GATEWAY OF THE PACIFIC 4 DENSITY TRANSFER PROJECT, CITY OF SOUTH SAN FRANCISCO

Supplemental Environmental Impact Report

SCH# 2008062059

Prepared for
City of South San Francisco

January 2022

ESA

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South San Francisco, California 94080

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SUMMARY

Gateway of the Pacific 4 Density Transfer Project Supplemental Environmental Impact Report

Introduction

The City of South San Francisco has prepared this Draft Supplemental Environmental Impact Report (SEIR) for the Gateway of the Pacific (GOP) 4 Density Transfer project ("proposed project") per the requirements of the California Environmental Quality Act (CEQA) statutes (Public Resources Code [PRC] Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations 15000 et seq.). This Draft SEIR is a supplemental analysis to the certified EIR for the GOP Master Plan project (SCH #2008062059) and subsequently-prepared Addenda, which are collectively referenced in this Draft SEIR as the "EIR." The proposed project is a modification to the GOP 4 project studied in the most recent Addendum.

This Draft SEIR describes the existing environmental conditions in the vicinity of the GOP 4 site, located on the GOP Master Plan area south of Oyster Point Boulevard between Gateway Boulevard and Eccles Avenue, analyzes whether new or more severe significant environmental impacts will occur due to the proposed project, and identifies mitigation measures that could avoid or reduce the magnitude of those new or more severe significant impacts. The only environmental resource topic fully evaluated in the Draft SEIR is transportation, and all other topics are discussed to the extent warranted to disclose the SEIR's consistency with the guidance for preparation of a supplemental environmental analysis (CEQA Guidelines Sections 15163 and 15162). The Draft SEIR considers a reasonable range of alternatives for the proposed project.

This Draft SEIR is subject to review and comment by the public, as well as responsible agencies and other interested jurisdictions, agencies, and organizations for a minimum of forty-five (45) days. The public may comment on the Draft SEIR by submitting written comments at any time during the public review period. The City will prepare a Final SEIR, which will include the written comments received regarding the Draft SEIR, responses to substantial environmental issues raised in the comments, and any changes to the Draft SEIR that are required by the responses to written comments, or that are initiated by staff.

Upon publication of the Draft EIR and release of the Final SEIR, each of these environmental documents will be made available online to the public at https://weblink.ssf.net, and may be viewed in printed form at the offices of the City's Planning Division at 315 Maple Avenue, South San Francisco, California 94083. A scoping hearing to address the scope of this SEIR was held on December 6, 2021. Public hearings regarding the proposed project, including its CEQA review,

will occur at various times, and the City will post public notices and hearing agendas at City Hall and on its website at www.ssf.net.

City staff responsible for the drafting of the environmental document may be contacted with questions:

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The Final SEIR will be submitted to the City of South San Francisco Planning Commission and City Council for their consideration. As part of the project review and consideration, the City, prior to approving the project, is required under CEQA to certify that the SEIR has been prepared in compliance with CEQA, and would also consider adoption of Findings of Fact pertaining to this SEIR, specific mitigation measures, a Statement of Overriding Considerations relating to any identified significant and unavoidable effects, and a Mitigation Monitoring Plan.

Project Description

Project Location

The GOP 4 site is located in the City of South San Francisco, approximately 1.5 miles north of San Francisco International Airport (SFO) and approximately 10 miles south of downtown San Francisco. The City of South San Francisco is located on the San Francisco Bay plain and the northern foothills of the Coastal range. The City is located along major transportation routes including US 101, Interstate 380 ("I-380"), Interstate 280 ("I-280"), and the Union Pacific Railroad (see Figure 2-1, *Project Location*).

The GOP 4 project is the fourth phase of the GOP Master Plan project, which is located within the larger Gateway Specific Plan area and East of 101 Sub-area. The GOP Master Plan area consists of approximately 23 acres of land and is bounded by Oyster Point Boulevard on the north, Gateway Boulevard on the west, a narrow band of vacant land to the east, and a hotel to the south. The GOP Master Plan area is developed with office, warehousing and research and development ("R&D") uses.

The GOP 4 site itself is 4.8 acres in size and is generally located in the northeastern portion of the GOP Master Plan area, south of buildings housing R&D uses located at 180 and 200 Oyster Point Boulevard, which are located outside the GOP Master Plan area. The site is presently developed with two one-story buildings, a Federal Express (FedEx) distribution center (900 Gateway Boulevard) totaling 50,000 sf and an abandoned office building (850 Gateway Boulevard) totaling approximately 19,300 sf (see Figure 2-2, *GOP 4 Site*).

Background

In February 2010, the City certified an EIR, adopted certain findings under CEQA, and approved the Gateway Business Park Master Plan project and a Precise Plan for Phase 1. Other approvals included related General Plan and zoning changes, and a Development Agreement. Specifically, the environmental effects of the project were analyzed in the EIR (State Clearinghouse Number 2008062059) that was certified on February 10, 2010 (City Council Resolution 18-2010)("2010 EIR"). In addition, a Mitigation Monitoring and Reporting Program ("MMRP") and a statement of overriding considerations for the project were adopted at the same time. The master plan project involved the phased removal and replacement of existing buildings on the 22.6-acre site, construction of five to six new buildings, and construction of two to four parking structures, in up to five phases. The plan would have developed the site with a Floor Area Ratio (FAR) of 1.25, which would have resulted in approximately 1,230,570 square feet (sf) of building space.

In April 2013, the City approved modifications to the Gateway Business Park Master Plan project and the Precise Plan for Phase 1 (City Council Resolution 44-2013). The City found that the modifications were within the scope of the 2010 EIR and re-certified that EIR (City Council Resolution 43-2013). As it considered the modifications to that project, the City re-adopted the CEQA findings, the MMRP and the statement of overriding considerations. The modifications included more flexibility in phasing, a new amenity building in Phase 1, a First Amendment to the Development Agreement, and minor changes to on-site circulation. The overall development standards and FAR of 1.25 did not change. These modifications were reflected in a revised Master Plan, which was renamed as the GOP Master Plan, and a revised Precise Plan for GOP 1. Phase 1 has since been constructed.

In July 2018, the City approved a Second Amended and Restated Development Agreement ("Second Amendment") (Ordinance No. 1559-2018). The Second Amendment recognizes a lot line adjustment that had previously adjusted the property line between Phases 1 and 2, recognized the current ownership of the various parcels that comprise the GOP Master Plan area, allocated responsibility for compliance with the conditions of approval and mitigation measures separately among each phase, and clarified that the requirement for a replacement childcare facility on the site be triggered upon occupation of 750,000 sf of gross floor area within the GOP Master Plan area. The City determined that no additional environmental review was required for the Second Amendment.

In December 2018, the City approved Precise Plans for Phases 2 and 3 of the GOP Master Plan project (Planning Commission Resolution 2835-2018). The Planning Commission determined that Phases 2 and 3 were within the scope of the 2010 EIR and adopted an Addendum (Planning Commission Resolution 2834-2018) ("2018 Addendum") to the previous analysis. The Precise Plans provided detailed development plans that implemented the already-approved GOP Master Plan project. Phases 2 and 3 are currently under construction.

In July 2020, the City approved a Precise Plan for Phase 4 of the GOP Master Plan project, as well as a Use Permit for the adjacent project at 475 Eccles Avenue to the west, which is now known as GOP 5 (Planning Commission Resolution No. 2859-2020 and City Council Resolution No. 119-2020). The Precise Plan for the GOP 4 project provided detailed development plans that

implemented the already-approved GOP Master Plan project. The GOP 4 project included two five-story buildings with R&D uses totaling 226,000 sf and a six-story parking structure, with a partial floor on the sixth level, in the northeastern portion of the GOP Master Plan area. The Planning Commission determined that Phase 4 was within the scope of the 2010 EIR and 2018 Addendum, and adopted another Addendum (Planning Commission Resolution No. 2858-2020) ("2020 Addendum") to the previous analysis. Construction of GOP 4 has not commenced.

The Use Permit for the GOP 5 project integrated the adjacent project at 475 Eccles Avenue into a campus that would include both the GOP Master Plan and GOP 5 projects. The GOP 5 project includes the site of some former rail spurs that previously separated the GOP Master Plan area from the 475 Eccles site, which will be converted into a publicly-accessible multi-use path connecting Oyster Point Boulevard with Forbes Boulevard, and providing pedestrian connections within the campus.

Project Characteristics

Previously Approved Project

As discussed above, the approved GOP 4 project included two five-story buildings totaling 226,000 sf and a five-story parking structure. One building would be located on the northern portion of the site and the other building would be located on the southern portion of the site with the parking structure located to the east (see Figure 2-3, *GOP 4 Site Plan*). Both the northern and southern buildings were approximately the same size with each totaling about 113,000 sf. The two structures were also each 98 feet above the average level of the highest and lowest points on the lot. A total of 531 parking spaces would be provided in a six-level parking structure (five full floors and a partial level on the sixth floor). The massing and height of the approved structures are shown in Figure 2-4, *Approved GOP Massing Diagram*, and Figure 2-5, *Approved GOP Rendering*. The project would have employed approximately 603 workers. The envelope of the buildings consisted of a high-quality curtain-wall system with energy-efficient glazing and accents of metal panels, wood and concrete.

Modified Project

The site of the former rail spurs on the GOP 5 site is 2.76 acres or 120,221 sf in size. Based on an allowed FAR of 1.0 for R&D establishments permitted by the City's General Plan, a total of 120,221 sf of R&D use could be developed on this portion of the GOP 5 site. The proposed GOP 4 Density Transfer project would transfer this space from the GOP 5 site to the GOP 4 site. The developable space would be added to the northern building on the GOP 4 site as four additional floors. The portion of the GOP 5 site encompassing the rail spurs would then be deed restricted to not allow any of the density transferred to GOP 4 site to be constructed on the rail spur property. The additional space would employ an additional 321 workers. The additional square footage would be parked at 2 spaces per 1,000 sf, which would be accommodated by adding 2.5 floors to the previously-approved parking structure; a total of approximately 240 new parking spaces would be provided.

As revised, the northern building on the GOP 4 site would total nine floors and reach a height of 178 feet above the average level of the highest and lowest points on the lot. The northern

structure would include about 233,300 sf of space. The height and size of the southern building would remain the same. The parking structure would also now be eight levels in height and include 771 parking spaces. The massing and height of the modified structures are shown in Figure 2-6, *Modified GOP Massing Diagram*, and Figure 2-7, *Modified GOP Rendering*.

The approved architectural scheme of the buildings would be extended to the new floors, without any substantive changes in architecture. The modified GOP 4 project also includes a generator yard at ground level in the landscaped area on the northwest side of the GOP 4 parking structure. In exchange for reducing current density at the rail spurs to zero, the overall FAR of the GOP Master Plan area would increase from 1.25 to 1.37 with the addition of the space associated with the proposed project.

Areas of Controversy

As required by the state CEQA Guidelines, the scope of this Draft SEIR includes all environmental issues to be resolved and all areas of controversy relevant to the physical environment known to the Lead Agency (City of South San Francisco), including those issues and concerns identified by the City, and by other agencies, organizations, and individuals in response to the City's Notice of Preparation (NOP) published on November 16, 2021 (see Appendix A for the NOP and Appendix B for the NOP Comment Letters). Areas of potential controversy or interest regarding the Project, based on the number of public comments received, include:

- Vehicle miles traveled per capita associated with the proposed project; and
- Compatibility of the proposed project with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.

These environmental issues are discussed in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*.

Environmental Effects

The following discussion provides an overview of the key environmental effects of the proposed project. At the end of this chapter, **Table S-1,** *Summary of Impacts and Mitigation Measures*, includes a complete summary of all impacts and mitigation measures described in Chapter 3 of the SEIR.

Transportation

Conflict with a Program, Plan, Ordinance, or Policy Addressing the Circulation System

The GOP Master Plan project would develop a pedestrian-friendly Central Commons open space in the area created by the parking structures and the office buildings. The master plan would enhance public street frontages and foster transit use by providing multiple pedestrian connections to and from the internal campus and shuttle system stops. The proposed project

would be compatible with the GOP Master Plan project and the existing GOP 4 Precise Plan. Therefore, the proposed project would not have a detrimental impact to pedestrian circulation.

Bicycle access to the proposed project is provided via the bicycle lanes on Oyster Point Boulevard and the bike route on Gateway Boulevard. As part of the GOP 5 project, the existing rail spur that separates the GOP 4 and 5 sites would be redeveloped into a multi-use trail. This multi-use trail would provide an additional connection between the Class II bicycle lanes on Oyster Point Boulevard and the existing multi-use trail on Forbes Boulevard. As a result, the proposed project would not conflict with existing and planned bicycle facilities.

The proposed project is expected to generate trips via transit services, which can be accommodated by the existing/planned transit capacity. According to California State Office of Planning and Research guidelines, the addition of new transit riders should not be treated as an adverse impact as such development also improves regional flow by adding less vehicle travel onto the regional network. Therefore, the proposed project would not have a detrimental impact to transit service.

For the reasons presented above, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and this impact is considered less than significant. No new or substantially more severe impacts would occur than analyzed in the EIR.

Vehicle Miles Traveled

According to the City of South San Francisco's vehicle miles traveled (VMT) guidelines, a significant impact would occur for employment generating projects if the baseline project-generated home-based work (HBW) VMT per employee is higher than 85 percent of the existing nine-county Bay Area-Wide average for employee VMT, which is 14.2 under current conditions and 14.6 under cumulative 2040 conditions. Based on the C/CAG – VTA travel demand model, the VMT per employee for the proposed project would be 16.2 under existing conditions, which is above the threshold of 12.1 for existing conditions. Under cumulative 2040 conditions, the VMT per employee for the proposed project would be 12.9, which is above the threshold of 12.4 for cumulative conditions. Therefore, the proposed project would result in a significant impact with respect to VMT under existing and cumulative conditions.

Even with the implementation of the actions listed in Mitigation Measure 3.1-1, which include improvements that support and enable first- and last-mile non-auto commute strategies, this impact would not be reduced to a less-than-significant level as the effectiveness of these actions are unknown and may not reduce the project's HBW VMT below the existing and cumulative thresholds. Therefore, the project's effect on VMT would be significant and unavoidable.

Design Hazards

The proposed project would increase the intensity of planned uses on the GOP 4 site, but would not include the introduction of new land uses or changes to the GOP 4 Precise Plan site design. A project safety impact is considered significant if the proposed project would provide inadequate design features that present safety concerns within the project site or on the adjacent streets. The

proposed project would not alter any design components of the recently approved GOP Phase 4 Precise Plan. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible land uses, and no impact would occur. No new or substantially more severe impacts would occur than analyzed in the EIR.

Emergency Access

The proposed project would not reroute or change any of the city streets in its vicinity that would impact emergency vehicle access to the GOP 4 site. Access to GOP 4 site would be provided via driveways along Oyster Point Boulevard and Gateway Boulevard. Park Street, a new internal access roadway, would be constructed along the east side of the parking garages and would connect to Oyster Point Boulevard to the north and Gateway Boulevard to the south. The emergency vehicles would utilize all entries and supplemental access points as necessary to reach Park Street and the central pedestrian walkway which would be wide enough to serve as an emergency vehicle route. Thus, the proposed project would not result in inadequate emergency access, and this impact is considered less than significant. No new or substantially more severe impacts would occur than analyzed in the EIR.

All Other Topics

The EIR addressed the remaining environmental topics: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology and soils, greenhouse gases and climate change, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services and recreation, and utilities. With the exception of significant impacts related to construction air quality and noise, and transportation delay-based impacts that can no longer be considered significant impacts under CEQA, the EIR determined that GOP Master Plan project would not create significant impacts with respect to these environmental topics once mitigation was incorporated.

The proposed project would be required to implement mitigation set forth in the MMRP approved in 2010 and again in 2013. In addition, since the increase in building space associated with the project is not substantial, significant impacts related to construction air quality and noise would not increase in severity. There has been no substantial change in surrounding circumstances or new information with respect to these environmental topics since the City most recently determined, in 2020, that no such changes had occurred in connection with the GOP 4 Precise Plan approval. As a result, no new or more severe significant impacts with respect to these environmental topics are anticipated beyond those anticipated and analyzed in the EIR.

Significant and Unavoidable Environmental Effects

Pursuant to CEQA Guidelines Section 15123(b)(1), an EIR must summarize the impacts and mitigation measures associated with a proposed project, as well as any significant impacts following mitigation. This information is detailed in this SEIR in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*, and is summarized in Table S-1 at the end of this chapter.

Throughout this SEIR, certain transportation impacts are identified that would be less than significant without the need for additional mitigation measures. When impacts are identified which cannot be eliminated or reduced to a less-than-significant level even with the implementation of feasible mitigation measures, those impacts are identified as significant and unavoidable environmental impacts. As discussed above, the proposed project has significant and unavoidable impacts associated with VMT, both at the project-level and the cumulative level.

Alternatives to the Proposed Project

CEQA Guidelines Section 15126.6 requires that an EIR must present and consider a reasonable range of alternatives to the proposed project. These alternatives should be able to feasibly achieve the majority of the basic objectives of the project while avoiding or substantially lessening one or more of the significant effects of the project. The feasibility of an alternative is determined by the lead agency and is evaluated based on a variety of factors, which may include site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site acquisition and control.

Several alternatives were considered for their potential to reduce the project's significant VMT impacts but not carried forward for analysis for several reasons. A reduced height alternative was considered but not carried forward for analysis as a smaller project does not directly correlate to a reduced VMT impact because VMT is assessed based on a per-capita or per-employee rate. A residential land use alternative was considered but not carried forward for analysis as the land use and zoning designations for the GOP 4 site do not permit residential use, residential use would not be consistent with existing land uses in the vicinity of the GOP 4 site, and residential use would be inconsistent with all project objectives. Two alternative locations near an existing Caltrain station and approximately 0.7 miles from the proposed project's site were considered but not carried forward for analysis as the City is considering mixed-use development unrelated to this project on these parcels as part of the City's general plan update. In addition, neither of these alternative sites considered are owned by the project applicant, both sites have existing long-term leases and tenants, and neither site may be available for purchase or development. Finally, as the proposed project is an addition to an already approved building, it would be more cost efficient from a construction perspective, as constructing this space on another site would involve additional construction phases, such as demolition and site preparation.

For these reasons, there are no feasible alternatives that might feasibly accomplish most of the project's basic objectives and avoid or substantially lessen one or more of the significant effects of the project. Thus, only the no project alternative was considered for further analysis.

No Project Alternative

State CEQA guidelines require consideration of the "No Project" alternative, which evaluates the impacts associated with not moving forward with the proposed project. Under the No Project Alternative, as required by CEQA Guidelines Section 15126.6(e), the transfer of density under the proposed project would not occur, and the approved GOP 4 project would be constructed on the GOP 4 site.

Environmentally Superior Alternative

Pursuant to State CEQA Guidelines Section 15126.6, an EIR must identify the environmentally superior alternative from among the range of alternatives that are evaluated. As the No Project Alternative was the only alternative carried forward for analysis it is the environmentally superior alternative, although the project- and cumulative level impacts associated with VMT would remain the same since the fewer vehicle trips associated with this alternative would not directly correlate to a reduction in VMT, which is assessed based on a per-capita or per-employee rate.

Summary Table

Table S-1, *Summary of Impacts and Mitigation Measures*, is structured to correspond with the environmental issues discussed in Chapter 3. The table is arranged in four columns:

1. New or more severe significant environmental impacts ("Impact")
2. Level of significance without mitigation ("Significance Before Mitigation")
3. Mitigation measures ("Mitigation Measure")
4. Level of significance following implementation of mitigation measures ("Significance After Mitigation")

If an impact is determined to be significant or potentially significant, mitigation measures are identified to reduce the effects of that impact, where appropriate. Multiple mitigation measures may be required to reduce the impact to a less-than-significant level. This SEIR assumes compliance with all plans, policies, guidelines, and regulations relevant and applicable to the proposed project. These actions and the plans, policies, guidelines, and laws upon which they are based are discussed within the Regulatory Setting and applicable impact analysis of each issue area.

