces and 33 valet spaces. Parking for 35 bikes is proposed, including 10 for employees and 25 public spaces. A screened loading dock and yard with space allocated for two dedicated service trucks would be provided adjacent to the back of house facilities with access through the central parking lot.

AREA MAP



VICINITY MAP



Figure 1: Project Location

Source: SB Architects, Project Plan Set, dated 9/28/22



Figure 2: Site Plan
Source: SB Architects, Project Plan Set, dated 9/28/22

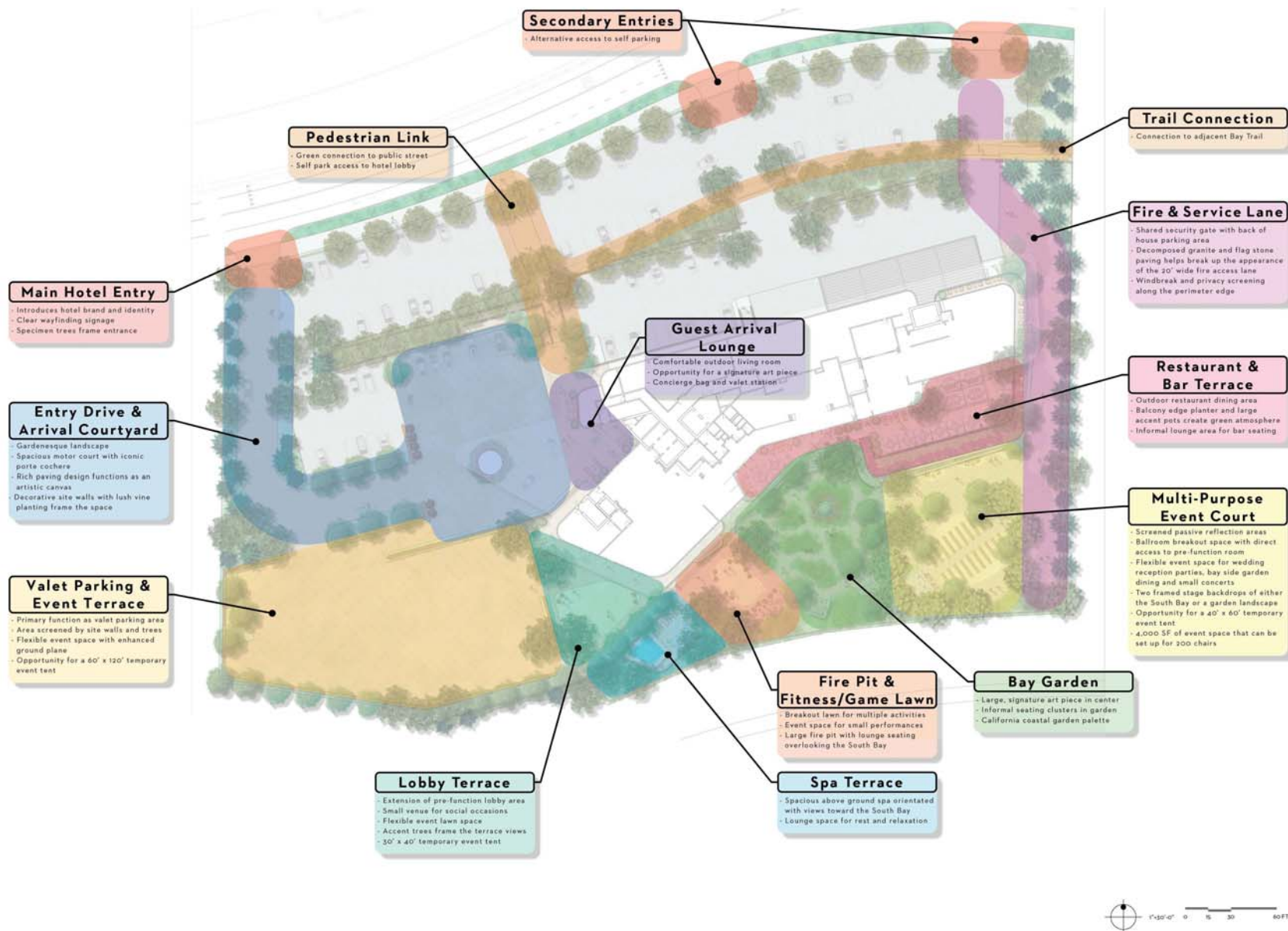


Figure 3: Site Programming

Source: SB Architects, Project Plan Set, dated 9/28/22

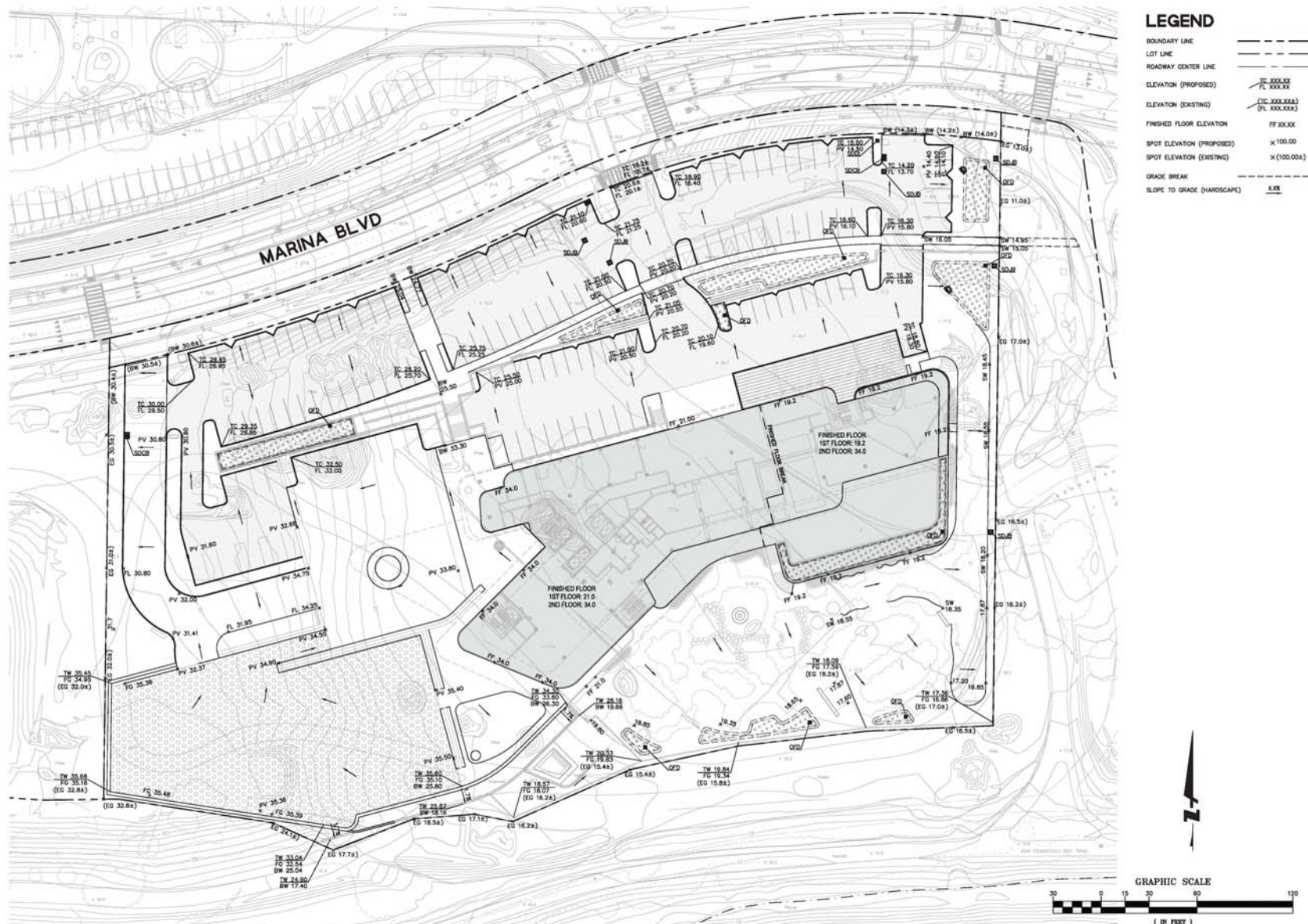


Figure 4: Preliminary Grading and Drainage
 Source: SB Architects, Project Plan Set, dated 9/28/22

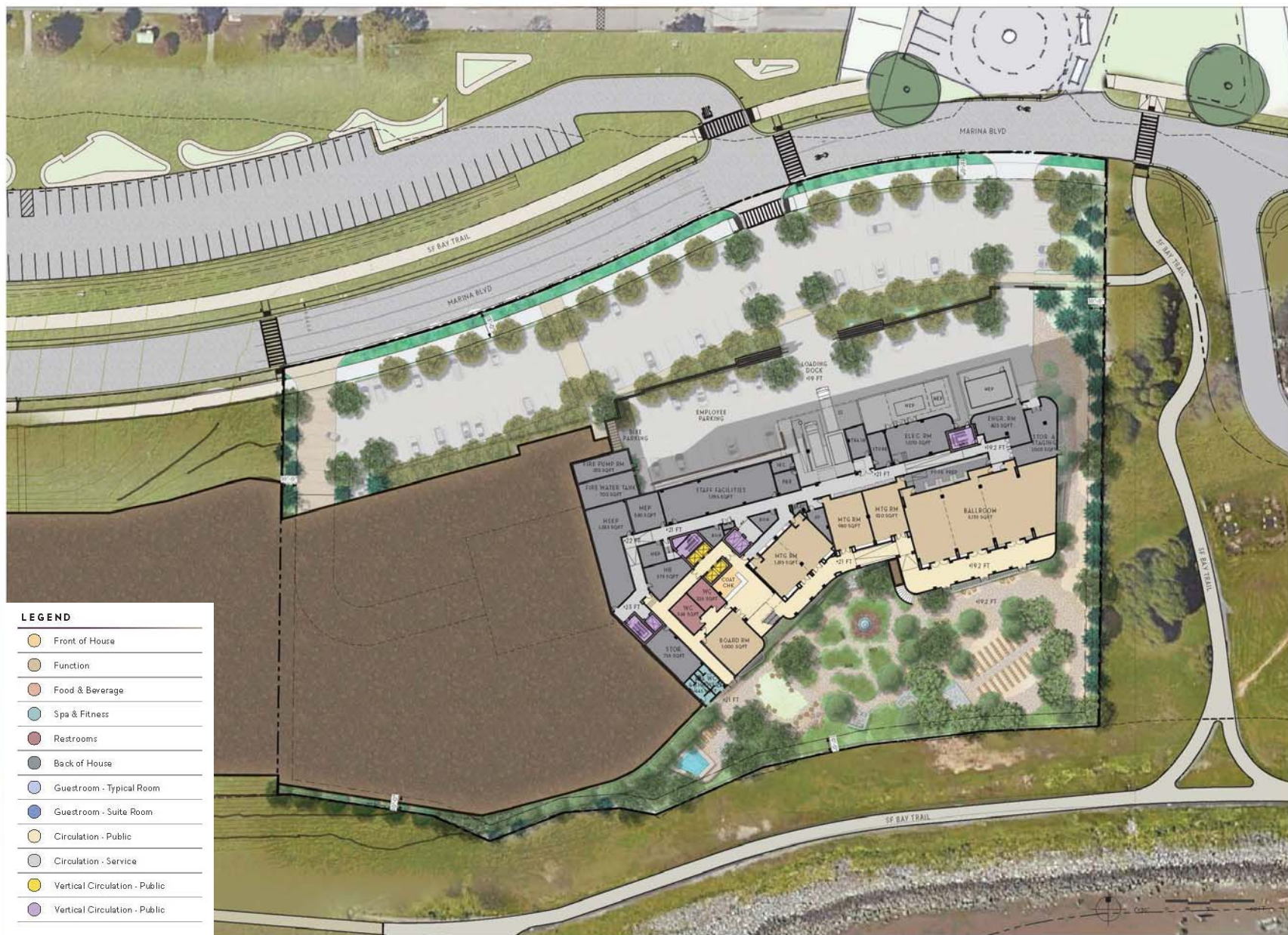


Figure 5: Floor Plan, Ground Floor

Source: SB Architects, Project Plan Set, dated 9/28/22

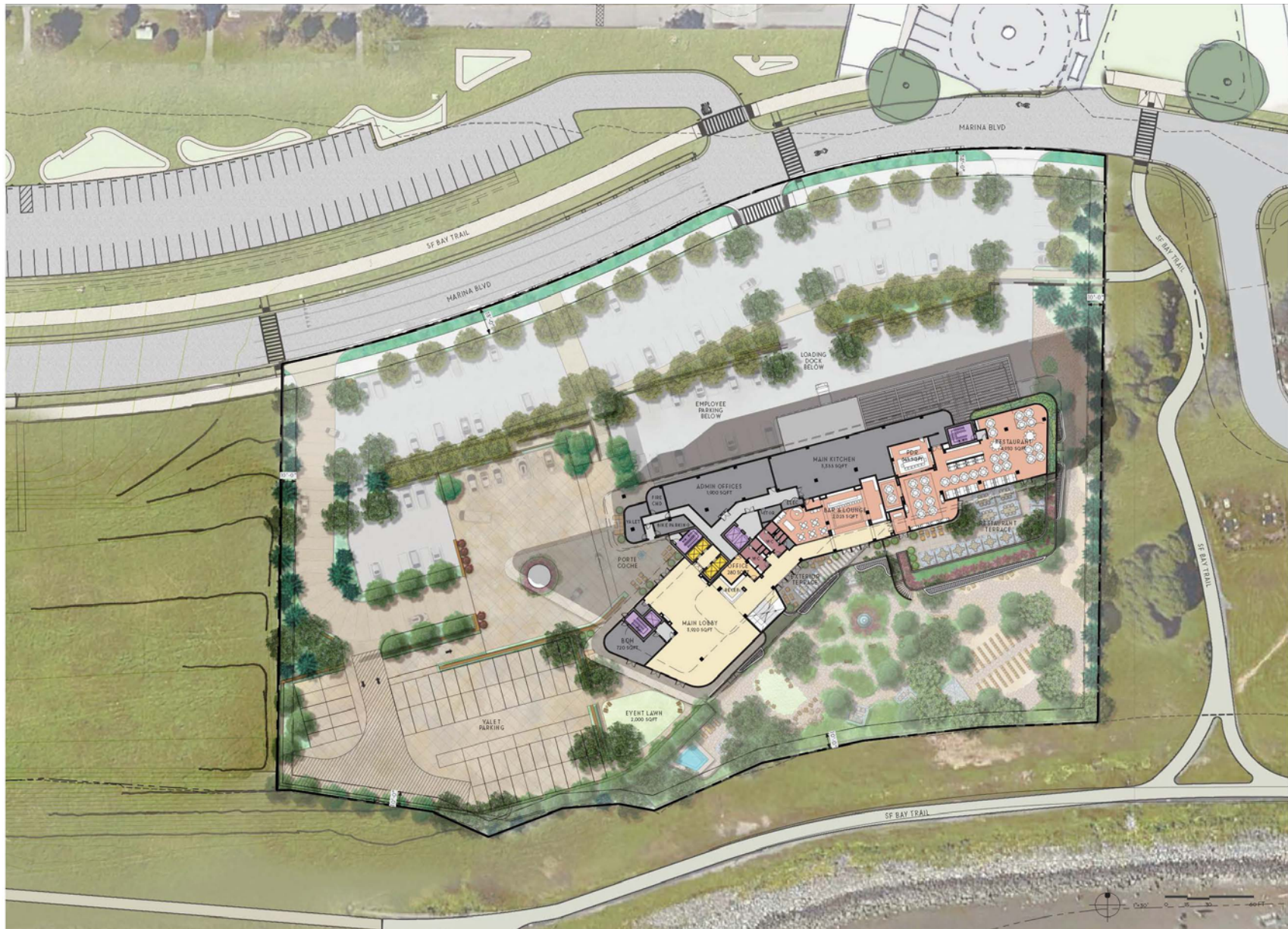


Figure 6: Floor Plan, Floor 2

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 5)

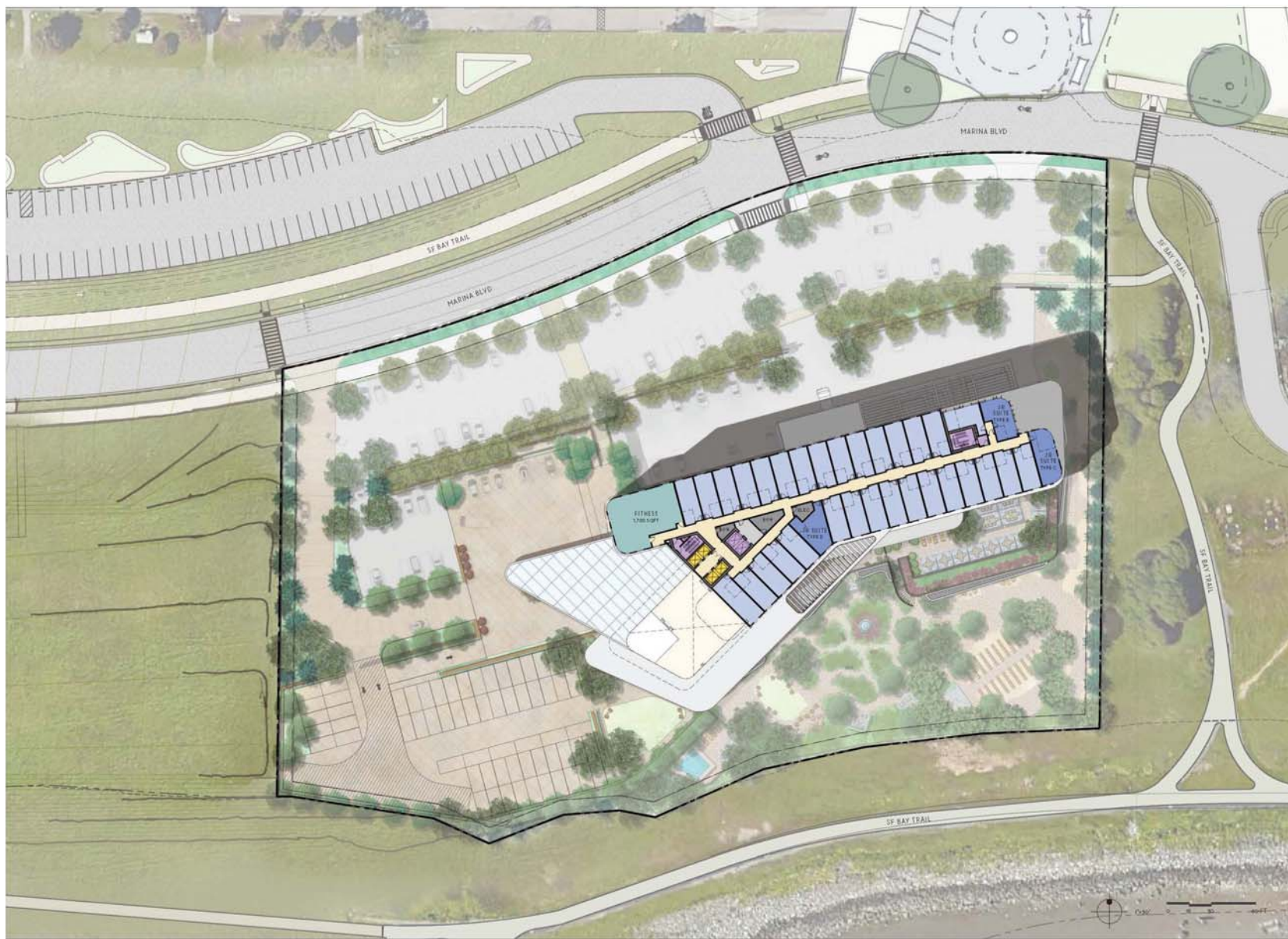


Figure 7: Floor Plan, Floor 3

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 5)

