

OYSTER POINT PHASES 2, 3, AND 4 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
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Attachments

- A: Mitigation Monitoring and Reporting Program
- B: H. T. Harvey & Associates updated Biological Resources Report
- C: Updated Cultural Records Searches
- D: Fehr & Peers Traffic Operations and Vehicle Miles Assessments

I. Project Characteristics

- 1. Project Title:** Oyster Point Phases 2, 3, and 4 Project
- 2. Lead Agency Name and Address:** City of South San Francisco
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- 3. Contact Person and Phone Number:** Billy Gross, Senior Planner
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- 4. Project Location:** 375/377, 379, 384, 385 and 389 Oyster Point
Boulevard, South San Francisco
- 5. Project Sponsors' Names and Addresses:** KR Oyster Point Developer, LLC
Contact: Jonas Vass
100 1st Street, suite 250
San Francisco, CA 94105
- 6. Existing General Plan Designations:** Business 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 (OPSP). The current project encompasses the northern 29.9 acres of the 85-acre OPSP area, including the areas identified in the 2011 EIR as Phases 2, 3, and 4 of office R&D development.

Consistent with the OPSP, the existing Oyster Point Business Park, a series of five single-story light-industrial buildings at 375/377, 379, 384, 385 and 389 Oyster Point Boulevard would be demolished and office/R&D developed. The current project proposes 1,707,609 square feet of office/R&D uses and 47,466 square feet of amenity space to serve site users. Seven 6 to 8-story office/R&D buildings and two parking garages at 9 and 10 stories are proposed within the same general development area as under the OPSP. Consistent with the 2011 OPSP, the current project includes improvements to waterfront trail and open spaces within the project area, including the Bay Trail along the project site. Public restrooms are proposed by parking lots at the northern and southern access points to the Bay Trail.

California Environmental Quality Act (CEQA) Guidelines Sections 15162 and 15168 provide that when a Programmatic EIR has been prepared and certified, later activities (such as the current project) determined by the lead agency as being within the scope of the that EIR do not require subsequent environmental review. This document serves as substantial evidence that the current project is within the scope of the previous analysis and that subsequent CEQA analysis is not required for the proposed project.

III. Background, Purpose, and Organization

Background

The project site is within the Oyster Point Specific Plan (OPSP) area. The 2011 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 related EIR was certified. The 2011 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 2011 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 consistent with the 2011 EIR has been approved and was under construction at the time of this report.

Note that Phase 1 development includes reconfiguration of the Oyster Point Boulevard and Marina Boulevard intersection and related adjustment of the adjacent development parcels. As part of this Phase 1 work, any landfill debris within the reconfigured intersection and Phase 2 area is being removed. As noted, this was underway at the time of drafting of this report and will be complete prior to the beginning of work for Phase 2. Therefore, while reconfiguration of this intersection and removal of landfill debris from these areas was part of the overall 2011 OPSP, for purposes of this analysis, the intersection is considered to be reconfigured and no landfill debris to remain on the current project site.

Programmatic EIRs evaluate the effects of broad proposals or planning-level decisions and often include multiple individual projects that will be implemented over a long timeframe. Programmatic EIRs are usually prepared for general plans, specific plans, and master plans and provide the level of detail necessary to choose among planning-level alternatives and develop broad mitigation strategies. Programmatic EIRs generally assess plans that do not include specific details related to construction activities and specifics of design and operational activities.

Per section 15168 of the CEQA Guidelines, projects proposed in an area covered by a programmatic EIR – referred to as “Later Activities” – must be assessed to determine if additional environmental documentation is required to address the specifics of those project-level proposals. A Later Activity could be determined to have been adequately addressed in the programmatic EIR or a subsequent CEQA document can be prepared to address the project-level details that have been subsequently proposed.

As detailed in Chapter 3: Project Description, project-level details are available for the remaining phases (2, 3, and 4) of the OPSP office/R&D development at this time.

Purpose

This Environmental Checklist has been prepared in accordance with the CEQA Guidelines Section 15162 to determine whether the current project is within the scope of the 2011 OPSP EIR, or whether further environmental review is needed to examine the significant environmental impacts of the Project.

The 2011 OPSP EIR 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.

This CEQA Analysis has also been prepared in accordance with the CEQA Guidelines section 15168(c), Use With Later Activities, which states: "If an agency finds that pursuant to section 15162, no new effects could occur or no new mitigation measures 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." This CEQA Analysis under §15168 serves as the evaluation pursuant to the referenced Section 15162 of the CEQA Guidelines of whether new significant effects have been identified or new mitigation measures would be required. If new environmental effects are identified or new mitigation measures required for the project, additional CEQA documentation may be necessary.

Section 15162 specifies that no subsequent EIR shall be prepared unless one or more of the following conditions are met:

- 1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- 2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- 3) 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 previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or Mitigation measures or alternatives which are considerably different from those analyzed in the

previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Subsequent activities under the OPSP are subject to environmental requirements pursuant to the OPSP EIR. The OPSP EIR analyzed the environmental impacts of implementation of the OPSP, including development of the project site for office/R&D development as currently proposed.

The Environmental Checklist contained in this document summarizes the impact findings of the OPSP EIR, which is the underlying EIR for the proposed project, and assesses whether impacts of the proposed project would fall within those identified in the OPSP EIR or whether new or more significant environmental impacts than those identified in the OPSP EIR are identified which would trigger the need for a Subsequent EIR.

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, including bioscience offices. 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 encompasses the northern 29.9 acres of the 85-acre OPSP area, including the areas identified in the 2011 EIR as Phases 2, 3, and 4. The location of the current project area within the larger full OPSP area and vicinity are shown in **Figure 1**.

The project site is currently occupied by the Oyster Point Business Park, which is a privately owned series of five single-story light-industrial buildings at 375/377, 379, 384, 385 and 389 Oyster Point Boulevard that were developed in the early 1980s totaling 403,212 square feet of space with surrounding parking. These buildings have generally been occupied by a variety of light industrial, office, and R&D tenants. Since the 2011 EIR, vacancies in site buildings have increased as redevelopment of the site approaches.

Proposed Project

The 2011 OPSP originally envisioned demolition of existing buildings and construction of a total of approximately 1,750,000 square feet of private office/R&D development across Phases 2, 3, and 4, (the current project area).

In that same area, the current project proposes demolition of existing buildings and construction of an office/R&D development totaling 1,755,021 square feet including 1,707,609 square feet office/R&D uses and 47,466 square feet of amenity space. Note that the "amenity space" currently proposed is described as spaces that offer services oriented toward office tenants and visitors such as fitness and food service facilities, which are essentially the same as the "accessory commercial uses" discussed as being part of office/R&D development in the 2011 EIR. The total square footage currently proposed is slightly larger, but within 0.3% of the square footage total in the 2011 EIR and consistent with the relevant development allowances of the site.

Building Height and Massing

The 2011 OPSP included nine 10-story office/R&D buildings and two separate parking garage structures on the project area. The previous plan is included for comparative purposes as **Figure 2**.