TABLE S-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
3.1 Transportation			
Impact 3.1-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.	LTS	None Required.	NA
Impact 3.1-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision b) related to VMT.	PS	**Mitigation Measure 3.1-1: First- and Last-Mile Transit Connections and Active Transportation Improvements** First- and last-mile transit connections and active transportation improvements are likely to yield the greatest VMT reductions. These measures would not only serve the density transfer project but also the entire GOP Master Plan area and all of the existing and planned development in the area. Thus, the new VMT generated by the project would be partially offset by reductions in VMT for other development. The following mitigation measures support and enable the first-and last-mile non-auto commute strategies in the GOP Master Plan TDM Plan. The mitigation measures described below are appropriate under both existing plus project conditions and cumulative plus project conditions. a) The project applicant has acquired the rail spur property adjacent to the GOP 4 site and shall use it to connect the GOP Master Plan area with the 475 Eccles site, which is currently referred to as GOP Phase 5, approved for two office/R&D buildings totaling 262,287 square feet and one parking structure. The applicant proposes to develop the rail spurs into a publicly accessible multi-use path connecting Oyster Point Boulevard with Forbes Boulevard, with pedestrian amenities, all to implement the City's draft "rails to trails" plan. A grand staircase allowing access from the lower elevation of the GOP Master Plan area to the higher elevation of the 475 Eccles site is also proposed. The applicant shall construct these improvements. This multi-use path shall connect to Class II bicycle lanes on Oyster Point Boulevard and to the multi-use trail on Forbes Boulevard. b) The applicant shall construct crossings at the northern and southern ends of the multi-use path required by paragraph (a) above, at Forbes Boulevard and Oyster Point Boulevard, in the configuration determined necessary by the City Engineer for bicycle access from those streets to the multi-use path. c) The applicant shall use good faith efforts to obtain all approvals and consent required to install the improvements required by paragraphs (a) and (b) above, including the use of any necessary land owned by the applicant or its affiliates. Each improvement shall be constructed by the later of (i) issuance of the first certificate of occupancy for any portion of the 120,221 square-foot expansion in GOP 4, or (ii) such time as public agencies have granted all necessary approvals for the mitigation improvement and the applicant has been given the right to construct on any land owned by others that is necessary for the mitigation improvement.	SU

LTS = less than significant; NA = Not applicable; NI = no impact; PS = potentially significant; S = Significant; SU = significant and unavoidable.

TABLE S-1
SUMMARY OF IMPACTS AND MITIGATION MEASURES

Impact	Significance Before Mitigation	Mitigation Measure	Significance After Mitigation
Impact 3.1-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment).	NI	None Required.	NA
Impact 3.1-4: The proposed project would not result in inadequate emergency access.	LTS	None Required.	NA
Impact 3.1-5: Implementation of the proposed project, in combination with other development, could contribute to cumulative conditions where VMT per capita or VMT per employee could exceed 85 percent of the 2040 cumulative Bay Area-wide regional average daily VMT per employee.	PS	Implement **Mitigation Measure 3.1-1**.	SU

LTS = less than significant; NA = Not applicable; NI = no impact; PS = potentially significant; SU = significant and unavoidable.

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CHAPTER 1
Introduction

In February 2010, the City of South San Francisco approved the Gateway Business Park Master Plan project and a Precise Plan for Phase 1. The master plan project involved the phased removal and replacement of existing buildings on the 22.6-acre site, construction of five to six new buildings, and construction of two to four parking structures, in up to five phases.

In April 2013, the City approved modifications to the Gateway Business Park Master Plan project and the Precise Plan for Phase 1. The modifications included more flexibility in phasing, a new amenity building in Phase 1, a First Amendment to the Development Agreement, and minor changes to on-site circulation. These modifications were reflected in a revised Master Plan, which was renamed as the GOP Master Plan and a revised Precise Plan for Phase 1. Precise Plans were subsequently approved for phases 2, 3 and 4 as well. When it was considering the precise plans, the City adopted addenda in 2018 and 2020 to the 2010 EIR, for the subsequent approval of the plans. As used in this Draft SEIR, the "2010 EIR" refers to the EIR certified on February 10, 2010, as supplemented by these Addenda. Phase 1 (GOP 1) has since been constructed while Phases 2 and 3 (GOP 2 & 3) are currently under construction; Phase 4 (GOP 4) has yet to begin construction.

In July 2016, the City approved a project on a nearby property to the west of the GOP Master Plan area known as 475 Eccles. The project consisted of two office buildings and a parking structure. In 2020, the City approved an expansion of the 475 Eccles site to include the site of some former rail spurs that currently separate the GOP Master Plan area from the 475 Eccles site. The purpose of the expansion was to integrate the GOP Master Plan area and the 475 Eccles site into one life sciences campus connected by pedestrian pathways and a grand staircase. This modified project, which now includes both 475 Eccles site and the site of the former rail spurs, is now known as Phase 5 of the GOP Master Plan project (GOP 5). Construction has yet to begin on GOP 5.

BioMed Reality (project applicant) proposes the transfer of 120,221 square feet (sf) of developable space from the GOP 5 site to the GOP 4 site. The developable space consists of what could potentially be built on the site of the former rail spurs and would be added to the northern building on the GOP 4 site as four additional floors. The portion of the GOP 5 site encompassing the rail spurs would then be deed restricted to allow no development of the density that is transferred. The new square footage on the GOP 4 site would be parked at 2 spaces per 1,000 sf, which would be accommodated by adding 2.5 floors to the previously-approved parking structure on the GOP 4 site.

The proposed density transfer project is referred to throughout this Draft Supplemental Environmental Impact Report (SEIR) as the "GOP 4 Density Transfer project" or the "proposed project." The City of South San Francisco is the Lead Agency for preparation of this Draft SEIR and responsible for the majority of approvals required for the project, pursuant to CEQA Guidelines Section 15051).

1.1 Background

The environmental effects of development on the Gateway Business Park Master Plan project and a Precise Plan for Phase 1 were analyzed in the 2010 EIR. The 2010 EIR examined the potential for environmental impacts of the master plan, as well as the specific development proposal for Phase 1. In April 2013, the City found that the modifications to the Gateway Business Park Master Plan and GOP 1 Precise Plan were within the scope of the 2010 EIR and re-certified that EIR. For the Phase 2, 3 and 4 Precise Plans, the City had adopted 2018 and 2020 Addenda that determined that no new or more significant effects would result from those Precise Plans. The most recent decision was made on August 6, 2020, when the Planning Commission adopted Resolution 2858-2020 approving the 2020 Addendum and approving the Precise Plan for GOP 4, concluding that there were no changes to the project studied in the 2010 EIR, changes in surrounding circumstances, or significant new information, any of which showed a new or more severe significant impact.

The currently proposed project modifies the previously-approved GOP 4 Precise Plan to provide for an expansion of 120,221 square feet.

1.2 CEQA Context

Since the City already determined, as of August 6, 2020, that the 2010 EIR was adequate for the GOP 4 Precise Plan and that there were no material changes in surrounding circumstances or significant new information relating to GOP 4, and because the proposed project is a minor modification to the GOP 4 Precise Plan approved on August 6, 2020, this Supplemental EIR evaluates whether the changes proposed by the proposed project, or changes in circumstances or significant new information developed since August 6, 2020, will cause any new or more significant impacts than are identified in the 2010 EIR.

Preparation of a subsequent or supplemental environmental impact report would be warranted if and to the extent that the project meets any of the following stated conditions:

1) **Substantial** changes to the project or **substantial** changes to circumstances, or new information of **substantial** importance; which

2) require **major revisions** to the EIR; **and**

3) result in **new significant** environmental effects or a **substantial increase** in the severity of previously identified significant effects. (PRC Section 21166; CEQA Guidelines Sections 15162 and 15163.)

The findings for each of these standards must be based on substantial evidence (State CEQA Guidelines Section 15162). The metric for analyzing transportation impacts has changed under CEQA. Previously, impacts were analyzed using a congestion or delay-based metric, such as Level of Service. Now, CEQA requires that transportation impacts be assessed using Vehicle Miles Traveled (VMT), which measures the distance a vehicle will travel to a destination. Preliminary analysis by the City suggest that the GOP 4 Density Transfer project will create a significant VMT impact. As a result, the City determined that subsequent or supplemental environmental analysis for the project is required.

According to Section 15163 of the State CEQA Guidelines, a supplement to an EIR is required if: (1) any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and (2) only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation. When certified, the SEIR, along with the 2010 EIR, will serve as the environmental document for the proposed project.

This Draft SEIR assesses whether the proposed project would or would not cause new or more significant impacts not previously identified for the GOP 4 site analyzed in the 2010 EIR.

Pursuant to PRC Section 21166 and CEQA Guidelines Section 15162, the analysis in this Draft SEIR also considers whether substantial changes to circumstances or new information of substantial importance exist that could result in the proposed project having a new significant impact not previously identified for the GOP 4 site in the 2010 EIR.

1.3 Purpose and Use of this EIR

Consistent with CEQA, this SEIR is a public information document, and its key purpose is for use by governmental agencies and the public to identify and evaluate potential environmental consequences of a proposed project, to recommend mitigation measures to lessen or eliminate adverse impacts, and to examine feasible alternatives to the proposed project. The City, as Lead Agency for this SEIR, will review and consider the information contained in this Draft SEIR prior to taking action on the proposed project.

The City's actions on the project include several required discretionary permits and approvals necessary before development of the project could proceed. The currently anticipated City and other agency permits and approvals that may be required for the project are described at the end of Chapter 2, *Project Description*, of this document. In addition, the project may rely on or require review and approval by a number of public agencies and jurisdictions that have authority over specific aspects of the project.

Copies of this Draft SEIR are available at the City of South San Francisco, Planning Division, at the offices of the City's Planning Division at 315 Maple Avenue, South San Francisco, California 94083. This Draft SEIR is subject to review and comment by the public, as well as responsible agencies and other interested jurisdictions, agencies, and organizations for a minimum of forty-five (45) days. During this review period, written comments on the SEIR may be submitted to the

City at the address above. Responses to all comments received on the environmental analysis in this Draft SEIR and submitted within the 45-day review period will be included in the Final SEIR.

1.4 CEQA Environmental Review

1.4.1 Preliminary Project Evaluation

The State CEQA Guidelines define the role and standards of adequacy of an EIR as follows:

- **Informational Document.** An EIR is an informational document that will inform public agency decision-makers and the public of the significant environmental effect(s) of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. The public agency shall consider the information in the EIR along with other information that may be presented to the agency (State CEQA Guidelines section 15121[a]).

- **Standards for Adequacy of an EIR.** An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information that enables them to make an informed decision that takes account of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure (State CEQA Guidelines section 15151).

State CEQA Guidelines Section 15382 defines a significant effect on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project…" Therefore, in identifying whether the proposed project will cause new or more severe impacts, this SEIR describes the potential for the proposed project to result in substantial new physical effects within the area affected by the project, and identifies mitigation measures that would avoid or reduce the magnitude of those new effects. See Section 3.0, *Introduction to the Analysis*, for further description of the approach to analyzing environmental impacts and identifying mitigation measures presented in this SEIR.

1.4.2 EIR Scoping

On November 16, 2021, the City issued a Notice of Preparation (NOP) of the Draft SEIR to governmental agencies and organizations and persons interested in the project (included in Appendix A). The NOP review period ended on December 20, 2021. The NOP was distributed to governmental agencies, organizations, and persons interested in the proposed project along with notice to the general public. The City sent the NOP to agencies with statutory responsibilities in connection with the proposed project with the request for their input on the scope and content of the environmental information that should be addressed in the EIR.

The City of South San Francisco received two written comment letters regarding the proposed project (included in Appendix B). Although many specific issues were mentioned in the NOP comment letters, the comments generally tended toward larger themes such as:

- Analysis of vehicle miles traveled;
- Support of transit and active transportation modes;
- Implementation of travel demand management measures; and
- Compatibility with the Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport.

1.4.3 Public Review

The Draft SEIR will be available for public review and comment as set forth in the Notice of Availability. During the review and comment period written comments (including email) regarding the Draft SEIR may be submitted to the City at the address below:

Billy Gross, Principal Planner
City of South San Francisco
Department of Economic and Community Development
315 Maple Avenue
South San Francisco, California 94080
Email: billy.gross@ssf.net

The Draft SEIR, Notice of Availability and other supporting documents, such as technical studies prepared by the City as part of the EIR process, are available for public review at the offices of the Planning Division at 315 Maple Avenue, South San Francisco, California 94080, and on the City's website at https://weblink.ssf.net.

1.4.4 Final EIR and EIR Certification

Following the public review and comment period for the Draft SEIR, the City will prepare responses that address all substantive written and oral comments on environmental issues addressed in the Draft SEIR that are received within the specified review period. The responses and any other revisions to the Draft SEIR will be provided as a Final SEIR. The Draft SEIR and its Appendices, together with the Final SEIR and the 2010 EIR, will collectively constitute the EIR for the proposed project.

1.4.5 Mitigation Monitoring and Reporting Program

Throughout this SEIR, mitigation measures have been identified and presented in language that will facilitate preparation of a mitigation monitoring and reporting program ("MMRP"). As required under CEQA, an MMRP will be implemented following certification of the Final SEIR for the proposed project and will identify the specific timing and roles and responsibilities for implementation of adopted mitigation measures.[1]

[1] See State CEQA Guidelines, section 15097.

1.5 Document Organization

This Draft SEIR document is organized as follows:

Summary – This section summarizes the proposed project and the conclusions of the Draft SEIR. A summary table is included and organized to allow the reader to easily identify potentially significant effects, proposed mitigation measures, and any residual environmental impacts after implementation of mitigation measures. A summary of the alternatives to the proposed project and the environmentally superior alternatives are also provided. The Summary also describes areas of controversy regarding the proposed project that are known to the City as of publication of this Draft SEIR.

Chapter 1, Introduction – This chapter describes the purpose and organization of the SEIR.

Chapter 2, Project Description – This chapter describes the proposed project. The description includes, with text and graphics, the location and boundaries of the proposed project, statements of objectives from the project applicant and the City, and a description of the proposed project's components and characteristics.

Chapter 3, Environmental Impact Analysis – For *Transportation*, this chapter discusses the environmental and regulatory setting, the methodology used, the detailed analysis of potential impacts (including direct, indirect, and cumulative impacts), and where necessary, a discussion of potentially feasible mitigation measures. This section also discusses *Other Resource Topics*, summarizing impacts and whether the project would trigger any changes to the conclusions in the prior certified EIR.

Chapter 4, Alternatives – This chapter describes alternatives considered and an alternative fully analyzed that may avoid or substantially reduce one or more of the project's significant impacts while attaining most of the basic objectives of the project. This section evaluates the comparative environmental effects of the potentially feasible alternative and identifies the environmental superior alternative.

Chapter 5, Other CEQA Required Considerations – This chapter discusses several issues required to be included in an SEIR, including effects not found to be significant, significant and unavoidable impacts, significant irreversible environmental changes, the potential for the proposed project to cause urban decay, and the potential for the proposed project to induce urban growth and development.

Chapter 6, List of Preparers – This chapter identifies the agency staff and consultants who prepared the SEIR, and agencies or individuals consulted during preparation of the SEIR.

Appendices – The appendices include environmental scoping information and technical reports and data used in the preparation of the Draft SEIR.

CHAPTER 2
Project Description

2.1 Introduction

This chapter presents information regarding the components and characteristics of the proposed Gateway of Pacific ("GOP") 4 Density Transfer project, or "proposed project." which modifies the previously approved GOP 4 Precise Plan, which itself was a later approval for the GOP Master Plan project studied in the 2010 EIR, and the discretionary approvals anticipated to implement it. A concise outline of the project elements is provided in the Executive Summary.

2.2 Project Location

The GOP 4 site is located in the City of South San Francisco, approximately 1.5 miles north of San Francisco International Airport (SFO) and approximately 10 miles south of downtown San Francisco. The City of South San Francisco is located on the San Francisco Bay plain and the northern foothills of the Coastal range. The City is located along major transportation routes including US 101, Interstate 380 ("I-380"), Interstate 280 ("I-280"), and the Union Pacific Railroad (see **Figure 2-1**, *Project Location*).

The GOP 4 project is the fourth phase of the GOP Master Plan project studied in the EIR, which is located within the larger Gateway Specific Plan area and East of 101 Sub-area. The GOP Master Plan area consists of approximately 23 acres of land and is generally bounded by Oyster Point Boulevard on the north, Gateway Boulevard on the west, a narrow band of vacant land to the east, and a hotel to the south. The GOP Master Plan area is developed with office, warehousing and research and development ("R&D") uses.

The GOP 4 site itself is 4.8 acres in size and is located at 850 and 900 Gateway Boulevard, which is in the northeastern portion of the GOP Master Plan area. The site is located south of buildings housing R&D uses located at 180 and 200 Oyster Point Boulevard, which are located outside the GOP Master Plan area. The site is presently developed with two one-story buildings, a Federal Express (FedEx) distribution center (900 Gateway Boulevard) totaling 50,000 sf and an abandoned office building (850 Gateway Boulevard) totaling approximately 19,300 sf (see **Figure 2-2**, *GOP 4 Site*).

Regionally, the GOP 4 site is accessible from the northwest via the US 101 Oyster Point Boulevard off- and on-ramps and from the southwest by the East Grand Avenue exit off of US 101. Locally, the GOP 4 site is accessible from two points along Oyster Boulevard, a drive way between 180 and 200 Oyster Point Boulevard, and the FedEx driveway along the eastern boundary of the GOP Master Plan area that connects with Oyster Point Boulevard.

SOURCE: ESA, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-1
PROJECT LOCATION

SOURCE: Google Earth, 2021; ESA, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-2
GOP 4 SITE

2.3 Project Objectives

California Environmental Quality Act ("CEQA") Guidelines Section 15124(b) requires that an EIR project description include a statement of the objectives intended to be achieved by the project. The objectives describe the purpose of the project and are intended to assist the lead agency in developing a reasonable range of alternatives for consideration in the EIR, as well as assisting the decision makers in assessing the feasibility of mitigation measures and alternatives.

The objective of the GOP 4 Density Transfer project is to transfer unused Floor Area Ratio from the adjacent rail spur properties to enable an expansion to Phase 4 of the GOP Master Plan project in a manner that:

- builds upon prior approvals by implementing their conditions, mitigation measures and architectural treatments;
- softens the height transition between the buildings constructed during GOP Phase 1 and the buildings to be constructed during GOP Phase 4; and
- locates the expansion in an already-approved campus, allowing it to take advantage of approved pedestrian connections, the multi-modal improvements approved for the adjacent rail spur properties and the shuttle stop planned for the campus.

2.4 Background

In February 2010, the City approved the Gateway Business Park Master Plan project and a Precise Plan for Phase 1. Other approvals included related General Plan and zoning changes, and a Development Agreement. The environmental effects of the project were analyzed in a 2010 EIR (State Clearinghouse Number 2008062059) certified via City Council Resolution 18-2010. In addition, the City Council also adopted CEQA findings, a Mitigation Monitoring and Reporting Program ("MMRP") and a statement of overriding considerations for the project. The master plan project involved the phased removal and replacement of existing buildings on the 22.6-acre site, construction of five to six new buildings, and construction of two to four parking structures, in up to five phases. The plan would have developed the site with a Floor Area Ratio (FAR) of 1.25, which would have resulted in approximately 1,230,570 square feet (sf) of building space.