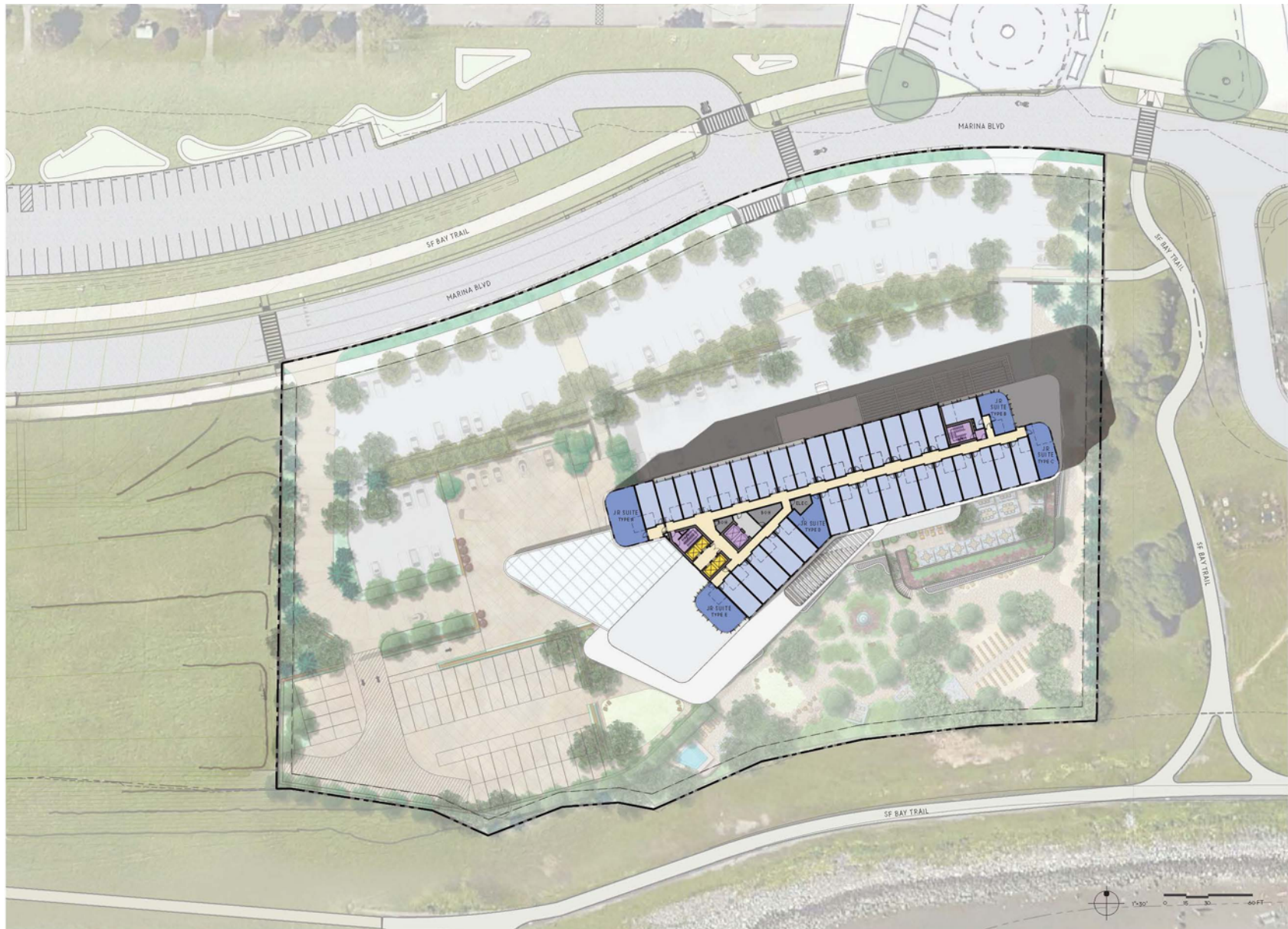


Figure 8: Floor Plan, Floors 4 through 7 (these floors would have substantially similar floor plans)

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 5)

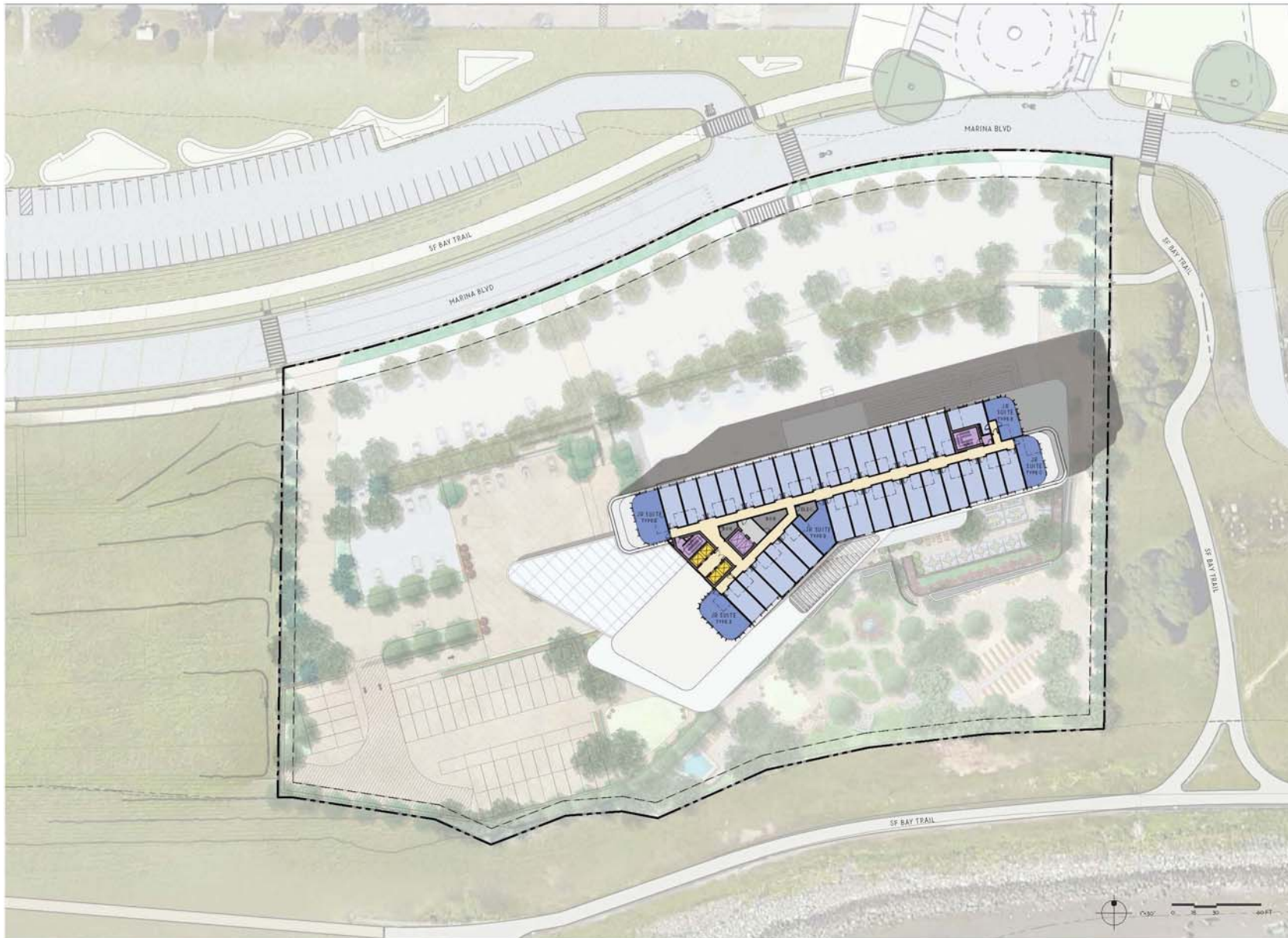


Figure 9: Floor Plan, Floors 9 through 11 (these floors would have substantially similar floor plans)

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 5)

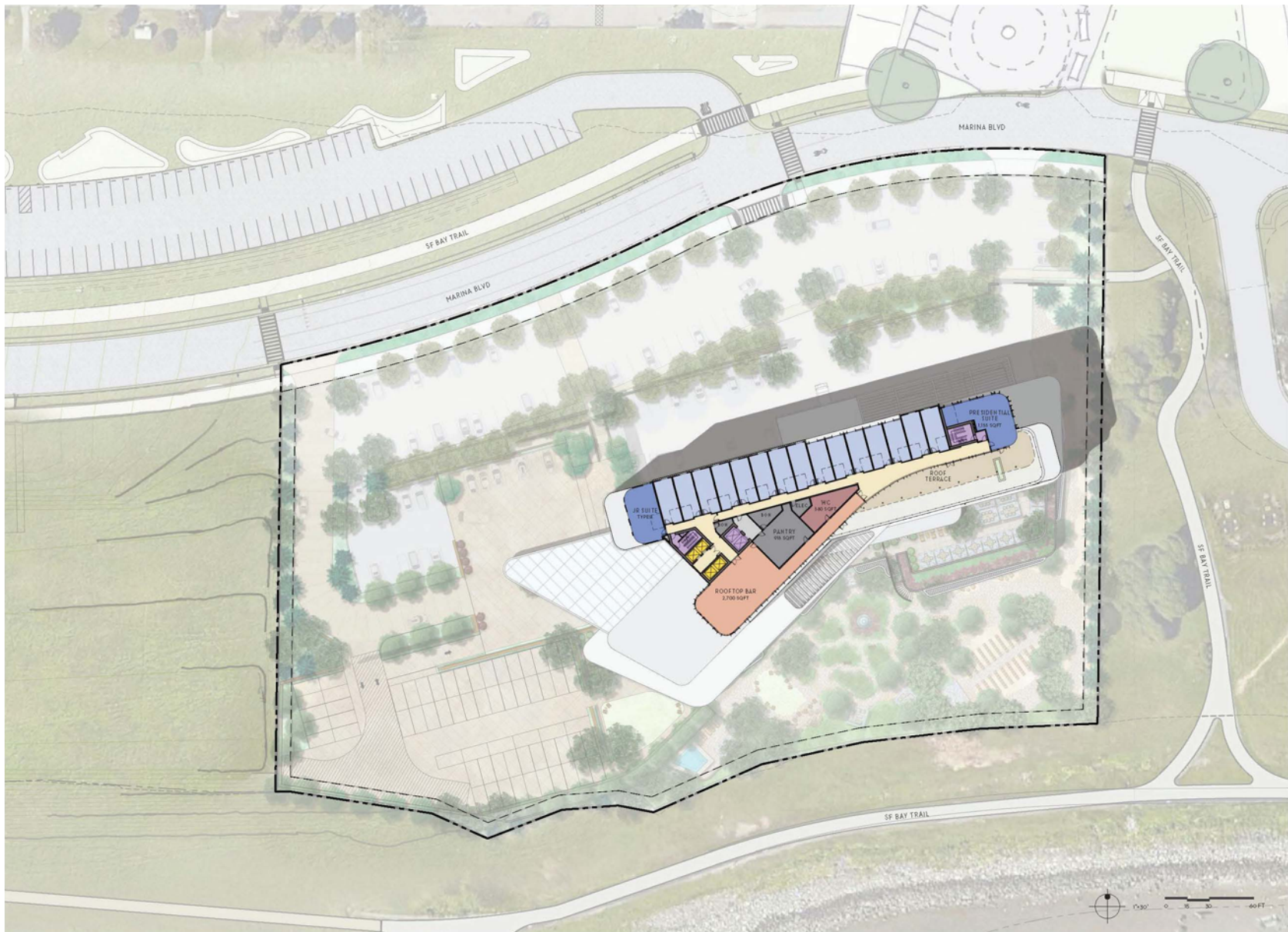


Figure 10: Floor Plan, Floor 12

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 5)



Figure 11: Building Elevation, North
Source: SB Architects, Project Plan Set, dated 9/28/22

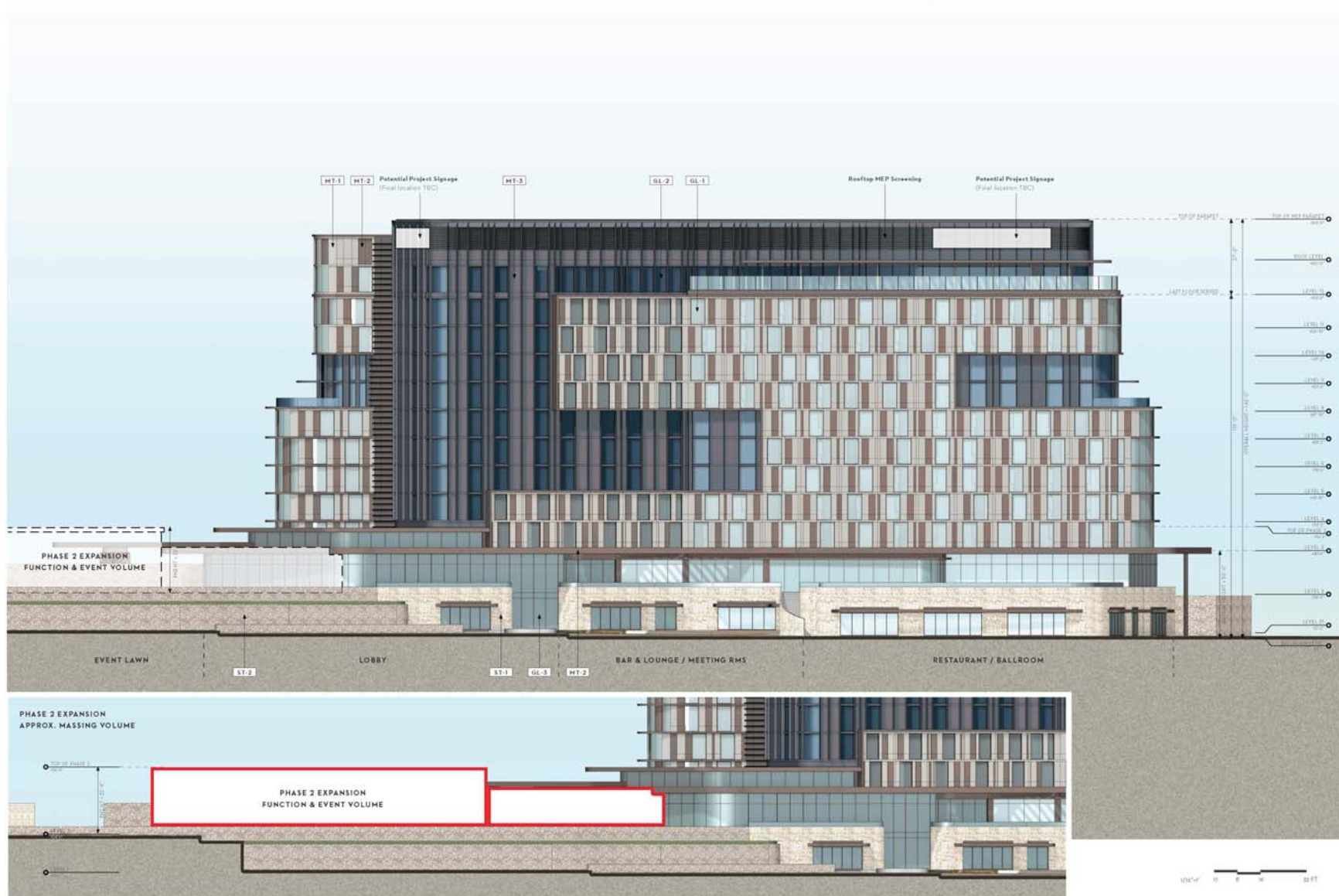


Figure 12: Building Elevation, South

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 11)



Figure 13: Building Elevation, East

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 11)



Figure 14: Building Elevation, West

Source: SB Architects, Project Plan Set, dated 9/28/22 (see Legend on Figure 11)

V. Summary of CEQA Findings

Given the substantial evidence included in this document and attachments and the 2011 EIR for the OPSP, the current project would not require subsequent analysis to the 2011 EIR per CEQA Guidelines Section 15162, as confirmed by the following statements:

- (1) The current project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) There are no changes in circumstances that would result in the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) There is no new information resulting in a new significant effect or a substantial increase in the severity of previously identified significant effects, or a change in the feasibility (or acceptance) of mitigation measures.

While specific details of the hotel development within the OPSP area have now been proposed, this assessment has determined that no further documentation is required per CEQA Guidelines Section 15162. The 2011 EIR for the OPSP continues to serve as the applicable environmental review document pursuant to the requirements of CEQA for approval of the current project.

VI. ENVIRONMENTAL CHECKLIST

This Environmental Checklist compares potential environmental impacts of the project to the findings of the 2011 EIR, notes whether the project would result in new significant impacts or impacts substantially greater or more severe than those previously identified in the 2011 EIR, and includes an explanation substantiating the findings for each topic. It uses the abbreviation SU for significant and unavoidable, LTS for less-than-significant, LTS w/ MMs for impacts that are reduced to LTS with implementation of identified mitigation measures (MMs), and NI for when No Impact was identified in the 2011 EIR.

The checklist also lists applicable mitigation measures from the 2011 EIR. A full list of the MMs applicable to the current project can be found in Attachment A, Mitigation Monitoring and Reporting Program (MMRP). More detail regarding the significance criteria used in this document and the environmental impacts of implementation of the OPSP is available in the OPSP Draft and Final EIR available from the City of South San Francisco Economic & Community Development Department at 315 Maple Avenue in South San Francisco, and on the City of South San Francisco website at: <http://weblink.ssf.net> under Planning Division/Environmental Reports/Oyster Point Specific Plan.

When a dash (--) appears in the checklist below, it means that the OPSP EIR did not identify any MMs related to that environmental impact. N/A appears when an MM was identified but it does not apply to the current project (e.g., the project characteristics do not meet the criteria specified in the MM).

As discussed below, the proposed project was designed to be in general compliance with the development, design, and performance standards of the OPSP, and the project is therefore consistent with the 2011 EIR. There is no evidence of substantial changes to the circumstances under which impacts were analyzed in the 2011 EIR, and no evidence of new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the 2011 EIR was certified, that would show a new or more severe significant impact resulting from the project relative to the analysis included in the 2011 EIR.

A. Aesthetics

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Scenic Vistas	LTS	☒	☐	--	LTS
b. Scenic Resources	NI	☒	☐	--	NI
c. Visual Character	NI	☒	☐	--	NI
d. Light or Glare	LTS w/ MM	☒	☐	MM Vis-2a: Lighting Plan MM Vis-2b: Glare Reduction	LTS w/ MM

Discussion

Aesthetic Changes from the 2011 EIR

Consistent with the OPSP, the existing building previously located on the project site has already been demolished as part of prior activities at the site.

Visual models and renderings of the proposed development can be seen in Figures 3 through 5. The full description of the proposed changes can be found in Section IV: Project Description and was used to assess aesthetic impacts. The proposed changes can be summarized as follows:

The 2011 EIR did not have any details about a proposed hotel design, other than the OPSP allowing for 1 or 2 hotels with a maximum of 350 rooms. The 2011 EIR included a possible hotel project in the visual modeling, which included a lower height (75 feet compared to the proposed height of 119 feet) and a larger footprint than currently proposed. This visual modeling was conducted for demonstrative purposes prior to details being available and was not intended to represent constraints on the actual development. The 2011 EIR noted that actual heights would be restricted only to those allowable under Federal Aviation Regulations Part 77, which this project would be required to be in compliance with.

Scenic Vistas

Same Conclusion (conclusion remains LTS): *The current project would not change Impact Vis-1 or the less-than-significant conclusion as there are no scenic vista viewpoints in the area and therefore the potential to impact views is generally the same as under the 2011 EIR despite revisions to the height of the building.*

While both the San Francisco Bay and San Bruno Mountains are visible from portions of the site and surrounding area, there are no designated public viewpoints for scenic vistas. The topography of the area and existing development already fully or partially blocks views from U.S. 101 and surrounding development. The conclusion of less-than-significant in regard to scenic vistas would remain the same even with the taller building proposed with the current project.

Scenic Resources

Same Conclusion (conclusion remains NI): *The current project would not change the no impact conclusion related to scenic highways, as the lack of scenic designation of the nearby highways is the same as under the 2011 EIR.*

Visual Character

Same Conclusion (conclusion remains NI): *The current project would not change the no adverse impact conclusion as commercial development consistent with applicable design criteria is not considered a degradation of character or quality of the environment.*

The visual character of the East of 101 area consists of a mixture of older and newer office, industrial, and hotel buildings, with differing amounts of associated landscaping. Development of the current project would involve new construction of a modern building with a high-quality design including private and public landscaping and pedestrian improvements. While the height would substantially increase over the existing vacant conditions, the proposed conditions are within that allowed under the zoning and consistent with other development in the East of 101 area. Therefore, consistent with conclusions of the 2011 EIR, while the site would look different following construction, the construction of a modern building meeting or exceeding the City's design criteria would not result in any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Light and Glare

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impact Vis-2, mitigation measures Vis-2a and Vis-2b, or the less-than-significant with mitigation conclusion as the proposed lighting levels and potential for light and glare would be substantially the same as under the 2011 EIR.*

While the development proposed with the current project has different specific building massing and location than that included in the visual model for the 2011 EIR, as specified in the 2011 EIR, the project will be required to adhere to a lighting plan (mitigation measure Vis-2a) and incorporate exterior surfaces intended to reduce glare (mitigation measure Vis-2b). The potential for light and glare impacts would remain substantially the same as under the 2011 EIR, and therefore the project would not result in any new or substantially more severe impacts related to light and glare than previously analyzed in the 2011 EIR.

B. Agricultural and Forest Resources

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Convert Farmland	NI	☒	☐	--	NI
b. Conflict with Agricultural Designation	NI	☒	☐	--	NI
c. Conflict with Forest Designation	NI	☒	☐	--	NI
d. Convert Forest	NI	☒	☐	--	NI
e. Indirect Conversion of Agricultural or Forest Land	NI	☒	☐	--	NI

Discussion

Same Conclusion (NI): *There have been no changes in circumstance or new information related to agriculture and forest resources, which do not occur in the project area, and there would be no change to the no impact conclusion related to these topics.*

C. Air Quality

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Conflict with Air Quality Plan	SU w/MM	☒	☐	MM Traf-1: Transportation Demand Management Plan	LTS w/MM
b. Criteria Air Pollutants	LTS w/MM	☒	☐	MM AIR-4a: Implement BAAQMD-Recommended Measures to Control Particulate Matter Emissions during Construction MM Traf-1: Transportation Demand Management Plan	LTS w/MM
c. Sensitive Receptors	LTS w/ MM	☒	☐	MM AIR-4a: Implement BAAQMD-Recommended Measures to Control Particulate Matter Emissions during Construction	LTS w/ MM
d. Odors	LTS	☒	☐	--	LTS

Discussion

Air Quality Setting Changes from the 2011 EIR

Since the 2011 EIR, the Bay Area Air Quality Management District (BAAQMD) has updated its CEQA Air Quality Guidelines (BAAQMD Guidelines), which assist lead agencies in evaluating and mitigating air quality impacts. The 2011 EIR was being prepared as the 1999 BAAQMD Guidelines were being updated for the 2010 draft and the 2011 EIR compared the OPSP to both thresholds. The latest draft of the BAAQMD guidelines was issued in May 2017 and includes thresholds consistent with the 2010 draft BAAQMD Guidelines assessed in the 2011 EIR. Since the 2011 EIR, the Bay Area 2017 Clean Air Plan updated the 2010 Clean Air Plan utilized in the 2011 EIR assessment. The latest update to the Clean Air Plan revises the way in which projects are assessed for consistency and no longer considers the ratio of population increase to vehicle use of a project to be a consistency factor.