The current project proposes seven 6 to 8-story office/R&D buildings with the two parking garages at 9 and 10 stories. The buildings are proposed within the same general development area as that previously proposed, with fewer shorter buildings. The western segment along the marina and bay would be developed under the current plan for open space and marina parking rather than an office/R&D building as shown under the 2011 OPSP. The proposed site plan is included as **Figure 3**.

Open Space and Bay Trail

Consistent with the 2011 OPSP, the current project includes improvements to waterfront trail and open spaces within the project area. The Bay Trail is proposed to be reconstructed along the project's bay frontage and improved with lawn, beach, terrace, grove, seating, and picnic areas. Public restrooms are proposed by parking lots at the northern and southern access points to the Bay Trail.

Access and Circulation

Parking: A total of 4,445 parking spaces are proposed, including 4,372 in structured parking for the proposed office/R&D development and 73 in surface lots to serve the existing marina area and public shoreline access.

Gull Drive Access: A key difference between the proposed project access configuration and the OPSP conceptual circulation network is that the Phase 2 parking facility access is currently proposed to be provided at the Oyster Point Boulevard / Gull Drive intersection, allowing additional flexibility for accessing the Phase 2 parking structure and direct access for marina-serving parking. The 2011 OPSP concentrated all site access points along Oyster Point Boulevard north of the Marina Boulevard / Oyster Point Boulevard intersection.

Oyster Point Boulevard Cul-De-Sac: Another difference in the circulation plan is that the current plan shows Oyster Point Boulevard continuing in the existing alignment north of the intersection with Marina Boulevard, which ends in a cul-de-sac providing a turn-around and access to the existing development to the east. The 2011 OPSP had proposed realignment and a new intersection prior to connecting to existing development to the east.

Bicycle & Pedestrian Circulation: The Oyster Point Boulevard / Phase 3+4 Garage Access A intersection is a key vehicular, pedestrian, and bicycle connection. The intersection is anticipated to be a major vehicular link to the Phase 3 and 4 garage and pedestrian crossing for motorists to access the buildings on the west side of Oyster Point Boulevard and their parked vehicles. A San Francisco Bay Trail spur crosses Oyster Point Boulevard at this intersection and is an important east-west off-street bicycle corridor that connects the Project site to the South San Francisco Ferry Terminal and permits through cyclists to bypass an alternate circuitous route. Based on review of the OPSP circulation goals and feedback from the Bay Conservation Development Commission (BCDC) received via Project team discussions, Fehr & Peers recommended a protected intersection design which was incorporated at the schematic design level. A protected intersection physically separates bicyclists from motor and pedestrian traffic on all intersection approaches and the design intent is to enhance safety for all modes and reduce bicyclist stress. Traffic signal phasing may also include protected bicycle phases separated from motor vehicle movements which would require further evaluation as part of traffic signal design prepared for the construction design stage. The San Francisco Bay Trail will be reconstructed along the western edge of the Project site and the east-west connector mentioned above will be widened. As landscape, civil, and lighting plans are

developed, Fehr & Peers recommends any reconstructed portion of the San Francisco Bay Trail be designed per the San Francisco Bay Trail Design Guidelines and Toolkit, and Caltrans design standards for Class I multi-use trails, where appropriate. Pedestrian facilities including sidewalks and crosswalks are proposed between buildings, along and across public roadways serving the Project site.

Transit Facilities & Network Configuration: The OPSP encourages site design that is conducive to alternative modes, including transit. 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. The Project proposes new on-street shuttle stops which may be used by commute.org shuttles or other providers which are generally more efficient for through-running transit service with multiple stops on a line. All Project bus stops are configured with pull-out lanes integrated with the roadway section. Note that the eastbound stop adjacent to the Phase 1 development was approved and under construction at the time of this analysis and it is not configured in the same way as the proposed bus stops in Phase 2, 3, and 4.

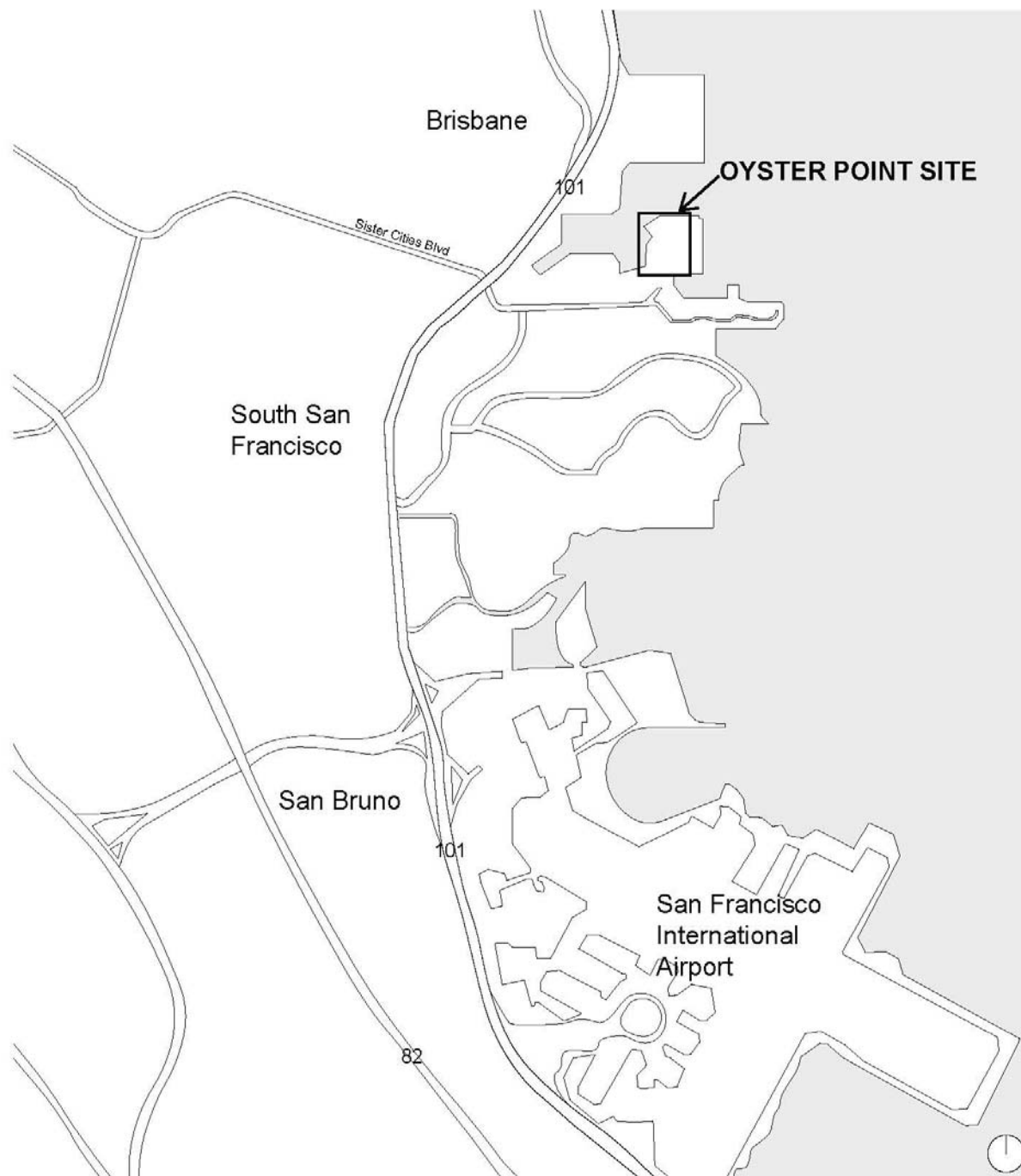


Figure 1: Project Location

Source: Kilroy, dated November 6, 2019



Figure 2: 2011 OPSP

Source: 2011 EIR (Phase II, Phase III and Phase IV areas indicated)