In April 2013, the City approved modifications to the Gateway Business Park Master Plan project and the Precise Plan for Phase 1 (City Council Resolution 44-2013). The City found that the modifications were within the scope of the 2010 EIR and re-certified that EIR (City Council Resolution 43-2013). In addition, the City re-adopted the CEQA findings, the MMRP and the statement of overriding considerations. The modifications included more flexibility in phasing, a new amenity building in Phase 1, a First Amendment to the Development Agreement, and minor changes to on-site circulation. The overall development standards and FAR of 1.25 did not change. These modifications were reflected in a revised Master Plan, which was renamed as the GOP Master Plan, and a revised Precise Plan for GOP 1. Phase 1 has since been constructed.

In July 2018, the City approved a Second Amended and Restated Development Agreement ("Second Amendment") (Ordinance No. 1559-2018). The Second Amendment recognizes a lot line adjustment

that had previously adjusted the property line between Phases 1 and 2, recognized the current ownership of the various parcels that comprise the GOP Master Plan area, allocated responsibility for compliance with the conditions of approval and mitigation measures separately among each phase, and clarified that the requirement for a replacement childcare facility on the site be triggered upon occupation of 750,000 sf of gross floor area within the GOP Master Plan area. The City determined that no additional environmental review was required for the Second Amendment.

In December 2018, the City approved Precise Plans for Phases 2 and 3 of the GOP Master Plan project (Planning Commission Resolution 2835-2018). The Planning Commission determined that Phases 2 and 3 were within the scope of the 2010 EIR and adopted a 2018 Addendum to the previous analysis. The Precise Plans provided detailed development plans that implemented the already-approved GOP Master Plan project. Phases 2 and 3 are currently under construction.

In July 2020, the City approved a Precise Plan for Phase 4 of the GOP Master Plan project, as well as a Use Permit for the adjacent project at 475 Eccles Avenue to the southeast, which is now known as GOP 5 (Planning Commission Resolution Nos. 2859-2020 and 119-2020). The Precise Plan for the GOP 4 project provided detailed development plans that implemented the already-approved GOP Master Plan project. The GOP 4 project included two five-story buildings with R&D uses totaling 226,000 sf and a six-story parking structure, with a partial floor on the sixth level, in the northeastern portion of the GOP Master Plan area. For this project, the Planning Commission determined that Phase 4 was within the scope of the 2010 EIR and 2018 Addendum, and adopted a 2020 Addendum to the previous analysis. Construction of GOP 4 has not commenced.

The Use Permit for the GOP 5 project integrated the adjacent project at 475 Eccles Avenue into a campus that would include both the GOP Master Plan and GOP 5 projects. The GOP 5 project includes the site of some former rail spurs that previously separated the GOP Master Plan area from the 475 Eccles site, which will be converted into a publicly-accessible multi-use path connecting Oyster Point Boulevard with Forbes Boulevard, and provided pedestrian connections within the campus.

2.5 Existing Conditions

Existing Land Use Regulations

South San Francisco General Plan

The South San Francisco General Plan designates the GOP Master Plan area, including the GOP 4 site, as Business Commercial. This category is intended for business and professional offices, visitor service establishments, and retail. The maximum FAR is 0.5, but increases may be permitted up to a total FAR of 1.0 for uses such as R&D establishments, or for development meeting specific transportation demand management (TDM), off-site improvements, or specific design standards.

East of 101 Area Plan

The East of 101 Area Plan, which was adopted by the City Council in 1994, contains a Land Use Element that designates the East of 101 Sub-area into Planned Commercial, Light Industrial,

Coastal Commercial, Airport-Related, Mixed-Use Categories, and Planned Industrial. The GOP Master Plan area, including the GOP 4 site, is designated Planned Commercial in the East of 101 Area Plan. However, land use policies and designations of the General Plan supersede those outlined in the East of 101 Area Plan. The City has, however, retained the East of 101 Area Plan Design Element policies to be the design guidelines for development in the East of 101 Area.

South San Francisco Zoning Ordinance

The GOP Master Plan area, including the GOP 4 site, is located in the Gateway Specific Plan zoning district within the East of 101 Area Plan. The district was created to refine and implement the City's General Plan for a specific area within the East of 101 Area Plan. The zoning regulations for this district have been incorporated into the City's Municipal Code as set forth in Chapter 20.220. Uses permitted in this district include, but are not limited to, office buildings for professional or business purposes, R&D, and office/sales/service. Building limitations in this zoning district state the building coverage shall not exceed 50 percent of the area of a site, building heights shall not exceed 250 feet, and that FAR shall not exceed 1.25. Setbacks along property line adjacent to streets are required to be 40 feet from the property line. Off-street parking requirements are as follows: one space for each 300 sf of gross floor area (business and professional offices, financial institutions); one space for each 500 sf of gross floor area and one space for each 300 sf of gross office or non-storage areas or non-laboratory area (R&D); and one space for each 300 sf of gross floor area (office/sales/service). All regulations in the Municipal code relating to the GOP Master Plan area govern its development unless otherwise indicated in the GOP Master Plan project Development Agreement (which vests the project into the 2013 version of the Zoning code). The GOP Master Plan is subject to a condition that limits parking to 2.73 spaces per 1,000 square feet.

Surrounding Land Uses

The GOP Master Plan area is surrounded by office, R&D, commercial (including childcare facilities, fitness centers, restaurants), and light industrial uses. In particular, the Cove at Oyster Point, which is composed of four- to six-story buildings consisting of office and biotechnology uses, is located to the north across Oyster Point Boulevard, and the Gateway Campus, which is composed of three- to 16-story buildings consisting of office, R&D, childcare, and amenity uses, is located to the west across Gateway Boulevard. The GOP 4 site itself is surrounded by R&D uses to the north, a vacant strip of land to the east/south, and two buildings housing R&D and amenity uses to the west that were constructed during Phase 1 of the GOP Master Plan project.

2.6 Project Characteristics

Previously Approved Project

As discussed above, the approved GOP 4 project included two five-story buildings totaling 226,000 sf and a five-story parking structure. One building would be located on the northern portion of the site and the other building would be located on the southern portion of the site with the parking structure located to the east (see **Figure 2-3**, *GOP 4 Site Plan*). Both the northern and southern buildings were approximately the same size each with each totaling about 113,000 sf.

SOURCE: Flad, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-3
GOP 4 SITE PLAN

The two structures were also each 98 feet above the average level of the highest and lowest points on the lot. A total of 531 parking spaces were be provided in a six-level the parking structure (five full floors and a partial level on the sixth floor). The massing and height of the approved structures are shown in **Figure 2-4**, *Approved GOP Massing Diagram*, and **Figure 2-5**, *Approved GOP Rendering*. The project would have employed approximately 603 workers. The envelope of the buildings consisted of a high-quality curtain-wall system with energy-efficient glazing and accents of metal panels, wood and concrete.

Modified Project

The site of the former rail spurs on the GOP 5 site is 2.76 acres or 120,221 sf in size. Based on an allowed FAR of 1.0 for R&D establishments permitted by the City's General Plan, a total of 120,221 sf of R&D use could be developed on this portion of the GOP 5 site. The proposed GOP 4 Density Transfer project would transfer this space from the GOP 5 site to the GOP 4 site. The developable space would be added to the northern building on the GOP 4 site as four additional floors. The portion of the GOP 5 site encompassing the rail spurs would then be deed restricted to not allow any of the density transferred to GOP 4 site to be constructed on the rail spur property.

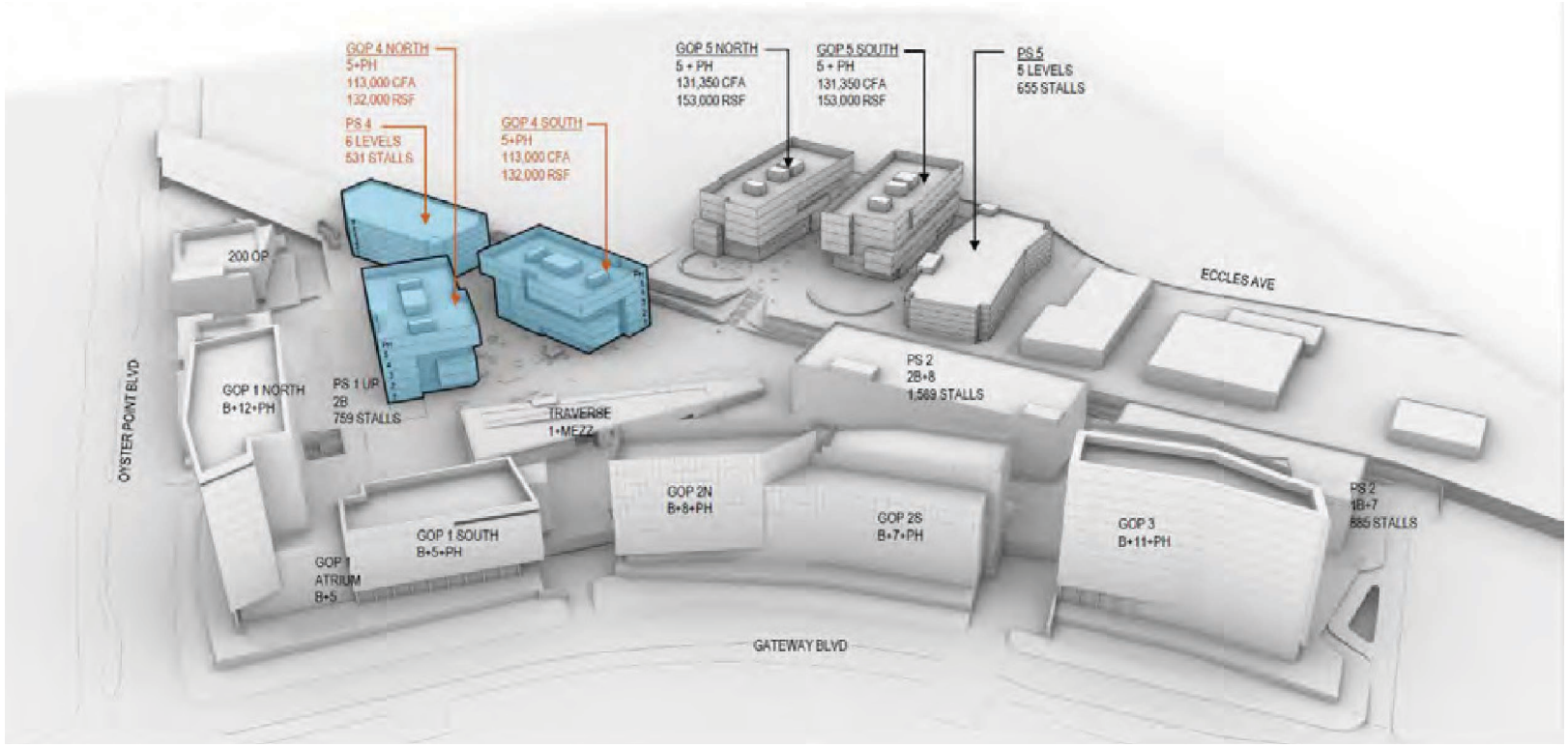
In exchange for effectively reducing the FAR on the rail spurs to zero, the FAR would be increased at the GOP 4 site, and the GOP Master Plan project would be amended as indicated in **Table 2-1**, *GOP Master Plan Amendment*.

TABLE 2-1
GOP MASTER PLAN AMENDMENT

	GOP 1 Parcel C	GOP 2 Parcel B	GOP 3 Parcel A	GOP 4 Parcel D	GOP Master Plan (Phases 1-4)
Lot Square Footage, after most recent LLA	284,584 (6.53 acres)	237,986 (5.46 acres)	185,262 (4.25 acres)	276,639[1] (6.35 acres)	984,471
As Built or Entitled – Before GOP 4 Density Transfer Project					
Building Floor Area	479,116	371,648	302,722	225,621[2]	1,379,107
Building Floor Area that counts towards FAR	427,104	312,130	265,734	225,621	1,230,589
FAR	1.50	1.31	1.43	0.82	1.25
After Implementation of the GOP 4 Density Transfer Project, Which Proposes to Transfer 120,221 SF from the Rail Spurs to GOP 4					
Building Floor Area	479,116	371,648	302,722	345,842	1,499,328
Building Floor Area that counts towards FAR	427,104	312,130	265,734	345,842	1,350,810
FAR	1.50	1.31	1.43	1.25	1.37

Notes:
Floor Area is calculated pursuant to Municipal Code § 20.040.008. Floor Area Ratio (FAR) is calculated pursuant to Municipal Code § 20.040.009.

1 The GOP 4 site was 276,422 SF when BMR first applied for the GOP 4 Precise Plan. Pursuant to a Lot Line Adjustment subsequently approved by the City, the GOP 4 site is now 276,639 SF.
2 The approved plan set for GOP 4 shows 226,000 SF of Floor Area. However, subsequent calculations that took into account the exact square footage of GOP 1 – 3 revealed that only 225,261 SF of Floor Area (a difference of 379 square feet) is available to be built on GOP 4 site under the 1.25 FAR currently applicable to the entire GOP Master Plan area.



SOURCE: Flad, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-4
APPROVED GOP MASSING DIAGRAM

SOURCE: Flad, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-5
APPROVED GOP RENDERING

The additional square footage would be parked at 2 spaces per 1,000 sf, which would be accommodated by adding 2.5 floors to the previously-approved parking structure; a total of approximately 240 new parking spaces would be provided.

As revised, the northern building on the GOP 4 site would total nine floors and reach at height of 178 feet above the average level of the highest and lowest points on the lot. The northern structure would include about 233,300 sf of space. The height and size of the southern building would remain the same. The parking structure would also now be eight levels in height and include 771 parking spaces. The massing and height of the modified structures are shown in **Figure 2-6**, *Modified GOP Massing Diagram*, and **Figure 2-7**, *Modified GOP Rendering*.

The approved architectural scheme of the buildings would be extended to the new floors, without any substantive changes in architecture. The modified GOP 4 project also includes a generator yard at ground level in the landscaped area on the northwest side of the GOP 4 parking structure. The additional space would employ an additional 321 workers.

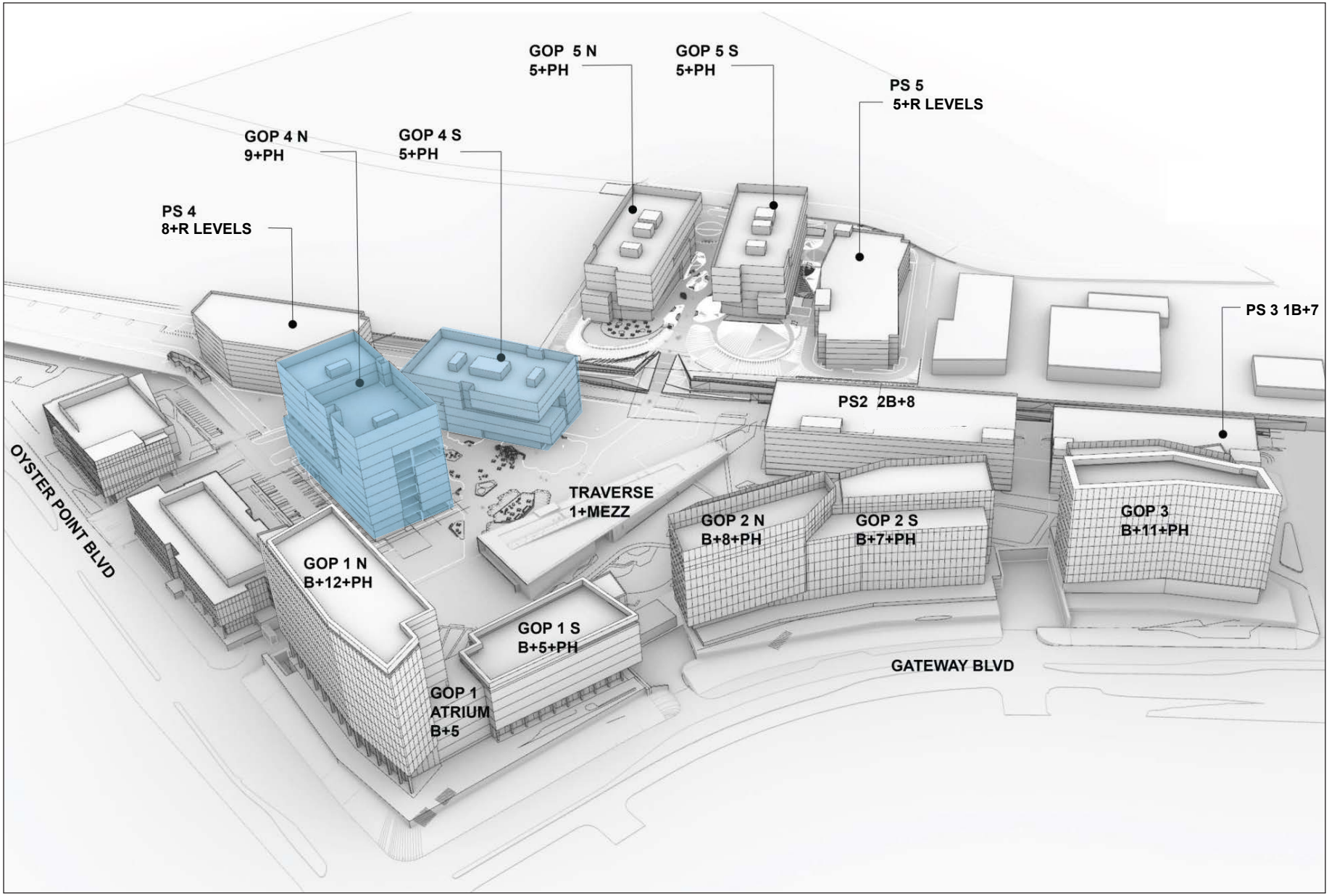
2.7 Open Space

The proposed project does not include any changes to open space. The placement of the two buildings on the GOP 4 site would remain the same, and would allow for an open space area between the two structures, which would serve as a gathering space and passive use area. Landscaping on the GOP 4 site would emphasize a natural and informal landscape using simple plant materials combined in consideration of form, color, and texture. Plants would be chosen considering the climate of South San Francisco in the East of 101 area and would be combined with landform to provide a wind-protected space. The approved Precise Plans have approximately 360,000 square feet of irrigated landscaping, including the live roof on the amenity building, which is less than the 383,500 square feet of irrigated landscaping studied in the EIR.

2.8 Circulation

Vehicular

The proposed project does not include any changes to primary or secondary vehicular access. As already approved, primary vehicular access to the GOP 4 site will be provided via a driveway at the intersection of Oyster Point and Veterans Boulevards located between buildings 180 and 200 and the current Fed-ex driveway. Secondary access will be provided from Gateway Boulevard via a private drive aisle named “Park Street,” to be constructed along the western edges of Phases 2 and 3.



SOURCE: Flad, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-6
MODIFIED GOP MASSING DIAGRAM

SOURCE: Flad, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 2-7
MODIFIED GOP RENDING

Service/delivery access also would not change, and would continue to be served by the secondary access lane or by supplemental access points. Service and delivery vehicles will be limited in usage of the primary entrances. Emergency vehicles would utilize all entries and supplemental access points as necessary.[1]

Pedestrian

The proposed project does not include any changes to onsite or offside pedestrian access. As already approved, pedestrian circulation within the GOP4 site would be provide by pathways between the two proposed structures and the parking structure. These pathways would connect to the central spine running north to south within the GOP Master Plan area, which would accommodate higher volumes of pedestrian movement and include a central gathering space and other useable outdoor spaces. Street frontages and the offsite multi-use trail along the former rail spurs would continue to provide access to offsite areas.

Transit

Transit services have not changed. As was the case when the GOP 4 Precise Plan was approved, the GOP 4 site is not served directly by regional rail, bus, or ferry services, but these transit modes provide service to the City of South San Francisco, at varying distances from the GOP 4 site. First- and last-mile connections to regional transit services, in the form of shuttles, provide periodic access to the GOP 4 site. A description of regional transit serving the City and shuttle service to the East of 101 Sub-area is provided in Section 3.1, *Transportation*. Shuttle stops in the vicinity of the GOP 4 site are located along Gateway and Oyster Point Boulevards.