Conflict with Air Quality Plan

Less Significant Conclusion (SU reduced to LTS w/ MM): *There have been no changes in circumstance or new information related to the applicable air quality plans, or the less-than-significant with mitigation conclusion as the potential impacts would be substantially the same as under the 2011 EIR. In addition, the Clean Air Plan has been updated since the 2011 EIR and now includes different standards with which to assess a project; while no further analysis is required by CEQA, consistency with the updated Clean Air Plan is nonetheless evaluated for informational purposes below. Mitigation measure Traf-1, requiring implementation of TDM plans, remains applicable and unchanged from the 2011 EIR and would apply to the project.*

The significant and unavoidable impact in the 2011 EIR was based on the previous Clean Air Plan's requirement to consider the relative increase in population and vehicle use. This is no longer a threshold in the current Clean Air Plan. Under the current Clean Air Plan, a project's impact would be significant if

the project would conflict with or obstruct attainment of the primary goals or implementation of the control measures.

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

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

The current project would be consistent with all applicable rules and regulations related to emissions and health risk and would not result in a new substantial source of emissions or toxic air contaminants or otherwise conflict with the primary goals of the Bay Area 2017 Clean Air Plan.

Many of the Bay Area 2017 Clean Air Plan's control measures are targeted to area-wide improvements, regional policies, or large stationary source reductions, and these are not directly applicable to the project. However, the current project is consistent with all rules and regulations related to construction activities and the proposed development would meet current standards of energy and water efficiency (Energy Control Measure EN1 and Water Control Measure WR2) and recycling and green waste requirements (Waste Management Control Measures WA3 and WA4). The required TDM plans (MM Traf-1) will contribute to trip reduction programs (Transportation Control Measure TR2), and improving access/connectivity for bicycles and pedestrians (Transportation Control Measure TR9).

Therefore, the project does not conflict with applicable control measures, is generally consistent with the Bay Area 2017 Clean Air Plan, and would not create any new or substantially more severe impacts than previously analyzed in the 2011 EIR. The project would also be subject to mitigation measure Traf-1 requiring TDM plans for development, which would require trip reductions that would also reduce resultant emissions.

Criteria Air Pollutants

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impact Air-4 and the less-than-significant with mitigation conclusion related to construction-period impacts or Impact Air-5 and the less-than-significant with mitigation conclusion related to operational-period impacts. Mitigation measure Air-4b relates to refuse relocation, which has already been completed on the project site, and is therefore not applicable.

As noted in the 2011 EIR, short-term degradation of air quality may occur due to the release of fugitive dust, criteria pollutants, and diesel exhaust particulate matter generated by grading, hauling, and other construction related activities. Construction emissions from redevelopment were quantified based on overall areas and building square footages and were found to be below thresholds levels with implementation of applicable controls detailed in MM Air-4a. (MM Air-4b relates to refuse relocation from the Phase 1 site, which has already occurred on the project site and is not a part of the current project.)

As noted in the 2011 EIR, development of the OPSP would generate operational emissions from vehicle emissions and building/site operation and maintenance. Operational emissions were quantified and

found to be below applicable threshold levels. While not discussed in the 2011 EIR, MM Traf-1 would further reduce this less-than-significant impact by reducing vehicle trips and related emissions. For these reasons, the project would not result in any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Sensitive Receptors

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impact Air-4 and the less-than-significant with mitigation conclusion related to construction-period health risk. As has become standard practice for construction projects with nearby receptors, mitigation measure Air-4c would be added to further reduce construction-period health risk. The current project would not introduce new sensitive receptors such as a daycare facility, which would negate the need for mitigation measure Air-2.

Regarding Impact Air-2 and operational-period emissions, the 2011 EIR concluded that while the increased traffic and generators would contribute to area health risks, the contribution would be less-than-significant. The 2011 EIR also concluded that any proposed new sensitive uses (such as if Day Care Facilities were proposed as uses ancillary to office/R&D developments) would need to implement Air-2 requiring a site-specific health risk assessment and implementation of any necessary measures to reduce toxic air contaminant exposures. A hotel use is not considered to be a sensitive receptor, so mitigation measure Air-2 would not be applicable to the current project.

Regarding construction-period health risk, the 2011 EIR concluded that with implementation of applicable construction-period emissions controls identified in MM Air-4a (and MM Air-4b which applied only to refuse relocation activities on the Phase 1 site that are not applicable to the current project), the impact of the project would be less-than-significant. The project would comply with MM Air-4a and would therefore not create any new or substantially more severe impacts related to construction emission impacts on sensitive receptors. In addition, as a best practice, the applicant is committing to further reduce construction emissions by utilizing construction equipment with engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 4 Final off-road emission standards. This voluntary improvement measure will be memorialized as a condition of approval.

Improvement Measure: Construction Equipment Standards and Construction Emissions Minimization Plan. All off-road construction equipment greater than 25 horsepower shall have engines that meet or exceed either U.S. Environmental Protection Agency (USEPA) or California Air Resources Board (ARB) Tier 4 Final off-road emission standards. If a particular piece of off-road equipment that meets these standards is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use off-road equipment that does not meet these standards, the Contractor shall use the next cleanest piece of off-road equipment (i.e., Tier 3 Engine with Level 3 Verified Diesel Emission Control Strategy (VDECS), Tier 3 Engine with Level 2 VDECS, Tier 3 Engine with alternative fuel), and the Contractor shall develop a Construction Emissions Minimization Plan (CEMP) to describe the process used to identify the next cleanest piece of off-road equipment and the steps that will be taken to reduce emissions of criteria air pollutants to the greatest extent practicable. The CEMP shall be submitted to the City's Planning Department for review and approval prior to using the equipment.

Odors

Same Conclusion (conclusion remains LTS): The current project would not change Impact Air-3 and the less-than-significant conclusion related to odors.

As noted in the 2011 EIR, hotel uses are not the types of uses that generate frequent or substantial odors and the impact related to odors would be less than significant. Odors from construction activities would be transient and temporary in nature and also less-than-significant; therefore, the project would not result in any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

D. Biological Resources

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Special-Status Species	LTS w/MM	☒	☐	Bio-6: Pre-Construction Nesting Bird Survey	LTS w/MM
b. Riparian/Sensitive Habitat	LTS	☒	☐	--	LTS
c. Wetlands	LTS w/MM	☒	☐	Bio-3a: Incorporate Best Management Practices for Water Quality During Construction Bio-3b: Minimize Soil Disturbance Adjacent to Wetland and Marsh Habitat Bio-4: Ensure Adequate Stormwater Run-off Capacity	LTS w/MM
d. Wildlife Corridors/ Nursery Sites	LTS w/MM	☒	☐	Bio-10a: Lighting Measures to Reduce Impacts to Birds Bio-10b: Building Design Measures to Minimize Bird Strike Risk	LTS w/MM
e. Conflict with Local Biological Policies	LTS	☒	☐	--	LTS
f. Conflict with Adopted Conservation Plans	NI	☒	☐	--	NI

Discussion

Biological Resources Setting Changes from the 2011 EIR

The 2011 EIR identified the following categories of biotic habitat/land use on the current project site:

Developed/Landscaped: Comprised of hardscaped roads, buildings, parking lot surfaces, paved trail surfaces, ornamental, and landscaped areas (typically irrigated with a mulch base), and irrigated turf, developed/landscaped area provide low or very low suitability for special status species or habitat. This land use occurs over the totality of the current project area.

California Annual Grassland/Coyote Brush Scrub: Approximately 18.90 ac of the OPSP area are dominated by California annual grassland/coyote brush scrub. These areas vary in composition based on water availability and soil characteristics. Non-native annual grass species are dominant throughout the annual grassland. Native purple needlegrass, (*Nassella pulchra*) is becoming established south of Marina Boulevard near the road along with herbaceous species such as birds-foot trefoil (*Lotus corniculatus*), flax (*Linum* sp.), and blue eyed grass (*Sisyrinchium bellum*). However, this patch of native grass is too small to be distinguished as a separate habitat type. Some shrubs such as coyote brush (*Baccharis pilularis*), toyon (*Heteromeles arbutifolia*), and big saltbush (*Atriplex lentiformis*) have become established along the slopes above the estuarine canal south of Marina Boulevard.

The grassland and scrubby habitats within the Project boundaries host a variety of common invertebrates, which in turn provide food for widespread reptiles and for a number of bird and mammal species. A western meadowlark (*Sturnella neglecta*) and a Say's phoebe (*Sayornis saya*) were observed foraging at the southwestern corner of the OPSP area. Although other grassland-associated species occur in the Project vicinity and may forage in the OPSP area on occasion, this patch of grassland is likely too small to support nesting pairs of these species. Small mammals and mesocarnivores including house mice, striped skunks, and raccoons may forage in these habitats, and several valley pocket gopher (*Thomomys bottae*) burrows were observed in the grassland in the southwestern corner of the OPSP area.

Since the 2011 EIR, the project site has undergone identified Phase 1 activities including landfill refuse relocation and recapping and regrading across the entire project site. The site would currently be considered an active construction site that was recently fully disturbed and that does not therefore have the potential to contain significant biological resources.

Special-Status Species

Same Conclusion or Less than Significant Conclusion (conclusion remains LTS w/ MM for some species and LTS for others or is reduced from LTS w/ MM to LTS): The current project would not change Impact Bio-6, mitigation measure Bio-6, or the less-than-significant with mitigation conclusion related to nesting birds. The current project would also not change Impacts Bio-8 and Bio-9 and the significance conclusions of less-than-significant in relation to indirect impacts on special-status species through recreational disturbance and increased lighting. These impacts and conclusions remain substantially the same as under the 2011 EIR, as the current project would disturb the same area, involve substantially the same intensity of development, and would not therefore result in any new or substantially more severe impacts. Impact Bio-7 and mitigation measures Bio-7a, Bio-7b, and Bio-7c relate to burrowing owl, which would not be likely to be present on the project site due to its status as a currently active construction site and landfill cap and cover and therefore would now be reduced to a less-than-significant conclusion rather than requiring mitigation.

Consistent with conclusions in the 2011 EIR, some special-status bird species could potentially nest in or adjacent to the project area but are not expected to be significantly impacted by the OPSP. These species include the white-tailed kite and loggerhead shrike, for which there is a very low probability of nesting, as well as the San Francisco common yellowthroat, Alameda song sparrow, and Bryant's savannah sparrow, which have a somewhat higher probability of nesting in wetland vegetation at the nearby bay margins. The loss of any active nests due to construction noise and activity of protected birds would be in violation of federal and state laws so would require pre-construction surveys and buffers if necessary (Bio-6), which has not substantially changed since the 2011 EIR.

The project could increase area light levels and recreational usage of the area, which could disturb sensitive species. However, consistent with conclusions of the 2011 EIR, substantial urban lighting levels and human activity already occurs in the area and the potential impact of increased recreational activity and increased light levels consistent with City requirements would be less-than-significant.

Burrowing owls occur at scattered locations throughout the South San Francisco Bay Area where low grasslands and ruderal habitats support ground squirrel colonies. There is no grassland habitat on the current project site, which is an active construction site and landfill cap and cover. Therefore, there would not be the potential for a significant impact to burrowing owls due to development of the project site and mitigation measures Bio-7a through Bio-7c would not be applicable to the current project.

For these reasons, the project would not result in any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Riparian/Sensitive Habitat

Same Conclusion (conclusion remains LTS): *The current project would not change Impact Bio-1 or Bio-5 or the less-than-significant conclusion as the loss of common terrestrial habitats and habitat for non-breeding special-status wildlife species remains substantially the same as under the 2011 EIR.*

As noted in the 2011 EIR, the OPSP site does not contain riparian habitat. Wetland/aquatic and related habitat is discussed under the Wetland and Aquatic Habitat topic below.

Development of the project site involves already disturbed areas which would not represent a biological impact. This project site is an active construction site that has been recently and fully disturbed by landfill refuse relocation and recapping and therefore does not represent a sensitive, valuable (from the perspective of providing important wildlife habitat), or exemplary habitat type, and so the loss of potential nesting, roosting, and foraging opportunities at the site is considered a less-than-significant impact consistent with the analysis in the 2011 EIR. The project would not therefore create new or substantially more severe impacts on riparian or sensitive habitat than previously the analyzed in the 2011 EIR.

Wetlands or Aquatic Habitats

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impacts Bio-3 and Bio-4, mitigation measures Bio-3a and -3b and -4, and the significance conclusions of less-than-significant with mitigation as the potential for indirect impact of nearby wetland and aquatic habitat remains substantially the same as under the 2011 EIR. Impact Bio-2 and mitigation measures Bio-2a through Bio-2d would not apply to this project as there are no shoreline improvements involved. Impacts Bio-12, Bio-13, Bio-14, Bio-15 and associated mitigation measures Bio-12, Bio-13a and b, Bio-14a through c, and Bio-15a through c are related to in-water construction are not applicable to the current project because no in-water construction is proposed.*

Development occurring throughout the site will be in close proximity to, and upslope from, sensitive aquatic habitats. There is thus some potential for operational and construction-related runoff to have indirect effects on these habitats and on water quality in adjacent aquatic habitats. Mitigation measures to reduce these potential impacts to less-than-significant levels (*mitigation measures Bio-3a and -3b and -4*) as previously analyzed in the 2011 EIR would apply to the proposed project. The project would not therefore create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Wildlife Corridors/Nursery Sites

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impact Bio-10, mitigation measures Bio-10a and Bio-10b, or the less-than-significant with mitigation conclusion as with mitigation requiring appropriate design to minimize bird strikes, impacts and conclusions would be substantially the same as under the 2011 EIR.*

As noted in the 2011 EIR, the OPSP area is located along the Pacific Flyway for migratory birds, and the juxtaposition of wetland, shoreline, and open water habitats used by birds results in large-scale movements of birds along the edge of San Francisco Bay, both during long-distance movements (such as migration) and during daily movements between roosting and foraging habitats.

Within the current project site and as previously analyzed in the 2011 EIR, there is some potential for birds to collide during daytime and nocturnal flights with structures such as windows of proposed buildings. Although proposed buildings are likely to be at a lower height than most migrating birds will be flying, the 2011 EIR explained that the OPSP would create potential bird strike hazards at elevations that do not currently exist, and depending on the design of the buildings there is some potential for such mortality to occur in the absence of mitigation measures. The project would comply with MM Bio-10a and Bio-10b and would not therefore have any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

For informational purposes, while industry-standards for how to reduce the potential for bird strikes have evolved since the 2011 EIR, the examples included in the measures are not proscriptive and allow for implementing measures to current standards.

Conflict with Local Policies or Conservation Plans

Same Conclusion (conclusion remains LTS): The current project would not change Impact Bio-11 and the less-than-significant conclusion as there are no conservation plans that cover the site and there are no protected trees in the current project site, which is unchanged from the 2011 EIR.

E. Cultural and Tribal Cultural Resources

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a-e. Historical Resources, Archaeological, Paleontological, and Tribal Cultural Resources and Human Remains	LTS w/MM	☒	☐	N/A	LTS

Discussion

Cultural and Tribal Cultural Resources Setting Changes from the 2011 EIR

There have been no changes to the cultural and tribal cultural resources environmental setting of the project site.

Since the 2011 EIR, the Native American Historic Resource Protection Act (Assembly Bill 52) was passed, which is intended to minimize conflict between Native American and development interests. AB 52 adds "tribal cultural resources" to the specific cultural resources analyzed under CEQA. As had been standard practice at the time, the 2011 EIR considered tribal cultural resources as part of the cultural resources analysis, so they are discussed here.

As the current project is being built over capped landfill debris and does not have the potential to disturb native soil, no additional record searches or tribal contacts were made for this project.

Cultural and Tribal Cultural Resources and Human Remains

Less Significant Conclusion (LTS w/ MM reduced to LTS): The current project would not change the less-than-significant conclusion as the site is entirely over capped landfill.

As under the 2011 EIR, the project site is located over a capped landfill site. Construction activities are not expected to disturb native soils. As noted in the 2011 EIR, there are no known historic resources in the OPSP area and while currently unknown underground resources could be unexpectedly discovered during ground disturbance, such discoveries are required to be handled appropriately according to Section 21083.2 of the Public Resources Code dealing with the treatment and handling of underground cultural/tribal cultural resources, Section 21084.1 dealing with the treatment of handling of historical resources, and Section 7050.5 of the Health and Safety Code/ Section 5097.98 of the Public Resources Code dealing with discovery of human remains. With adherence to applicable regulations and the low chance of disturbing native soils on the project site, impacts related to accidental discovery of cultural/tribal cultural resources would be less than significant. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

F. Geology and Soils

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Seismic Hazards	LTS w/ MM	☒	☐	Geo-2a: Compliance with California Building Code Geo-2b: Compliance with a design-level Geotechnical Investigation and with Structural Design Plans Geo-2c: Obtain a Building Permit Geo-3a: Compliance with a design-level Geotechnical Investigation and with Structural Design Plans Geo-3b: Obtain a Building Permit Geo-4: Compliance with recommendations of a Geotechnical Investigation	LTS w/ MM
b. Soil Erosion	LTS w/MM	☒	☐	Geo-14: Storm Water Pollution Prevention Plan	LTS w/MM
c. Unstable Soil	LTS w/ MM	☒	☐	Geo-5a: Deep Foundations Geo-5b: Predrilling and/or Pile Configuration Geo-5c: Indicator Pile Program Geo-6: Account for Drag Load on Deep Foundations Geo-7: Incorporate Systems for Landfill Gas Control Geo-8a: Avoid Significant New Loads on Landfill Waste and Bay Mud Geo-8b: Design Building-Soil Interface to Allow Free Movement Geo-9a: Monitoring and Testing Geo-9b: Locate Underground Utilities in Soil Cap Geo-9c: Seal Trenches and Underground Structures Geo-10: Provide For Continuity of Landfill Cap Geo-11: Common Trenches and Vaults Geo-12: Flexible Materials and Joints Geo-13: Increase Flow Gradient	LTS w/ MM
d. Expansive Soil	LTS	☒	☐	--	LTS
e. Septic Tanks	NI	☒	☐	--	NI
f. Geologic Features ¹	NI	☒	☐	--	NI

¹ Note that the current CEQA Guidelines include paleontological resources in this section. These have been addressed under Section E. Cultural and Tribal Cultural Resources as they were in the 2011 EIR.

Discussion

Geology and Soils Setting Changes from the 2011 EIR

Langan Engineering and Environmental Services, Inc. prepared an updated Geotechnical Investigation, dated October 19, 2017, which is available as part of the project application on file with the City of South San Francisco Economic & Community Development Department. Refuse materials from the nearby Phase 1 office site were removed as a part of that development and relocated to the project site and surroundings. Refuse that could be reused was utilized as the foundation layer, as well as the former cap material that was removed in the excavation. Additional fill was imported from off-site for the clay cap and erosion protection layers. The current project would be required to meet current rules and regulation, including the updated California Building Code. These regular updates to regulatory documents would not change the conclusions of the 2011 EIR.

Seismic Hazards

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impacts Geo-2 through Geo-4, mitigation measures Geo-2a through Geo-4, or the less-than-significant with mitigation conclusion as the known seismically active character of the region and potential for seismically induced ground failure has not changed since the 2011 EIR. The current project would also not change Impact Geo-1 or the less-than-significant conclusion related to fault hazards as there are no known faults at the site, and this has not changed since the 2011 EIR.

Consistent with conclusions in the 2011 EIR, while there are no known faults at the project site, the region is known to be seismically active and the project will need to comply with the California Building Code and project-specific geotechnical recommendations and building permit requirements as detailed in the mitigation measures (Geo-2a through Geo-4). The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Soil Erosion

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impact Geo-14, mitigation measure Geo-14, or the less-than-significant with mitigation conclusion as the potential for soil erosion and requirement to include best management practices to reduce soil erosion potential have not changed since the 2011 EIR.

While the site has been graded and the previous structures have been demolished, there will still be soil movement for landscaping, paving, and other construction activities requiring mitigation, which is addressed by mitigation measures Geo-14. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Unstable and Expansive Soils

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impacts Geo-5 and Geo-6, mitigation measures Geo-5a through Geo-6, or the less-than-significant with mitigation conclusion as the need to account for variable subsurface conditions and potential for settling have not changed since the 2011 EIR. The current project would also not change the no impact conclusion related to landslides as the lack of potential for landslides at the site has not changed since the 2011 EIR. 2011 EIR impacts Geo-7 through Geo-13 and associated mitigation measures Geo-7 through Geo-13 are related to construction in landfill areas and are applicable to the current project site as well. 2011 EIR impact Geo-16 and associated mitigation measure are related to Crescent Park and Beach, which is located outside the current project area and is therefore not applicable to the current project.

As noted in the 2011 EIR, soil layers at the project site include regraded refuse and a landfill cap over varying thicknesses of Bay Mud and sloping bedrock surface, which could result in settlement following building construction. These variable subsurface conditions will influence the design, performance, and constructability of foundation systems for the proposed buildings and are mitigated through appropriate foundation design as detailed in the mitigation measures.

The geotechnical reports conclude that the project site would undergo significant settlement caused by the decomposition of the refuse, and consolidation and compression of the refuse and Bay Mud from the weight of refuse, existing cover soil, new fill, and/or structural loads associated with the proposed development. These processes could result in significant total and differential settlements of the ground surface and the site improvements. To reduce the potential for settlement of the structure, the proposed hotel would be supported on deep foundations gaining support in the dense to very dense sand layer or bedrock beneath the weak refuse and Bay Mud layers. Due to the thickness and depth of the Bay Mud, extending in some areas as much as 120 feet below ground surface, driven steel piles are recommended by the geotechnical investigation, with careful implementation to address the potential for disturbance of the landfill cover and preserve the integrity of the landfill components.

The impact related to the wave susceptibility of the proposed Crescent Park and Beach is not applicable to the current project because this area is not within the current project site.