Figure 3: Oyster Point Phases 2, 3, and 4 Illustrative Plan and Phasing Plan

Source: Kilroy, dated November 6, 2019

V. Summary of CEQA Findings

Given the substantial evidence included in this document and attachments and the 2011 OPSP EIR, 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 not discussed in new significant environmental effects, 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 Phase 2, 3 and 4 office/R&D development within the OPSP area has been proposed, this assessment has determined that no further documentation is required per CEQA Guidelines Section 15162. The 2011 OPSP EIR continues to serve as the applicable environmental review document pursuant to the requirements of CEQA for approval of the current project.

Sailesh Mehra, Chief Planner
City of South San Francisco

Date

VI. ENVIRONMENTAL CHECKLIST

The Abbreviated Environmental Checklist below compares potential environmental impacts of the project to the findings of the 2011 OPSP EIR, notes whether the project would result in new significant impacts or impacts substantially greater or more severe than those previously identified in 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 mitigation measures applicable to the current project impacts. 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).

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
b. Scenic Resources	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
c. Visual Character	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
d. Light or Glare	LTS w/ MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MM Vis-2a: Lighting Plan MM Vis-2b: Glare Reduction	LTS w/ MM

Discussion

Aesthetic Changes from the 2011 OPSP

As under the 2011 OPSP, existing buildings on the project site would be demolished and replaced with new buildings as development proceeds in phases. 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 currently proposed buildings have different massing than those shown in the 2011 EIR. These structures are generally within the overall total size and height assessed in the 2011 EIR and are in generally the same areas, but have different footprints and are oriented differently.

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 OPSP despite revisions to the specifics of building massing and location.*

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 specific massing and location of buildings 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 OPSP.*

Visual Character

Same Conclusion (conclusion remains NI): *The current project would not change the no adverse impact conclusion as residential development 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 and industrial buildings, with differing amounts of associated landscaping. Development of the current project would involve replacement of older office/light industrial buildings with new construction of modern buildings with a high quality design including private and public landscaping and pedestrian improvements. While the heights and massing will substantially increase over the existing conditions, the proposed conditions are within that allowed under the zoning and consistent with other office/R&D 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 modern buildings meeting or exceeding the city's design criteria would not "degrade the existing visual character or quality of the site" or have an adverse impact in this regard.

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 OPSP.*

While the development proposed with the current project has different specific building massing and locations, as specified in the 2011 EIR, development 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 OPSP.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
b. Conflict with Agricultural Designation	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
c. Conflict with Forest Designation	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
d. Convert Forest	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
e. Indirect Conversion of Agricultural or Forest Land	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MM Traf-1: Transportation Demand Management Plan	LTS w/MM
b. Criteria Air Pollutants	LTS w/MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MM AIR-2: Health Risk Assessment for Proposed Sensitive Receptors MM AIR-4a: Implement BAAQMD-Recommended Measures to Control Particulate Matter Emissions during Construction New MM AIR-4c: Construction Equipment Standards and Construction Emissions Minimization Plan	LTS w/ MM
d. Odors	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS

Discussion

Air Quality Setting Changes from the 2011 OPSP

Since the 2011 OPSP, 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 OPSP, 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): The Clean Air Plan has been updated since the 2011 EIR and now includes different standards with which to assess a project, which requires revisions to Impact Air-1, and a change in significance conclusion from significant and unavoidable to less-than-significant with mitigation. Mitigation measure Traf-1, requiring implementation of TDM plans, remains applicable and unchanged from the 2011 EIR.

Revised Impact Air-1: Conflict with the Clean Air Plan Assumptions. Development anticipated as a result of the OPSP would increase employment uses in an area designed for employment centers served by local and regional transit. However, ~~city-wide, vehicle miles traveled (VMT) was projected to increase at a faster rate than the city's population, which~~ development could conflict with CAP assumptions if transportation control measures are not implemented with development projects. This impact is a less-than-significant impact with mitigation.

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 the impact would be reduced to less-than-significant with implementation of mitigation measure Traf-1 requiring TDM plans for development, which would require trip reductions that would also reduce resultant emissions, consistent with Bay Area 2017 Clean Air Plan control measures.

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 Phase 1 activities not part of the current project, 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 demolition, 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 is already proceeding under a separate approval and 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.

Sensitive Receptors

Same Conclusion, Revised Statements (conclusion remains LTS w/ MM): *The current project would not change Impact Air-2 and the less-than-significant with mitigation conclusion related to operational-period health risk or 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.*

Regarding 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 while office/R&D uses would not be considered a sensitive use, sensitive uses such as day care facilities could be included in what are now called “amenity spaces.” While the applicant has not specifically proposed day care facilities, mitigation measure Air-2 from the 2011 EIR would ensure that such uses are appropriately analyzed and risks considered.

Regarding construction-period health risk, the 2011 EIR concluded that with implementation of applicable construction-period emissions controls identified in Air-4a (and 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. Because standard practices for reducing construction emissions have been updated since the 2011 EIR, new mitigation measure Air-4c would be implemented to supplement the reductions previously identified and the conclusions would remain consistent with the 2011 EIR.

New Mitigation Measure

Air-4c: 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, office/R&D uses are not the types of uses that generate frequent or substantial odors and the impact related to odors would be less than significant.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Bio-6: Pre-Construction Nesting Bird Survey	LTS w/MM
b. Riparian/Sensitive Habitat	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
c. Wetlands	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Bio-2a: Delineate Jurisdictional Boundaries Bio-2b: Impact Avoidance/Minimization Bio-2c: Restoration of Temporarily Impacted Wetland/Aquatic Habitats Bio-2d: Compensation for Permanently Impacted Wetland/Aquatic Habitats 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
d. Wildlife Corridors/Nursery Sites	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Bio-10a: Lighting Measures to Reduce Impacts to Birds Bio-10b: Building Design Measures to Minimize Bird Strike Risk	NI
e. Conflict with Local Biological Policies	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
f. Conflict with Adopted Conservation Plans	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI

Discussion

Biological Resources Setting Changes from the 2011 OPSP

H. T. Harvey & Associates, who prepared the Biological Resources Report for the 2011 EIR, updated their report in 2017. The updated biological conditions report, dated April 19, 2017, is included in full in Attachment B.