2.9 Utilities

The proposed project does not include any changes to utility services, and circumstances regarding utility providers has not changed. This information is summarized below.

Water

The GOP Master Plan area is served by the California Water Service Company, which purchases most of its water from the San Francisco Public Utilities Commission. Existing water distribution mains in the vicinity of the GOP Master Plan area include a 12-inch main along Gateway Boulevard and 16-inch main along Oyster Point Boulevard.

[1] The project also proposes a non-substantive modification to Mitigation Measure IV.M-1 to make explicit the requirement that the Transportation Demand Management program be applied to the additional 120,221 square feet, as follows:

"The project sponsors shall implement a Transportation Demand Management (TDM) program consistent with the City of South San Francisco Zoning Ordinance Chapter 20.120 Transportation Demand Management, and acceptable to C/CAG. These programs, once implemented, must be ongoing for the occupied life of the development. The C/CAG guidelines specify the number of trips that may be credited for each TDM measure. The project's TDM program is included in Appendix H and will ~~generate trip credits to offset the 412 total AM peak hour and 357 PM peak hour net new trips generated by the project by the year 2015.~~ be applied to all square footage in the project, with a target of 40% non-drive alone mode during peak periods."

Wastewater

Sewage and wastewater generated within the City is collected through the City's sewer system and is disposed of and treated at the South San Francisco/San Bruno Water Quality Control Plant. Existing wastewater conveyance infrastructure in the vicinity of the GOP Master Plan area includes a 6- and 12-inch line along Oyster Point Boulevard and a 15-inch line along Gateway Boulevard. The line along Oyster Boulevard discharges into a pump station located on the southwestern corner of Oyster Point and Gateway boulevards, which then re-directs the flow to the line along Gateway Boulevard.

Storm Drainage

The GOP Master Plan area includes three sub-basins. The northern subbasin is served by an 18-inch to 24-inch storm drain line in Oyster Point Boulevard that flows west, the central subbasin is served by an 18-inch storm drain line in Gateway Boulevard that flows north, and the southern subbasin is served by a 30-inch storm drainpipe in Gateway Boulevard that flows south.

Electricity and Natural Gas

The GOP Master Plan area is served by the existing natural gas and electric service provided by Pacific Gas and Electric (PG&E). Underground electrical lines and natural gas mains are located Oyster Point Boulevard.

2.10 Sustainability

The proposed project would conform to the sustainability criteria already approved for the GOP 4 project. The additional square footage, like the approved square footage, would be designed to enhance resource efficiency and ensure good indoor environmental quality, as well as reduce energy consumption, water consumption, and waste generation. Building and landscape design and material selection would not change. They were selected to support Energy and Environmental Design (LEED) and high-performance energy and environmental standards. As set forth in the Development Agreement, the project applicant will use good faith efforts to achieve a LEED rating of silver or better. The design will follow the framework established by the GOP Master Plan project and the approach to sustainability and commitment to design quality would be consistent with the other GOP phases. The modified GOP project would also be designed to meet requirements contained in the California Building Energy Efficiency Standards (Title 24, Parts 6 and 11).

The proposed project will also incorporate water-saving measures, such as low flow fixtures, and leak detection technology and a water meter tied to the building management system for the cooling towers for each building In addition, the cooling towers for each building will incorporate the following items and practices:

- Cooling towers and chillers for each building;
- A chiller that is appropriately sized for each cooling tower;

- A conductivity controller for each cooling tower, which continuously measures the conductivity of the water in the cooling tower and will initiate blowdown only when the conductivity set point is exceeded;
- A high-end central computer controller that has alerts directly to operation staff;
- Submeters on the make-up and blowdown lines of each cooling tower;
- A building operations manager that runs and manages the cooling tower systems;
- Daily visual inspections of system;
- Deep cleanings semiannually;
- If chemicals are contracted out, should be on a fixed fee, rather than based on amount of chemicals sold; and
- Cycles of concentration for the San Francisco Bay Area great water quality with low TDS is ideally 10 or higher.

2.11 Transportation Demand Management Plan

The proposed project would be required to adhere to the Transportation Demand Management (TDM) Plan approved for the GOP Master Plan project. The TDM plan includes a set of strategies, measures, and incentives to encourage future employees within the GOP Master Plan area to walk, bicycle, use public transportation, carpool, or use other alternatives to driving alone when traveling to and from work. Some of the strategies, measures, and incentives listed in the TDM Plan include:

- Secure on-site bicycle storage such as racks, cages, or lockers;
- Well-lit paths to the most direct route to the nearest transit or shuttle stop from the building;
- Free parking spaces for carpools and vanpools;
- Passenger loading zones for carpools and vanpools near the building entrances;
- Pedestrian connections with lighted paths and sidewalks between buildings, parking areas, and Gateway and Oyster Point Boulevards;
- Preferential parking spaces for carpools and vanpools;
- Shower facilities with clothing lockers available to employees throughout the campus;
- Employee use of shuttle services including the Oyster Point BART shuttle to/from the South San Francisco BART Station, and the Gateway Area Caltrain and Oyster Point Caltrain Shuttles to/from the South San Francisco Caltrain Station;
- Permanent displays of commute alternative information in building lobbies, break rooms, and other common areas;
- Designated TDM employer contacts (TDM Coordinators);
- Carpool/vanpool ride-matching services provided by TDM Coordinator;

- Guaranteed ride home program for emergencies via taxi cabs or rental cars;
- Promotion programs provided by the TDM Coordinators distributed on a quarterly basis, and provided for new employees, to provide information on transportation options;
- Shuttle maps and schedules posted on campus and on tenant websites, and on-site assistance provided to visitors by TDM Coordinators;
- Tenants will join the Peninsula Traffic Congestion Relief Alliance;
- TDM Coordinators will administer a biannual employee commute survey to determine strategy adjustments;
- Transportation options will be outlined in tenant's employee handbook and new employee orientation packets;
- Commute alternatives brochure racks will be provided in public spaces within each building;
- Promotion of Spare the Air program by TDM Coordinators;
- Promotion of rideshare week by TDM Coordinators;
- Land dedication for transit/bus shelter;
- Bicycle connections to bicycle parking areas from bicycle routes;
- Tenant-subsidized transit tickets for commuters;
- On-site amenities for employees provided by e-concierge;
- On-site and nearby open space for recreation opportunities;
- On-site transit ticket sales;
- Employee access to nearby childcare center (YMCA);
- Opportunities for telecommuting;
- Employee access to Downtown Dasher lunchtime taxi service;
- At least one video conferencing room per building;
- Dedicated motorcycle parking spaces in garages;
- Tenants will allow employees to work varied work schedule (flextime);
- Development of a Transportation Action Plan between tenant and Transportation Management Association; and
- Employee access to connections to a future ferry service.

2.12 Construction Activities and Schedule

Construction of the proposed project is scheduled to commence with site preparation in fall 2022 and end in spring 2024, lasting approximately 18 months, if the required entitlements are

approved by the City. The proposed project would include the following construction stages: 1) site preparation and demolition, 2) foundation installation, 3) building structure construction, 4) exterior and roof buildout, 5) interior buildout, and 6) commissioning and final inspections.

The hours of construction would be stipulated by the Building Division, and the project contractor would be required to comply with Section 8.32.050 of the South San Francisco Municipal Code the South San Francisco Noise Ordinance, which includes regulations related to noise generated by construction. Project construction would typically occur Monday through Friday, between 7:00 AM and 5:00 PM, although some work is anticipated to occur on Saturdays between 9:00 AM and 8:00 PM or on Sundays between 10:00 AM and 6:00 PM. Construction is not anticipated to occur on major legal holidays.

Construction materials and equipment would be staged entirely on-site, in areas where construction is not occurring. Construction workers would park on the GOP 4 site or use existing parking within the GOP Master Plan area. No temporary road closures that would affect the public right-of-way would be required during project construction.

A stormwater pollution prevention plan (SWPPP) has been approved for the site as part of the GOP 4 Precise Plan approvals, and would be implemented during project construction. Project construction would use water from a metered hydrant up to 1,600 gallons a day, maximum). No dewatering would be required during project construction.

The proposed project includes no changes to the requirement that, 100 percent of all inert solids (building materials) and 65 percent of non-inert solids (all other materials) would be recycled as required by the City under Chapter 15.60 of the South San Francisco Municipal Code.

2.13 Project Approvals and Entitlements

City of South San Francisco

Approval of the GOP 4 Density Transfer project is anticipated to require, but may not be limited to, the following City actions:

- Amend General Plan to allow a density transfer. Specifically, add text to the notes in General Plan FAR tables 2.2-1 and 2.2-2 that apply to the Business Commercial land use. The notes would be amended to add the following underlined text:

  The Gateway Business Park Master Plan and the Oyster Point Specific Plan are permitted to develop up to a FAR of 1.25 with a TDM, and are allowed to develop additional density to the extent such density would otherwise be available on immediately adjacent property that is (a) subject to an FAR limitation of 1.25 or less; (b) part of the same research & development campus; and (c) deed-restricted to preclude development of the transferred FAR;

  BMR also seeks an amendment to the text on pages 2-21 to 2-22 of the General Plan currently published on line, as follows:

  The Gateway Business Park Master Plan area, comprising several parcels on 22.6 acres at the southeast corner of Gateway Boulevard and Oyster Point Boulevard, is permitted to develop

up to a FAR of 1.25 and is allowed to develop additional density in limited circumstances as provided in Tables 2.2-1 and 2.2-2.

- Repeal of Gateway Specific Plan as it may be considered outdated and because the relevant components of the Specific Plan have already been incorporated into the applicable zoning district regulations. Barring repeal, amend Gateway Specific Plan to allow a transfer of density from adjacent property into the Specific Plan area;

- Amend Gateway Specific Plan Zoning District regulations to allow transfer of density from an adjacent zoning district;

- Amend GOP Master Plan to allow a transfer of density from an adjoining property;

- Modify GOP 4 Precise Plan to incorporate an additional 120,221 square feet, with four additional floors on the GOP 4 North building, and 2.5 additional floors on the parking structure. Undergo associated design review.

- Certify EIR to verify that the EIR was completed in compliance with the requirements of CEQA, that the decision-making body has reviewed and considered the information in the EIR, and that the EIR reflects the independent judgement of the City of South San Francisco;

- Amend Development Agreement for the GOP Master Plan to encompass the above approvals;

- Adopt a MMRP, which specifies the methods for monitoring mitigation measures required to eliminate or reduce the project's significant effects on the environment; and

- Adoption of Findings of Fact and a Statement of Overriding Considerations.

Other Local, Regional, State, or Federal Agencies

The proposed project would be anticipated to include, but may not be limited to, the following actions by entities other than the City:

- Notice of Proposed Construction and Alteration and Federal Aviation Administration Determination per Code of Federal Regulations Title 14, Part 77.9

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CHAPTER 3
Environmental Setting, Impacts, and Mitigation Measures

3.0 Introduction to the Analysis

This Supplemental Environmental Impact Report (SEIR) evaluates the potential physical environmental effects resulting from implementation of the proposed GOP 4 Transfer Density project. Some environmental issue areas that are typically considered under CEQA would not be affected by the proposed project and, pursuant to CEQA, are not further analyzed in this SEIR. A discussion of those issues is found in Section 3.2, *Other Resource Topics*.

3.0.1 Definitions of Terms Used in the SEIR

This SEIR uses a number of terms that have specific meaning under CEQA. Among the most important of the terms used in the SEIR are those that refer to the significance of environmental impacts. The following terms are used to describe environmental effects of the proposed GOP 4 Transfer Density project:

- **Significance Criteria:** A set of criteria used by the lead agency to determine at what level or threshold an impact would be considered significant. Standards of Significance used in this EIR include those standards provided by the City of South San Francisco. In determining the level of significance, the analysis assumes that the project would comply with relevant federal, State, and local regulations and ordinances.

- **Significant Impact:** A project impact is considered significant if the project would result in a substantial adverse change in the physical conditions of the environment. Significant impacts are identified by the evaluation of project-related physical change compared to specified significance criteria. A significant impact is defined as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."[1]

- **Potentially Significant Impact:** A potentially significant impact is identified where the project may cause a substantial adverse change in the environment, depending on certain unknown conditions related to the project or the affected environment. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact.

[1] State CEQA Guidelines, section 15382.

- **Less-than-Significant Impact:** A project impact is considered less than significant when the physical change caused by the project would not exceed the applicable significance criterion.

- **Significant and Unavoidable Impact:** A project impact is considered significant and unavoidable if it would result in a substantial adverse physical change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.

- **Cumulative Impact:** Under CEQA, a cumulative impact refers to "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."[2] Like any other significant impact, a significant cumulative impact is one in which the cumulative adverse physical change would exceed the applicable significance criterion and the project's contribution is "cumulatively considerable."[3]

- **Mitigation Measure:** A mitigation measure is an action that could be taken that would avoid or reduce the magnitude of a significant impact. Section 15370 of the State CEQA Guidelines defines mitigation as:

    a. Avoiding the impact altogether by not taking a certain action or parts of an action;

    b. Minimizing impacts by limiting the degree of magnitude of the action and its implementation;

    c. Rectifying the impact by repairing, rehabilitating, or restoring the affected environment;

    d. Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action; and

    e. Compensating for the impact by replacing or providing substitute resources or environments.

3.0.2 Section Format

Chapter 3 includes one technical section (i.e., Section 3.1, *Transportation*) that presents the physical environmental setting, regulatory setting, significance criteria, methodology and assumptions, and impacts on the environment with respect to traffic. Where required, potentially feasible mitigation measures are identified to lessen or avoid significant impacts. Section 3.1, *Transportation*, includes an analysis of both project-specific and cumulative impacts.

Section 3.1, *Transportation*, begins with a description of the proposed GOP 4 Density Transfer project's **environmental setting** and the **regulatory setting** as it pertains to transportation. The environmental setting provides a point of reference for assessing the environmental impacts of the proposed project and project alternatives. The environmental setting discussion addresses the conditions that exist prior to implementation of the proposed project. This setting establishes the baseline by which the proposed project and project alternatives are measured for environmental impacts. The regulatory setting presents relevant information about federal, state, regional, and/or local laws, regulations, plans or policies that pertain to the environmental resources addressed in each section.

2 State CEQA Guidelines, section 15355.
3 State CEQA Guidelines, section 15130(a).

Next, Section 3.1, *Transportation*, presents **significance criteria**, which identify the standards used by the City of South San Francisco to determine the significance of effects of the proposed GOP 4 Density Transfer project. The significance criteria used for this analysis were derived from the City of South San Francisco's established significance standards, which, in turn, reflect policies of the 1999 General Plan, as well as other criteria applicable under CEQA, including thresholds established by trustee and responsible agencies.

The **methods and assumptions** description in Section 3.1, *Transportation*, presents the analytical methods and key assumptions used in the evaluation of effects of the proposed GOP 4 Density Transfer project, and is followed by an **impacts** and **mitigation** discussion. The impact and mitigation portion of Section 3.1, *Transportation*, includes impact statements, prefaced by a number in bold-faced type. An explanation of each impact is followed by an analysis of its significance. The subsection concludes with a statement that the impact, following implementation of the mitigation measure(s) and/or the continuation of existing policies and regulations, would be reduced to a less-than-significant level or would remain significant and unavoidable.

The analysis of environmental impacts considers both the construction and operational phases associated with implementation of the proposed GOP 4 Density Transfer project. As required by Section 15126.2(a) of the State CEQA Guidelines, direct, indirect, short-term, long-term, onsite, and/or off-site impacts are addressed, as appropriate, for the environmental issue area being analyzed. Under CEQA, economic or social changes by themselves are not considered to be significant impacts, but may be considered in linking the implementation of a project to a physical environmental change, or in determining whether an impact is significant.

Where enforcement exists and compliance can be reasonably anticipated, this EIR assumes that the proposed GOP 4 Density Transfer project would meet the requirements of applicable laws and other regulations.

Mitigation measures pertinent to each individual impact, if available, appear after the impact discussion section. The magnitude of reduction of an impact and the potential effect of that reduction in magnitude on the significance of the impact is also disclosed. An example of the format is shown below.

Impacts and Mitigation Measures

Impact 3.X-1: Impact Statement.

A discussion of the potential impact of the project on the resource is provided in paragraph form. To identify impacts that may be site- or project element-specific, where appropriate, the discussion differentiates between construction effects and operational effects. A statement of the level of significance before application of any mitigation measures is provided in **bold**.

Mitigation Measure 3.X-1:

Recommended mitigation measure numbered in consecutive order. *OR*

Mitigation: None required.

Where appropriate, one or more potentially feasible mitigation measures are described. If necessary, a statement of the degree to which the available mitigation measure(s) would reduce the significance of the impact is included in **bold**.

Cumulative Impacts

An analysis of cumulative impacts follows the project-specific impacts and mitigation measures evaluation in Section 3.1, *Transportation*. A cumulative impact consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other past, present and reasonably foreseeable projects causing related impacts.[4]

The beginning of the cumulative impact analysis in each technical section includes a description of the cumulative analysis methodology and the geographic or temporal context in which the cumulative impact is analyzed (e.g., the City of South San Francisco, the San Francisco Bay Area Air Basin, other activity concurrent with project construction). In some instances, a project-specific impact may be considered less than significant, but when considered in conjunction with other cumulative projects or activities may be considered significant or potentially significant.

As noted above, where a cumulative impact is significant when compared to existing or baseline conditions, the analysis must address whether the project's contribution to the significant cumulative impact is "considerable." If the contribution of the project is considerable, then the EIR must identify potentially feasible measures that could avoid or reduce the magnitude of the project's contribution to a less-than-considerable level. If the project's contribution is not considerable, it is considered less than significant and no mitigation of the project contribution is required.[5] The cumulative impacts analysis is formatted the same as the project-specific impacts, as shown above.

The *State CEQA Guidelines* suggest that the analysis of cumulative impacts can employ one of two methods to establish the effects of other past, current, and probable future projects. A lead agency may select a list of projects, including those outside the control of the agency, or alternatively, a summary of projections. These projections may be from an adopted general plan or related planning document, or from a prior environmental document that has been adopted or certified, and these documents may describe or evaluate regional or area-wide conditions contributing to the cumulative impact.

In this Draft SEIR, the evaluation of impacts to the local and regional transportation system uses the projected growth in traffic through 2040 based on San Mateo City/County Association of Governments projections.

4 State CEQA Guidelines section 15355.
5 State CEQA Guidelines section 15130(a)(3).

3.1 Transportation and Circulation

This section analyzes the potential transportation impacts associated with the proposed GOP 4 Density Transfer project to the roadway, bicycle, pedestrian, and transit systems in the study area. This section presents the project-specific and cumulatively considerable impacts of the proposed project and recommends mitigation measures to lessen their significance. All supporting technical calculations and additional technical information can be found in Appendix C of the Draft SEIR.

In response to the Notice of Preparation (NOP), the City received a comment letter from the California Department of Transportation (Caltrans) requesting that a detailed analysis of vehicle miles traveled (VMT) be included in the Draft SEIR. Specifically, Caltrans requested that if project VMT exceeded the threshold of significance for city-wide or regional VMT that mitigation should be identified. Caltrans also requested that the SEIR include a robust Transportation Demand Management (TDM) program to reduce VMT and greenhouse gas emissions from future development in this area. The requested VMT analysis, along with proposed mitigation and a discussion of the project's TDM program, is provided below.

3.1.1 Environmental Setting

Roadway Network

The City's General Plan includes a street classification system, which identifies the types of roadways that exist within the City. These classifications include freeways, arterials (both major and minor), collectors, and local streets.