Expansive Soils

Same Conclusion (conclusion remains LTS): *The current project would not change Impact Geo-15 or the less-than-significant conclusion related to expansive soils as soil conditions are the same and the low potential for expansive soils has not changed since the 2011 EIR.*

Septic Tanks

Same Conclusion (conclusion remains NI): *The current project would not change the no impact conclusion related to septic systems as the project area is serviced by the City's sewer system, which has not changed since the 2011 EIR.*

Geologic Features

Same Conclusion (conclusion remains NI): *The current project would not change the no impact conclusion related to unique geologic features as the lack of unique geologic features at the site has not changed since the 2011 EIR.*

G. Greenhouse Gas Emissions

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. GHG Emissions	SU	☒	☐	N/A	SU
b. Conflict with GHG Reduction Plans	NI	☒	☐	--	NI

Discussion

Greenhouse Gas Emissions Setting Changes from the 2011 EIR

As discussed above in connection with air quality impacts, since the 2011 EIR was certified, BAAQMD has updated its CEQA Air Quality Guidelines (BAAQMD Guidelines), which assist lead agencies in evaluating and mitigating emissions impacts. The 2011 EIR was being prepared as the 1999 BAAQMD Guidelines were being updated for the 2010 draft. The 2011 EIR compared the OPSP to those in the 2010 draft. The latest draft of the BAAQMD Guidelines was issued in May 2017 and includes thresholds consistent with the 2010 draft BAAQMD Guidelines assessed in the 2011 EIR.

Since the 2011 EIR, the City adopted a qualified GHG reduction plan in 2014, the City of South San Francisco Climate Action Plan, which includes various reduction measures to meet 2020 reduction goals.

In 2016, SB 32 was passed, which codifies additional target GHG emissions reductions by 2030. In April 2022, BAAQMD issued a new GHG threshold, revising the threshold from the quantifiable level used in the 2011 EIR to a checklist of compliance, requiring consistency with either criterion A or B as follows:

A. Projects must include, at a minimum, the following project design elements:

1. Buildings

- a. The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
- b. The project will not result in any wasteful, inefficient, or unnecessary electrical usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.

2. Transportation

- a. Achieve compliance with electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.
- b. Achieve a reduction in project-generated vehicle miles traveled (VMT) below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's Technical Advisory on Evaluating Transportation Impacts in CEQA:
 - i. Residential projects: 15 percent below the existing VMT per capita

- ii. Office projects: 15 percent below the existing VMT per employee
 - iii. Retail projects: no net increase in existing VMT
- B. Be consistent with a local GHG reduction strategy that meets the criteria under State CEQA Guidelines Section 15183.5(b).

Since the 2011 EIR, the Bay Area 2017 Clean Air Plan updated the 2010 Clean Air Plan that was utilized in the 2011 EIR assessment. The latest update to the Clean Air Plan revises the way in which projects are assessed for consistency and no longer considers the ratio of population increase to vehicle use of a project to be a consistency factor.

The purpose of this document, however, is to determine whether the project is within the scope of the 2011 EIR. Accordingly, this document does not address and is not required to address whether the project is consistent with regulatory changes that occurred after certification of the 2011 EIR.

GHG Emissions

Same Conclusion (conclusion remains SU): The current project would not change Impact GHG-1 (combined with Impact GHG-2) as the GHG emissions of the project were accounted for in the 2011 EIR and therefore the conclusion remains significant and unavoidable.

The 2011 EIR concluded that the OPSP would have a significant and unavoidable impact related to GHG emissions. As a hotel project within the parameters of that analyzed in the OPSP and 2011 EIR, the GHG emissions of the project were accounted for in the prior analysis and the project would not therefore result in new or substantially more severe impacts related to GHG emissions than previously identified in the 2011 EIR.

In addition, the project would be required to comply with updated GHG reduction requirements implemented since the 2011 EIR. Many of the City's Climate Action Plan's reduction measures are targeted to city-wide strategies that are not directly applicable to development projects. The project is located near the ferry terminal and would include pedestrian/bicycle connections and walkways and participate in a Transportation Demand Management program to promote transit and reduce trips (contributing to Measures 1.1 through 1.3). The project would include new tree plantings (Measure 3.4) and would meet current standards of energy and water efficiency (Measures 3.1 and 6.1), and would participate in recycling for waste reduction (Measure 5.1). Development projects in the city, including those in the current project, are required to complete a GHG Compliance Checklist during the plan review process demonstrating that all applicable requirements are met. The current project will comply with the Climate Action Plan.

Further, BAAQMD updated its guidelines since the 2011 EIR. Although this Environmental Checklist is limited to an analysis of the project's consistency with the 2011 EIR pursuant to CEQA Guidelines section 15168, the project was reviewed against BAAQMD's updated thresholds and would not result in wasteful, inefficient, or unnecessary electrical usage (see Section P: Utilities and Service Systems and Energy), would comply with required electric vehicle requirements and VMT targets (see Section O: Transportation), and would implement applicable measures from the City's Climate Action Plan. At the time of preparation of this analysis, the City does not preclude natural gas appliances and plumbing in hotel projects.

Consistency with GHG Reduction Plans

Same Conclusion (Conclusions remains NI): *The Clean Air Plan has been updated and the South San Francisco Climate Action Plan has been adopted since the 2011 EIR but the current project remains consistent with relevant plans and the no additional impact conclusion remains unchanged from the 2011 EIR.*

For informational purposes, the project's consistency with the City's Climate Action Plan is discussed above and the current project would be consistent with that plan. The current project does not conflict with applicable control measures, is generally consistent with the Clean Air Plan as well as the City's Climate Action Plan. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

H. Hazards and Hazardous Materials and Wildfire

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Routine Hazardous Materials Use	LTS w/MM	☒	☐	N/A	LTS
b. Risk of Upset	LTS w/MM	☒	☐	Haz-2: Waste Excavation and Re-disposition [as it pertains to continued implementation of the Site Management Plan] Haz-4b: Deep Foundations Haz-4c: Minimization of Irrigation Water Haz-4e: Operation and Maintenance Activities	LTS w/MM
c. Hazardous Materials within a ¼-mile of a School	NI	☒	☐	--	NI
d. Hazardous Materials Site	LTS w/MM	☒	☐	Haz-6a: Site Management Plan Haz-6b: Landfill Gas System Haz-6c: Non-use of Groundwater	LTS w/MM
e. Airport Hazards	LTS	☒	☐	--	LTS
f. Emergency Access Routes	NI	☒	☐	--	NI
g. Wildfire ¹	NI	☒	☐	--	NI

¹ Note that the current CEQA Guidelines include wildfire in its own section. This topic has been addressed here as it was in the 2011 EIR.

Discussion

Hazards and Hazardous Materials Setting Changes from the 2011 EIR

Langan Engineering and Environmental Services, Inc. prepared a Final Closure Plan (FCP) and Post-Closure Monitoring and Maintenance Plan (PCMMP) for the Phase I and II Development of the OSPS area, which is available as part of the project application on file with the City of South San Francisco Economic & Community Development Department. The FCP provides a basis for preparing design and construction documents for landfill mitigation and monitoring components, such as the final landfill cover and landfill gas control and monitoring systems. The PCMMP provides a detailed plan for post-closure monitoring and maintenance activities during the various stages of development, as well as establishing the responsible parties for each required activity. As discussed in Section F: Geology and Soils, Langan excavated the original cap and some of the landfill refuse and regraded the site, re-using some of the refuse and transporting the rest off-site. Replacement fill was imported from off-site, and a new clay cap was put in place.

Lists of hazardous materials sites are regularly updated and have been updated since the 2011 EIR, including the following two additional sites in the general vicinity of the project: Seaboard Paper Company – 336 Oyster Point Boulevard, and Wildberg Brothers – 349 Oyster Point Boulevard. However, while nearby sites have been identified as having prior releases of hazardous materials, there is no reported evidence of active leaks or contamination from these sites affecting soil or groundwater that could migrate to the project site or represent significant releases in the project area requiring any additional actions related to the proposed project, so these are not further discussed.

The airport land use plan for the nearby airport has been updated since the 2011 EIR. The City/County Association of Governments of San Mateo County, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport was published in November 2012 including updated regulations regarding allowable building heights in the project area.

For informational purposes, since the 2011 EIR, the CEQA Guidelines have been updated to include more detailed threshold questions related to wildfire impacts in its own section. The purpose of this document, however, is to determine whether the project is within the scope of the 2011 EIR. As had been standard practice at the time, the 2011 EIR considered wildfire risk as part of the hazards and hazardous materials section, so this topic is discussed here. The expanded wildfire considerations apply to projects in areas that are very high fire severity zones, which does not apply to the project, so are not further detailed.

Routine Hazardous Materials Use

Less Significant Conclusion (LTS w/ MM reduced to LTS): Impact Haz-1 and related mitigation measures Haz-1a through Haz-1e pertain to the use of hazardous materials by research laboratory uses in the office/R&D portions of the OSPS, and are not applicable to this hotel project.

Operation of the hotel would use common hazardous materials such as cleaning products. State and federal laws require businesses that handle hazardous materials to ensure that the hazardous materials are properly handled, used, stored, and disposed of; and in the event that hazardous materials are accidentally released, to prevent or reduce injury to health and the environment. The South San Francisco Fire Prevention division enforces certain fire code regulations pertaining to safe handling and proper storage of hazardous materials. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health Administration is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. As a hotel use, project operations are not anticipated to create a significant hazard to the public or environment through the routine transport, use or disposal of hazardous materials.

This section pertains to recurring transportation, use or disposal of hazardous materials as part of long-term operation. One time transportation, use or disposal of hazardous materials related to construction and development is discussed in the following sections. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Risk of Upset

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impacts Haz-2 and -4, mitigation measures Haz-2, Haz-4b, Haz-4c, and Haz-4e, or the less-than-significant with mitigation conclusion as the potential for accidental future hazardous materials release of pre-existing site materials remains unchanged since the 2011 EIR, with the project site being on top of the former

landfill. Mitigation measure Haz-4a has already been met with the clay cap upgrade performed by Langan (see Section F: Geology and Soils) and Haz-4d is not applicable as none of the groundwater monitoring wells are on the project site property. 2011 EIR impact Haz-3 and associated mitigation measures are related to demolition of existing structures and are not applicable to the current project because demolition of the existing building has already been completed on the project site. Impact Haz-5 and related mitigation measures relate to the potential for accidental release of laboratory chemicals by research laboratory uses in the office/R&D portions of the OSPS, and are not applicable to this hotel project.

As noted in the 2011 EIR, due to the former use of the project site as a municipal landfill, there is a potential for development on the site to lead to an increased rate of on-site waste settlement and off-site migration of contaminants in groundwater. Due to the presence of methane in the soil, building on the project site present the potential for buildup of soil gases in the building; however, the project would comply with Haz-2, Haz-4b, Haz-4c, and Haz-4e and would not therefore have any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Hazardous Materials Near Schools

Same Conclusion (conclusion remains NI): The current project would not change the no impact conclusion related to hazardous materials near schools as the lack of schools in the vicinity has not changed since the 2011 EIR.

The OPSP area is not located within one-quarter mile of a school site. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Hazardous Materials Site

Same Conclusion (conclusion remains LTS w/ MM): Impact Haz-6 and mitigation measures Haz-6a through Haz-6c related to construction on a landfill cap would be applicable to the current project. Although waste relocation, demolition, and most of the excavation have already been completed on the site, landscaping and utility placement and maintenance still carry potential impacts due to the site's hazardous materials status. Mitigation measure Haz-6d would not be applicable to this project as there are no current businesses on the project site.

As mentioned above, Langan has drafted a PCMMMP, implementation of which is anticipated to fulfill mitigation measures Haz-6a through Haz-6c. The PCMMMP details measures necessary to mitigate the potential impacts of landfill gas and that can build up under the soil and potentially leak into the groundwater. The hotel would be required to include an alarm system that monitors the level of methane in the building and in the event that methane levels reached a concentration activating the alarm, the mitigation system would automatically implement active mitigation activities to reduce the level of methane to acceptable levels. Monitoring activities will be required to ensure the integrity of the cap and check for groundwater contamination.

Airport Hazards

Same Conclusion (conclusion remains LTS): The current project would not change the less-than-significant conclusion, as the proposed heights under the current project remain within height levels considered safe in relation to the airport.

The airport land use plan for San Francisco International Airport has been updated since the 2011 EIR. The OPSP area, including the current project site, is mapped in an area where critical aeronautical

surfaces (the height limits for development) are between approximately 425 and 450 feet above mean sea level. Structures reaching between 250 and 300 feet or more above mean sea level would be required to incorporate element to address possible obstructions. The proposed building height of 165 feet above sea level is below these heights. As a project within the Airport Land Use Plan, the project would be subject to applicable coordination with the Airport Land Use Commission and FAA to ensure compliance with applicable regulations, and would not therefore create any new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Emergency Access Routes

Same Conclusion (conclusion remains NI): The current project would not change the no impact conclusion as the general roadway design and requirements for adequate access have not changed since the 2011 EIR.

Wildfire

Same Conclusion (conclusion remains NI): The current project would not change the no impact conclusion as the project site is in a developed area and the lack of wildfire risk in the vicinity has not changed since the 2011 EIR.

I. Hydrology and Water Quality

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a., e. Water Quality and Water Plans	LTS w/MM	☒	☐	Hydro-1: Best Management Practices Hydro-2: Preparation and Implementation of Project SWPPP Hydro-3: Compliance with NPDES Requirements Haz-4e: Operation and Maintenance Activities	LTS w/MM
b. Groundwater	NI	☒	☐	--	NI
c. Alter Drainage	NI	☒	☐	--	NI
d. Inundation	LTS	☒	☐	--	LTS

Discussion

Hydrology and Water Quality Setting Changes from the 2011 EIR

The latest (April 5, 2019) Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) showed no portion of the project site proposed for development as subject to flood hazards.

The NPDES General Construction Permit Requirements apply to clearing, grading, and disturbances to the ground such as excavation and has been updated since the 2011 EIR, though these changes are not substantial as they relate to current project development. All construction and Stormwater Pollution Prevention Plan (SWPPP) activity would be in compliance with the Construction General Permit Order.

The California Department of Water Resources presented updated sea level rise scenarios in their California Climate Science and Data for Water Resources Management in 2015. The future sea level rise scenarios associated with planning and permitting development in potentially susceptible areas in the San Francisco Bay Area are:

- a sea level rise of 24 inches by 2050; and
- a sea level rise of 66 inches by 2100.

These values represent the upper end of the range of sea level rise estimates and are consistent with preliminary state recommendations for 100-year sea level rise. These values are meant to ensure that projects take these potentially high estimates into account when planning infrastructure and development projects and have changed slightly from those the 16- and 55-inch assumptions used in the 2011 EIR.

Consistent with Phase 1 development plans in the OPSP and 2011 EIR, the project site has been recently regraded and recapped such that the ground level at the footprint of the building is approximately 19 feet (228 inches) above sea level.

Water Quality and Water Plans

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impacts Hydro-1, Hydro-2, and Hydro-3 and mitigation measures Hydro-1, Hydro-2, and Hydro-3, or the less-than-significant with mitigation conclusion as the potential for contamination of bay water due to stormwater pollutants and erosion or siltation remains substantially unchanged since the 2011 EIR. Mitigation measure Haz-4e would also reduce impact Hydro-1. Mitigation measure Haz-4a, also listed under impact Hydro-1 in the 2011 EIR, has already been completed.*

Although the current project would not involve demolition or excavation of landfill materials, as mentioned in impact Hydro-3, construction activities at the site would still present a threat of soil erosion from soil disturbance by subjecting unprotected bare soil areas to the erosional forces of runoff during construction activities and the potential for increased erosion and/or parking lot pollutants to impair water quality. These impacts would be mitigated through compliance with applicable permitting requirements and a project-specific stormwater pollution prevention plan as detailed in the mitigation measures for the 2011 EIR. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Groundwater

Same Conclusion (conclusion remains NI): *The current project would not change the no impact conclusion related to groundwater depletion as the project area is nearly fully covered with impervious area under existing conditions and is located in the former Bay margin and not used for groundwater supply and therefore development under the current project would not result in the potential for groundwater depletion, which has not changed since the 2011 EIR.*

Alter Drainage

Same Conclusion (conclusion remains NI): *The current project would not change the no impact conclusion as the requirement for control of runoff and lack of potential for changes in stormwater runoff have not substantially changed since the 2011 EIR.*

The project represents redevelopment of a capped landfill. Consistent with the 2011 EIR, control of site stormwater runoff is addressed by required regulatory compliance and compliance with requirements would ensure no significant impacts. Siltation and erosion are discussed under water quality above and flooding is discussed under inundation below. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Inundation

Same Conclusion (conclusion remains LTS): *The current project would not change Impact Hydro-4 and Hydro-5 or the less-than-significant conclusions related to inundation as the project will not place new structures within the 100-year flood hazard zone and the potential for flooding due to levee or dam failure or sea level rise have not substantially changed since the 2011 EIR.*

As discussed above, while FEMA has reconsidered flood hazards in the area since the 2011 EIR, the current project will not place new structures within a 100-year flood hazard zone and the impact remains unchanged from the 2011 EIR.

Estimates of potential sea level rise scenarios have increased from 55 inches considered in the 2011 EIR to 66 inches (5.5 feet) by 2100. The project site has been recently regraded and capped as a part of Phase 1 landfill refuse relocation such that the ground level at the footprint of the building is

approximately 19 feet (228 inches) above sea level. This is above the updated projected sea level rise of up to 66 inches by 2100 and consistent with conclusions in the 2011 EIR. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

J. Land Use

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Division of an Existing Community	NI	☒	☐	--	NI
b. Conflict with Land Uses / Land Use Plans	NI	☒	☐	--	NI

Discussion

Land Use Setting Changes from the 2011 EIR

There have been no substantial changes to the land use environmental setting of the OPSP site, including the hotel site with respect to land use. Development of the area has proceeded according to area plans and recent development.

Since the 2011 EIR, the City's Housing Element of the General Plan was updated in 2015 but would not substantially change impacts or conclusions for the proposed hotel. The entire General Plan is currently being updated again, but the updated document is not yet in effect and is not anticipated to be substantially revised in relation to the project site and proposed development. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

The marine support services building that was previously on the project site has been demolished since the 2011 EIR, and the project site is currently vacant.

Division of an Existing Community

Same Conclusion (NI): The current project would not change the no impact conclusion as there are no established communities in the area to divide, which has not changed since the 2011 EIR.

Conflict with Land Uses / Land Use Plans

Same Conclusion (NI): The current project would not change the no impact conclusion as there are no conflicts with land uses/land use plans, which has not changed since the 2011 EIR.

The current project is consistent with the development type and density established by existing zoning and the General Plan, as previously updated for consistency with adoption of the 2011 EIR. The OPSP specified a hotel development to a total of 350 rooms. The current project proposes a hotel with up to 350 rooms. The project is consistent with development anticipated under relevant plans and therefore would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

K. Mineral Resources

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Loss of Mineral Resources	NI	☒	☐	--	NI
b. Loss of Mineral Recovery Sites	NI	☒	☐	--	NI

Discussion

Same Conclusion (NI): *There have been no changes in circumstance or new information related to mineral resources, which do not occur in the OPSP area, including the current project site, and there would be no change to the no impact conclusion related to mineral resources.*

L. Noise

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Noise	SU w/MM (construction) LTS (operations)	☒	☐	Noise-5: Construction Noise	SU w/MM (construction) LTS (operations)
b. Vibration	LTS	☒	☐	--	LTS
c. Airport Noise	LTS	☒	☐	--	LTS

Discussion

Noise Setting Changes from the 2011 EIR

The noise environment has not changed substantially from that assessed in the 2011 EIR and remains primarily characterized by ambient noise, local traffic noise generated along arterial streets and U.S. 101, and aircraft over flights associated with San Francisco International Airport. The types and locations of noise sensitive land uses in the vicinity has not substantially changed since the 2011 EIR, with the nearest noise sensitive receptors being live-aboard boats located in the marinas, which could be located as close as approximately 325 feet from the edge of the project site.

Noise (Construction)

Same Conclusion (conclusion remains SU w/ MM for construction): The current project would not change Impact Noise-5, mitigation measure Noise-5, and the significant and unavoidable conclusion as the potential for loud construction activities over long periods has not changed since the 2011 EIR.

As noted in the 2011 EIR, while the project would be required to comply with applicable construction noise regulations, construction activities, including pile driving, will generate substantial levels of noise at off-site receivers over an extended period of time. Construction activities for the current project would have substantially the same potential for noise under the current project as the 2011 EIR. As noted above, as a hotel project within the parameters of that analyzed in the OPSP and 2011 EIR, the construction noise of the project were accounted for in the prior analysis and therefore the project would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Noise (Operations)

Same Conclusion (conclusion remains LTS for operation): The current project would not change Impacts Noise-1 through Noise-3 or the less-than-significant conclusion as the potential for operational noise impacts has not substantially changed since the 2011 EIR.

As noted in the 2011 EIR, noise levels at a hotel and retail/restaurant site would not exceed the City's noise level goal for exterior noise (65 dBA CNEL) as a result of transportation noise sources. Consistent with conclusions of the 2011 EIR, while roadway traffic and related noise would increase with the project, the ambient noise level is already characterized by traffic noise and increases from

development of the project site would not have the potential to be substantial (would be less than 3 dBA) at noise sensitive uses.

With area development, the 2011 EIR forecast an interior noise level of 35 dBA CNEL at the hotel assuming standard construction, which is consistent with interior noise standards for hotel uses. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Vibration

Same Conclusion (conclusion remains LTS): The current project would not change Impact Noise-4 and the less-than-significant conclusion as the potential for groundborne vibration has not changed since the 2011 EIR.