The footprint of the current project remains within the area analyzed in the 2011 EIR and there have been no substantial changes in the use or nature of the current project site. To determine whether biological site conditions and habitat conditions had changed since the 2011 EIR, the project site was visited by H. T. Harvey & Associates wildlife ecologist Steve Rottenborn, Ph.D., on March 8, 2017,

and H. T. Harvey & Associates plant ecologist Matthew Mosher and K. Hardwicke on March 16, 2017.

The only noticeable change in biological conditions on the project site since the 2011 EIR was a minor increase in the extent of vegetation on the rock levee slopes along the shoreline that does not substantially change biological conditions or conclusions. Otherwise, project site conditions were nearly identical to conditions assessed in the 2011 EIR. While some time has passed between the 2017 assessment and this document, the two previous assessments have demonstrated that biological site conditions in the area are generally static and do not warrant additional reassessment.

H. T. Harvey & Associates wildlife ecologist Steve Rottenborn, Ph.D. additionally assessed the potential suitability of the Northern Coastal Salt Marsh habitat for special-status marsh species such as the California Ridgway's rail (*Rallus obsoletus obsoletus*) on March 8, 2017 (previously called the California clapper rail) and determined that the area does not provide suitable habitat, where the 2011 EIR had determined that some areas could potentially provide such suitable habitat.

The 2011 EIR and attached updated biological report identify the following four categories of biotic habitat/land use on the current project site, which are also detailed in Figure 4:

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 majority of the current project area.

California Annual Grassland/Coyote Brush Scrub: Dominated by non-native annual grass species and scattered shrubs, there is only a very small area (0.09 acres) of this habitat type on the current project site. This habitat does not support separate native grass habitat or substantial special status species. Birds and other grassland-associated species may forage in the southwestern corner of the OPSP area (outside the current project area) on occasion, but the patch of grassland is likely too small to support nesting pairs of these species.

Armored Rock Levee Slope: This habitat type, which is found along some portions of the coastline in both the current project area (totaling 0.13 acres) and the larger OPSP site, is primarily composed of large rock rip-rap on varying degrees of slope approximately 10-15 feet wide at the edge of the water and tidal flats, which extends downslope from the OPSP boundary in a number of areas. Vegetation is found between the rocks and bordering the top of the slopes and is dominated by non-native species. This habitat type in the OPSP area provides limited wildlife habitat because of their unyielding surfaces, lack of vegetation, and proximity to open marine water, but is nonetheless utilized by several species for foraging or refugia including rocky shore crab species and rocky shore-associated birds. The levee slopes also could provide habitat for nuisance species such as Norway rats, black rats (*Rattus rattus*), and feral cats, which are known to prey upon native wildlife species.

Northern Coastal Salt Marsh: This habitat type occurs in both the current project area (a small amount totaling 0.06 acres) and the larger OPSP area in the intertidal zone in strips or larger areas surrounding the rock levees, and is influenced daily by rising and falling tides within the bay. Salt marsh habitats form unique ecological communities in the San Francisco Bay that support wildlife species adapted to a saline environment and frequent cyclic changes in water levels, as well as several more widely-adapted common species. This habitat type in and adjacent to the OPSP area

supports foraging shorebirds and common birds though due to the limited extent, underdeveloped vegetation, and isolation from known populations, is unsuitable for supporting salt-marsh adapted mammal species and the California Ridgway's rail (formerly the California clapper rail).

Open Water: While not part of the land area, open water habitat is present in the vicinity of the project area in the Oyster Cove Marina, as well as the surrounding Bay waters. The San Francisco Bay supports a thriving community of estuarine life. A diversity of invertebrates provide an ample prey base for common fish, which in turn provide food sources for seabirds and marine mammals. Suitable habitat for the Olympia oyster, which consists of solid surfaces to which the larvae can easily attach, is distributed throughout the shoreline of the OPSP area.

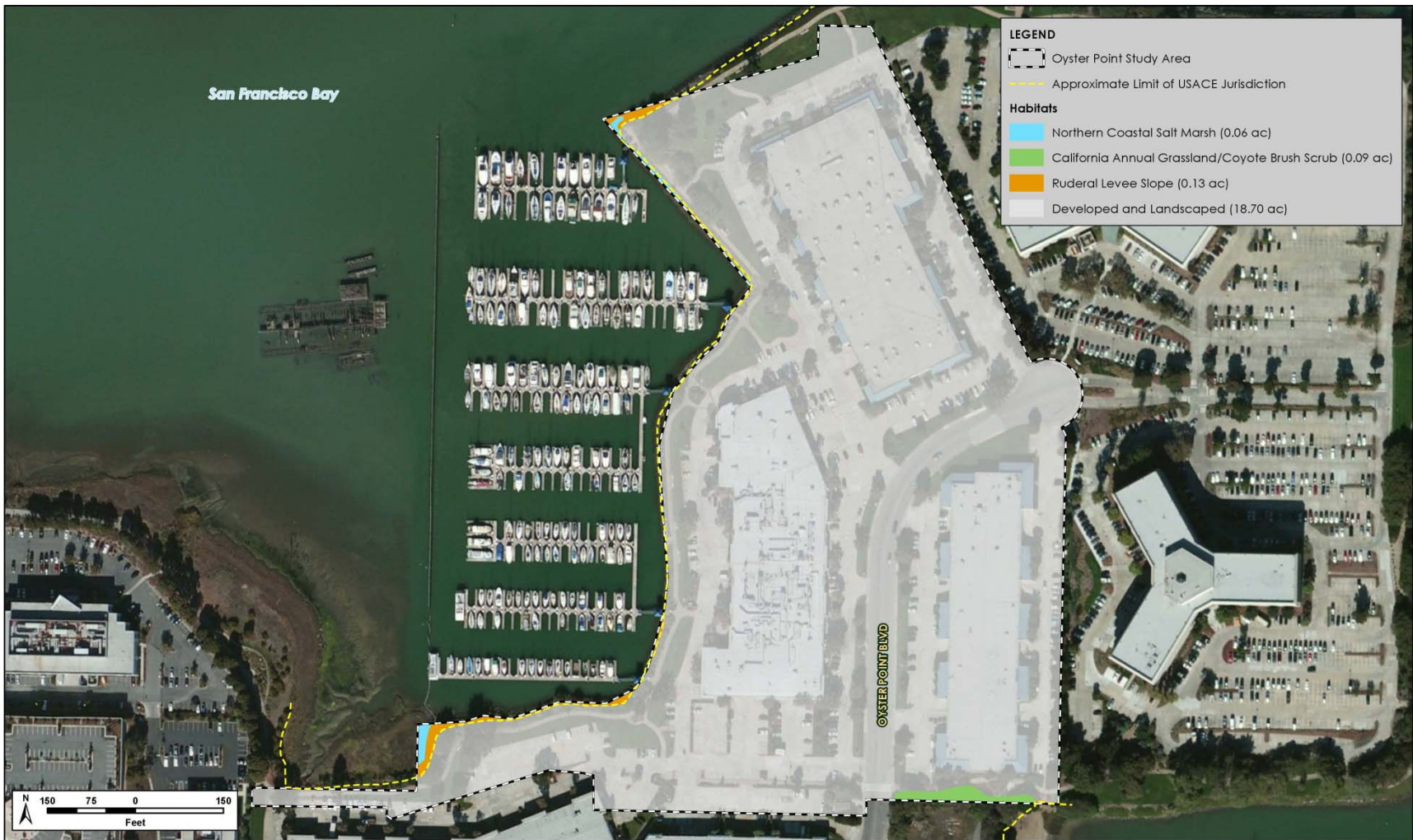


Figure 4: Habitat Map

Source: H. T. Harvey and Associates Ecological Consultants, April 2017

Note: This figure omits the remainder of the Phase 2 area to the south, which is comprised entirely of "Developed and Landscaped" area.