The project area is served by two north-south freeways, U.S. 101 and Interstate 280 (I-280), which provide regional connectivity between the City and areas to the north, including the City of San Francisco, areas further to north and east via the San Francisco Bay and Golden Gate bridges, and areas to the south, including the City of San José and other cities in the south Bay Area. In addition, the project area is served by an east-west freeway, Interstate 380 (I-380), which provides local connectivity between the southeastern portion of City of South San Francisco and the City of San Bruno. Finally, the project area is served by State Route 82 (SR-82), an arterial road that runs the length of the San Francisco peninsula from San Francisco to the north and San José to the south.

U.S. 101

U.S. 101 runs north-south in the project area, and runs through the City of South San Francisco, extending from Los Angeles, through the City of South San Francisco, north to the State of Washington.

I-280

I-280 runs north-south in the project area and provides regional connectivity, extending from the City of San Francisco, through the City of South San Francisco, to the City of San José.

I-380

I-380 runs east-west in the project area and provides local connectivity, extending from the South Airport Sub-area in the City of South San Francisco, through the City of San Bruno, to I-280.

SR-82

SR 82 (also known as El Camino Real) runs north-south in the project area and provides regional connectivity, extending from the City of San Francisco, through the City of South San Francisco, to the City of San José.

Oyster Point Boulevard/Sister Cities Boulevard

Oyster Point Boulevard runs east-west to the north of the GOP 4 site. It is the eastward extension of Sister Cities Boulevard, which is designated as a major arterial in the City's General Plan. The Oyster Point Boulevard/U.S. 101 interchange is the nearest freeway access to the GOP 4 site.

Gateway Boulevard

Gateway Boulevard runs southwest/northeast in the project area, extending south from Oyster Point Boulevard to the San Francisco International Airport (SFO).

East Grand Avenue

East Grand Avenue runs east-west to the south of the GOP 4 site. East Grand Avenue is designated in the City's general plan as a major arterial, and extends from Point San Bruno Park near the San Francisco Bay shoreline, west to U.S. 101, where it becomes Grand Avenue and extends west to Mission Road.

Eccles Avenue

Eccles Avenue is a local street that runs northeast-southwest to the southeast of the GOP 4 site. Eccles Avenue extents from Oyster Point Boulevard to Forbes Boulevard, just south of the GOP 4 site.

Bicycle and Pedestrian Facilities

Roadways within the project area include sidewalks. The GOP Master Plan area includes pedestrian walkways that intersperse the overall site and connect to sidewalks along roadways in the project vicinity.

Bicycle facilities in the project area include a Class II bicycle lane along the north and south sides of Oyster Point Boulevard, which span east from the intersection of Gateway Boulevard and Oyster Point Boulevard to the Oyster Point Marina area. A Class III bicycle route is located along Gateway Boulevard that extends south from Oyster Point Boulevard to East Grand Avenue, which provides access to the South San Francisco Caltrain Station, located approximately 0.3 miles to the west of the intersection of Gateway Boulevard and Grand Avenue. A pedestrian plaza is provided on the east end of Grand Avenue underpass on the west side of the E. Grand Avenue/Poletti Way intersection. Access to the existing Caltrain station is provided via Grand Avenue to Dubuque Avenue. A metal staircase is provided at the northeast corner of Grand/ Dubuque for pedestrians to access the Caltrain station. The San Francisco Bay Trail is a Class I

bicycle path located along the shoreline of the San Francisco Bay, to the north, east, and south of the GOP 4 site. There is a Class I multi-use path, that connects the San Francisco Bay Trail to Oyster Point Boulevard, at the intersection of Oyster Point and Veterans boulevards directly north of the GOP 4 site.

The approved GOP Master Plan and GOP 5 projects have and will construct pedestrian connections within the GOP Master Plan area, and a multi-modal trail connecting Oyster Point Boulevard to Forbes Avenue.

Transit

The GOP 4 site is not served directly by regional rail, bus, or ferry services, but these transit modes provide service to the City of South San Francisco, at varying distances from the GOP 4 site. First- and last-mile connections to regional transit services provide periodic access to the project site.

Bay Area Rapid Transit (BART)

BART provides regional commuter rail service between San Francisco and the East Bay (Pittsburg/Bay Point, Richmond, Dublin/Pleasanton and Fremont), as well as between San Francisco and San Mateo County (SFO Airport and Millbrae). Weekday hours of operation are currently between 5:00 AM and midnight. During the weekday PM peak period, headways are 5 to 15 minutes along each line. Within the City of South San Francisco, BART operates underground. The closest BART station to the GOP 4 site is the San Bruno Station, located approximately two miles southwest of the GOP 4 site, at South Huntington Avenue and Sneath Lane.[1] Transit connection to the project area is provided via SamTrans bus Route 130, which stops nearest the GOP 4 site at the intersection of Airport Boulevard and Linden Avenue, and a free Commute.org shuttle route (OPB), which operates Monday through Friday, during peak commute times. BART trains operate on 15-minute headways during peak hours, and 20-minute headways during off-peak hours.

Caltrain

Caltrain provides passenger rail service on the Peninsula between San Francisco and Downtown San José with several stops in San Mateo County and Santa Clara County. Limited service is available south of San José. Caltrain service headways during the AM and PM peak periods are 10 to 60 minutes, depending on the type of train. The peak direction of service is southbound during the AM peak period and northbound during the PM peak period. The nearest Caltrain station to the GOP 4 site is located at 590 Dubuque Avenue, an approximately 1-mile walk southwest from the GOP 4 site. This station is currently a limited stop, providing service only once per hour in either direction. Preliminary planning calls for service at the station to increase by up to eight stops per hour by 2040.[2] Peak period shuttle service is provided from the South San Francisco Caltrain station to locations along Oyster Point Boulevard, via the Oyster Point Caltrain Shuttle (OPC) provided by Commute.org.

1 Bay Area Rapid Transit, 2021. Bay Area Rapid Transit webpage; System map. Available: https://www.bart.gov/system-map. Accessed November 11, 2021.

2 Caltrain Business Plan, May 2019.

Caltrain is in the process of implementing a Modernization Program that will electrify the railway. The electrification project is scheduled to be complete by 2022 and will upgrade rail performance, improve operational efficiency, and result in higher capacity. For example, whereas today Caltrain operates 10 trains per hour during peak periods, electrification will support an increase to 12 trains per hour. Additionally, Caltrain is anticipating a "blended system," with California High Speed Rail trains running alongside Caltrain on the same tracks by 2040. Electrification of Caltrain (and the associated improved travel times and frequencies), as well as the introduction of High Speed Rail, may improve the GOP 4 site's regional transit access.

San Mateo Transit District (SamTrans)

SamTrans operates bus and rail service in San Mateo County, through Caltrain. A couple of SamTrans routes also serve the project area, but do not provide direct service to the East of 101 area. Those include Routes 292 and 397, which both stop near the intersection of Airport Boulevard and Grand Avenue. AM peak hour headways are between 10 and 15 minutes, and PM peak hour headways are 20 minutes.[3,4] SamTrans riders may need to walk to the nearby South San Francisco Caltrain station to access first- and last-mile connection shuttles provided by Commute.org, for connecting transit closer to the GOP 4 site.

SamTrans is currently undergoing "Reimagine SamTrans," a comprehensive operational analysis (COA) to redesign the entire SamTrans system. As part of the COA, SamTrans is proposing to extend Route 130 into the East of 101 area by continuing service east along Grand Avenue from its present terminus at Linden Ave, north along Gateway Boulevard, and east on Oyster Point Boulevard to the Oyster Point ferry terminal.

Commute.org

Commute.org is a joint powers agency (JPA) located in San Mateo County, and is comprised of 17 cities and towns, as well as the County of San Mateo.[5] The agency provides transportation demand management (TDM) programming and services to employers, residents, and commuters. In the project area, Commute.org provides free first- and last-mile shuttle service connections from regional transit stops to local business centers, Monday through Friday, during morning and afternoon commute hours. The following Commute.org shuttle routes provide connectivity between stops near the GOP 4 site and regional transit stops.

Oyster Point Caltrain Shuttle (OPC):

The Oyster Point Caltrain shuttle (OPC) operates from the South San Francisco Caltrain Station and provides free service for all passengers, to offices and businesses along Oyster Point Boulevard.[6]

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3 San Mateo Transit District (SamTrans), 2021. SamTrans website; Route 292 page. Available: https://www.samtrans.com/schedulesandmaps/timetables/292.html. Accessed November 12, 2021.

4 San Mateo Transit District (SamTrans), 2021. SamTrans website; Route 397 page. Available: https://www.samtrans.com/schedulesandmaps/timetables/397.html. Accessed November 12, 2021.

5 Commute.org, 2021. Commute.org webpage; About. Available: https://commute.org/about/. Accessed November 12, 2021.

6 Commute.org, 2021. OPC – Oyster Point Caltrain (SSF Caltrain) webpage. Available: https://commute.org/route/oyster-point-caltrain/. Accessed November 12, 2021.

Oyster Point BART Shuttle (OPB)

The Oyster Point BART shuttle (OPB) operates from the South San Francisco BART Station and provides service to offices and businesses along Oyster Point Boulevard.[7]

Oyster Point Ferry Shuttle (OPF)

The Oyster Point Ferry shuttle (OPF) connects riders from the South San Francisco Ferry Terminal to businesses on Oyster Point Boulevard and Genesis Towers, as well as service to the South San Francisco Caltrain Station.[8]

San Francisco Bay Ferry

The San Francisco Bay Ferry provides ferry commute service for East Bay residents who work in South San Francisco, particularly in the Oyster Point area. The South San Francisco Ferry Terminal is located approximately 0.8 miles east of the GOP 4 site, at Oyster Point Marina. Ferry route connections to the South San Francisco Ferry Terminal are provided from Alameda and Oakland, primarily serving travel to South San Francisco during morning peak commute times and travel to East Bay during the afternoon peak commute times.[9] First- and last-mile transit connection from the San Francisco Ferry Terminal to the project site is provided via the Oyster Point Ferry Shuttle (OPF) provided by Commute.org during peak morning and afternoon commute times.

3.1.2 Regulatory Setting

Federal

There are no federal regulations applicable to the proposed project.

State

California Department of Transportation

The California Department of Transportation (Caltrans) owns and operates the State highway system, which includes the freeways and State routes within California. In South San Francisco, Caltrans maintains the freeways (U.S. 101 and I-280), and SR-82. Caltrans has mandated that an impact on the freeway facility would occur if off-ramp queuing were to spill back into the mainline or metered on-ramp queuing were to spill back into the arterial roadway. The passage of Senate Bill 743 in Fall 2013 led to a change in the way that transportation impacts are measured under CEQA. As of July 1, 2020, automobile delay and level of service may no longer be used as the performance measure to determine the transportation impacts of land development projects under CEQA. Instead, an alternative metric that supports the goals of Senate Bill 743 is required. This requirement does not modify the discretion lead agencies have to develop their own methodologies or guidelines, or to analyze impacts on other components of the transportation system, such as walking, bicycling, transit, and safety.

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7 Commute.org, 2021. OPB – Oyster Point BART (SSF BART) webpage. Available: https://commute.org/route/oyster-point-bart/. Accessed November 12, 2021.

8 Commute.org, 2021. OPF – Oyster Point Ferry (SSF Ferry Terminal/Caltrain) webpage. Available: https://commute.org/route/oyster-point-sf-bay-ferry/. Accessed November 12, 2021.

9 San Francisco Bay Ferry, 2021. San Francisco Bay Ferry website; South San Francisco Ferry Route page. Available: https://sanfranciscobayferry.com/south-san-francisco-ferry-route. Accessed November 12, 2021.

Senate Bill 743

Senate Bill 743 (SB 743), passed in 2013, required the OPR to develop new CEQA guidelines that address traffic metrics under CEQA. As stated in the legislation, upon adoption of the new guidelines, "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division, except in locations specifically identified in the guidelines, if any." OPR recently updated its CEQA Guidelines to implement SB 743 to require that VMT be the primary metric used to identify transportation impacts. The VMT standard for evaluating transportation impacts under CEQA became mandatory statewide on July 1, 2020.

VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period. VMT is a measure of the efficiency of land use patterns. VMT is calculated based on individual vehicle trips generated and their associated trip lengths. VMT accounts for two-way (round trip) travel and is estimated for a typical weekday to measure transportation impacts. The City of South San Francisco's VMT guidelines are consistent with OPR's recommendation of using VMT as a metric.

SB 743 also established CEQA exemptions for certain qualifying projects, which do not apply to the proposed project. (PRC Section 21155.4)

Regional

San Mateo City/County Association of Governments

The San Mateo City/County Association of Governments (C/CAG) provides regional coordination and guidance on issues relevant to transportation, air quality, stormwater runoff, hazardous waste, solid waste and recycling, land use near airports, and abandoned vehicle abatement. Member agencies of C/CAG include Atherton, Belmont, Brisbane, Burlingame, Colma, Daly City, East Palo Alto, Foster City, Half Moon Bay, Hillsborough, Menlo Park, Millbrae, Pacifica, Portola Valley, Redwood City, San Bruno, San Carlos, San Mateo, San Mateo County, South San Francisco, and Woodside. C/CAG maintains programs and reports that provide relevant policy guidance to the proposed project including the San Mateo County Comprehensive Bicycle and Pedestrian Plan.

C/CAG is also the congestion management agency for San Mateo County. In this role, C/CAG develops and maintains a countywide travel demand model. Travel models are tools that can be used to project future transportation conditions, forecast the need for and potential effectiveness of transportation projects and infrastructure improvements, and identify the impacts of land use development. C/CAG licenses the countywide travel demand model for San Mateo County from the Santa Clara Valley Transportation Authority (VTA), which maintains a travel demand model that is optimized for the counties of Santa Clara and San Mateo and accounts for transportation impacts from neighboring counties and regional commute sheds.

San Mateo County Comprehensive Bicycle and Pedestrian Plan

The San Mateo County Comprehensive Bicycle and Pedestrian Plan (SM CCBP) was adopted by C/CAG and the San Mateo County Transportation Authority (SMCTA) in September 2011. This

plan addresses the planning, design, funding and implementation of bicycle and pedestrian projects of countywide significance. An update to the SM CCBP is presently under consideration.

Peninsula Traffic Congestion Relief Alliance

The Peninsula Traffic Congestion Relief Alliance (Alliance) is a joint powers authority (JPA) which implements transportation demand management programs across San Mateo County. The Alliance manages twenty-six shuttle routes in San Mateo County. In the City of South San Francisco, the Alliance provides service to seven shuttle routes, which provide connectivity between large employment areas and the South San Francisco Caltrain and BART stations, and the South San Francisco Bay Ferry terminal, during peak commute periods.

Local

City of South San Francisco

General Plan

The City of South San Francisco General Plan provides goals, objectives, and policies that define the City's desired transportation and circulation function as it applies to current and future conditions. The following goals and policies are relevant to the proposed project.

Transportation Element

Street System

Guiding Policy 4.2-G-12: Provide fair and equitable means for paying for future street improvements including mechanisms such as development impact fees. (Amended by Resolution 98-2001, adopted September 26, 2001)

Implementing Policy 4.2-I-5: Establish accessibility requirements for all streets designated as arterial or collector on Figure 4-1. As part of development review of all projects along these streets, ensure that access to individual sites does not impede through traffic flow.

Implementing Policy 4.2-I-7: Continue to require that new development pays a fair share of the costs of street and other traffic and transportation improvements, based on traffic generated and impacts on service levels. Explore the feasibility of establishing impact fee, especially for improvements required in the Lindenville area. (Amended by Resolution 98-2001, adopted September 26, 2001)

Implementing Policy 4.2-I-7a: Establish a traffic improvement fee to fund transportation improvements in the East of 101 area. The fee should be updated to also fund enhancements to pedestrian and bicycle infrastructure, consistent with the objectives of the Bicycle Master Plan and Pedestrian Master Plan. (Amended by Resolution 98-2001, adopted September 26, 2001; and Resolution 27-2014, adopted February 12, 2014)

Implementing Policy 4.2-I-12: Develop policies and tools to improve South San Francisco's Complete Streets practices.

- Develop a pedestrian crossings policy, addressing matters such as where to place crosswalks and when to use enhanced crossing treatments.
- Develop policies to improve the safety of crossings and travel in the vicinity of schools and parks.

- Develop a checklist for South San Francisco's development and redevelopment projects, to ensure the inclusion of infrastructure providing for safe travel for all users and enhance project outcomes and community impact.

- As feasible, South San Francisco shall incorporate Complete Streets infrastructure into existing public and private streets to improve the safety and convenience of Users, construct and enhance the transportation network for each category of Users, and create employment. (Amended by Resolution 136-2014, adopted December 10, 2014)

Alternative Transportation Systems

Guiding Policy 4.3-G-5: In partnership with employers, continue efforts to expand shuttle operations.

Guiding Policy 4.3-G-6: In partnership with the local business community, develop a transportation systems management plan with identified trip-reduction goals, while continuing to maintain a positive and supportive business environment.

Implementing Policy 4.3-I-4: Require provision of secure covered bicycle parking at all existing and future multifamily residential, commercial, industrial, and office/ institutional uses. Secure parking means areas where bicycles can be secured to a non-movable rack to prevent theft.

Pedestrian Circulation

Implementing Policy 4.3-I-6: Expand pedestrian facilities in new development, using the Pedestrian Master Plan (PMP) for pedestrian design guidelines and to identify other improvements that should be considered for projects proposed in areas that are identified in PMP concept plans. (Amended by Resolution 26-2014, adopted February 26, 2014)

Implementing Policy 4.3-I-11: As part of any development in Lindenville or East of 101, require project proponents to provide sidewalks and street trees as part of frontage improvements for new development and redevelopment projects.

Transportation Demand Management

Implementing Policy 4.3-I-15: Adopt a TDM program or ordinance which includes, but is not limited to, the following components:

- Methodology to determine eligibility for land use intensity bonuses for TDM programs identified in the Land Use Element.

- Procedures to ensure continued maintenance of measures that result in intensity bonuses.

- Requirements for off-site improvements (such as bus shelters and pedestrian connections) that are directly necessary as a result of development.

- Establishment of baseline TDM requirements for all new projects generating more than 100 peak period trips.

- Establishment of additional requirements for all new projects seeking a FAR bonus.

- An ongoing monitoring and enforcement program to ensure TDM measures are actually implemented.

- Reduce parking requirements for new projects implementing a TDM Program in proximity to fixed guide way transit or those with demonstrated measures that would reduce trip generation.

(Amended by Resolution 98-2001, adopted September 26, 2001)

Bicycle Master Plan

The South San Francisco Bicycle Master Plan (Bicycle Plan), adopted February 9, 2011, is intended to guide the development of a comprehensive and integrated system of bikeways that accommodates safer, more direct bicycle travel through residential neighborhoods, employment and shopping areas, and to transit stops. As of the adoption of the Bicycle Mater Plan, the City maintained approximately 48.3 miles of existing bikeways.

In the project area, the Bicycle Plan identified an existing Class II bicycle lane on Oyster Point Boulevard, that extends east from Gateway Boulevard, and a Class III bicycle route along Gateway Boulevard. The San Francisco Bay Trail is a Class 1 bicycle path located along the shoreline of the San Francisco Bay, to the north, east, and south of the GOP 4 site. In the project vicinity the Bicycle Plan identifies a proposed Class I multi-use path, that would connect the San Francisco Bay Trail to Oyster Point Boulevard, at the Oyster Point Boulevard/Veterans Boulevard intersection directly north of the project site. This travel route has been subsequently constructed.

The Bicycle Master Plan provides goals, objectives, and policies intended to make bicycle travel accessible to the widest range of users. The following goals and policies have relevance to the proposed project:

Goal 1: Promote and Encourage Bicycle Transportation

Policy 1.1: Integrate bicycle facility and planning into all of the City's planning review and construction activities, legitimizing bicycling as a transportation mode.

Implementing Measure 1.1-1: All Development projects shall be required to conform to the Bicycle Transportation Plan goals, policies and implementation measures.