As noted in the 2011 EIR, the proposed uses are not the type that will generate substantial groundborne vibration during operations and construction activities are of the type and distance from existing structures that there is no potential for significant vibration impacts. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Airport Noise

Same Conclusion (conclusion remains LTS): The current project would not change Impact Noise-6 or the less-than-significant conclusion as the site is outside the area significantly impacted by aircraft noise, which has not changed since the 2011 EIR.

While the airport land use plan for San Francisco International Airport has been updated since the 2011 EIR, the OPSP area remains well outside the airport's noise-affected 65 dBA CNEL noise contour. The exterior noise environment at the OPSP area resulting from aircraft would be considered compatible with proposed uses. The project would therefore not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

M. Population & Housing

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Population Growth	LTS	☒	☐	--	LTS
b. Displacement of Housing or People	NI	☒	☐	--	NI

Discussion

Population and Housing Setting Changes from the 2011 EIR

Local and regional planning documents are regularly updated, including related to this topic, the City's Housing Element of the General Plan in 2015 which incorporates the Association of Bay Area Governments' (ABAG) Regional Housing Needs Allocation (RHNA). Updated RHNA numbers are currently being incorporated into an updated General Plan. As an approved specific plan, OPSP development is considered as planned development in these planning documents.

Population Growth

Same Conclusion (conclusion remains LTS): The current project would not change Impact Pop-1 or the less-than-significant conclusion as the potential for indirect population growth due to increased employment has not changed since the 2011 EIR.

While the specifics of employment depend on the exact programming of the various spaces, a hotel of the proposed size with a restaurant and commercial amenities would be anticipated to support approximately 200 to 300 employees. As concluded in the 2011 EIR, the project would increase employment and contribute to the high jobs to housing ratio in the city and contribute to indirect population growth, but a hotel use would support nearby employment uses and would be consistent with local and area planning and would therefore not be considered unplanned growth. The project is consistent with the program previously analyzed in the 2011 EIR and therefore would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Displacement of Housing or People

Same Conclusion (conclusion remains NI): The current project would not change the no impact conclusion as there have been no changes in existing residents on the site since the 2011 EIR.

The only current residences in the OPSP remain live-aboard boats in the marinas, which were found to not be affected by development in the 2011 EIR. The project is consistent with the program previously analyzed in the 2011 EIR and therefore would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

N. Public Services & Recreation

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Public Services	LTS	☒	☐	--	LTS
b. Recreation	LTS	☒	☐	--	LTS

Discussion

Public Services and Recreation Setting Changes from the 2011 EIR

Area-wide development has continued throughout the vicinity and public service and recreation plans and operations are regularly assessed and updated. The SSFPD operates generally out of one main station (as opposed to having substations), located at 33 Arroyo Drive. The closest Fire Station to the project site is #62 at 249 Harbor Way, approximately 1.5 miles away.

Public Services and Recreation

Same Conclusion (conclusion remains LTS): The current project would not change the less-than-significant conclusion as the potential to increase demand for services and recreation has not changed since the 2011 EIR.

As under the 2011 EIR, the current project will be served by existing facilities (or those relocated through separate projects), will meet emergency vehicle access standards, and will pay appropriate development fees toward public services. The project therefore would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

While the current project does not include public open space, it is part of the OPSP development, which as noted in the 2011 EIR, included more than the standard of 0.5 acres of parks per 1,000 employees, including approximately 3 acres of park and 3.1 acres of bay front open space and would therefore create more recreational space than demand for recreational opportunities and have a net benefit on recreational facilities. The project would contribute in-lieu fees toward the cost of the public parks and includes a spa and fitness / game lawn and outdoor open space on site for use by hotel guests. The conclusion of a less-than-significant impact with respect to recreation remains unchanged for the current project.

O. Transportation

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. Conflict with Circulation Plans or Policies	LTS w/MM	☒	☐	Traf-2b: Bay trail Continuity Provisions in Construction Management Plan	LTS w/MM
b. Conflict with Transportation Impact Reduction Goals ¹	SU	☒	☐	Traf-1: Transportation Demand Management Program	LTS w/MM
c. Increase Hazards	LTS	☒	☐	N/A	LTS
d. Inadequate Emergency Access	LTS	☒	☐	--	LTS
¹ State CEQA Guidelines have been revised since the 2011 EIR such that intersection and roadway specific service level analysis will be replaced by an analysis of the amount of vehicle miles traveled per CEQA Section 15064.3.					

Discussion

Traffic engineers Fehr & Peers prepared a transportation assessment as referenced in this document and included in full as Attachment B.

Transportation Setting Changes from the 2011 EIR

Area-wide development has continued throughout the vicinity as anticipated under the OPSP and other area plans and included in the cumulative traffic analysis in the 2011 EIR. The City's Transportation Improvement Program (TIP) is regularly updated to include needed improvements. Reconfiguration of the intersection of Oyster Point Boulevard and Marina Boulevard was underway during preparation of this document per the OPSP as part of Phase 1 development but otherwise, there have not been substantial changes to the roadway system in the vicinity of the project since the 2011 EIR.

The ferry terminal proposed as a part of OPSP development has been constructed and ferry service is in operation.

Since the adoption of the 2011 EIR, the California Natural Resources Agency certified and adopted new CEQA Guidelines in 2018 to implement the requirements of California Senate Bill (SB) 743. Specifically, SB 743 and the resulting CEQA Guideline section 15064.3 changed the CEQA transportation impact analysis significance criteria to eliminate auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA. The changes in CEQA Guidelines to implement SB 743 present vehicle miles traveled (VMT) as an appropriate measure of transportation impacts.

While the 2011 EIR identified level of service-based impacts and mitigation measures, these are not applicable to the current project under current CEQA law and are therefore not further discussed in this analysis. The City of South San Francisco addresses level of service and capacity upgrades through payment of the city-wide Transportation Impact Fee and any other applicable fees and the prior impacts and mitigation measures Traf-6 through Traf-36 would no longer be applicable to the project and are

not further discussed in this document. The assessment under subsection b) instead addresses VMT-based analysis.

Conflicts with Circulation Plans or Policies

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change the less than significant conclusion with mitigation measures for Impact Traf-2b, as the site is adjacent to the Bay Trail and would therefore require mitigation measure Traf-2b to ensure trail continuity during construction. Impact and mitigation measures Traf-2 and Traf-5 would not be relevant to this project, as they are specific to Phase III and IV offices.*

As under the 2011 EIR, the current project could result in increased use of area pedestrian and bicycle facilities and includes enhancement and new connections to those facilities. Identified mitigation measure Traf-2b requires continuity of the Bay Trail during construction activities and would be applicable to the project. The project is consistent with the program previously analyzed in the 2011 EIR and therefore would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

Conflict with Transportation Impact Reduction Goals

Same Conclusion (SU reduced to LTS w/ MM): *While the 2011 EIR had identified impacts and mitigation related to level of service, current laws require analysis on a VMT basis, which demonstrates the project would have a less-than-significant impact with respect to transportation impacts and would be required to implement TDM measures per City requirements (Traf-1). Trip generation and characteristics under the current project would be consistent with the hotel development specified under the 2011 EIR.*

Traffic engineers Fehr & Peers prepared a trip generation comparison between the total OPSP development as analyzed in the 2011 EIR and the current project, as shown in Table 1 below. Although the 2011 EIR did not break down trip generation by land use, the project size is consistent with that assumed in the 2011 EIR and would therefore be expected to generate a comparable number of trips as the hotel identified in the 2011 EIR. Moreover, the trip generation would be well within the estimated trip generation envelope of the OPSP and therefore vehicular transportation-related impacts are consistent with the 2011 EIR and would not be considered new impacts for the purposes of CEQA analysis.

Table 1: Trip Generation Comparison

Scenario	Daily	AM Peak Hour	PM Peak Hour
Oyster Point Specific Plan	17,684	1,873	2,127
Oyster Point Hotel Project	2,751	135	204

Source: Fehr & Peers, 2022

The City of South San Francisco provides VMT screening criteria for development projects. The criteria are based on the type of project, characteristics, and/or location. If a project meets the City's screening criteria, the project is determined to result in less-than-significant impacts, and a detailed VMT analysis is not required. The project would not meet the location-based screening as nearby transit options do not currently meet high-quality transit standards. A hotel use is not one of the uses for which screening criteria are specifically provided. Although the City of South San Francisco does not have a threshold of significance for VMT associated with hotel uses specifically, consistent with the City's screening criteria

for local serving land uses, the project would have a less than significant impact with respect to VMT if it does not result in a net increase in VMT.

The project's VMT was assessed by Fehr & Peers (Attachment B). Based on a survey of other area uses, hotels in the vicinity primarily serve nearby office/R&D uses and the San Francisco International Airport, as opposed to generating new tourism-oriented or resort-oriented travel. The average trip length associated with a hotel in the East of 101 area was calculated to be 3.6 to 3.9 miles, compared to average trip lengths of 12.9 miles for office/R&D and other land uses in the that area.

Assuming a similar travel pattern for the proposed project as existing hotels in the vicinity, the project would not materially increase vehicle miles traveled and may help shorten trips for hotel guests that would otherwise stay at hotels farther away.

Therefore, the project would not result in a net increase in VMT and would have a less-than-significant impact in this regard. Compliance with the City's TDM requirements, also required by Traf-1, would likely further reduce the project's VMT.

Hazards and Emergency Access

Less Significant Conclusion (LTS w/ MM reduced to LTS): *The current project would have a reduced conclusion to Impacts and mitigation measures Traf-2 and Traf-3 would not apply as the site has been designed to meet safety standards and is not near the Phase III and Phase IV garages.*

The proposed project would not reroute or change any of the city streets in its vicinity that would impact emergency vehicle access to nearby properties. The project would provide access suitable for truck traffic, which would also include emergency vehicles. Emergency vehicles would have access to all building entrances and facilities as well as the Bay Trail connection along the east side of the project. The project is consistent with the program previously analyzed in the 2011 EIR and therefore would not create new or substantially more severe impacts than previously analyzed in the 2011 EIR.

P. Utilities and Service Systems and Energy

Impacts Related To:	OPSP EIR Findings with Implementation of MM (If Required)	PROJECT			
		Relationship to OPSP EIR Findings		Applicable MMs	Project Level of Significance
		Equal or Less Severity	Substantial Increase in Severity		
a. New or Expanded Facilities	LTS	☒	☐	--	LTS
b. Water Supplies	LTS	☒	☐	--	LTS
c. Wastewater Capacity	LTS w/MM	☒	☐	Util-2b: Oyster Point Subtrunk Replacement	LTS w/MM
d-e. Solid Waste	LTS	☒	☐	--	LTS
f. Energy ¹	LTS	☒	☐	--	LTS
¹ Note that the current CEQA Guidelines include energy in its own section. This topic has been addressed here as it was in the 2011 EIR.					

Discussion

Utilities and Service Systems Setting Changes from the 2011 EIR

Area-wide development has continued throughout the vicinity and utilities plans and service are regularly assessed and updated, including Cal Water's South San Francisco District Water Supply and Facilities Master Plan, the City's Sewer System Management Plan (SSMP), and contracts and operations related to solid waste.

Relocation of wastewater system Pump Station No. 1 as identified in the 2011 EIR is being completed as part of Phase 1 development activities and will be completed prior to development of the project site. The upsizing and improvements to Pump Station No. 2 as identified in the 2011 EIR to accommodate build-out of the OPSP area as well as other area growth has since been included in the City's current Capital Improvement Plan though not constructed; this pump station does not service the project site.

California Assembly Bill (AB) 341 requires businesses that generate 4 or more cubic yards of waste per week to recycle. AB 1826 requires all businesses to subscribe to organics recycling service. The City of South San Francisco has implemented these requirements through programs run by the South San Francisco Scavenger Company.

New or Expanded Facilities

Same Conclusion (conclusion remains LTS): *The current project would not change the less-than-significant conclusion related to new or expanded facilities as the need for new or expanded facilities has not changed since the 2011 EIR.*

As under the 2011 EIR, the current project will be served by existing facilities (or those relocated through separate projects) or on-site and in-roadway utility improvements that were included in analysis of OPSP development, and the current project would not change the potential for impacts related to such improvements. Consistent with assumptions in the OPSP and 2011 EIR, a new sewer pump station is proposed on or in the vicinity of the project site. The conclusion of a less-than-significant impact with respect to new or expanded utility facilities remains unchanged for the current project.

Water Supply

Same Conclusion (conclusion remains LTS): *The current project would not change Impact Util-1 or the less-than-significant conclusion as the current project would not substantially change projected increases in water demand.*

The 2011 EIR included a Water Supply Assessment, which determined that with proposed on-site distribution infrastructure and compliance with applicable water conservation measures, proposed water usage would be within available supply. As part of an approved specific plan, development of the project site has been included in local and regional water supply planning. The project is also smaller than the 500-room hotel size that would have been required to prepare a project-specific Water Supply Assessment under Senate Bill 610. The conclusion of a less-than-significant impact with respect to water supply remains unchanged for the current project.

Wastewater

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impacts Util-2 and Util-3, and mitigation measure Util-2b, or the less-than-significant with mitigation conclusion as the current project would not substantially change projected wastewater generation or planned capacity. Mitigation measure Util-2a would not apply as Pump Station No. 2 does not serve the project area.*

As part of an approved specific plan, development of the project site has been included in area-wide wastewater planning and was determined in the 2011 EIR not to have a significant effect on system-wide wastewater capacity but would require localized improvements, including the off-site improvement of a larger sized subtrunk in Oyster Point. Mitigation measure Util-2b requiring demonstrated capacity prior to operations remains applicable to the current project to reduce potential to less than significant. The City may determine that payment of the Sewer Impact Fee satisfies this measure.

Solid Waste

Same Conclusion (conclusion remains LTS): *The current project would not change Impact Util-5 or the less-than-significant conclusion as the site would be adequately served by existing facilities and comply with applicable solid waste regulations.*

The 2011 EIR determined that the solid waste generated by development in the OPSP area would be within availability capacity of applicable facilities and would meet reduction standards and not otherwise conflict with applicable regulations or goals. While specific requirements for commercial solid waste service are regularly updated, the current project would meet all current requirements and the impact would remain less-than-significant and consistent with 2011 EIR conclusions.

Energy

Same Conclusion (conclusion remains LTS): *The current project would contribute to increased energy consumption in the OPSP area but would not change Impact Util-6 or the less-than-significant conclusion as development would comply with applicable energy efficiency regulations.*

The OPSP would be considered to have a significant impact related to energy use if it would violate applicable federal, state, and local statutes and regulations relating to energy standards and/or if energy consumption increases resulting from the OPSP would trigger the need or expanded off-site energy facilities.

The current project would be required by the City to comply with all standards of Title 24 of the California Code of Regulations and the new California Green Building Standards Code (CALGREEN), as applicable, aimed at the incorporation of energy-conserving design and construction. PG&E infrastructure exists in the area, and any improvements and extensions required to accommodate the OPSP would be determined in consultation with PG&E prior to installation. As a result, although the OPSP would incrementally increase energy consumption, it would not result in a significant impact related to the provision of energy services. The project is consistent with the hotel development assumed in the 2011 EIR and would therefore be within the energy usage assumed for the OPSP and by the 2011 EIR with the less-than-significant energy impact identified in the 2011 EIR.

MITIGATION MONITORING AND REPORTING PROGRAM

ATTACHMENT A

to the
Oyster Point Hotel Project Environmental Checklist

MITIGATION MONITORING AND REPORTING PROGRAM

INTRODUCTION

This Mitigation Monitoring and Reporting Program (MMRP) fulfills Public Resources Code Section 21081.6 which requires adoption of a mitigation monitoring program when mitigation measures are required to avoid or reduce a proposed projects significant environmental effects. The MMRP is only applicable if the City of South San Francisco decides to approve the proposed Project.

The MMRP is organized to correspond to environmental issues and significant impacts discussed in the Addendum. The table below is arranged in the following five columns:

- Recommended mitigation measures,
- Timing for implementation of the mitigation measures,
- Party responsible for implementation,
- Monitoring action,
- Party or parties responsible for monitoring the implementation of the mitigation measures, and
- A blank for entry of completion date as mitigation occurs.

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Vis-2a: Lighting Plan. In order to reduce sources of light and glare created by lighting within the OPSP area, the applicant shall specify fixtures and lighting that maintains appropriate levels of light at building entries, walkways, courtyards, parking lots and private roads at night consistent with minimum levels detailed in the City's building codes. These fixtures shall be designed to eliminate spillover, high intensity, and unshielded lighting, thereby avoiding unnecessary light pollution. Prior to issuance of building permits for each phase of construction within the OPSP, the applicant shall submit a Lighting Design Plan for review and approval by the City of South San Francisco Planning Department. The plan shall include, but not necessarily be limited to the following: ○ The Lighting Design Plan shall disclose all potential light sources with the types of lighting and their locations. ○ Typical lighting shall include low mounted, downward casting and shielded lights that do not cause spillover onto adjacent properties and the utilization of motion detection systems where applicable. ○ No flood lights shall be utilized. ○ Lighting shall be limited to the areas that would be in operation during nighttime hours. ○ Low intensity, indirect light sources shall be encouraged. ○ On-demand lighting systems shall be encouraged. ○ Mercury, sodium vapor, and similar intense and bright lights shall not be permitted except where their need is specifically approved and their source of light is restricted. ○ Generally, light fixtures shall not be located at the periphery of	Prior to construction	Applicant for the development	Verify requirements are included in construction contracts and are met during construction	SSF Planning Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
the property and should shut off automatically when the use is not operating. Security lighting visible from the highway shall be motion-sensor activated. ○ Use “cut-off” fixtures designed to prevent the upward cast of light and avoid unnecessary light pollution where appropriate. ○ All lighting shall be installed in accordance with the building codes and the approved lighting plan during construction.					
Vis-2b: Glare Reduction. In order to reduce sources of daytime glare created by reflective building materials, the applicant shall specify exterior building materials for all proposed structures constructed for the Phase I Project and each subsequent phase of development under the OPSP that include the use of textured or other non-reflective exterior surfaces and non-reflective glass types, including double glazed and non-reflective vision glass. These materials shall be chosen for their non-reflective characteristics and their ability to reduce daytime glare. All exterior glass must meet the specifications of all applicable codes for non-reflective glass and would therefore reduce daytime glare emanating from the OPSP area.	Prior to construction	Applicant for the development	Verify requirements are included in construction contracts and are met during construction	SSF Planning Division	
Air-4a: Implement BAAQMD-Recommended Measures to Control Particulate Matter Emissions during Construction. Measures to reduce diesel particulate matter and PM10 from construction are recommended to ensure that short-term health impacts to nearby sensitive receptors are avoided. Dust (PM10) Control Measures: ○ Water all active construction areas at least twice daily and more often during windy periods. Active areas adjacent to residences should be kept damp at all times.	Prior to issuance of construction permits -and- During construction	Applicant for the development	Verify requirements are included in construction contracts and are met during construction	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
○ Cover all hauling trucks or maintain at least two feet of freeboard. ○ Pave, apply water at least twice daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas. ○ Sweep daily (with water sweepers) all paved access roads, parking areas, and staging areas and sweep streets daily (with water sweepers) if visible soil material is deposited onto the adjacent roads. ○ Hydroseed or apply (non-toxic) soil stabilizers to inactive construction areas (i.e., previously-graded areas that are inactive for 10 days or more). ○ Enclose, cover, water twice daily, or apply (non-toxic) soil binders to exposed stockpiles. ○ Limit traffic speeds on any unpaved roads to 15 mph. ○ Replant vegetation in disturbed areas as quickly as possible. ○ Suspend construction activities that cause visible dust plumes to extend beyond the construction site. ○ Post a publically visible sign(s) with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The Air District's phone number shall also be visible to ensure compliance with applicable regulations. Additional Measures to Reduce Diesel Particulate Matter and PM2.5 and other construction emissions: ○ The developer or contractor shall provide a plan for approval by the City or BAAQMD demonstrating that the heavy-duty					