Special-Status Species

Same Conclusion or Less 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 OPSP, as the current project would disturb the same area and involve substantially the same intensity of development. Impact Bio-7 and mitigation measures Bio-7a, Bio-7b, and Bio-7c relate to burrowing owl, which has been subsequently demonstrated not to occur on the current project site 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 periphery of the site. Breeding individuals could be temporarily disturbed or displaced by construction-related noise and activity, 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 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 only 0.09 acre of grassland habitat on the current project site and no ground squirrel burrows were found during reconnaissance surveys at the site. 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.

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 OPSP.*

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 primarily involves already developed areas which would not represent a biological impact. The potential loss or conversion of small amounts of common terrestrial habitat such as the California Annual Grassland/Coyote Brush Scrub and Non-Jurisdictional Armored Rock Levee Slope Habitats and associated potential reduction in habitat for non-breeding special-status wildlife species is within the impacts identified in the 2011 EIR. The

2011 EIR concluded that because these habitat types are relatively abundant and widespread regionally, and none of the habitats to be impacted by the OPSP represent sensitive, valuable (from the perspective of providing important wildlife habitat), or exemplary occurrences of these habitat types, the loss of potential nesting, roosting, and foraging opportunities associated with such habitats, are considered a less-than-significant impact.

Wetlands or Aquatic Habitats

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impact Bio-2, mitigation measures Bio-2a through Bio-2d, or the less-than-significant with mitigation conclusion as Bay Trail and related shoreline public open space improvements would result in substantially the same impacts and conclusions as under the 2011 OPSP. The current project would also 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 adjacent/nearby wetland and aquatic habitat remains substantially the same as under the 2011 OPSP. 2011 EIR impacts Bio-12, Bio-13, Bio-14, Bio-15 and associated mitigation measures are related to in-water construction are not applicable to the current project because no in-water construction is proposed.

While the main office/R&D development would not directly impact wetland or aquatic habitats, shoreline improvements for the Bay Trail and associated public open space could disturb areas considered wetlands or associated habitat. The total amounts of such habitats in the current project area are minimal and total 0.06 acres of Northern Coastal Salt Marsh and 0.13 acres of Ruderal Levee Slope (see Figure 4). As discussed in the 2011 EIR, jurisdictional coordination is required for construction in these areas and restoration and/or compensation as determined appropriate through such coordination as detailed in MMs Bio-2a through Bio-2d.

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. These impacts and the mitigation measures to reduce it to less-than-significant levels are unchanged from 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 OPSP.

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, 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 OPSP would create potential bird strike hazards at elevations that do not currently exist. Although large-scale injury or mortality of birds due to collisions with buildings has not been reported from the West

Coast, depending on the design of the buildings there is some potential for such mortality to occur in the absence of mitigation measures. This potential for impact would be substantially the same for the current project as for the 2011 OPSP.

Note that 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 without the need to revise mitigation measures Bio-10a and Bio-10b.

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 while there are no protected trees in the current project site, though the City's Tree Preservation Ordinance would be applicable, which is unchanged from the 2011 OPSP.*

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	MM Culture-1a: Halt Construction Activity, Evaluate Find and Implement Mitigation MM Culture-1b: Halt Construction Activity, Evaluate Find and Take Appropriate Action in Coordination with Native American Heritage Commission	LTS w/MM

Discussion

Cultural and Tribal Cultural Resources Setting Changes from the 2011 OPSP

There have been no changes to the cultural and tribal cultural resources environmental setting of the project site, and the details of the current project do not change the potential for cultural and tribal cultural resources impacts.

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.

Updated records searches were performed in 2017 to confirm no new information had become available since the 2011 EIR, including a records search by the Northwest Information Center (NWIC) at Sonoma State University, part of the California Historical Resources Information System, and a search of the Sacred Lands Files by the Native American Heritage Commission (both included in Attachment C). While no tribes requested consultation under AB52, as recommended, the Native American tribes historically active in the area were contacted via letter on August 15, 2017. No response has been received, indicating that there are no additional concerns of tribal cultural resources that could be disturbed in the area.

Cultural and Tribal Cultural Resources and Human Remains

Same Conclusion, Revised Statements (conclusion remains LTS w/ MM): *The current project would not change the following significance conclusions. The Impact Culture-1 statement and mitigation measures Culture-1a and Culture-1b have been revised to clarify that tribal cultural resources are included as cultural resources per the Native American Historic Resource Protection Act.*

As under the 2011 EIR, the project site has been previously disturbed and is covered with business park development, and roadways. A search of the Sacred Lands Files confirmed that there are no records of Native American Sacred Lands in the vicinity of the OPSP. While records' searches found no known cultural or tribal cultural resources at the project site, based on the characteristics of the

site, they have identified a moderate potential for discovery of unrecorded historic-period archaeological and/or Native American resources during disturbance of native soils. Similarly, while there is no indication that human remains are present at the project site, the potential exists for discovery during ground disturbing activities.

Revised Impact Culture-1: Disturbance of Unidentified Paleontological Resources, Archaeological Resources, Tribal Cultural Resources, or Human Remains. During earth-moving activities at the OPSP site, it is possible that unidentified paleontological resources, archaeological resources, tribal cultural resources, or human remains could be uncovered and disturbed.

Revised Mitigation Measures

Culture-1a: Halt Construction Activity, Evaluate Find and Implement Mitigation. In the event that any previously unidentified paleontological resources, tribal cultural resources, or archaeological resources are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by a qualified paleontologist or archaeologist or Native American contact and specific mitigation measures can be implemented to protect these resources.

Culture-1b: Halt Construction Activity, Evaluate Find and Take Appropriate Action in Coordination with Native American Heritage Commission. In the event that any human remains are uncovered during site preparation, excavation or other construction activity, all such activity shall cease until these resources have been evaluated by the County Coroner, and appropriate action taken if necessary in coordination with the Native American Heritage Commission and appropriate Native American contact.

As noted above, while the potential for impacts to cultural and tribal cultural resources remains unchanged from the 2011 EIR, revisions to the impact and mitigation statements respond to updated regulations by explicitly noting inclusion of tribal cultural resources.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Geo-14: Storm Water Pollution Prevention Plan	LTS w/MM
c. Unstable Soil	LTS w/ MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	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	LTS w/ MM
d. Expansive Soil	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
e. Septic Tanks	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
f. Geologic Features ¹	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	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 OPSP

There have been no changes to the geology and soils environmental setting of the project site, and the details of the current project do not change the potential for geological and soils impacts.