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

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

Implementing Measure 1.2-2: All developments with approved Transportation Demand Management Plans shall be required to prepare periodic reports as prescribed in the South San Francisco Municipal Code Title 20 Zoning Regulations.

Goal 3: Improve Bicycle Access

Policy 3.2: Bicycle parking facilities should be provided at schools, parks and transit stops, and shall be required to be provided at private developments including places of work, commercial shopping establishments, parks, community facilities and other bicyclist destinations.

Traffic Calming Program

The City of South San Francisco has established an ongoing Traffic Calming program, accompanied by a local Traffic Calming Plan. This program was developed to provide policies and procedures that will act as guidelines to address traffic complaints related to excessive speeding, cut-through traffic, and high vehicular volumes while maintaining pedestrian and vehicular safety. The Traffic Calming Plan provides a toolkit for implementing solutions; however, the City has no dedicated funding source for implementation at the present time.

City of South San Francisco Pedestrian Master Plan

The City of South San Francisco Pedestrian Master Plan (Pedestrian Plan) provides policies and plans for the design, maintenance, and improvement of pedestrian facilities in the City of South San Francisco, with a focus on access and connectivity. Figure 3-2 of the Pedestrian Plan identified missing sidewalks in a citywide inventory, including segments of sidewalk near the GOP 4 site. Eccles Avenue near the GOP 4 site, was identified as a roadway that needed additional pedestrian facilities. Recommended improvements included the addition of pedestrian facilities between the Bay Trail and the Oyster Point Boulevard/Veterans Boulevard intersection. As described in the environmental setting, these facilities have already been constructed. The Pedestrian Plan calls for a sidewalk along the south side of Oyster Point Boulevard, between Dubuque Avenue and Gateway Boulevard. However, these facilities have not been constructed.

The Pedestrian Plan also provides goals and policies, the following of which are relevant to the proposed project:

Goal 1: Promote and Encourage Walking

Policy 1.1: Integrate pedestrian facilities and planning into all of the City's planning review and construction activities, legitimizing walking as a transportation mode.

Implementation Measure 1.1-1: All development projects shall be required to conform to the Pedestrian Master Plan goals, policies, and implementation measures.

Implementation Measure 1.1-2: All public and private street projects shall incorporate pedestrian improvements and amenities.

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

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

Implementing Measure 1.2-2: All developments with approved Transportation Demand Management Plans shall be required to prepare periodic reports as prescribed in the South San Francisco Municipal Code Title 20 Zoning Regulations.

Policy 3.2: Pedestrian facilities and amenities should be provided at schools, parks and transit stops, and shall be required to be provided at private developments including places of work, commercial shopping establishments, parks, community facilities and other pedestrian destinations.

Implementing Measure 3.2-1: Amend the City's Transportation Demand Management Ordinance to clarify and quantify the requirements for pedestrian amenities and facilities within individual development projects and access to other destinations (i.e., connections to transit, safe crossing treatments for pedestrians, and continuous sidewalks).

South San Francisco Transportation Demand Management Ordinance

The City of South San Francisco Transportation Demand Ordinance (1432-2010, Section 2) establishes a performance target of 28 percent minimum alternative mode share for all nonresidential projects resulting in more than 100 average daily trips and identifies a higher threshold for projects requesting a floor area ratio bonus.

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

3.1.1 Analysis, Impacts and Mitigation

Significance Criteria

For purposes of this Draft SEIR and consistent with the criteria presented in Appendix G of the State CEQA Guidelines, impacts related to transportation and traffic are considered significant if the proposed project would result in the following:

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

VMT Threshold of Significance

Section 15064.3, subdivision b) of the State CEQA Guidelines outlines criteria for analyzing transportation impacts. Subpart 4) of subdivision b) identifies that a lead agency has discretion to choose the most appropriate methodology to evaluate a project's VMT, including whether to express the change in absolute terms, per capita, per household or in any other measure. According to the City of South San Francisco's VMT guidelines, a significant impact would occur for employment generating projects if the baseline project-generated home-based work (HBW) VMT per employee is higher than 85 percent of the existing nine-county Bay Area-Wide average for employee VMT. According to the C/CAG – VTA Travel Demand Model, the existing Bay Area-wide regional average daily VMT per employee is 14.2. With the 15 percent reduction factor, the average daily HBW VMT per employee threshold is 12.1 (see **Table 3.1-1**, *Home-*

Based Work Vehicle Miles Traveled per Employee Thresholds).[10] The 2040 cumulative Bay Area-wide regional average daily VMT per employee is 14.6, so the threshold is an average daily HBW VMT per employee of 12.4 for cumulative conditions.[11]

TABLE 3.1-1
HOME-BASED WORK VEHICLE MILES TRAVELED PER EMPLOYEE THRESHOLDS

Location	Estimated HBW VMT	Estimated Employees	Estimated HBW VMT per Employee
Bay Area Region (Existing)	63,336,200	4,461,670	14.2
		VMT Reduction Factor	-15%
		HBW VMT Per Employee Threshold	12.1
Bay Area Region (2040 Cumulative)	78,980,240	5,406,190	14.6
		VMT Reduction Factor	-15%
		HBW VMT Per Employee Threshold	12.4
Source: Fehr & Peers, 2020; C/CAG-VTA Bi County Transportation Demand Model, 2019; as used in Hexagon, 2021.			

Methodology and Assumptions

VMT Analysis

Project-generated HBW VMT per employee is estimated based on the HBW VMT for the project's transportation analysis zone (TAZ) in the C/CAG – VTA travel demand model. A TAZ is the smallest resolution available in the C/CAG – VTA model. Each TAZ included in the model contains information related to the existing and proposed land uses and transportation options in that zone. Therefore, the transportation properties of the project's TAZ are an appropriate proxy for transportation properties of the project itself.

A significant project impact would occur under the following conditions.

- If the existing HBW VMT per employee in the travel demand model TAZ that encompasses the project is greater than 12.1 under existing conditions.
- If the 2040 HBW VMT per employee in the travel demand model TAZ that encompasses the project is greater than 12.4 under cumulative conditions.

The existing land use and transportation characteristics of the East of 101 area contribute to the East of 101 area's higher-than-average VMT per employee. As a single-use employment center, all homebased trips begin or end outside the East of 101 area, requiring longer travel along auto-oriented roadways. Longer trips also result from the fact that South San Francisco, and especially the East of 101 area, is bounded by the Bay on its eastern side, further limiting the locations where housing could be located. Also, transit service to the area is limited. As a result, all employment-based uses in the East of 101 area are likely to have longer commute trips compared to average

[10] Fehr & Peers 2020; C/CAG-VTA Bi-County Transportation Demand Model, 2019 in Hexagon, 2021 (see Appendix C)

[11] Fehr & Peers 2020; C/CAG-VTA Bi-County Transportation Demand Model, 2019 in Hexagon, 2021 (see Appendix C)

HBW trips in the Bay Area. However, it should be noted that the higher-than-average VMT per employee is not unique to South San Francisco and is common for many cities in the peninsula.

Impacts and Mitigation Measures

Impact 3.1-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. (Less than Significant)

The proposed project does not alter bicycle or pedestrian access, or transportation system access approved as part of the GOP 4 Precise Plan in August 2020. The proposed project adds only 321 employees, which are not anticipated to overwhelm the already-approved pedestrian and bicycle facilities, or transit facilities.

A significant impact would occur if the proposed project conflicted with applicable or adopted policies, plans or programs related to pedestrian facilities or otherwise decreased the performance or safety of pedestrian facilities. The GOP Master Plan project would develop a pedestrian-friendly Central Commons open space in the area created by the parking structures and the office buildings. The master plan would enhance public street frontages and foster transit use by providing multiple pedestrian connections to and from the internal campus and shuttle system stops. The proposed project would be compatible with the GOP Master Plan project and the existing GOP 4 Precise Plan. Therefore, the proposed project would not have a detrimental impact to pedestrian circulation.

Bicycle access to the proposed project is provided via the bicycle lanes on Oyster Point Boulevard and the bike route on Gateway Boulevard. As part of the GOP 5 project, the existing rail spur that separates the GOP 4 and 5 sites would be redeveloped into a multi-use trail. This multi-use trail would provide an additional connection between the Class II bicycle lanes on Oyster Point Boulevard and the existing multi-use trail on Forbes Boulevard. As a result, the proposed project would not conflict with existing and planned bicycle facilities.

The proposed project is expected to generate trips via transit services, which can be accommodated by the existing/planned transit capacity. According to OPR guidelines, the addition of new transit riders should not be treated as an adverse impact as such development also improves regional flow by adding less vehicle travel onto the regional network. Therefore, the proposed project would not have a detrimental impact to transit service.

For the reasons presented above, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities, and this impact is considered less than significant. No new or substantially more severe impacts would occur than analyzed in the EIR.

Mitigation Measure

None required.

Impact 3.1-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision b) related to VMT. (Significant and Unavoidable)

According to the City of South San Francisco's VMT guidelines, a significant impact would occur for employment generating projects if the baseline project-generated HBW VMT per employee is higher than 85 percent of the existing nine-county Bay Area-Wide average for employee VMT. Based on the C/CAG – VTA travel demand model, the VMT per employee for the proposed project would be 16.2 under existing conditions (see **Table 3.1-2**, *Project VMT Impact Determination*), which is above the threshold of 12.1 for existing conditions. Under cumulative 2040 conditions, the VMT per employee for the proposed project would be 12.9, which is above the threshold of 12.4 for cumulative conditions. Therefore, the proposed project would result in a significant impact with respect to VMT under existing and cumulative conditions.

TABLE 3.1-2
PROJECT VMT IMPACT DETERMINATION

Location	Estimated HBW VMT	Estimated Employees	Estimated HBW VMT per Employee	VMT per Employee Threshold	VMT Impact
Project (Existing)	5,194	321	16.2	12.1	Yes
Project (2040 Cumulative)	4,136	321	12.9	12.4	Yes
Source: Fehr & Peers 2020; C/ CAG-VTA Bi-County Transportation Demand Model, 2019.					

The TDM program prepared for the GOP Master Plan project was designed to achieve a 40 percent non-drive alone mode share during peak periods under the City's current TDM requirements and policy direction to reduce single-occupant vehicle trips. A discussion of the TDM program for the GOP Master Plan project is provided in Chapter 2, *Project Description*. As the additional R&D space associated with the proposed project would become part of the GOP Master Plan project and is expected to generate more than 100 average daily trips, the proposed project would be subject to this TDM program.

Based on *U. S. Census Bureau, 2006-2010 American Community Survey*, the non-drive alone mode share for commute trips in San Mateo County is 29 percent. The proposed project will be required to achieve a 40 percent non-drive alone mode share, which represents an additional 11 percent reduction in non-drive alone mode share from baseline conditions.

However, reductions in non-drive alone mode share are not necessarily interchangeable with VMT reductions on a percentage point for percentage point basis because mode share targets do not necessarily correlate with trip generation and trip length. Although many East of 101 area employers meet their non-drive alone mode share targets, and while trip generation is lower than ITE rates due to TDM programs, vehicle trip generation and trip lengths in this area are slightly higher than regional averages based on the C/CAG – VTA travel demand model outputs. Therefore, project HBW VMT per employee was not adjusted based on the GOP Master Plan TDM plan, and the impact with respect to VMT would be potentially significant.

Mitigation Measures

Mitigation Measure 3.1-1: First- and Last-Mile Transit Connections and Active Transportation Improvements

First- and last-mile transit connections and active transportation improvements are likely to yield the greatest VMT reductions. These measures would not only serve the density transfer project but also the entire GOP Master Plan area and all of the existing and planned development in the area. Thus, the new VMT generated by the project would be partially offset by reductions in VMT for other development. The following mitigation measures support and enable the first-and last-mile non-auto commute strategies in the GOP Master Plan TDM Plan. The mitigation measures described below are appropriate under both existing plus project conditions and cumulative plus project conditions. These improvements are shown on **Figure 3.1-1**, *Mitigation Measure Improvements*.

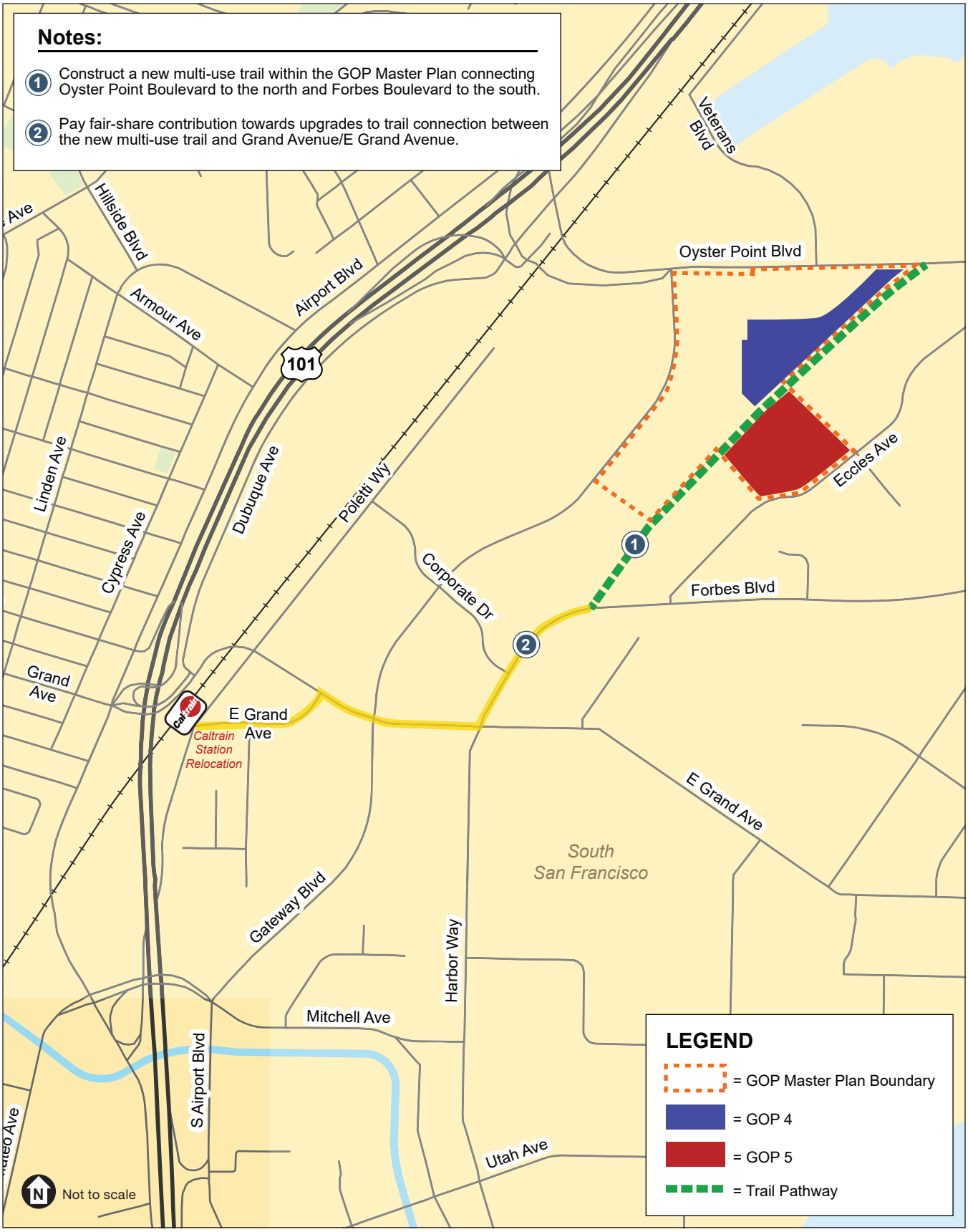
a) The project applicant has acquired the rail spur property adjacent to the GOP 4 site and shall use it to connect the GOP Master Plan area with the 475 Eccles site, which is currently referred to as GOP Phase 5, approved for two office/R&D buildings totaling 262,287 square feet and one parking structure. The applicant proposes to develop the rail spurs into a publicly accessible multi-use path connecting Oyster Point Boulevard with Forbes Boulevard, with pedestrian amenities, all to implement the City's draft "rails to trails" plan. A grand staircase allowing access from the lower elevation of the GOP Master Plan area to the higher elevation of the 475 Eccles site is also proposed. The applicant shall construct these improvements. This multi-use path shall connect to Class II bicycle lanes on Oyster Point Boulevard and to the multi-use trail on Forbes Boulevard.

b) The applicant shall construct crossings at the northern and southern ends of the multi-use path required by paragraph (a) above, at Forbes Boulevard and Oyster Point Boulevard, in the configuration determined necessary by the City Engineer for bicycle access from those streets to the multi-use path.

c) The applicant shall use good faith efforts to obtain all approvals and consent required to install the improvements required by paragraphs (a) and (b) above, including the use of any necessary land owned by the applicant or its affiliates. Each improvement shall be constructed by the later of (i) issuance of the first certificate of occupancy for any portion of the 120,221 square-foot expansion in GOP 4, or (ii) such time as public agencies have granted all necessary approvals for the mitigation improvement and the applicant has been given the right to construct on any land owned by others that is necessary for the mitigation improvement.

Significance After Mitigation

Implementation of the actions listed in Mitigation Measure 3.1-1 include improvements that support and enable the first- and last-mile non-auto commute strategies, which would be anticipated to increase the use of alternative modes by project employees, in place of single-occupant vehicle travel, thus reducing HBW VMT. However, the mitigation measure's effectiveness is unknown and may not reduce the project's HBW VMT below the existing and cumulative thresholds to reach a less-than-significant conclusion. Therefore, the project's effect on VMT would be significant and unavoidable.



SOURCE: Hexagon, 2021

BioMed GOP4 Master Plan Focused SEIR

FIGURE 3.1-1
MITIGATION MEASURE IMPROVEMENTS

Impact 3.1-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible land uses (e.g., farm equipment). (No Impact)

The proposed project would increase the intensity of planned uses on the GOP 4 site, but would not include the introduction of new land uses or changes to the GOP 4 Precise Plan. A project safety impact is considered significant if the proposed project would provide inadequate design features that present safety concerns within the project site or on the adjacent streets. The proposed project would not alter any design components of the recently approved GOP Phase 4 Precise Plan. Therefore, the proposed project would not substantially increase hazards due to a geometric design feature or incompatible land uses, and no impact would occur. No new or substantially more severe impacts would occur than analyzed in the EIR.

Mitigation Measure

None required.

Impact 3.1-4: The proposed project would not result in inadequate emergency access. (Less than Significant)

The proposed project would not reroute or change any of the city streets in its vicinity that would impact emergency vehicle access to the GOP 4 site, and would not alter the emergency access approved as part of the GOP 4 Precise Plan in August 2020. Access to GOP 4 site would be provided via driveways along Oyster point Boulevard and Gateway Boulevard. Park Street, a new internal access roadway would be constructed along the east side of the parking garages and would connect to Oyster Point Boulevard to the north and Gateway Boulevard to the south. The emergency vehicles would utilize all entries and supplemental access points as necessary to reach Park Street and the central pedestrian walkway which would be wide enough to serve as an emergency vehicles route. Thus, the proposed project would not result in inadequate emergency access, and this impact is considered less than significant. No new or substantially more severe impacts would occur than analyzed in the EIR.

Mitigation Measure

None required.

Cumulative Impacts

Impact 3.1-5: Implementation of the proposed project, in combination with other development, could contribute to cumulative conditions where VMT per capita or VMT per employee could exceed 85 percent of the 2040 cumulative Bay Area-wide regional average daily VMT per employee. (Significant and Unavoidable)

The analysis in Impact 3.1-2 described how the proposed GOP 4 Density Transfer project would result in a significant unavoidable impact, as the daily VMT per employee within the 120,221 square foot expansion proposed by the density transfer project would be 16.2 under existing

conditions, which exceeds the Bay Area-wide regional average threshold of 12.1 daily VMT per employee for existing conditions.