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
(>50 horsepower) off-road vehicles to be used in the construction project, including owned, leased and subcontractor vehicles, will achieve a project wide fleet-average 20 percent NOx reduction and 45 percent particulate reduction compared to the most recent CARB fleet average for the year 2011 ○ Clear signage at all construction sites will be posted indicating that diesel equipment standing idle for more than five minutes shall be turned off. This would include trucks waiting to deliver or receive soil, aggregate, or other bulk materials. Rotating drum concrete trucks could keep their engines running continuously as long as they were onsite or adjacent to the construction site. ○ Opacity is an indicator of exhaust particulate emissions from off-road diesel powered equipment. Each project shall ensure that emissions from all construction diesel powered equipment used on the project site do not exceed 40 percent opacity for more than three minutes in any one hour. Any equipment found to exceed 40 percent opacity (or Ringelmann 2.0) shall be repaired immediately ○ The contractor shall install temporary electrical service whenever possible to avoid the need for independently powered equipment (e.g. compressors). ○ Properly tune and maintain equipment for low emissions.					
Bio-3a: Incorporate Best Management Practices for Water Quality During Construction. The Plan shall incorporate Best Management Practices (BMPs) for water quality to minimize	During construction	Applicant for the development	Verification that requirements are met during	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
impacts in the surrounding wetland environment, sloughs and channels, and the San Francisco Bay during construction. These BMPs shall include numerous practices that will be outlined within the Stormwater Pollution Prevention Plan (SWPPP), including, but not limited to, the following mitigation measures: 1. No equipment will be operated in live flow in any of the sloughs or channels or ditches on or adjacent to the site. 2. No debris, soil, silt, sand, bark, slash, sawdust, cement, concrete, washings, petroleum products or other organic or earthen material shall be allowed to enter into or be placed where it may be washed by rainfall or runoff into aquatic or wetland habitat. 3. Standard erosion control and slope stabilization measures will be required for work performed in any area where erosion could lead to sedimentation of a waterbody. For example, silt fencing will be installed just outside the limits of grading and construction in any areas where such activities will occur upslope from, and within 50 ft of, any wetland, aquatic, or marsh habitat. This silt fencing will be inspected and maintained regularly throughout the duration of construction. 4. Machinery will be refueled at least 50 ft from any aquatic habitat, and a spill prevention and response plan will be developed. All workers will be informed of the importance of preventing spills and of the appropriate measures to take should a spill occur.			construction		
Bio-3b: Minimize Soil Disturbance Adjacent to Wetland and Marsh Habitat. To the extent feasible, soil stockpiling, equipment	During construction	Applicant for the	Verification that Environmentally	SSF Planning Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
staging, construction access roads, and other intensively soil-disturbing activities shall not occur immediately adjacent to any wetlands that are to be avoided by the OPSP. The limits of the construction area shall be clearly demarcated with Environmentally Sensitive Area fencing to avoid inadvertent disturbance outside the fence during construction activities.		development	Sensitive Areas are avoided		
Bio-4: Ensure Adequate Stormwater Run-off Capacity. Increases in stormwater run-off due to increased hardscape shall be mitigated through the construction and maintenance of features designed to handle the expected increases in flows and provide adequate energy dissipation. All such features, including outfalls, shall be regularly maintained to ensure continued function and prevent failure following construction.	Prior to construction	Applicant for the development	Verification that adequate stormwater run-off capacity is provided	SSF Public Works Department	
Bio-6: Pre-Construction Nesting Bird Survey. Pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the OPSP area shall be conducted if construction commences during the avian nesting season, between February 1 and August 31. The survey should be undertaken no more than 15 days prior to any site-disturbing activities, including vegetation removal or grading. If active nests are found, a qualified biologist shall determine an appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity. The buffers should be maintained until after the nestlings have fledged and left the nest.	Prior to construction if during nesting period	Applicant for the development	Completion of survey and, if birds present, provision of buffer	SSF Planning Division	
Bio-10a: Lighting Measures to Reduce Impacts to Birds. During design of any building greater than 100 feet tall, the OPSP Applicant shall consult with a qualified biologist experienced with	During preliminary design of any	Applicant for the	Incorporation of lighting that minimizes bird	SSF Planning Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
bird strikes and building/lighting design issues to identify lighting-related measures to minimize the effects of the building's lighting on birds. Such measures, which may include the following and/or other measures, shall be incorporated into the building's design and operation. ○ Use strobe or flashing lights in place of continuously burning lights for obstruction lighting. Use flashing white lights rather than continuous light, red light, or rotating beams. ○ Install shields onto light sources not necessary for air traffic to direct light towards the ground. ○ Extinguish all exterior lighting (i.e., rooftop floods, perimeter spots) not required for public safety. ○ When interior or exterior lights must be left on at night, the operator of the buildings shall examine and adopt alternatives to bright, all-night, floor-wide lighting, which may include: ○ Installing motion-sensitive lighting. ○ Using desk lamps and task lighting. ○ Reprogramming timers. ○ Use of lower-intensity lighting. ○ Windows or window treatments that reduce transmission of light out of the building shall be implemented to the extent feasible.	building greater than 100 feet tall	development	impacts		
Bio-10b: Building Design Measures to Minimize Bird Strike Risk. During design of any building greater than 100 feet tall, the OPSP Applicant shall consult with a qualified biologist experienced with bird strikes and building/lighting design issues to identify measures related to the external appearance of the building to minimize the	During preliminary design of any building greater than	Applicant for the development	Incorporation of design features that minimize bird impacts	SSF Planning Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
risk of bird strikes. Such measures, which may include the following and/or other measures, shall be incorporated into the building's design. ○ Use non-reflective tinted glass. ○ Use window films to make windows visible to birds from the outside. ○ Use external surfaces/designs that "break up" reflective surfaces rather than having large, uninterrupted areas of surfaces that reflect, and thus may not appear noticeably different (to a bird) from, the sky.	100 feet tall				
Geo-2a: Compliance with California Building Code. OPSP development shall meet requirements of the California Building Code, including the California Building Standards, published by the International Conference of Building Officials, and as modified by the amendments, additions and deletions as adopted by the City of South San Francisco, California. Incorporation of seismic construction standards will reduce the potential for catastrophic effects of ground shaking, such as complete structural failure, but will not completely eliminate the hazard of seismically induced ground shaking. Geo-2b: Compliance with a design-level Geotechnical Investigation report prepared by a Registered Geotechnical Engineer and with Structural Design Plans as prepared by a Licensed Professional Engineer. Proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer and a Licensed Professional Engineer. The structural engineering design, with supporting Geotechnical Investigation, shall incorporate seismic parameters compliant with the California Building Code.	Prior to issuance of building permits -and- Prior to construction	Applicant for the development	Verify geotechnical recommendations are included in plans and construction contracts	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Geo-2c: Obtain a building permit. The OPSP applicant shall obtain a building permit through the City of South San Francisco Building Division. Plan Review of planned buildings and structures shall be completed by the Building Division for adherence to the seismic design criteria for planned commercial and industrial sites in the East of 101 area of the City of South San Francisco. According to the East of 101 area plan, Geotechnical Safety Element, buildings shall not be subject to catastrophic collapse under foreseeable seismic events, and will allow egress of occupants in the event of damage following a strong earthquake.					
Geo-3a: Compliance with recommendations of a Geotechnical Investigation and in conformance with Structural Design Plans. A design-level Geotechnical Investigation shall be prepared for the site under the direction of a California Registered Geotechnical Engineer and shall include analysis for liquefaction potential of the site soils, particularly in the perimeter dikes. Proper foundation engineering and construction shall be performed in accordance with the recommendations of the Geotechnical Investigation. The Geotechnical Investigation shall be reviewed and approved by the City's Geotechnical Consultant and by the City Engineer. A Registered Structural Engineer shall prepare project structural design plans. Structures shall be designed to reduce the effects of anticipated seismic settlements. The Geotechnical Engineer shall review the Structural Design Plans and provide approval for the Geotechnical elements of the plans. The design plans shall identify specific mitigation measures to reduce liquefaction potential, if the potential for liquefaction is found to exist, or other ground failure modes such as lateral spreading, seismic densification or stability of the perimeter dike slopes. Mitigation measures may include ground improvement by methods such as stone columns or jet	Prior to issuance of building permits	Applicant for the development	Verify geotechnical recommendations are included in plans and construction contracts	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
grouting. Geo-3b: Obtain a building permit. The OPSP applicant shall obtain a building permit through the City of South San Francisco Building Division. Plan Review of planned buildings and structures shall be completed by the Building Division for adherence to the seismic design criteria for planned commercial and industrial sites in the East of 101 area of the City of South San Francisco. According to the East of 101 area plan, Geotechnical Safety Element, buildings should not be subject to catastrophic collapse under foreseeable seismic events, and will allow egress of occupants in the event of damage following a strong earthquake.					
Geo-4: Compliance with recommendations of a Geotechnical Investigation. A design-level Geotechnical Investigation shall include an evaluation of static stability and seismic stability under a design magnitude earthquake event. Seismic analyses shall include pseudo-static analyses to estimate permanent slope displacements due to earthquake motions. The Geotechnical Engineer shall prepare recommendations to mitigate potential slope instability, if slope stability problems are identified. Mitigation measures may include ground improvement by methods such as stone columns or jet grouting. Design-level Geotechnical Investigations shall be completed during preliminary and final design stages and will confirm material types used in the construction of the perimeter dikes to verify that the slopes meet minimum criteria for stability under both static and seismic conditions. Knowledge of the stability of the perimeter dikes will guide the selection of any future measures to mitigate any deficiencies identified in the perimeter dike.	Prior to issuance of building permits	Applicant for the development	Verify geotechnical recommendation s are included in plans and construction contracts	SSF Building Division	
Geo-5a: Deep Foundations. Because of the magnitude of expected settlement of Bay Mud soils and waste fill materials that would	Prior to	Applicant for	Verify	SSF Building	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
occur under new building loads, the OPSP applicant must consider the use of deep foundations such as driven piles. Specific recommendations for suitable deep foundation alternatives and required penetrations will be provided during the course of a design-level geotechnical investigation and will depend on factors such as the depth and hardness of the underlying clays, sands or bedrock, and the corrosivity of the waste materials and Bay Mud soils. Suitable deep foundation types may include driven precast, prestressed concrete piles or driven closed-end steel pipe piles with the interior of the pile filled with concrete after driving. Deep foundations shall extend through all waste materials and Bay Mud and be tipped in underlying stiff to hard clays, dense sands or weathered bedrock. Where waste and Bay Mud soils underlie the site, wall and column loads as well as floor slabs shall be founded on deep foundations. Settlement of properly-designed and constructed deep foundation elements is typically less than about one-half inch. The majority of settlement typically occurs during construction as the loads are applied. Where landfill waste and Bay Mud are not present (possibly at extreme western and northwestern edges of the site) and competent soil or bedrock are present near the ground surface (within about 5 feet of finished grade elevation), shallow foundations such as footings or mats may be appropriate foundation types, as determined during the course of a design-level geotechnical investigation. Where proposed structures straddle a transition zone between these conditions, a combination of shallow and deep foundations may be required. Any transition zones shall be identified during site-specific geotechnical investigations for preliminary and final designs. Geo-5b: Predrilling and/or Pile Configuration. Piles either shall be	issuance of building permits	the development	requirements are included in construction contracts and are met during construction	Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
predrilled through the fill and landfill materials to protect the piles from damage due to unknown materials, to reduce pushing waste material deeper, and to reduce pile alignment problems or shall have a pointed tip configuration. If a drill is used, it should only loosen and break up in-place obstructions that may cause pile damage. During recent subsurface investigations reported by Treadwell & Rollo (2009b) obstructions including concrete rubble was encountered throughout the landfill area, particularly in the northern end of the site. Even with predrilling, precast concrete piles could be damaged during installation at a landfill site such as Oyster Point. For preliminary planning purposes, a precast concrete pile breakage rate during installation of 10 to 15 percent may be considered applicable. Piles usually have to include pointed tip configurations to avoid pushing landfill waste downward. These configurations are typically readily accommodated by pile driving contractors. Geo-5c: Indicator Pile Program. Prior to specifying the lengths of the production piles, drive indicator piles at the structure sites in order to observe the driving characteristic of the piles and the ability of the driving equipment when a driven pile is used. The driving criteria and pile length of production piles shall also be estimated from the information obtained from driving of the indicator piles. The contractor shall use the same equipment to drive both the indicator and production piles. Indicator pile lengths and locations shall be selected by the Geotechnical Engineer, in conjunction with the Structural Engineer and Contractor after the foundation plan has been finalized. The indicator pile program will serve to establish information on the following: ○ Estimates of production pile lengths;					

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
○ Drivability of production piles; ○ Performance of pile driving equipment; and ○ Variation in driving resistance relative to depth and location of piles.					
Geo-6: Account for Drag Load on Deep Foundations. The Geotechnical Engineer shall account for accumulation of drag load in the structural design of the deep foundations elements (piles).	Prior to issuance of building permits	Applicant for the development	Verify geotechnical recommendations are included in plans and construction contracts	SSF Building Division	
Geo-7: Incorporate Systems for Landfill Gas Control. Measures for the control of landfill gas shall be included in building design. Measures for the control of landfill gas typically include a collection system, floor slab shielding and interior alarms.	For projects on or adjacent to the landfill area, during preliminary project design and prior to issuance of building permit	Applies on a building by building basis	Verification that measures for the control of landfill gas are included	SSF Building Division and SSF Public Works Department	
Geo-8a: Avoid Significant New Loads on Landfill Waste and Bay Mud. A design-level Geotechnical Investigation shall include exploration to more thoroughly determine the thickness and areal extent of landfill waste and Bay Mud. To avoid inducing additional settlement to the settlement that is already on-going, grading plans shall include as little additional new fill as possible, and	Prior to issuance of building permit	Applies to all construction	Verification of adequate report	SSF Building Division and SSF Public Works Department	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
significant new structure loads or any structures that are settlement-sensitive shall be founded on deep foundations extended below the Bay Mud, as recommended in the design-level Geotechnical Investigation report. All grading shall be planned to avoid penetrating the landfill cap and to reduce the amount of long-term settlement in response to new fills. Because the Bay Mud and waste across most of the site are still settling under the weight of existing fill and waste decomposition and will settle more under new fills, additional settlement should be expected, with the creation of localized low-lying surface areas. Existing low areas shall be corrected during site grading to allow for proper drainage. Long-term maintenance planning for the development shall also include provisions for periodic grading to correct drainage problems and improve site grades, as outlined in the Disposition and Development Agreement. The Geotechnical Engineer will recommend other site-specific recommendations based on the results of the design-level Geotechnical Investigation to mitigate on-going settlement and any additional settlement to be expected in response to new development.					
Geo-8b: Design Building-Soil Interface to Allow Free Movement. The Structural Engineer shall provide that structures not supported on deep foundations not be structurally tied into pile-supported buildings, except as noted below, and shall be designed to allow free vertical movement between structures. Articulated ramps on walkways and building entrances at the interface between the pile and soil-supported areas can provide a smooth walkway over moderate differential settlements with some amount of maintenance. As the magnitude of the differential	Prior to issuance of building permit	Applies to all construction	Verification of compliant construction plans	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
settlement increases, however, these ramps may need to be rebuilt or realigned to account for the larger elevation differential. Similar ramps may also reduce differential settlements between driveways and pile-supported parking lots. Over time, voids will tend to form beneath pile-supported buildings due to on-going settlement of the landfill. Use of wall skirts around the building perimeter will help to reduce the visual impact of these voids.					
Geo-9a: Monitoring and Testing. Special precautions shall be taken to monitor the safety conditions and to provide for the safety of workers in the area. Additionally, if excavations encounter water, this water shall be tested for contaminants and may have to undergo specialized handling, treatment and/or disposal if it is contaminated. A system to disperse methane during construction shall be installed in or adjacent to the trenches.	For projects on the landfill area, prior to issuance of building permit and during construction	Applies to all construction on a landfill	Adherence to measures if water discovered during excavation	SSF Building Division and SSF Public Works Department	
Geo-9b: Locate Underground Utilities in Soil Cap. To the extent practicable, the utilities shall be constructed in the soil landfill cap to avoid direct contact of the utility lines and construction workers with the waste material. If construction of utilities in the waste material is necessary, proper design and construction precautions shall be taken to protect the system and the workers from the corrosive and hazardous conditions of the waste. Geo-9c: Seal Trenches and Underground Structures. Trenches and underground structures shall be sealed to preclude gas intrusion. Typical types of sealing procedures include providing a low permeability clay cover of 1 foot over the top of the pipe, or the utility trench be lined with a relatively impervious	For projects on the landfill area, prior to issuance of building permit and during construction	Applies to all construction on a landfill	Verification of compliant plans and adherence to approved plans during construction	SSF Building Division and SSF Public Works Department	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
geomembrane. Underground manholes may be shielded from methane intrusion by placement of a membrane around the outside of the structure. To reduce gas migration off-site within the utility trenches, all trenches crossing the transition zone between the landfill and non-landfill portions of the property shall be sealed with a clay plug surrounding the pipe or other approved methods. In addition, plugs shall also be provided at the perimeters of buildings to reduce migration of gas through the utility trenches to beneath the buildings.					
Geo-10: Provide For Continuity of Landfill Cap. Following planned landfill excavation and landfill cap repair, the project Civil Engineer shall require that excavations for building foundations, utility trenches and other underground structures be configured to maintain continuity of the landfill cap. The specific configuration will depend upon the excavation depth and orientation to underlying wastes. However, a low-permeability layer of soil or a geomembrane properly tied to surrounding cap areas may be required.	For projects on the landfill area, prior to issuance of building permit and during construction	Applies to all construction on a landfill	Verification of landfill cap installation	SSF Building Division and SSF Public Works Department	
Geo-11: Common Trenches and Vaults. Where underground utilities are to be located in landfill areas, consideration shall be given to reducing the number of utilities trenches by locating utilities in common trenches to the extent practicable. In addition, vaulted systems shall be designed and maintained at such interfaces that provide flexible and/or expandable connections to the proposed buildings. In addition, the utility lines beneath buildings shall be suspended from hangers fastened to structural floor slabs.	For projects on the landfill area, during preliminary design and prior to issuance of building permit	Applies to all construction on a landfill	Verification of adherence to measures	SSF Building Division and SSF Public Works Department	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Geo-12: Flexible Materials and Joints. Utility lines shall be constructed of flexible pipe such as welded polyethylene to accommodate differential settlement within the waste material and landfill cap. At the border of the landfill, where differential settlements are expected to be large, the utility lines shall be designed to allow for rotation. As with buried utilities on a conventional site, proper bedding and backfilling shall be completed, as specified in a design-level geotechnical investigation report.	For projects on the landfill area, during preliminary design, prior to issuance of building permit and during construction	Applies to all construction on a landfill	Verification of adherence to measures	SSF Building Division and SSF Public Works Department	
Geo-13: Increase Flow Gradient. The Civil Engineer shall consider increasing the flow gradient in sewers and storm drains so that differential settlements will not disrupt the flow. An alternative is to provide a pumping system that does not rely on gravity flow. Such measures will reduce the impact of reduced flow gradient due to differential settlement to less than significant. This applies to the entire OPSP, including the Phase I Project.	For projects on the landfill area, during preliminary design, prior to issuance of building permit and during construction	Applies to all construction on a landfill	Verification of adherence to measures	SSF Building Division and SSF Public Works Department	
Geo-14: Storm Water Pollution Prevention Plan. In accordance with the Clean Water Act and the State Water Resources Control Board (SWRCB), the Applicant shall file a Storm Water Pollution Prevention Plan (SWPPP) prior to the start of construction. The SWPPP shall include specific best management practices to reduce soil erosion. This is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ).	Prior to construction	Applicant for the development	Verification that adequate plan prepared	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Haz-2: Waste Excavation and Re-disposition. A plan shall be written for management of excavated wastes/refuse. Non-hazardous excavated waste shall be re-deposited in an alternate part of the site and any hazardous waste shall be relocated off-site for appropriate disposal. The plan can be a section of the Site Management Plan (Mitigation Measure Haz-4a), or a stand alone document. The plan shall include measures to avoid releases of wastes or waste water into the environment and to protect workers and the public. The details of the plan shall be based, in part, on the amount of material to be removed and the final design of foundation structures, but will generally include the following, as deemed appropriate by the regulatory agencies, particularly DTSC and RWQCB: ○ To the greatest extent possible, use existing boring data to obtain pre-characterization of refuse for off-site disposal, and to pre-plan areas to be removed versus areas to be re-deposited on-site. ○ Divide excavation areas into daily sections; plan to complete excavation and backfilling a section during each working day. Minimize the time period that refuse is exposed. ○ Review existing boring data and existing site documentation to evaluate potential subsurface materials to be encountered. ○ Stake out area to be excavated. ○ If excavation is to be conducted at depths where groundwater is to be encountered, conduct dewatering to minimize worker potential direct contact with groundwater. Removed groundwater shall be treated in accordance with the requirements outlined in the Site Management Plan (Mitigation Measure Haz-4a).	Prior to issuance of building permit and during construction on the landfill area	Applies to all construction	Compliance with Site Management Plan	SSF Public Works Department	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
- Screen excavation site with a portable photoionization detector and combustible gas monitor for landfill gasses. Continue screening progress of each excavation section as work proceeds. Use foam suppressants or 6 inches minimum of daily soil cover for nuisance odors. - Provide carbon dioxide gas source (fire extinguisher or cylinder) to flood excavation as necessary to prevent migration of gases into atmosphere above excavation, minimize explosive or fire potential, and control nuisance and odors. - Begin excavation and segregate soil and /or clay cap material above refuse for reuse as foundation layer. - Upon reaching refuse, place refuse into dump truck standing by on-site. - Dispose of each truck load of refuse immediately after filling equipment. All loads to be covered when hauling. Refuse shall be either re-deposited on-site in a specified area, or hauled to an off-site disposal facility. - Prior to relocation, field verify each load for disposal classification type (landfill classification, Class 3 or Class 2). If waste for off-site disposal is characterized as either California or Federal Hazardous Waste as defined in the criteria described in CCR Title 22 Section 66261, then the hazardous waste shall be tracked using the Uniform Hazardous Waste Manifest System (USEPA Form 8700-22). - Hazardous and if necessary, non-hazardous waste shall be transported to the appropriate disposal facility using a permitted, licensed, and insured transportation company. Transporters of hazardous waste shall meet the requirements of 40 CFR 263 and 22 CCR 66263. Copies of					