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.

While a portion of the Phase 2 area of the project site previously contained landfill materials, landfill materials are being removed from that area as a part of Phase 1 activities fully addressed in the 2011 EIR. Impact and mitigation measures related to disturbance of landfill materials would not be applicable to the current project.

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 OPSP. 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 OPSP.*

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.

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 OPSP.*

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 OPSP. 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 OPSP. 2011 EIR impacts Geo-7 through Geo-13 and associated mitigation measures are related to construction in landfill areas and are not applicable to the current project because there are no landfill areas on the current project site. 2011 EIR impact Geo-16 and associated mitigation measure are related to Crescent Park and Beach, which are located outside the current project area and are therefore not applicable to the current project.*

As noted in the 2011 EIR, soil layers at the site include varying thicknesses of Bay Mud, fill, 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.

Areas with landfill waste represented additional potential for impacts, but the current project site does not include landfill waste so these are not applicable to the current project. Similarly, 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 (and proposed shoreline improvements within the project area retain the existing rock rip-rap along the water).

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 OPSP.*

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 OPSP.*

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 OPSP.*

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
b. Conflict with GHG Reduction Plans	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI

Discussion

Greenhouse Gas Emissions Setting Changes from the 2011 OPSP

Since the 2011 OPSP, 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 emissions impacts. The 2011 EIR was being prepared as the 1999 BAAQMD Guidelines were being updated for the 2010 draft. Because the previous guidelines did not contain GHG thresholds, 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 OPSP, 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.

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 reduction goals.

In 2016, SB 32 was passed, which codifies additional target GHG emissions reductions by 2030.

GHG Emissions

Less Significant Conclusion (SU conclusion changed to LTS): *The current project is consistent with the Climate Action Plan, which has been adopted since the 2011 EIR. Impact GHG-1 (combined with Impact GHG-2) is revised and the conclusion is reduced to less-than-significant. Requirements of the Climate Action Plan replace previous mitigation measure GHG-1, which is therefore not applicable to the current project.*

The relevant BAAQMD Guidelines significance thresholds for operational GHG emissions are:

- Compliance with Qualified GHG Reduction Strategy, or
- Emissions at or below 1,100 metric tons (MT) CO₂e or at or below an efficiency threshold of 4.6 metric tons (MT) CO₂e per service population (residents and employees) per year

The BAAQMD Guidelines do not present a separate significance threshold for construction emissions, though industry standard has become to divide the construction emissions over the expected lifetime of the building and add to the annual emissions.

Since the 2011 EIR, the City has adopted a Climate Action Plan, which is a qualified GHG reduction strategy. The Climate Action Plan includes reduction measures to be implemented to meet city-wide reduction goals.

Many of the 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 occupants 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 and impacts related to GHG emissions would be less than significant. The impacts with respect to GHG emissions are therefore revised as follows and MM GHG-1 would no longer be applicable:

~~Revised Impact GHG-1: Construction-Period and GHG Emissions.~~ ~~Temporary construction-related exhaust would be an additional source of GHG emissions that could contribute to significant impacts on the environment. This is a less-than-significant impact.~~

~~Impact GHG 2: Operational Greenhouse Gas Emissions.~~ ~~New development in the OPSP area would be an additional source of construction-period and operational GHG emissions, primarily through consumption of energy for transportation and energy usage, which could contribute to significant impacts on the environment. However, projects are required to implement all applicable measures of the Climate Action Plan to contribute toward GHG reduction targets. This impact is potentially less-than-significant.~~

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.*

Consistency with the Climate Action Plan is discussed above and the current project would be consistent with that plan.

BAAQMD recommends analyzing a project's consistency with current air quality plan primary goals and control measures. The 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 goal of the 2017 Clean Air Plan as it relates to GHG emissions is:

- Reduce Bay Area GHG emissions 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050.

Many of the 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 current project. However, the current project would be consistent with all rules and regulations related to construction activities and the proposed development would meet current standards of energy and water efficiency (Energy Control Measure EN1 and Water Control Measure WR2) and recycling and green waste requirements (Waste Management Control Measures WA3 and WA4) and the required TDM plans (see Traf-1) will contribute to trip reduction programs (Transportation Control Measure TR2), and improving access/connectivity for bicycles and pedestrians (Transportation Control Measure TR9).

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. GHG emissions were assessed in this document per the BAAQMD May 2017 CEQA Air Quality Guidelines. BAAQMD's thresholds and methodologies take into account implementation of state-wide regulations and plans, such as the AB 32 Scoping Plan and adopted state regulations such as Pavley and the low carbon fuel standard.

Therefore, as determined in the 2011 EIR, there would be no impact in relation to consistency with GHG reduction plans.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Haz-1a: Plan Review for Adherence to Fire and Safety Codes Haz-1b: Construction Inspection and Final Inspection Prior to Occupancy Haz-1c: Hazardous Materials Business Plan Program Haz-1d: Hazardous Waste Generator Program Haz-1e: Compliance with Applicable Laws and Regulations	LTS w/MM
b. Risk of Upset	LTS w/MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Haz-3: Demolition Plan and Permitting Haz-5: California Accidental Release Prevention Program (CalARP)	LTS w/MM
c. Hazardous Materials within a ¼-mile of a School	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
d. Hazardous Materials Site	LTS w/MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	N/A	LTS
e. Airport Hazards	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
f. Emergency Access Routes	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
g. Wildfire ¹	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	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 OPSP

While a portion of the Phase 2 area of the project site previously contained landfill materials, landfill materials are being removed from that area as a part of Phase 1 activities fully addressed in the 2011 EIR. Impact and mitigation measures related to disturbance of landfill materials would not be applicable to the current project.

List 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 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.

Since the 2011 EIR, the CEQA Guidelines have been updated to include more detailed threshold questions related to wildfire impacts in its own section. 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

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impact Haz-1, mitigation measures HAz-1a through Haz-1d, or the less-than-significant with mitigation conclusion. Proposed uses under the current project would require routine transportation, use or disposal of hazardous materials and require compliance with applicable regulations, plans and programs, which remains unchanged since the 2011 EIR.

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.

As noted in the 2011 EIR, while specific tenants have not yet been identified, R&D laboratories are likely to handle materials considered to be biological hazards, chemical hazards and/or carry a risk of fire or explosion. Office uses would involve household hazardous waste such as vehicle components and cleaners. The risk of accidental upset and environmental contamination from routine transport, storage, use and disposal of hazardous and potentially hazardous materials to the public and environment would be mitigated through adherence to fire and safety codes, inspection prior to occupancy, participation in the Hazardous Materials Business Plan and Hazardous Waste Generator programs as applicable, and compliance with applicable laws and regulations, as detailed in the mitigation measures.