The C/CAG - VTA Travel Demand Model was used to identify the 2040 cumulative Bay Area-wide regional average daily VMT per employee. The 2040 cumulative Bay Area-wide regional average daily VMT per employee is 14.6, so the cumulative threshold is 12.4 daily VMT per employee, with the 15 percent VMT reduction factor. The methodologies for conducting this analysis are identical to the ones described above, but rather than add the proposed project to the existing conditions scenario, the project was added to the future-year scenario, designed to represent 2040 conditions. As shown in Table 3.1-2, the proposed project's daily VMT per employee would be 12.9, which would exceed the cumulative threshold.

As discussed in Impact 3.1-2, the GOP Master Plan project is required to implement a TDM program designed to achieve a 40 percent non-drive alone mode share during peak periods under the City's current TDM requirements and policy direction to reduce single-occupant vehicle trips. Because the proposed project would become part of the GOP Master Plan project and is expected to generate more than 100 average daily trips, the proposed project would be subject to this TDM program. However, reductions in non-drive alone mode share are not necessarily interchangeable with VMT reductions on a percentage point for percentage point basis because mode share targets do not necessarily correlate with trip generation and trip length. Although many East of 101 area employers meet their non-drive alone mode share targets, and while trip generation is lower than ITE rates due to TDM programs, vehicle trip generation and trip lengths in this area are slightly higher than regional averages based on the C/CAG travel demand model outputs. Therefore, project HBW VMT per employee was not adjusted based on the GOP TDM plan, and would be cumulatively considerable.

Because the proposed project has no impact relating to circulation system plans (Impact 3.1-1) and hazards (Impact 3.1-3), it would not contribute towards any cumulative impacts related to those resources.

Mitigation Measures

Implement *Mitigation Measure 3.1-1: First- and Last-Mile Transit Connections and Active Transportation Improvements*.

Significance After Mitigation

Implementation of these mitigation measures include improvements that support and enable the first- and last-mile non-auto commute strategies, which would be anticipated to increase the use of transit by Project employees, in place of single-occupant vehicle travel, thus reducing HBW VMT. This mitigation could be anticipated to benefit cumulative development in the project area, as employees from surrounding uses could be anticipated to utilize those connections and improvements. However, the mitigation measure's effectiveness is unknown and may not reduce the project's cumulatively considerable HBW VMT below the cumulative thresholds to reach a less-than-significant level. Therefore, the project's effect on VMT would be cumulatively considerable, thus resulting in a significant and unavoidable impact.

3.2 Other Resource Topics

3.2.1 Resource Topics addressed in the EIR

The environmental impacts discussed and analyzed below include impacts specific to the GOP 4 Density Transfer project, the GOP Master Plan project, and cumulative impacts. This analysis addresses the impacts of the proposed project, and analyzes whether the project would trigger any changes to the conclusions in Resolution 2858-2020 determining that the GOP 4 Precise Plan was fully within the scope of the 2010 EIR, that the 2020 Addendum prepared for GOP 4 was the appropriate environmental document for the project, and confirming the continued applicability of the MMRP for the project.

The mitigation measures, as set forth in the MMRP attached to Resolution 2858-2020, are applicable to all phases of the GOP Master Plan project and will be implemented in connection with the GOP 4 Density Transfer project insofar as they are relevant.

Aesthetics

The EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to aesthetics. The proposed project proposes construction of a structure (GOP 4 north) that is four-stories higher than contemplated in the GOP 4 Precise Plan approved in 2020. However, at 178 feet total (with the additional four stories), this structure would conform to the 250-foot building height limitation provided in the GOP Master Plan criteria. In addition, the taller northern building on the GOP 4 site would provide a transition between the 12-story structure to the northwest that was constructed during GOP Phase 1 and the five-story southern building on the GOP 4 site to the south. The proposed project would also be subject to mitigation measures found in Resolution 2858-2020 that reduce impacts with respect to light and glare. As a result, the change in impacts with regard to aesthetics would be immaterial.

There has been no substantial change in surrounding circumstances or new information with respect to aesthetics since the 2010 EIR was approved that show new or more severe significant impacts. Based on the discussion above, no new or more severe significant impacts to aesthetics are anticipated beyond those anticipated and analyzed in the 2010 EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Agricultural Resources

The EIR determined that neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to agricultural resources. The GOP 4 site does not include any agricultural resources; this circumstance has not changed since approval of the 2010 EIR, and the proposed project does not include any changes to the area of ground disturbance. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Air Quality

Operational emissions of the proposed project are addressed in a report prepared by Ramboll, which is attached as Appendix D. As demonstrated in that report, the proposed project will not trigger any new or more severe air quality impacts. In general, due to emissions reductions in the vehicle fleet as well as a more efficient building design standards contained in the California Building Energy Efficiency Standards (Title 24, Parts 6 and 11), the operational emissions associated with the GOP Master Plan project as modified by the proposed project are well below the net operational emissions that were estimated for the GOP Master Plan project as part of the EIR. Details are discussed below.

The 2010 EIR determined that construction emissions associated with the GOP Master Plan project and the GOP 4 Precise Plan would have resulted in a significant and unavoidable impact with mitigation. The proposed project would incrementally increase the short-term emissions generated during construction. The proposed project would be subject to numerous mitigation measures found in the Resolution 2858-2020, conditions of approval, and requirements of the Bay Area Air Quality Management District (BAAQMD). These include condition A.14, which requires that the developer provide the City with a Health Risk Assessment (HRA) report, acceptable to the City, evaluating the impact of toxic air contaminants resulting from demolition and construction of the project on nearby sensitive receptors. However, even with these measures in place, the construction of additional space associated with the proposed project could still adversely affect nearby sensitive receptors. The proposed project would increase the total amount of R&D space allowed within the GOP Master Plan area by 9.8 percent. However, this increase is not substantial, and thus no change in the severity of this impact is anticipated.

The 2010 EIR determined that because the GOP Master Plan project included a General Plan Amendment that would increase VMTs compared to those associated with the General Plan in effect at the time, it would therefore conflict with the applicable air quality plan. It further determined the GOP Master Plan project would exceed BAAQMD thresholds for respirable particulate matter (PM10). The U.S. Environmental Protection Agency has established federal ambient air quality standards for six of the most common air pollutants— carbon monoxide (CO), lead (Pb), ground-level ozone (O_3), particulate matter (PM) in size fractions of 10 microns or less in diameter (PM10) and 2.5 microns or less in diameter (PM2.5), nitrogen dioxide (NO_2), and sulfur dioxide (SO_2)—known as "criteria" air pollutants (or simply "criteria pollutants"). In addition, California has also established state ambient air quality standards for criteria pollutants, which in some cases are more stringent than the national standards. The Bay Area Basin is considered "nonattainment" for federal ambient air quality standards for ozone, whose precursors are reactive organic gases (ROG) and oxides of nitrogen Oxides (NOx), and is considered "nonattainment" for State ambient air quality standards for ozone and PM10. As shown in **Table 3.2-1***, Summary of Operational Emissions – Criteria Air Pollutants*, emissions of these pollutants associated with GOP Master Plan project as modified by the proposed project would be well below the emissions of these pollutants associated with the GOP Master Plan project that was evaluated in the 2010 EIR. As a result, operational emissions associated with the additional space added by the proposed project would not cause new or more severe air quality impacts.

TABLE 3.2-1
SUMMARY OF OPERATIONAL EMISSIONS – CRITERIA AIR POLLUTANTS

	Criteria Air Pollutant Emissions (lbs/day)		
	ROG	**NO_X**	**PM_{10}**
Original GOP Project	44.8	59.4	151.4
Modified GOP Project	26.5	44.1	41.9
Difference	*-18.3*	*-15.3*	*-109.5*
Source: Ramboll, 2021.			

The 2010 EIR determined that neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created a significant impact with respect to exposing sensitive receptors to substantial pollutants. Vehicle trips associated with the proposed project would result in an incremental increase in emissions of CO and toxic air contaminants. The proposed project would increase the total amount of R&D space allowed within the GOP Master Plan area by 9.8 percent. However, this increase is not substantial, and thus no change in the severity of this impact is anticipated.

There has been no substantial change in surrounding circumstances or new information with respect to air quality since the 2010 EIR was approved that show new or more severe significant impacts. Accordingly, no new or more severe significant impacts to air quality are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Biological Resources

The 2010 EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to biological resources. The proposed project will not alter any impacts to biological resources, as it proposes no change in grading and no change in ground-level activities. The GOP 4 site has been developed with warehouse distribution and office uses for decades and, as discussed in the 2010 EIR, does not provide any habitat of high biological value. The proposed project is subject to mitigation measures requiring pre-construction surveys for nesting birds, special-status birds and/or raptors, and compliance with local tree protection ordinances. These measures will help ensure that the proposed project will not alter the impacts to biological resources.

There has been no substantial change in information or the circumstances regarding the GOP 4 site or the surrounding East of 101 area since the 2010 EIR was approved that would affect biological resources. Accordingly, no new or more severe significant impacts to biological resources are anticipated beyond those anticipated and analyzed in the 2010 EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Cultural Resources

The 2010 EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to cultural resources. The proposed project will not affect cultural resources, as it proposes no change in grading or ground disturbance activities. The GOP 4 site includes fill imported from unknown locations, and has already been extensively disturbed for development. The 2010 EIR determined that the area did not contain any recorded historic or archaeological resources. It further explained that the area was initially impacted by development late in the nineteenth century, and noted that past development and placement of fill have significantly reduced the archaeological potential of the GOP Master Plan area. The proposed project is subject to mitigation measures requiring that specific actions be taken if previously unknown cultural or archeological resources, or human remains, are discovered during excavation that are found, as required by Resolution 2858-2020. These measures will help ensure that the proposed project will not alter the impacts to cultural resources.

There has been no substantial change to the circumstances regarding the GOP 4 site since the 2010 EIR was approved that would show new or more severe impacts. Construction of Phase 1 revealed only the railroad spurs mentioned in the 2010 EIR, and did not uncover any previously unknown significant cultural resources. In addition, construction in the surrounding East of 101 area has not revealed any significant finds that would affect the 2010 EIR's analysis of the GOP Master Plan project or the GOP 4 Precise Plan. Accordingly, no new or more severe significant impacts to cultural impacts are anticipated beyond those anticipated and evaluated in the 2010 EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Geology and Soils

The EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to geology and soils. The proposed project will not affect geological or soil resources, as it proposes no change in grading and no change in construction or activities other than the addition of four floors to the approved building footprint. As discussed in the 2010 EIR, GOP Master Plan area is not within the Alquist-Priolo Earthquake Fault Zone boundary, is not within a liquefaction hazard zone, and that while the Hillside Fault may cross the GOP Master Plan area, this fault has not shown evidence of activity for at least the past 2 million years. The proposed project is subject to mitigation measures imposed under Resolution 2858-2020 and conditions of approval requiring compliance with building codes, other regulatory requirements, and recommendations of licensed geotechnical engineers, which are all designed to protect against any remaining risk of seismic shaking, landslide or soil erosion. These measures will help ensure that the proposed project will not materially alter impacts to geologic and soil resources.

There has been no substantial change in surrounding circumstances or new information since the 2010 EIR was approved that show new or more severe impacts. The construction of Phases 1, 2 and 3 has not revealed any unanticipated issues relating to geology and soils. Accordingly, no new or more severe significant impacts are anticipated beyond those anticipated and analyzed in the EIR. In addition, the California Supreme Court made clear, in *California Building Industry*

Assn. v. Bay Area Air Quality Management District, (2015) 62 Cal.4th 369, that the impacts of existing soil conditions on a project are not within the purview of CEQA. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Greenhouse Gases and Climate Change

Greenhouse gas (GHG) emissions are addressed in a report prepared by Ramboll, which is attached as Appendix D. As demonstrated in that report, the proposed project will not trigger any new or more severe GHG emissions impacts. In general, due to emissions reductions in the vehicle fleet as well as a more efficient building design standards contained in the California Building Energy Efficiency Standards (Title 24, Parts 6 and 11), the GHG emissions associated with the GOP Master Plan project as modified by the proposed project are well below the net operational emissions that were estimated for the original GOP Master Plan project as part of the 2010 EIR. Details are discussed below.

The 2010 EIR determined that neither the original GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to GHG emissions. The proposed project would achieve a LEED Silver or better rating, and be designed to meet South San Francisco Municipal Code standards and California Building Energy Efficiency Standards (Title 24, Parts 6 and 11), which would reduce GHG emissions associated with the operation of the buildings. As shown in **Table 3.2-2**, *Summary of Operational Emissions – Greenhouse Gas Emissions*, GHG emissions associated with the GOP Master Plan project as modified by the proposed project would be well below GHG emissions associated with the original GOP Master Plan project evaluated in the EIR. As a result, GHG emissions associated with the additional space added by the proposed project would not cause new or more severe GHG impacts.

TABLE 3.2-2
SUMMARY OF OPERATIONAL EMISSIONS – GREENHOUSE GAS EMISSIONS

	CO2e Emissions (metric tons/year)
Original GOP Project	19,909
Modified GOP Project	13452
Difference	*-6,457*
Source: Ramboll, 2021.	

Based on the discussion above, no new or more severe significant impacts with respect to GHG emissions are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Hazards and Hazardous Materials

The 2010 EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to hazards and hazardous

materials. The GOP 4 site formerly hosted many industrial uses that involved hazardous materials. The approval of the GOP Master Plan project and the GOP 4 Precise Plan included imposition of numerous mitigation measures imposed by Resolution 2858-2020 and conditions to address the potential for hazardous materials to be encountered. As expected, hazardous materials were encountered during excavation for earlier phases, and these were and are being handled pursuant to the requirements of the mitigation measures and conditions. The proposed project will not affect the amount of excavation. The additional mitigation measures that were imposed on the GOP Master Plan project and the GOP 4 Precise Plan are intended to reduce the risk of handling hazardous materials during operation of R&D businesses. The proposed project remains subject to these measures and to laws and regulations regarding the handling of hazardous materials.

There has been no substantial change in surrounding circumstances or new information related to hazards and hazardous emissions since the 2010 EIR was approved that would create new or more severe impacts. Based on the discussion above, no new or more severe significant impacts from hazards and hazardous materials are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Hydrology and Water Quality

The 2010 EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to hydrology and water quality. The proposed project would not alter any impacts related to hydrology or water quality, as it includes no changes to grading, building footprints, stormwater systems, or water quality protections. Further, the proposed project would be subject to numerous mitigation measures imposed by Resolution 2858-2020 and conditions of approval regarding stormwater management and water quality protections that also will ensure no material change in impact conclusions.

There has been no substantial change in surrounding circumstances or new information related to hydrology and water quality since the 2010 EIR was approved. Accordingly, no new or more severe significant impacts to hydrology or water quality are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Land Use and Planning

The 2010 EIR determined that neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to land use as they would have implemented prior city plans for R&D/office development in the area. The proposed project includes changes to the General Plan and zoning, but these changes would merely transfer density that is already allowed to an adjacent location, and therefore would not materially affect land use or planning resources. The proposed project would conform to all of the development standards in the GOP Master Plan project except for the proposed increase in FAR, and would otherwise be consistent with all land use plan and regulations that are applicable to the GOP 4 site. The proposed change in FAR would be used to increase the height on previously-approved R&D buildings and

associated parking structure, with no substantive change in architecture. As a result, impacts with respect to land use and planning would not change materially.

There has been no substantial change in surrounding circumstances or new information since the 2010 EIR was approved that show new or more severe impacts. Based on the discussion above, no new or more severe significant impacts to land use and planning are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Mineral Resources

The 2010 EIR determined that neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to mineral resources. The GOP 4 site does not include any mineral resources, and this circumstance has not changed since approval of the 2010 EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Noise

The 2010 EIR determined that construction noise associated with the GOP Master Plan project and the GOP 4 Precise Plan would have resulted in a significant and unavoidable impact with mitigation as construction noise would have interfered with the operation of an onsite childcare center that would have been in operation during the first phase of the GOP Master Plan project. The proposed project would generate noise during construction, and would be subject to a mitigation measure found in Resolution 2858-2020 that would ensure that detailed, site specific noise attenuation measures are implemented. The onsite childcare center has since closed, and the significant and unavoidable construction noise impact associated with the child care center is no longer an issue. Therefore, noise generated during the construction of the additional space associated with the proposed project would not adversely affect nearby sensitive receptors.

The EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created a significant impact with respect to vibration generated during construction. The proposed project may incrementally increase the vibration generated during construction, and would be subject to a mitigation measure imposed by Resolution 2858-2020 that would require a pre-construction survey be conducted to determine whether a project's construction activities would impact vibration sensitive equipment located in adjacent buildings within 100 feet of the construction activity. As a result, vibration generated during the construction of the additional space associated with the proposed project would not materially change the effect on nearby sensitive receptors.

The 2010 EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to operational noise. The proposed project may incrementally increase the noise generated during operation, and would be subject to mitigation imposed by Resolution 2858-2020 to reduce noise associated with HVAC equipment. In addition, given the relatively small amount of additional space associated with the proposed project, traffic generated by the proposed project would not discernably increase ambient noise levels in the vicinity of the GOP 4 site as it would take a doubling of traffic on

roadways to result in a perceptible increase in noise. As a result, noise generated during the operation of additional space associated with the proposed project would not adversely affect nearby sensitive receptors.

With the exception of the closure of the onsite child care center, there has been no substantial change in surrounding circumstances or new information with respect to noise since the 2010 EIR was approved. Accordingly, no new or more severe significant impacts with respect to noise are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Population and Housing

The 2010 EIR determined that neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to population and housing as the increase in employees associated with the plan was within employment estimates for the City of South San Francisco prepared by the Association of Bay Area Governments (ABAG), and overall, the plan would have promoted a greater regional jobs balance. The GOP Master Plan project would result in the net increase 2,531 employees within the GOP Master Plan area, and the proposed project would add 321 workers to the area, an increase of 12.6 percent. However, as this increase in employment is not substantial, impacts with respect to population and housing would not change appreciably.

There has been no substantial change in surrounding circumstances or new information since the 2010 EIR was approved. Based on the discussion above, no new or more severe significant impacts are anticipated with respect to population and housing beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Public Services and Recreation

The 2010 EIR determined that neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to public services and recreation. The 2010 EIR determined that employees in the GOP Master Plan area would likely visit parks and recreational facilities near their places of residency and not their place of employment. Further, recreational activities will be available in onsite areas and the immediately adjacent multi-use trail. The proposed project would increase the total amount of R&D space allowed within the GOP Master Plan area by 9.8 percent, and thus would place additional demand on public services. However, as this increase is not substantial, no changes to these impact conclusions are anticipated.

There has been no substantial change in surrounding circumstances or new information since the 2010 EIR was approved. Accordingly, no new or more severe significant impacts are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Utilities

The 2010 EIR determined that with mitigation neither the GOP Master Plan project nor the GOP 4 Precise Plan would have created significant impacts with respect to utilities and service

systems. The proposed project would increase the total amount of R&D space allowed within the GOP Master Plan area by 9.8 percent, and thus would place additional demand of utilities and service systems serving the GOP Master Plan area. However, as this increase is not substantial, no changes to these impact conclusions are anticipated.

There has been no substantial change in surrounding circumstances or new information since the 2010 EIR was approved. The City has monitored and kept pace with the expansion of utilities for new development projects. Construction of the proposed project will be more water and energy efficient than anticipated due to imposition of stricter requirements found in the California Building Energy Efficiency Standards (Title 24, Parts 6 and 11). The site will incorporate water-saving measures and will not increase the water demand of the GOP project above that projected in the 2010 EIR, as documented in a report prepared by Maddaus Water Management, which is attached as Appendix E. No new or more severe significant impacts to utilities are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

3.2.2 Other Topics

The following impact discussions were not required topics of analysis when the 2010 EIR was approved. Current CEQA analysis includes the evaluation of potential environmental impacts resulting from energy consumption, disturbance of tribal cultural resources, and potential to expose individuals or property to wildfires. The following analysis is provided for discussion purposes. As discussed below, unlike VMT, none of the impacts associated with these environmental topics would result in a new significant and unavoidable impact. None of the following constitute "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." Therefore, any potential impacts do not require a subsequent or supplemental EIR pursuant to CEQA Guidelines Section 15162. (See *Concerned Dublin Citizens v. City of Dublin* (2013) 214 Cal.App.4th 1301, 1319-1320; *Fort Mojave Indian Tribe v. Department of Health Services* (1995) 38 Cal.App.4th 1574, 1605-1606.)