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
uniform hazardous waste manifests signed by the designated waste disposal facility shall be retained for at least five years from the date the waste was accepted by the initial transporter. Copies of records pertaining to the characterization of hazardous or nonhazardous waste shall be retained for a minimum of three years. ○ Upon reaching over-excavation depth, place a minimum of 6-inch thick layer of appropriate backfill soil on excavation bottom to seal exposed refuse surface. Place soil by the end of the same day excavation is completed. ○ Upon completion of excavation, begin cap placement procedures. Specific measures shall be targeted to minimize the duration of waste exposure, plan for appropriate final destination of wastes based on the presence of contaminants of concern, allow for adjustment in plan based on unexpected occurrences, and to protect worker safety and the public. Additional work plan measures are discussed in Haz-4a. In addition, worker protection measures for soil and dewatering are discussed in Haz-6a. Measures specific to off-site air quality during construction are included in mitigation measure Air-4.					
Haz-4b: Use Of Deep Foundations To Prevent Load Induced Settlement. Buildings on fill shall be supported using driven steel or concrete piles founded in stiff to hard clays, dense sands or weathered bedrock underlying the fill. Both the structural loads and building floor slabs shall be supported on piles. This will avoid placing additional building loads on fill material.	Prior to issuance of building permits	Applicant for the development	Adherence to specifications provided in measure	SSF Building Division	
Haz-4c: Minimization of Irrigation Water Use. Landscaping of the	During	Applicant for		SSF Building	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
site shall be selected to stabilize the soil, prevent erosion, and reduce the need for extensive irrigation. Excessive water could infiltrate the landfill cap and produce leachate. To prevent this, low-water vegetation shall be selected to reduce irrigation water. In addition the thickness of the erosion resistant layer in landscaped areas will be increased to minimize intrusion of roots into the lower layers of the cover.	Construction	the development		Division	
Haz-4e: Operation and Maintenance Activities. Operation and maintenance (O&M) activities are expected to occur indefinitely at the site. Operation and maintenance activities shall include inspections and observations of site features to protect the landfill cap, prevent utility damage, maintain gravity flow of sewer systems, maintain the landfill gas barrier and venting systems, and monitor for leachate and groundwater contaminant concentrations. O&M shall act to prevent releases of hazardous materials by identifying deficits in engineering controls prior to release events.		SSF Building Division		SSF Building Division	
Haz-6a: Development and Implementation of Site Management Plans. A Site Management Plan shall be prepared that addresses the exposure risk to people and the environment resulting from future demolition, construction, occupancy, and maintenance activities on the property. The plans for the landfill portion of the OPSP shall be in accordance with RWQCB order No. 00-046, the PCMP and recommendations of the Environmental Consultant, and shall be reviewed and approved by the RWQCB, DTSC, the SMCEHD Groundwater Protection Program and the City of South San Francisco Public Works Department. Specific mitigation measures designed to protect human health		SSF Building Division		SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
and the environment shall be provided in the plan. At a minimum, the plan shall include the following: 1) Requirements for site specific Health and Safety Plans (HASP) shall be prepared in accordance with OSHA regulations by all contractors at the OPSP area. This includes a HASP for all demolition, grading and excavation on the site, as well as for future subsurface maintenance work. The HASP shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The HASP shall be reviewed and approved by a Certified Industrial Hygienist. The plan shall also designate provisions to limit worker entry and exposure and shall show locations and type of protective fencing to prevent public exposure to hazards during demolition, site grading, and construction activities. 2) Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination shall be developed. This shall include dewatering techniques to minimize direct exposure to groundwater during construction activities, treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with local and Regional Water Quality Control Board guidelines. Groundwater encountered in excavations shall not be discharged into the neighboring storm drain, but into a closed containment facility, unless proven to have concentrations of contaminants below established regulatory guidelines. Extracted contaminated groundwater shall be required to be stored in tanks or other sealed container until tested. If testing determines that the water can be discharged into the sanitary sewer system, then the applicant shall acquire a ground water discharge permit from the City of South San Francisco Sanitary Sewer District and meet local discharge limits before					

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
being allowed to discharge into the sanitary sewer. Water shall be analyzed for the chemicals of concern at the site, including benzene, ethylbenzene, xylenes, chlorobenzene, naphthalene and additional compounds as requested by the receiving facility or the City of South San Francisco. 3) Waste relocation. Relocation or removal of existing landfill waste/refuse will be required for landfill cap upgrades and for site construction. Excavated waste can either be re-deposited on site or disposed of at an active landfill facility. Off-site disposal will require pre-characterization of the waste for acceptance at an approved waste disposal facility. Waste manifests will be prepared to document transportation and disposal. On-site disposal shall require proper placement, compaction, and capping of the refuse material. In either case, segregation of Class 2 and Class 3 from Class 1 material for disposal purposes shall be performed on-site to the extent possible. No Class 1 material shall be relocated or re-deposited on-site. BAAQMD Regulation 8 Rule 34 section 118 documents a limited exemption for construction activities at landfill sites. This section specifies that when the construction activities are related to “installing, expanding, replacing, or repairing components of the landfill gas, leachate, or gas condensate collection and removal systems.” Excavation for cap upgrades falls under this exemption. Excavation for construction purposes will also likely fall under this exemption. As such it will be necessary to provide BAAQMD with construction plans and other documentation as detailed under this regulation for the purposes of obtaining a letter of exemption from BAAQMD. Excavation procedures are also discussed in Measure Haz-2. 4) Future subsurface work plan. The plan shall document procedures for future subsurface landscaping work, utility maintenance, etc., with proper notification, where applicable. The					

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
plan shall include a general health and safety plan for each expected type of work, with appropriate personal protective equipment, where applicable. This plan may be included in the operations and maintenance plan as appropriate.					
Haz-6b: Landfill Gas System. Section 21160 of Title 27 of the CCR requires that closed landfills implement and maintain landfill gas control. A landfill gas (LFG) venting system shall be placed under the bottom slabs of each structure built entirely or partially over landfill material, to collect and vent the build up of gases diffusing through the landfill cap. The LFG system shall include spray-applied vapor barrier membranes, horizontal collection and passive venting, gas detection and monitoring. The system shall either have backup active collection and venting or shall be designed to facilitate retrofitting with an active system, if measures warrant the retrofit. Potential migration of LFG into the building space shall be mitigated by the collection and venting system, and secondly by the spray-applied membrane. Subsurface landfill gases shall be vented by a network of perforated piping placed beneath the building slabs. The exhaust gases shall be manifolded to a series of riser piping that is to be vented above structure roofs. Passive landfill gas systems do not require permits, however if an active system is installed, either at the time of construction or as part of a retrofit, a BAAQMD permit will be needed.		Applicant for the development (within building on site) -and- SSF Building Division (external to building)		SSF Building Division	
Haz-6c: Non-use of Groundwater. Water supply wells shall not be installed at the site. This will prevent direct contact between the public and site groundwater and leachate.	All phases	Applicant for the development	Verify requirements are included in landscaping plan	SSF Building	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Hydro-1: Best Management Practices (BMPs) shall be used during installation of foundation piers to reduce the potential for gaps in the subsurface confining layers around the piers. BMP requirements shall be identified in the SWPPP and shall be developed by the applicant or their authorized representative. The exact BMPs to be implemented shall depend on final pier design and type, but can include pre-drilling and grouting of concrete piers, use of hollow steel piers, or other methods to reduce the risk of displaced refuse creating a void in the Bay Mud layer. The proposed BMPs shall be benchmarked against the California Department of Transportation Stormwater Quality Handbooks Construction Site Best Management Practices (BMPs) Manual (2003 and associated updates).	Prior to issuance of building permits -and- During construction	Applicant for the development	Verify requirements are included in construction contracts and are met during construction	SSF Building Division	
Hydro-2: Preparation and Implementation of Project SWPPP. Pursuant to NPDES requirements, the applicant of a project under the OPSP shall develop a SWPPP to protect water quality during construction. If the SWPPP will be developed after September 2, 2011, the SWPPP shall be developed by a California Qualified SWPPP Developer in accordance with the State Water Resources Control Board Construction General Permit 2009-009-DWQ. The project SWPPP shall include, but is not limited, to the following mitigation measures for the construction period: 1) Grading and earthwork shall be allowed with the appropriate SWPPP measures during the wet season (October 1 through April 30) and such work shall be stopped before pending storm events. 2) Erosion control/soil stabilization techniques such as straw mulching, erosion control blankets, erosion control matting, and hydro-seeding, shall be utilized in accordance with the regulations outlined in the Association of Bay Area Governments "Erosion &	Prior to issuance of building permits -and- Prior to construction	Applicant for the development	Verify requirements are included in construction contracts and are met during construction	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Sediment Control Measures” manual. Silt fences shall be installed down slope of all graded slopes. Hay bales shall be installed in the flow path of graded areas receiving concentrated flows and around storm drain inlets. 3) BMPs to be developed by the applicant shall be used for preventing the discharge or other construction-related NPDES pollutants beside sediment (i.e. paint, concrete, etc) to downstream waters. 4) After construction is completed, all drainage facilities shall be inspected for accumulated sediment and these drainage structures shall be cleared of debris and sediment. In accordance with the handbook C.3 Stormwater Technical Guidance, Version 2, permanent mitigation measures for stormwater shall be submitted as part of project application submittals with the Planning Permit Application and the Building Permit Application. Elements that shall be addressed in the submittals include the following: 5) Description of potential sources of erosion and sediment at the OPSP area. R&D activities and significant materials and chemicals that could be used at the proposed OPSP area shall be described. This shall include a thorough assessment of existing and potential pollutant sources. 6) Identification of BMPs to be implemented at the OPSP area based on identified industrial activities and potential pollutant sources. Emphasis shall be placed on source control BMPs, with treatment controls used as needed. 7) Development of a monitoring and implementation plan. Maintenance requirements and frequency shall be carefully described including vector control, clearing of clogged or					

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
obstructed inlet or outlet structures, vegetation/landscape maintenance, replacement of media filters, etc. 8) The monitoring and maintenance program shall be conducted as described in Haz-4e. 9) Proposed pervious and impervious surfaces, including site design measures to minimize impervious surfaces and promote infiltration (except where the landfill cover is present). 10) Proposed locations and approximate sizes of stormwater treatment measures.					
Hydro-3: Compliance with NPDES Requirements. Applicants for a project under the OPSP shall comply with all Phase I NPDES General Construction Activities permit requirements established by the CWA and the Grading Permit requirements of the City of South San Francisco. Erosion control measures to be implemented during construction shall be included in the project SWPPP. The project SWPPP shall accompany the NOI filing and shall outline erosion control and storm water quality management measures to be implemented during and following construction. The SWPPP shall also provide the schedule for monitoring performance. Refer to Mitigation Measure Hydro-2 for more information regarding the project SWPPP. Implementation of Phase I NPDES General Construction Activities permit requirements would reduce construction-related impacts associated with erosion and/or siltation to less-than-significant.	Prior to issuance of building permits -and- During construction	Applicant for the development	Verify requirements are included in construction contracts and are met during construction	SSF Building Division	
Noise-5: Construction Noise. To reduce noise levels generated by construction, the following standard construction noise control measures shall be included in all construction projects within the	During construction	Applicant for the development	Verify requirements are included in construction	SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
OPSP area. - Equip all internal combustion engine driven equipment with intake and exhaust mufflers that are in good condition and appropriate for the equipment. - Unnecessary idling of internal combustion engines should be strictly prohibited. - Locate stationary noise generating equipment such as air compressors or portable power generators as far as possible from sensitive receptors. Construct temporary noise barriers to screen stationary noise generating equipment when located near adjoining sensitive receptors. Temporary noise barriers could reduce construction noise levels by 5 dBA. - Utilize "quiet" air compressors and other stationary noise sources where technology exists. - Route all construction traffic to and from the OPSP area via designated truck routes where possible. Prohibit construction related heavy truck traffic in residential areas where feasible. - Control noise from construction workers' radios to a point that they are not audible at existing residences bordering the OPSP area. - The contractor shall prepare and submit to the City for approval a detailed construction plan identifying the schedule for major noise-generating construction activities. - Designate a "disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator will determine the cause of the noise complaint (e.g., starting too early, bad muffler, etc.) and will require that reasonable measures warranted to correct the problem be implemented.			contracts and are met during construction		

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Conspicuously post a telephone number for the disturbance coordinator at the construction site and include it in the notice sent to neighbors regarding the construction schedule. For pile driving activities, consider a) pre-drilling foundation pile holes to minimize the number of impacts required to seat the pile, b) using multiple pile driving rigs to expedite this phase of construction, and/or c) the use of “acoustical blankets” for receivers located within 100 feet of the site.					
Traf-1: Transportation Demand Management Program. The OPSP sponsors shall implement a Transportation Demand Management (TDM) program consistent with the City of South San Francisco Zoning Ordinance Chapter 20.400 Transportation Demand Management, and acceptable to C/CAG. These programs, once implemented, must be ongoing for the occupied life of the development. The C/CAG guidelines specify the number of trips that may be credited for each TDM measure.	Prior to occupancy	Applicant for the development	Approval of TDM Program	SSF Planning Division	
Traf-2b: Bay Trail Continuity Provisions in Construction Management Plan. Continuity of the Bay Trail shall be included in construction management plans for all phases of development in the OPSP. When feasible, construction shall avoid disrupting the Bay Trail and when not feasible, the construction management plan shall specify plans for clear and safe detours for bicyclists and pedestrians and be ADA accessible.	Prior to issuance of building permits -and- During construction	Applicant for the development	Verification of inclusion in the construction management plan	SSF Planning Division and SSF Building Division	

Mitigation Measure	Timing/ Schedule	Implementation Responsibility	Verification		
			Monitoring Action	Monitoring Responsibility	Date Completed
Util-2b: Oyster Point Subtrunk Replacement. To provide the required sewer capacity, the Oyster Point Subtrunk will need to be replaced with a larger sized trunk line, with sizes ranging from 12, 15, and 18-inches. The majority of these improvements are included in the Sewer Master Plan and are funded through a flat-rate sewer connection fee for new development and a monthly impact fee. The amount of the impact fee is based on the quantity (flow) of wastewater generated. The occupants of the proposed OPSP shall pay the sanitary sewer fees imposed by the City of South San Francisco in order to mitigate the cost of the sewer system upgrades necessary to manage the wastewater flows generated by the OPSP. An additional 700 feet of 8-inch diameter sewer trunk from Eccles Avenue to Gull Road needs to be upsized to a 12-inch diameter trunk sewer. This segment of sewer trunk was not included in the recommendations in the Sewer Master Plan. The applicants shall either work with the City to include this improvement in an Sewer Master Plan update or directly fund their fair share of the improvement.	Prior to issuance of certificate of occupancy of Phase IV or building at which warrant criteria levels are approached, if earlier	Applicant for the development	Payment of sewer connection fee / fair share contribution	SSF Public Works Department	

FEHR & PEERS TRANSPORTATION ASSESSMENT

ATTACHMENT B

to the
Oyster Point Hotel Project Environmental Checklist

Memorandum

Date: May 4, 2022
To: Rebecca Auld, Lamphier Gregory
From: Daniel Jacobson and Emily Chen, Fehr & Peers
Subject: **Oyster Point Hotel Transportation Assessment**

SF22-1215

This memorandum provides a transportation assessment for a proposed hotel located within the Oyster Point Specific Plan area in South San Francisco ("Project"). It includes an analysis of travel demand, site access and circulation, and vehicle miles traveled, as well as a comparison to the analysis provided in the Oyster Point Specific Plan EIR.

Key Findings

- The Project's hotel and restaurant uses are unlikely to materially increase vehicle miles traveled due to the Project's proximity to office/R&D uses and the San Francisco International Airport.
- The Project's size and trip generation is well within the estimated trip generation envelope of the Specific Plan Area and therefore consistent with the transportation analysis in the Specific Plan EIR.
- Access and circulation illustrated in the Project's conceptual site plan is consistent with the Oyster Point Specific Plan and would not create or exacerbate transportation safety impacts.
- Based on the above findings, there are no anticipated new impacts to transportation facilities that were not identified in the Oyster Point Specific Plan EIR.



Project Description

The Project is located on Marina Boulevard near the eastern terminus of Oyster Point Boulevard adjacent to the South San Francisco Ferry Terminal. The Project consists of up to 350 hotel rooms, a restaurant and bar, and meeting rooms covering about 261,000 square feet. A ballroom may be added in a future phase. Approximately 250 parking spaces would be provided (78 of which would be valet) along with a loading dock that accommodates two service trucks. The Project includes three driveways along Marina Boulevard and a public access trail along the eastern edge of the site connecting to the Bay Trail.

Project Setting

Land Use & Transportation Context

The Project is located within the Oyster Point Specific Plan area, an 81 acre redevelopment in South San Francisco approved in 2011. The Specific Plan includes the development of up to 2.3 million square feet of office/R&D space as well as new infrastructure, recreation and open space, and the proposed Project. The Specific Plan's Phase One buildings (660,000 square feet) were completed in early 2022, while remaining phases are underway. The Project is located along Marina Boulevard near the eastern terminus of Oyster Point Boulevard, which connects to US-101 and major arterials within South San Francisco. Gull Drive, Eccles Avenue, and Gateway Boulevard are the nearest north-south streets intersecting with Oyster Point Boulevard.

The South San Francisco Ferry Terminal is located adjacent to the project site, while the South San Francisco Caltrain station and South San Francisco BART Station are accessible via peak period shuttle services provided by the Peninsula Traffic Congestion Relief Alliance (Commute.org). While no SamTrans bus service currently serves the site, an extension of Route 130 along the Oyster Point Boulevard corridor is planned to occur in 2023. New pedestrian and bicycle facilities have been provided along Oyster Point Boulevard and Marina Boulevard adjacent to the Project site, including sidewalks, crosswalks, and Class II bike lanes. The Bay Trail covers the perimeter of the Specific Plan area and has frontage on the southern shoreline of the Project site.

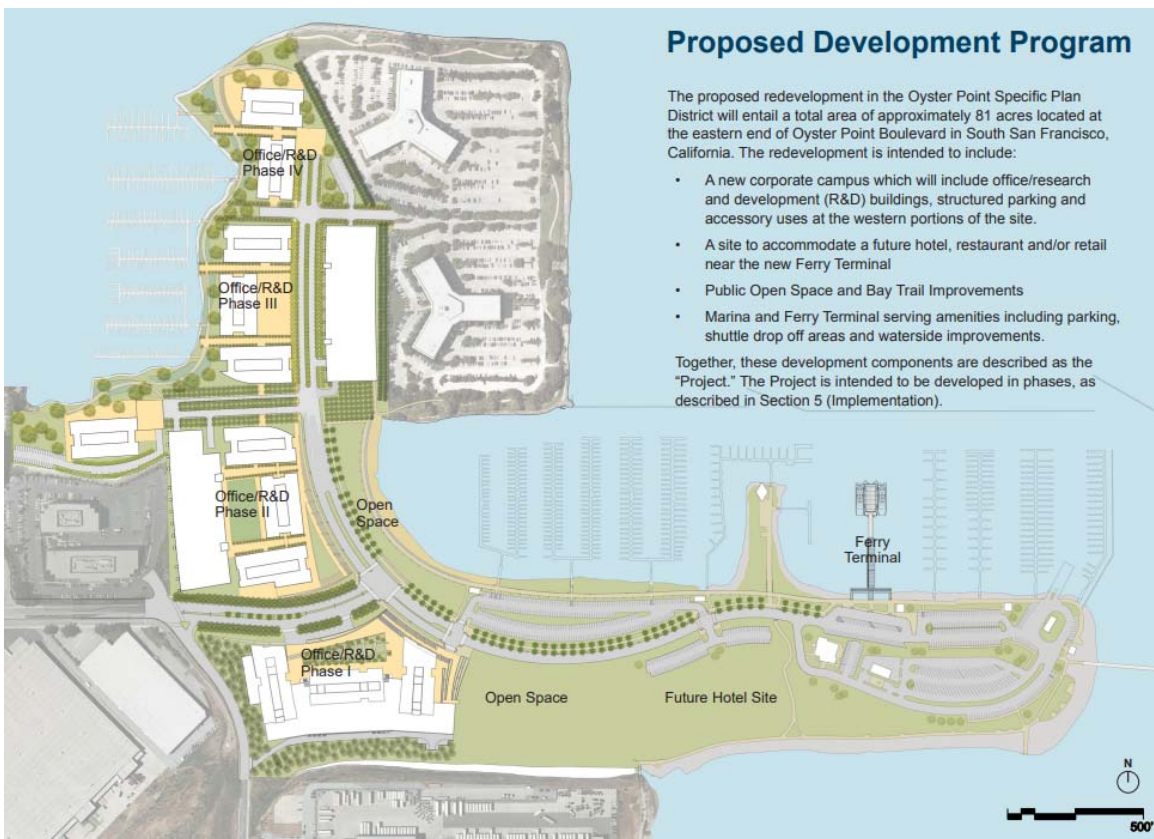
Figure 1 illustrates the Project location in relation to nearby land uses and transportation facilities. Figure 2 illustrates the Oyster Point Specific Plan.



Figure 1: Project Location



Figure 2: Oyster Point Specific Plan





Specific Plan Design Guidelines

The Oyster Point Specific Plan seeks to promote alternative transportation modes to, from and within the site (Design Goal 3). To accomplish this, it includes the following applicable design guidelines related to the Project's site access and circulation:

General Guidelines

- *Provide convenient, efficient, and safe access to Oyster Point.*
- *Maintain and enhance access to adjacent parcels, the waterfront, and the Ferry Terminal.*
- *Encourage alternative transportation by emphasizing pedestrian, bicycle and transit in the roadway network design.*
- *Promote safe pedestrian and vehicular circulation by minimizing conflicts at intersections and changes in road width and direction.*

Service, Delivery and Emergency Access Guidelines

- *Service vehicles should be accommodated by the roadway network, with clearly delineated lane markings, signals, and wayfinding signage.*
- *Service, delivery and emergency vehicles should have access to both primary as well as secondary entrances to buildings and facilities.*
- *These secondary entrances should be limited specifically to service, delivery, and emergency access.*
- *Service vehicle driveways and loading areas should be screened and separated from public pedestrian walkways where possible.*
- *Secondary access for emergency vehicles will be provided when their access is restricted from using primary entrances.*

Parking Access Guidelines

- *Parking access should be clearly delineated by lane markings, signals, and wayfinding signage.*
- *Access to and from the parking garages should be located at intersections or from a dedicated right turn lane.*
- *Adequate queuing space should be provided at parking garage entrances.*

Bicycle Circulation Guidelines

- *Bicycle access and parking should be clearly delineated by lane markings and wayfinding signage.*



Streetscapes and Sidewalks Guidelines

- *Sidewalks should support an interconnected and public development.*
- *Width of sidewalks should be appropriate to*
- *accommodate an active development.*
- *Sidewalks should be inset from roadways with a landscape buffer where possible to promote pedestrian friendly circulation.*

Guidelines to Support the TDM Program

- *The site should include dedicated passenger drop- off and shuttle stop areas.*
- *Pedestrian connections should be provided to connect the buildings and site adjacent sidewalks, Bay Trail and shuttle stops.*
- *Bicycle lanes, routes and/or paths should be provided to allow bicycle accessibility to all buildings at the site.*
- *The parking areas should provide preferred parking for carpool, vanpool, low-emitting and fuel-efficient vehicles, and electric plug-in vehicles.*
- *Parking should be provided for motorcycle and scooters.*
- *Long-term (Class I) and Short-Term (Class II) bicycle parking should be provided at or adjacent to all buildings.*
- *Shower and changing facilities should be provided in or easily accessible from all buildings.*
- *Transportation and Commute Information Kiosks should be provided at all buildings.*
- *In addition to the physical measures described above, the TDM program will include programmatic measures such as informational resources, transit programs, and commuter amenities.*

Project Travel Demand

Project Trip Generation

Vehicle trip estimates for the Project (Table 1) were developed by applying national trip generation rates presented in the Institute of Transportation Engineers (ITE) Trip Generation Manual 11th Edition to the proposed land uses. Due to the continued disruptions in travel behavior associated with the COVID-19 pandemic, ITE rates were used in lieu of conducting new vehicle counts at comparable local sites. ITE Land Use 310 (Hotel) is defined as a place of lodging and supporting facilities such as a full-service restaurant, bar, meeting rooms, ballrooms, and convention facilities, which most closely matches the facilities included in the proposed Project. ITE includes a reasonably large sample size of 28 studies for AM peak hour trip generation data and 31 studies for PM peak hour trip generation data. Daily trip generation data includes a more limited sample size of seven studies and may have a higher margin of error.