Risk of Upset

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impacts Haz-3 and Haz-5, mitigation measures Haz-3 and Haz-5, or the less-than-significant with mitigation conclusion as the potential for hazardous building materials in structures to be demolished and potential for accidental release of laboratory chemicals during operations remains unchanged since the 2011 OPSP. 2011 EIR impacts Haz-2 and Haz-4 and associated mitigation measures are related to construction in landfill areas and are not applicable to the current project because there are no landfill areas on the current project site.

As noted in the 2011 EIR, due to the age of existing buildings, they could contain hazardous building materials such as lead-based paint and asbestos-containing materials that would need to be abated prior to demolition per applicable mitigation. R&D facilities are likely to involve hazardous materials stored or used on site, which could lead to an accidental release if not handled appropriately as detailed in the mitigation. These conclusions are consistent with 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 OPSP.*

The OPSP area is not located within one-quarter mile of a school site. Therefore the OPSP, including the current project area, would have no impact based on proximity to school sites.

Hazardous Materials Site

Less Significant Conclusion (LTS w/ MM reduced to LTS): *Impact Haz-6 and mitigation measures Haz-6a through Haz-6d related to construction activities on a landfill cap would not be applicable to the current project because there are no landfill areas on the current project site.*

Airport Hazards

Same Conclusion, Revised Statements (conclusion remains LTS): The wording of Impact Haz-7 has been revised to remove wording specific to the previous version of the airport land use plan, which has been revised since the 2011 EIR. 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.

Revised Impact Haz-7: Airport Land Use Plan. The OPSP would be located within the jurisdiction of the Airport Land Use Plan for the San Francisco International Airport. ~~According to the East of 101 area plan, the most stringent height limits in South San Francisco are south of Forbes Boulevard and Lindenville (the area between Railroad Avenue, South Spruce Avenue, and San Mateo Avenue), which is south of the site. Federal Aviation Regulations, Part 77, limits building heights to an elevation of 161 feet above mean sea level, approximately 12 to 14 stories, in the most restricted areas, increasing at a slope of 20:1 to a height of 361 feet above mean sea level. Since the tallest building portion would not exceed 161 feet in height, Building heights in~~ the OPSP would be in compliance with the Airport Land Use Plan. The impact of the OPSP on the Airport Land Use Plan is less-than-significant with no mitigation warranted.

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 are between approximately 400 and 500 feet, which is well above the proposed building heights.

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 OPSP.*

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 OPSP.*

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Hydro-2: Preparation and Implementation of Project SWPPP Hydro-3: Compliance with NPDES Requirements	LTS w/MM
b. Groundwater	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
c. Alter Drainage	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
d. Inundation	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS

Discussion

Hydrology and Water Quality Setting Changes from the 2011 OPSP

While portions of the current project site were identified on the latest (October 16, 2012) Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRMs) as being in a flood hazard zone, FEMA subsequently issued a Letter of Map Revision determining that the project area is not within a flood hazard zone. This decision applies to the site now and will be reflected in updated FIRMs, which are issued periodically by FEMA. Per the FEMA decision, no portion of the project site proposed for development is 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 2009-2009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ.

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.

While a portion of the Phase 2 area of the project site previously contained landfill materials, landfill materials are being removed from that area as a part of Phase 1 activities fully addressed in the

2011 EIR. Impact and mitigation measures related to landfill materials would not be applicable to the current project.

Water Quality and Water Plans

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impacts Hydro-2 and Hydro-3 and mitigation measures 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 OPSP. Impact Hydro-1 and mitigation measure Hydro-1 related to potential for landfill leachate would not be applicable to the current project because there are no landfill areas on the current project site.*

Construction activities at the site would 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.

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 OPSP.*

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 OPSP.*

The project represents redevelopment of an already-developed and generally flat site. 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.

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 OPSP.*

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 margins of the project site immediately border the bay waters and as such, a fringe of area is at or below 6 feet above mean sea level. However,

development plans to not include development of the margins of the site that are at or below 6 feet above mean sea level and all proposed buildings would not be subject to inundation under sea level rise scenarios.

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 OPSP.*

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.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
b. Conflict with Land Uses / Land Use Plans	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI

Discussion

Land Use Setting Changes from the 2011 OPSP

There have been no substantial changes to the land use environmental setting of the OPSP site, including the OPSP Update area. 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 office/R&D development. The entire General Plan is currently being updated 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.

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 OPSP.*

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 OPSP.*

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 OPSP.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
b. Loss of Mineral Recovery Sites	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	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)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Noise-5: Construction Noise	SU w/MM (construction) LTS (operations)
b. Vibration	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI
c. Airport Noise	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI

Discussion

Noise Setting Changes from the 2011 OPSP

While 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 changes since the 2011 EIR. The nearest noise sensitive receptors are live-aboard boats located in the marinas and are located approximately 150 to 550 feet from the edge of the development area.

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 OPSP.

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 (over one year). Construction activities for the current project would have substantially the same potential for noise under the current project as the original 2011 OPSP.

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 OPSP.

As noted in the 2011 EIR, noise levels associated with commercial operations of office/R&D and associated amenity uses (including vehicle circulation and parking lot noises, loading docks, and outdoor mechanical equipment such as HVAC equipment) would generally be less than existing ambient noise levels and would not exceed City Municipal Code standards for stationary noise sources at the nearest receptors. 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.

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 OPSP.*

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.

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 OPSP.*

The airport land use plan for San Francisco International Airport has been updated since the 2011 EIR, but 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.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
b. Displacement of Housing or People	NI	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	NI

Discussion

Population and Housing Setting Changes from the 2011 OPSP

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). 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 OPSP.*

As concluded in the 2011 EIR, the project would increase employment and contribute to the high jobs to housing ratio in the city but would be consistent with local and area planning and would therefore have a less-than-significant impact.

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 OPSP.*

The only current residences in the OPSP area are live-aboard boats in the marinas, which are not proposed to be affected by the current project. Thus, no residents would be displaced, and there would be no impact and no mitigation measures are required related to displacement of people.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
b. Recreation	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS

Discussion

Public Services and Recreation Setting Changes from the 2011 OPSP

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), which is currently located at 33 Arroyo Drive but is planned to move to the City’s Community Civic Campus project once constructed. The Community Civic Campus will also include a relocated Fire Station #63, though the closest Fire Station to the project site will remain #62 at 249 Harbor Way, approximately 1.5 miles away. Note that moving this station to better serve East of 101 development has been considered and while no specific plan has been proposed, the choice of location would include considerations for continued service to existing service areas including the project site.

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 OPSP.*

As under the 2011 OPSP, 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 conclusion of a less-than-significant impact with respect to public services remains unchanged for the current project.

As under the 2011 OPSP, the current project would retain and enhance recreational facilities along the reconstructed and enhanced Bay Trail on the project site. The current project would also add additional connection points and public restrooms and parking as well as open space amenities for office/R&D workers. The conclusion of a less-than-significant impact with respect to recreation remains unchanged for the current project.

O. Transportation and Circulation

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Traf-2: Pedestrian Facilities Traf-3: Bicycle Lanes	LTS w/MM
b. Conflict with Transportation Impact Reduction Goals*	LTS w/MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Traf-1: Transportation Demand Management Program Traf-5: Internal Circulation System Signalization Traf-6 through Traf-37 relating to intersection and roadway improvements	LTS w/MM
c. Increase Hazards	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Traf-1: Transportation Demand Management Program Traf-5: Internal Circulation System Signalization	LTS w/MM
d. Inadequate Emergency Access	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
^a 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. However, such a change is not yet required to be implemented and has not been implemented by City of South San Francisco and is therefore not further discussed.					

Discussion

Traffic engineers Fehr & Peers prepared a traffic operations review and vehicle miles assessment as referenced in this document and included in full as Attachment D.

Transportation Setting Changes from the 2011 OPSP

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. The intersection of Oyster Point Boulevard and Marina Boulevard is currently being reconfigured 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.

Statewide legislation enacted since the 2011 EIR will render impacts based on vehicular delay no longer a consideration under CEQA by July 2020. Senate Bill (SB) 743 changes CEQA transportation impact analysis significance criteria to eliminate auto delay, LOS, and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA (although a jurisdiction may choose to maintain these measures under its General Plan). The changes in CEQA

Guidelines to implement SB 743 present VMT as an appropriate measure of transportation impacts. However, at present, the City of South San Francisco has not adopted VMT as a transportation impact criterion or established appropriate VMT significance thresholds and they are not yet required to do so. As a result, a VMT analysis is not included as part of this CEQA analysis.

Conflicts with Circulation Plans or Policies

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impacts Traf-2 and Traf-3, mitigation measures Traf-2 and Traf-3, or the less-than-significant with mitigation conclusions as the current project would include pedestrian and bicycle facilities meeting safety standards as under the 2011 OPSP.*

As under the 2011 OPSP, the current project could result in increased use of area pedestrian and bicycle facilities and includes enhancement and new connections to those facilities.

Conflict with Transportation Impact Reduction Goals

Same Conclusion (conclusion remains LTS w/ MM): *The current project would not change Impacts Traf-1 and Traf-5, mitigation measures Traf-1 and Traf-5, or the less-than-significant with mitigation conclusion as trip generation under the current project would be substantially the same as under the 2011 OPSP. The current project would also not change Impacts Traf-6 through Traf-37 and related mitigation or the significant and unavoidable impact related to congestion as trip generation under the current project would be substantially the same as under the 2011 OPSP and area growth was analyzed under the cumulative analysis in the 2011 EIR.*

There have not been substantial changes to the roadway system in the area since the 2011 EIR was prepared and certified. Development in the vicinity of the project has proceeded since the 2011 EIR but is generally consistent with the overall volumes anticipated under cumulative analysis conditions.

Traffic engineers Fehr & Peers prepared a trip generation comparison between the 2011 OPSP office/R&D development and that currently proposed including the current project and under-construction phase 1 office/R&D, as shown in Table 1 below.

Table 1: Trip Generation Comparison

Office R&D Development	AM Peak Hour	PM Peak Hour
Phase 1 – Under Construction ¹	417	398
Phase 2-4 – Current Project ²	1,222	1,266
2011 OPSP – All Phases (1-4) ¹	1,873	2,127
Difference from 2011 OPSP	-234	-463

Notes:

1. Trip generation forecasts obtained from the Oyster Point Specific Plan Environmental Impact Report.
2. Project trip generation estimates were prepared based on national standard trip generation rates from the Institute of Transportation Engineers (ITE) Trip Generation Manual. Trip generation estimates were adjusted to account for transportation demand management (TDM) measures required by City of South San Francisco’s zoning ordinance and consistency with the 2011 OPSP.

Fehr & Peers assessed the operations of vicinity intersections and while many were found to operate at unacceptable LOS F levels during the PM peak hour, the conclusions were consistent with the 2011 EIR. Note that for intersection and roadway improvements now formalized as part of the City's TIP, payment of TIP fees would qualify as the required fair share payments toward improvements identified in the mitigation.

Consistent with Impact and mitigation measure Traf-5 from the 2011 EIR, project intersections were assessed for the need for traffic signals. While none of the currently unsignalized project intersections meet signal warrants, a traffic signal is proposed at the intersection of Oyster Point Boulevard with the southern entrance to the Phase 3 and 4 parking garage and the pedestrian/bicycle connector to the Bay Trail due to the high anticipated pedestrian volumes and expected east-west bikeway crossing. For other internal intersections, the garage driveway approaches will be stop controlled.

There have not been substantial changes to the roadway system in the area since the 2011 EIR was prepared and certified. However, there has been development in the vicinity in that time and changes in both the existing and projected traffic levels in the area.

While not yet required as the City has not yet adopted applicable thresholds, the project's VMT was also assessed by Fehr & Peers. Project VMT was calculated as 16.1 VMT per employee for home-based work trips compared to the nine county Bay Area average VMT per employee is 14.2 VMT. While thresholds have not yet been adopted, the Governor's Office of Planning and Research guidance recommends office land development projects generate 15 percent less VMT than the regional average, which this project would not meet. Note that TDM measures required under Traf-1 and the City's municipal code would likely further reduce the project's VMT.

Hazards and Emergency Access

Same Conclusion (conclusion remains LTS w/ MM): The current project would not change Impacts Traf-2, Traf-3, and Traf-5, mitigation measures Traf-2, Traf-3, and Traf-5, or the less-than-significant with mitigation conclusion as the site has been designed to meet safety standards and would be substantially the same as under the 2011 OPSP.

The current project includes traffic signals along internal roadway intersections where warranted and appropriate pedestrian and bicycle connections. Additionally, because the northern connection between Phase 4 buildings and the Phase 4 parking garage does not include a traffic signal, plans specify a marked, uncontrolled crosswalk including a median refuge island to enhance pedestrian visibility and increase motorist yielding behavior, and rectangular rapid flashing beacons (RRFB's) with standard pedestrian warning signage. With these features included, Fehr & Peers identified adequate emergency access and no site hazards.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
b. Water Supplies	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
c. Wastewater Capacity	LTS w/MM	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Util-2a: Upsize Pump Station No. 2 Util-2b: Oyster Point Subtrunk Replacement	LTS w/MM
d-e. Solid Waste	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	LTS
f. Energy ¹	LTS	<input checked="" type="checkbox"/>	<input type="checkbox"/>	--	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 OPSP

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 OPSP is being completed as part of Phase 1 development activities and will be completed prior to development of the project area. 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.

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 OPSP.*

As under the 2011 OPSP, 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. 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 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, mitigation measures Util-2a and Util-2b, or the less-than-significant with mitigation conclusion as the current project would not substantially change projected wastewater generation or planned capacity.*

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 relocation of Pump Station No. 1 being completed as part of Phase 1 development and the following off-site improvements:

While Pump Station No. 2 upsizing and improvements has been included in the City's CIP since the 2011 OPSP and trunk capacity upgrades are identified in the SSMP, which means this improvement can be reasonably assumed, because these improvements have not yet been made, mitigation measures Util-2a and Util-2b requiring demonstrated capacity prior to operations remain applicable to the current project to reduce potential less than significant.

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 marginally increase the amount of energy consumption 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 on the current project site, 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.