ITE rates are typically derived from suburban settings that lack a mix of land uses within walking distance; consequently, Fehr & Peers used the trip generation methodology known as MXD+ to calibrate the trip generation estimates to local conditions and the proximity to adjacent office/research & development (R&D) uses. The MXD+ method is based on a weighted average of the U.S. Environmental Protection Agency's MXD Model and the National Cooperative Highway Research Program's Report 684 methodology. Additional reductions associated with the proposed transportation demand management program were not included due to limited data available for comparable hotel sites

As illustrated in Table 1, the project is projected to generate approximately 2,751 vehicle trips on an average weekday with about 135 occurring in the AM peak hour and about 204 in the PM peak hour. These trip generation estimates do not account for the proposed transportation demand management program, which would further reduce the number of private vehicle trips to the project.

The Project considers adding a ballroom in a future phase. Since ITE rates are based upon hotels that typically include ballrooms, the trip generation estimates in Table 1 include travel demand associated with the future ballroom. Consequently, Table 1 may present an overestimate of travel demand without the ballroom.

Table 1. Oyster Point Hotel Trip Generation

Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Hotel ¹	350 rooms	2,797	90	71	161	106	101	207
Internal Trip Reductions ²	-	(46)	(8)	(2)	(26)	(1)	(2)	(3)
Net New Project trips	-	2,751	82	69	135	105	99	204

Notes:

¹Based on ITE 11th Edition (Land Use #310 – Hotel, average rate)

²Based on MXD+ trip generation methodology which accounts for Internal trip reductions account for trips made between land uses within the Specific Plan area.

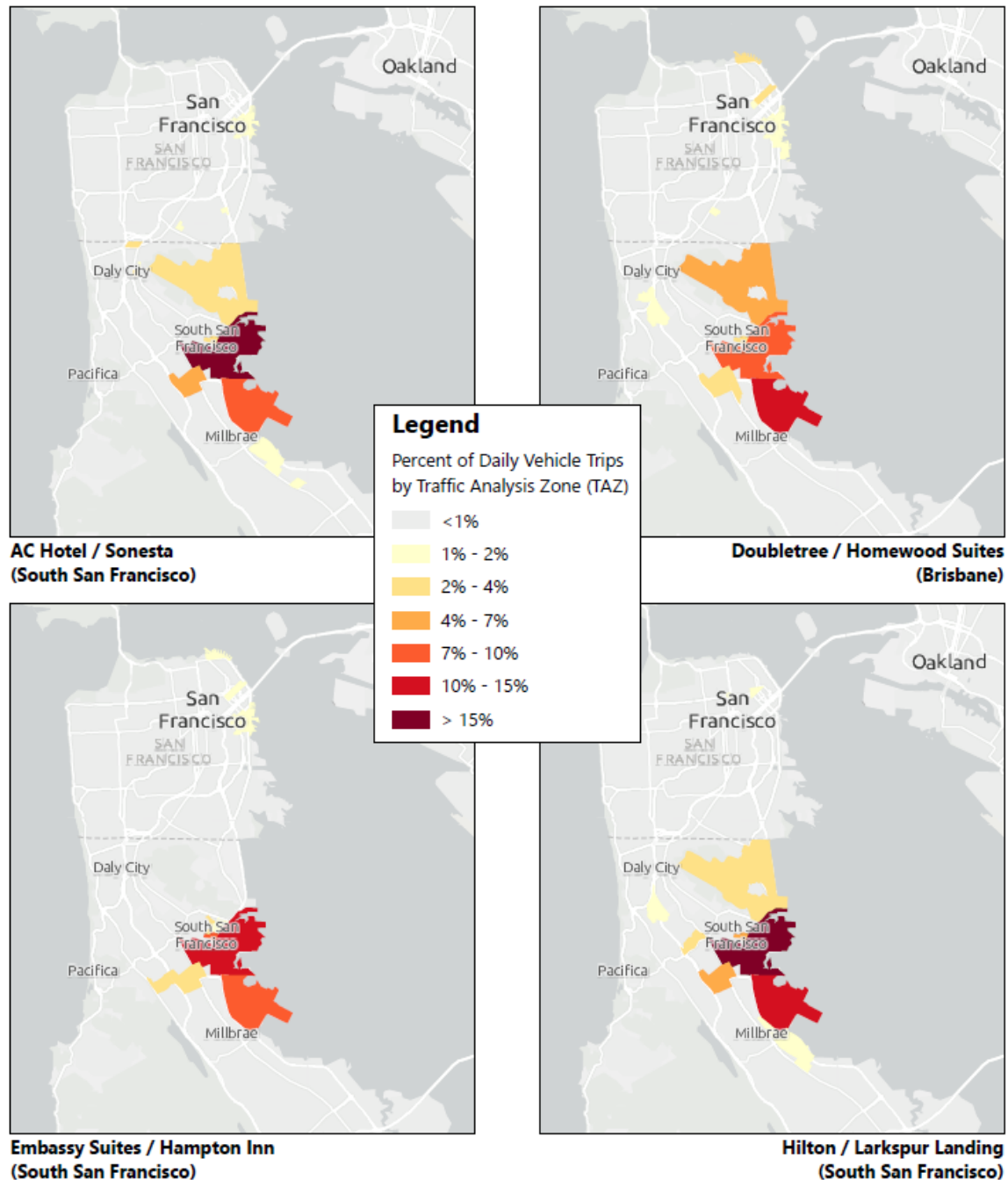
Trip Distribution and Assignment

About half of Project vehicle travel is expected to occur within South San Francisco, Brisbane, San Bruno, and the San Francisco International Airport. Figure 3 illustrates daily vehicle trip distribution between traffic analysis zones (TAZs) for nearby clusters of hotels in South San Francisco and Brisbane based on StreetLight data, which tracks anonymized movement using cell phone location-based services data. Each site shares similar characteristics as business-oriented hotels that illustrates comparable travel behavior, offering some combination of meeting rooms, ballrooms, and restaurant/bar facilities, although most of these sites are generally older and smaller hotels. Based on this analysis, the Project's vehicle trip distribution is expected to be most



heavily concentrated within the East of 101 Area (15 to 20 percent of trips), to/from the San Francisco International Airport (10 to 15 percent), and elsewhere in South San Francisco, Brisbane, or San Bruno (10 to 15 percent). The remaining 50 to 60 percent of trips would mostly be distributed across San Francisco and San Mateo counties.

Figure 3: Vehicle Trip Distribution for Nearby Hotels in South San Francisco and Brisbane





Vehicle trips would be concentrated along Oyster Point Boulevard to access US-101. Upon reaching US-101, about 50 percent of trips are likely to travel to the south, 40 percent to the north, and 10 percent continuing along Sister Cities Boulevard. Trips occurring fully within the East of 101 Area are likely to use Gull Drive, Eccles Avenue, and Gateway Boulevard.

Vehicle Miles Traveled

The Project is a business-oriented hotel primarily serving nearby office/R&D uses and San Francisco International Airport. Unlike nearby office/R&D land uses in the East of 101 Area that typically generate vehicle miles, the Project would exhibit characteristics of a local-serving land use rather than a regional destination. In its *Technical Advisory on Evaluating Transportation Impacts in CEQA*, the State of California's Office of Planning and Research notes that "local-serving retail development tends to shorten trips and reduce VMT."¹ Hotels in the East of 101 Area appear to exhibit similar travel behavior as local-serving retail: as illustrated in Figure 3, vehicle trip lengths for four nearby hotel clusters in South San Francisco and Brisbane tend to be short and focused around nearby office/R&D uses and the San Francisco International Airport. As shown in Table 2, the average vehicle trip length for nearby hotels is about four miles, compared with an average trip length of about 13 miles for other land uses in the East of 101 Area.

Table 2. Trip Length Comparison

East of 101 Area Land Use	Average Trip Length
Hotels	3.6-3.9 Miles
Office/R&D and Other Land Uses	12.9 miles

Source: StreetLight data and C/CAG Model

Hotels in the vicinity primarily serve nearby office/R&D uses and the San Francisco International Airport, as opposed to generating new tourism-oriented or resort-oriented travel. Assuming a similar travel pattern for the proposed Project as those existing in the vicinity, the Project would not materially increase vehicle miles traveled and may help shorten trips for hotel guests that would otherwise stay at hotels farther away. Although the City of South San Francisco does not have a threshold of significance for VMT associated with hotel uses, the Project may be presumed to have a less than significant impact to VMT based on the City's screening criteria for local serving land uses that do not result in a net increase in VMT.

¹ *Technical Advisory on Evaluating Transportation Impacts in CEQA*, State of California Office of Planning & Research, 2018 https://opr.ca.gov/docs/20180416-743_Technical_Advisory_4.16.18.pdf



Specific Plan & City Policy Consistency

Trip Generation

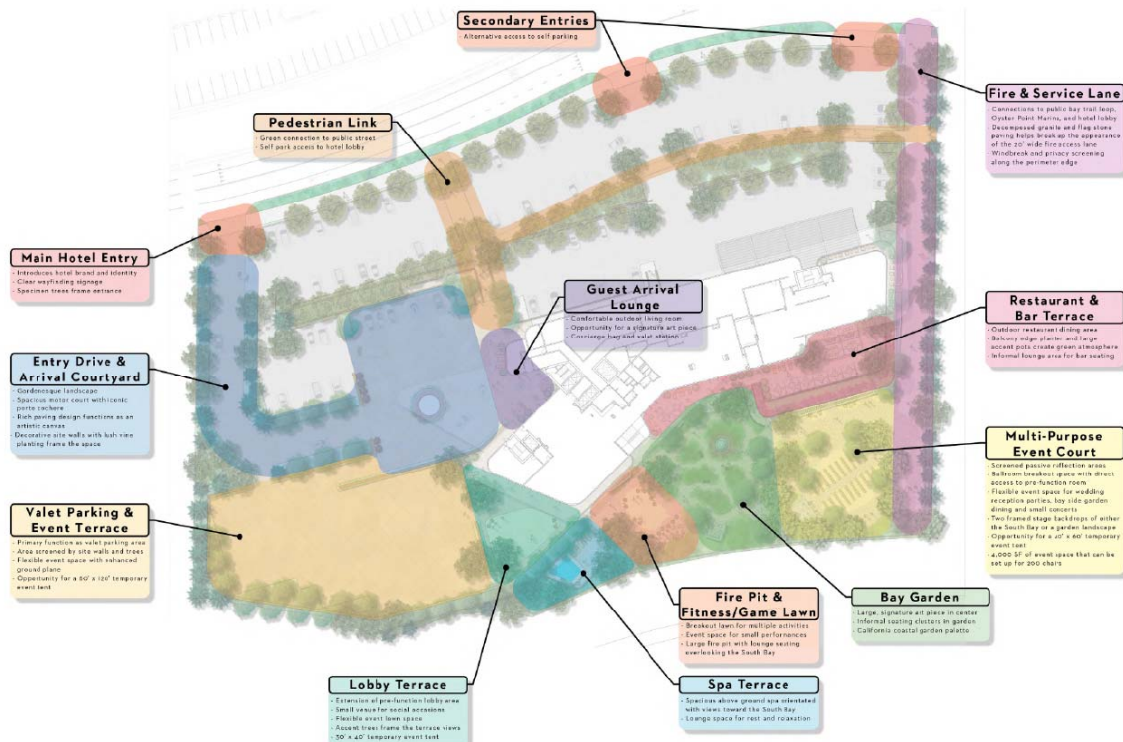
The Specific Plan EIR document published in 2011 estimated that the Specific Plan buildout would result in 17,684 daily trips, of which 1,873 would occur during the AM peak hour and 2,127 would occur during the PM peak hour (a net change of about 12,716 daily vehicle trips, 1,402 AM peak hour trips, and 1,621 PM peak hour trips. As shown in Table 3, the Oyster Point Hotel is expected to generate in total about 2,751 daily trips, including about 135 AM peak hour trips and 204 PM peak hour trips. Although the Specific Plan EIR did not break down trip generation by land use, the Oyster Point Hotel size is consistent with the Specific Plan, is therefore expected to generate a comparable number of trips as the hotel identified in the Specific Plan EIR. Moreover, its trip generation is well within the estimated trip generation envelope of the Specific Plan. The Specific Plan and Project trip generation are summarized in Table 3.

Table 3. Trip Generation Comparison

Scenario	Daily	AM Peak Hour	PM Peak Hour
Oyster Point Specific Plan (2011)	17,684	1,873	2,127
Oyster Point Hotel Project	2,751	135	204

Sources: Oyster Point Specific Plan, 2011 and Fehr & Peers, 2022

Figure 4: Annotated Project Site Plan





Access & Circulation

Access and circulation illustrated in the Project's conceptual site plan is consistent with the Oyster Point Specific Plan. The site plan (Figure 4) includes driveways connecting to Marina Boulevard, pedestrian connections to the street's sidewalk, and a Bay Trail connection on its eastern edge as identified in the Specific Plan.

Service, Delivery and Emergency Access

The Project would provide two onsite loading spaces for commercial deliveries and service vehicles. The Project would primarily be served by small- to mid-sized box trucks, laundry trucks, and garbage trucks (all typically 16 to 32 feet). Truck activity is expected to be spread throughout the day depending on particular functions: for example, garbage trucks typically arrive early morning, while laundry trucks typically arrive mid-morning (in coordination with housekeeping services). Service and delivery vehicles would use a screened in loading dock in the middle of the site. Trucks would enter via the easternmost driveway and conduct a three-point turn within the parking lot to back into the loading dock. The site plan remains conceptual at the time of this analysis, but it can be reasonably inferred that the proposed layout can accommodate such trucks provided that truck turning templates are used to inform the design process.

Larger tractor-trailer vehicles are expected for restaurant delivery. These deliveries would primarily occur overnight. Tractor-trailer trucks would back in from Marina Boulevard to access the loading dock. Since the site is located on a relatively low volume street and these deliveries would occur outside of peak hours, large truck deliveries would not pose conflicts with other modes. Truck drivers may benefit from approaching the site from the westbound direction (via looping around the Marina turnaround) to avoid reversing into their blind side when approaching the lot.

The City of South San Francisco requires five loading spaces for a 261,000 square foot commercial land use. Based on the anticipated loading activity and distribution throughout the day, city requirements likely exceed anticipated demand, and comparable hotels in the East of 101 Area typically include one to two loading spaces. The proposed loading supply is expected to be sufficient provided that hotel management staggers loading activities throughout the day.

Emergency vehicles would have access to all building entrances and facilities as well as the Bay Trail connection along the east side of the Project.

The Project is therefore consistent with the Specific Plan's guidelines for efficient service, delivery, and emergency vehicle access.

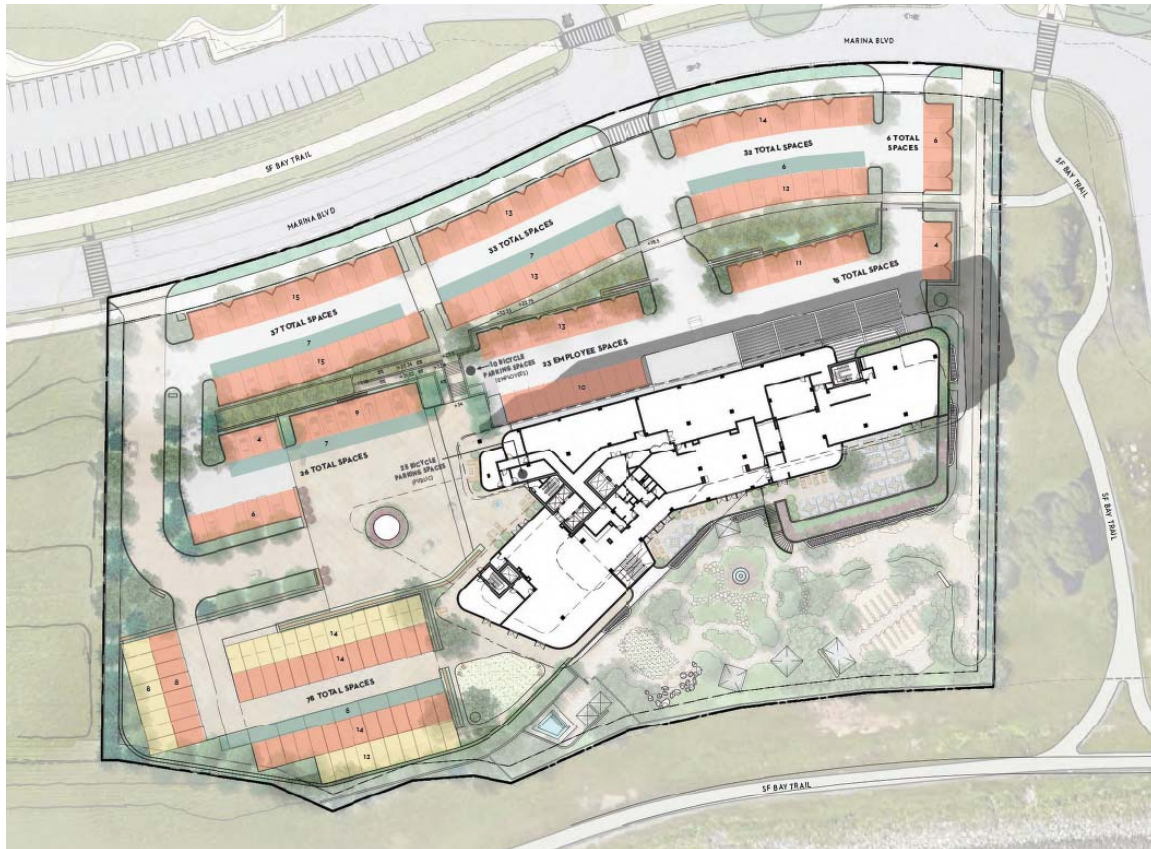
Parking Access

Access for the proposed 250 parking spaces would be provided via three driveways along Marina Boulevard. Each driveway would serve hotel, restaurant, and meeting room uses, with the



westernmost driveway expected to serve as the primary entrance. Since these driveways are located along the eastern edge of Marina Boulevard, they are likely to account for a majority of vehicle traffic along the street and are unlikely to pose conflicts with the limited through traffic that occurs.

Figure 5: Parking Layout



The Project's proposed parking supply includes a 26 percent reduction relative to parking requirements described in Section 20.330.006 of the zoning code. City code would require approximately 340 parking spaces, of which about one-third would be required for hotel guests and the remainder for meeting rooms, hotel employees, and other uses. The applicant has proposed a reduced parking supply due to the hotel's proximity to nearby office/R&D uses, access to shuttle, ferry, and planned SamTrans service, and market demand at similar hotels. In particular, travel behavior of airport- and business-oriented hotel guests has shifted in recent years from relying on rental cars to Uber and Lyft, resulting in a decrease in parking demand. While occasional surges in parking demand may occur, the applicant anticipates that this may be addressed through additional valet parking, shared parking with neighboring lots, and encouraging visitors to access the hotel via other transportation modes.



Bicycle Access

Bicyclists would access the site via the Project's driveways. Bicycle parking would be provided per City code and delineated with signage. The Project would provide 35 bicycle parking spaces, which is consistent with City code. The Project is consistent with the Specific Plan's guidelines to incorporate bicycle travel into projects.

Pedestrian Access

The Project would align with the new sidewalk and trail infrastructure in the Specific Plan Area. Pedestrians would access the Project via a pathway to the lobby. Pedestrians would access the South San Francisco Ferry Terminal, Commute.org shuttles, and planned SamTrans service by crossing Marina Boulevard and walking approximately 300 feet to the east to reach the ferry terminal entrance and bus/shuttle stop. The Project is consistent with the Specific Plan's guidelines to support an interconnected and pedestrian-friendly development.

TDM-Supportive Site Plan Features

The Project would be subject to the City's TDM Ordinance requirements and would incorporate site plan elements consistent with these requirements as described above, including a passenger loading area, direct pedestrian connections to sidewalks and transit facilities, access to bike lanes and trails, and bike parking. The Project is consistent with the Specific Plan's guidelines to encourage alternative forms of transportation.

EIR Transportation Impacts

The Oyster Point Specific Plan EIR identifies several significant impacts to transportation facilities, including intersection delay, freeway delay, and offramp queues. Based on the analysis above, the Project's effects would be consistent with this analysis. Since the certification of the EIR, the State of California has adopted new CEQA guidelines that that vehicle level of service (LOS) and similar measures related to auto delay shall not be used as the sole basis for determining the significance of transportation impacts. The Project would contribute toward Transportation Impact Fees to address multimodal transportation needs around the Specific Plan Area.