Energy

The 2010 EIR did not include an analysis of energy impacts, though it noted that the GOP Master Plan project and the GOP 4 Precise Plan would be more energy efficient that the buildings and uses that were being redeveloped, that the project would be required to adhere to an "energy budget" per Title 24, and that there were no shortages of energy resources that would preclude the construction and operation of the project. The proposed project would result in an incremental increase in energy use compared to the approved GOP 4 Precise Plan. The proposed project does not include uses or construction plans that would be more energy intensive than is normal for typical R&D uses. The additional R&D uses included in the proposed project are similar in type to those anticipated for the GOP 4 site by the GOP Master Plan project. Further, the proposed project would achieve a LEED rating of silver or better, and would be designed to meet South San Francisco Municipal Code standards and California Building Energy Efficiency Standards (Title 24, Parts 6 and 11), which would reduce energy demand. The proposed project is an expansion of an already-approved use and building, and would be built as part of a larger life

sciences campus, which would result in concentrated and efficient land use patterns that promote more energy savings than would development of the 120,221 square feet in a new, separate building. Thus, the proposed project would not be anticipated to result in the wasteful, inefficient, or unnecessary consumption of energy resources. This impact would be less than significant.

State renewable energy and energy efficiency plans that are applicable to the proposed project include the AB 1493 Pavley Rules to increase fuel efficiency, California Title 24 energy efficiency standards, Executive Order O B-16-12, which orders state entities to support rapid commercialization of zero-emission vehicles, SB 350, which requires (1) a Renewables Portfolio Standard (RPS) of 50 percent and (2) a doubling of the statewide energy efficiency savings related to natural gas and electricity end uses, and SB 100, which increases the 2030 RPS target set in SB 350 to 60 percent and requires an RPS of 100 percent by 2045. Local plans that address energy efficiency and are designed to achieve the state's RPS mandates include Pacific Gas & Electric's (PG&E) and Peninsula Energy's (PCE) 2018 Integrated Resource Plans (IRP) and the City's Climate Action Plan (CAP). The City's General Plan and East of 101 Area Plan also include goals and policies related to energy use and energy reductions.

The proposed project would benefit from these renewable energy developments and increases in energy efficiency. Therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

Tribal Cultural Resources

The 2010 EIR did not include an analysis of tribal cultural resources, though it discussed the history of the Ohlones population and culture at length, and included mitigation measures to protect unknown subsurface resources. The addition of four stories to an already-approved building in a manner that will not alter grading activities or the building footprint will not alter any impacts to tribal resources.

Assembly Bill (AB) 52 requires that lead agencies consider the effects of projects on tribal cultural resources and conduct notification and consultation with federally and non-federally recognized Native American tribes early in the environmental review process. According to AB 52, it is the responsibility of the tribes to formally request of a lead agency that they be notified of projects in the lead agency's jurisdiction so that they may request consultation. As of the publication of this SEIR, no tribes have formally requested to be notified of projects within the City of South San Francisco. However, the City did send the Notice of Preparation (NOP) to a large group of interested parties that included four tribes in the region; none of the tribes provided comments in response to the NOP.

Wildfire

The GOP 4 site is not located in an area that is designated as high risk for the occurrence of wildfires. The addition of four stories in an urbanized area will not increase any potential for wildfire. Based on the location of the GOP 4 site and the nature of the GOP 4 Density Transfer project, there would be no new or more severe impact related to wildfire hazards.

CHAPTER 4
Project Alternatives

4.1 Overview

Under CEQA, an environmental impact report (EIR) must describe a range of reasonable alternatives to the proposed project that might feasibly accomplish most of the project's basic objectives and could avoid or substantially lessen one or more of the significant effects of the project. The feasibility of an alternative is determined by the lead agency based on a variety of factors including, but not limited to, site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and site accessibility and control (CEQA Guidelines section 15126.6(f)(1)).

This chapter discloses the comparative effects of each of the alternatives relative to the proposed GOP4 Transfer Density project, and evaluates the relationship of the alternatives to the objectives of the proposed project. As required under section 15126.6(e)(2) of the CEQA Guidelines, the discussion describes the relative environmental merits of the alternatives and identifies which of them may be considered the "environmentally superior" alternative.

4.2 Factors in the Selection of Alternatives

Project Objectives

The objectives of the proposed GOP4 Transfer Density project are used to evaluate the reasonableness and potential feasibility of each alternative. As presented in Chapter 2, the objective of the GOP 4 Density Transfer project is to transfer unused Floor Area Ratio (FAR) from the adjacent rail spur properties to enable an expansion to Phase 4 of the GOP Master Plan project in a manner that:

- builds upon prior approvals by implementing their conditions, mitigation measures and architectural treatments;
- softens the height transition between the buildings constructed during GOP Phase 1 and the buildings to be constructed during GOP Phase 4; and
- locates the expansion in an already-approved campus, allowing it to take advantage of approved pedestrian connections, the multi-modal improvements approved for the adjacent rail spur properties and the shuttle stop planned for the campus.

Significant Effects of the Proposed Project

Section 15126.2(c) of the CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the proposed GOP4 Transfer Density project on transportation are discussed in detail in Chapter 3, Environmental Setting, Impacts, and Mitigation Measures. The analysis of transportation in Chapter 3 of this Draft SEIR did identify one project level impact (Impact 3.1-2) and one cumulative level impact (Impact 3.1-5) associated with the generation of vehicle miles traveled (VMT) that cannot be avoided if the project is approved as proposed. Therefore, there would be two significant and unavoidable impacts resulting from the proposed project.

4.3 Alternatives Considered but Dismissed from Further Evaluation

As required under section 15126.6(c) of the State CEQA Guidelines, the City is required to disclose alternatives that were considered but rejected from further analysis in this Draft SEIR. The screening process for identifying viable alternatives included consideration of the following criteria.

- Ability to meet the project objectives
- Potential ability to substantially lessen or avoid environmental effects associated with the proposed project
- Potential feasibility

The discussion below describes alternatives that were considered during preparation and scoping of this Draft SEIR, and gives the rationale for eliminating these alternatives from detailed consideration.

Reduced Height Alternative

The proposed project includes the addition of four additional stories to the northern building on the GOP 4 site. Alternatives similar to the proposed project but with a building reduced in height by one to three stories and reduced in size by approximately 30,000 to 90,000 square feet were evaluated for their its potential to reduce the project's significant VMT impacts (Impacts 3.1-2 and 3.1-5) as a result of their smaller size. However, a smaller project does not directly correlate to a reduced VMT impact because VMT is assessed based on a per-capita or per-employee rate. Regardless of how many workers are employed on the GOP 4 site, as VMT is defined as a measurement of miles traveled by vehicles within a specified region and for a specified time period, VMT per capita or per-employee would not change. Also, these alternatives would only partially meet the prime project objective of transferring unused FAR from the adjacent rail spur properties. Therefore, although these alternatives would meet most of the project objectives, they were not carried forward for analysis because they would not substantially reduce or eliminate the project's significant VMT impacts.

Residential Land Use Alternative

An alternative that would develop the additional space as residential was considered based on its potential to reduce the project's significant VMT impacts (Impacts 3.1-2 and 3.1-5). A residential alternative would have the potential to reduce the average home-based work (HBW) VMT per employee[1] by locating residential uses in an area predominantly occupied by employment uses, providing more opportunities for employees in the East of 101 area to live closer to their place of work. The GOP 4 site is identified as Business Commercial (BC) in the General Plan and is zoned Gateway Specific Plan District under the City's zoning ordinance. Neither of these designations permit residential uses, nor would residential uses be consistent with existing land uses in the vicinity of the GOP 4 site. Residential development at this site is not consistent with current General Plan direction and policies to preserve land East of 101 for employment uses. As part of the City's *Shape SSF 2040 General Plan* process, the City is considering residential uses in the East of 101 area, including high-density mixed use residential uses in areas adjacent to and within 0.5 mile to the Caltrain station in one of the alternatives. The areas along Gateway Boulevard that are under consideration for residential uses are within 0.5 mile of the Caltrain station, and do not include the GOP 4 site.[2] The City does not anticipate that the *Shape SSF 2040 General Plan* will consider residential uses for the GOP 4 site. Furthermore, a residential alternative would be inconsistent with all of the project objectives. Therefore, this alternative was not carried forward for analysis based on its infeasibility and inability to meet the project objectives.

Alternative Project Location

An alternative that would transfer the density to a parcel closer to transit was considered based on its potential to reduce the project's significant VMT impacts (Impacts 3.1-2 and 3.1-5). Two potential alternative project locations were considered in the East of 101 area. The first location is an approximately 2.6 acre parcel located at 100 East Grand Avenue. The site is currently occupied by a warehouse. The second location is an approximately 3.6 acre parcel located at 121 East Grand Avenue. The site is currently occupied by a Comfort Inn and Suites. As part of the City's *Shape SSF 2040 General Plan* process, the City is considering a mixed-use development with residential uses at these sites in several of the land use alternatives. The Caltrain Station at East Grand Avenue is approximately 0.25 to 0.5 mile north of the two alternative project locations. CEQA Guidelines Section 15064.3, subdivision (b) (1), states that "generally, projects within one-half mile of an existing major transit stop[3] or a stop along an existing high quality transit corridor[4] should be presumed to cause less-than-significant transportation impact." OPR

[1] The key metric used to determine a VMT impact is home-based work HBW VMT per capita, which is expressed as a rate per employee. For example, if an alternative would have fewer employees compared to the proposed project, it would still be required to substantially reduce the average trip length between employees' home and work to substantially reduce the average HBW VMT per employee compared to the proposed project.

[2] City of South San Francisco. 2020.Shape SSF 2040 General Plan. Available: https:// shapessf.com/ alternatives/. Accessed: November 9, 2021.

[3] major transit stop" means a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

[4] high-quality transit corridor" means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.

advises that the less than significant presumption would not apply, however, if project-specific or location-specific information indicates the project will still generate significant levels of VMT. As discussed in Section 3.1, Transportation, the HBW VMT per employee for the proposed project is higher than that of the Bay Area Region (16.2 compared to 14.2), which is representative of other sites in the East of 101 area. Given the high levels of VMT generated by sites in the East of 101 area, sites within 0.5 mile of an existing major transit stop in the East of 101 area may still generate significant levels of VMT. Furthermore, this alternative was rejected because neither of the potential alternative sites are owned by the project applicant. In addition, both sites have existing long-term leases and tenants, and neither site may be available for purchase or development. Next, as the proposed project is an addition to an already approved building, it would be more cost efficient from a construction perspective, as constructing this space on another site would involve additional construction phases, such a demolition and site preparation. Finally, locating the proposed project on these sites would not be consistent with the project objectives as it would not build upon prior approvals or be located an already-approved campus.

It is anticipated that an alternative that would transfer the density to a parcel in another area of the city (possibly outside of the East of 101 area) would not reduce the project's significant VMT impacts (Impacts 3.1-2 and 3.1-5) because there are no low VMT office areas anywhere in the City outside of areas in close proximity to major transit stations.[5] In addition, this alternative would not reduce the project's significant VMT impacts because any new jobs added to the City of South San Francisco (particularly in the East of 101 area and in the biotech industry) would likely attract employees from throughout the Bay Area, which would generate substantially more VMT and worsen the regional balance between jobs and housing. Therefore, this alternative was rejected because of its potential infeasibility.

4.4 Alternatives Selected for Further Consideration

Based on the screening criteria list above, there are no feasible alternatives that might feasibly accomplish most of the project's basic objectives and avoid or substantially lessen one or more of the significant effects of the project. As a result, this alternatives analysis only considers the no project alternative.

The evaluation of the no project alternative is organized to facilitate a clear comparison between the effects of the alternative and the effects of the proposed project. There is a discussion of those impacts of the alternative that would be the same or similar to those of the proposed project. This is followed by a discussion of those effects of the alternative that would be less substantial than those of the proposed project, followed by those effects of the alternative that would be more substantial than those of the proposed project. Each discussion concludes with a discussion of the relationship between the alternative and the basic objectives of the proposed project.

[5] City of South San Francisco. 2020. City of South San Francisco Significance Thresholds for Transportation.

No Project Alternative

Description

Under the No Project/No Development Alternative, the transfer of density under the proposed project would not occur, and the approved GOP 4 project would be constructed on the GOP 4 site. Under the No Project Alternative, Mitigation Measure 3.1-1, which requires the implementation first- and last-mile transit connections and active transportation improvements to offset the impacts of the expansion enabled by the density transfer, would not be implemented.

Comparative Analysis of Environmental Effects

The No Project Alternative would result in the construction of the approved GOP 4 project on the GOP 4 site.

Impacts Identified as Being the Same or Similar to the Proposed Project

Impacts identified for the proposed project associated with VMT would be the same or similar under the No Project Alternative, as the fewer vehicle trips associated with this alternative would not directly correlate to a reduction in VMT.

Impacts Identified as Being Less Substantial than the Proposed Project

There would be no impacts identified for the proposed project that would less substantial under the No Project Alternative, as no addition space for R&D uses would be constructed.

Impacts Identified as Being More Substantial than the Proposed Project

There would be no impacts identified for the proposed project that would be more substantial under the No Project Alternative, as no addition space for R&D uses would be constructed.

Relationship to Significant and Unavoidable Impacts

As noted in Chapter 3, the proposed project does have one project level impact (Impact 3.1-2) and one cumulative-level impact (Impact 3.1-5) associated with VMT that cannot be avoided. Similarly, the No Project Alternative would also have one project-level and on cumulative level significant and unavoidable impact with respect to VMT as the VMT per capita associated with the approved GOP 4 project would remain the same. Therefore, the relationship of the No Project Alternative to significant and unavoidable VMT impacts would be the same as that under the proposed project.

Relationship to Project Objectives

This alternative would not meet the basic project objective of transferring unused FAR from the adjacent rail spur properties to enable a relatively small expansion to Phase 4 of the GOP Master Plan project.

4.5 Environmentally Superior Alternative

From the alternatives considered for the proposed project in this Draft SEIR, the environmentally superior alternative would be the No Project Alternative, although the project- and cumulative level impacts associated with VMT would remain the same.

CHAPTER 5
Other CEQA Required Considerations

5.1 Introduction

Section 15126 of the CEQA Guidelines requires that all phases of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Further, CEQA Guidelines Section 15126.2(a) requires that the evaluation of significant impacts consider direct and reasonably foreseeable indirect effects of the project over the short-term and long-term. The EIR must identify (1) significant environmental effects of the proposed project, (2) feasible mitigation measures proposed to minimize significant effects, (3) significant environmental effects that cannot be avoided if the proposed project is implemented, (4) significant irreversible environmental changes that would result from implementation of the proposed project, (5) growth-inducing impacts of the proposed project, and (6) alternatives to the proposed project.[1]

Sections 3.1 and 3.2 of the SEIR provide a comprehensive presentation of the proposed GOP 4 Density Transfer project's new environmental effects, proposed mitigation measures, and conclusions regarding the level of significance of each impact both before and after mitigation.

Chapter 4, *Project Alternatives*, presents a comparative analysis of alternatives to the proposed GOP 4 Density Transfer project.

The other CEQA-required analyses described above are presented below.

5.2 Significant and Unavoidable Adverse Impacts

Section 15126.2(c) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. The environmental effects of the proposed GOP 4 Density Transfer project on various aspects of the environment are discussed in detail in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*. As discussed in Chapter 3, the proposed GOP 4 Density Transfer project would have the following new impacts that would be significant and unavoidable, that were not identified in the EIR:

[1] CEQA Guidelines sections 15126.2(a), (c-e), 15126.4, and 15126.6.

Impact 3.1-2: The proposed project would conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision b) related to VMT.

Impact 3.1-5: Implementation of the proposed project, in combination with other development, could contribute to cumulative conditions where VMT per capita or VMT per employee could exceed 85 percent of the 2040 cumulative Bay Area-wide regional average daily VMT per employee.

5.3 Significant Irreversible Environmental Effects

Under CEQA, an EIR must analyze the extent to which a project's primary and secondary effects would generally commit future generations to the allocation of nonrenewable resources and to irreversible environmental damage (State CEQA Guidelines section 15126.2(c); 15127). Section 15126.2(c) states:

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project would involve uses in which irreversible damage could result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development of the already-approved GOP 4 Precise Plan would result in the dedication of the GOP 4 project site to R&D building complex, thereby precluding other uses for the lifespan of the project. The proposed project does not exacerbate that circumstance.

The State CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident associated with the proposed GOP 4 Density Transfer project. While the proposed GOP 4 Density Transfer project would incrementally increase the use, transport, storage, and disposal of hazardous wastes during construction and operation, as described in EIR prepared for the GOP Master Plan project, all activities would comply with applicable state and federal laws related to hazardous materials, which significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage.

Implementation of the proposed GOP 4 Density Transfer project also would incrementally increase the long-term commitment of resources to urban development. The most notable significant irreversible impacts are increased generation of pollutants from vehicle travel and stationary operations, and the short-term commitment of non-renewable and/or slowly renewable natural and energy resources, such as water resources during construction activities. The environmental consequences of the proposed GOP 4 Density Transfer project are described in the appropriate sections in Chapter 3, *Environmental Setting, Impacts, and Mitigation Measures*.

Resources that would be permanently and continually consumed by implementation of the proposed GOP 4 Density Transfer project include water, electricity, natural gas, and fossil fuels; however, the amount and rate of consumption of these resources would not result in the unnecessary, inefficient, or wasteful use of resources. With respect to operational activities, compliance with applicable building codes, including the 2021 Title 24 Energy Efficiency Standards (Effective January 1, 2022), as well as mitigation measures, planning policies, and standard conservation features, would ensure that natural resources are conserved to the maximum extent feasible. It is also possible that, over time, new technologies or systems will emerge, or will become more cost-effective or user-friendly, to further reduce the reliance upon nonrenewable natural resources. Nonetheless, construction activities related to the proposed GOP 4 Density Transfer project would result an incremental increase in the irretrievable commitment of nonrenewable energy resources, primarily in the form of fossil fuels (including fuel oil), natural gas, and gasoline for automobiles and construction equipment.

Based on the discussion above, no new or more severe significant impacts with respect to significant irreversible environmental effects are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

5.4 Growth-Inducing Effects

As required by Section 15126.2(e) of the State CEQA Guidelines, an EIR must discuss ways in which a proposed project could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also, the EIR must discuss the characteristics of the project that could encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. Growth can be induced in a number of ways, such as through the elimination of obstacles to growth, through the stimulation of economic activity within the region, or through the establishment of policies or other precedents that directly or indirectly encourage additional growth. The purpose of this section is to evaluate the potential growth-inducing effects resulting from the implementation of the proposed GOP 4 Density Transfer project in the City of South San Francisco, and throughout the region.

In general, a project may foster spatial, economic, or population growth in a geographic area if the project removes an impediment to growth (e.g., the establishment of an essential public

service, the provision of the new access to or infrastructure capacity that serves an area; a change in zoning or general plan designations that increase density for areas outside the boundaries of the project site); or indirectly stimulates economic expansion or growth that occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.). These circumstances are further described below:

- **Elimination of Obstacles to Growth:** This refers to the potential for a proposed project to remove infrastructure limitations or provides infrastructure capacity, or removes regulatory constraints that could result in growth unforeseen at the time of project approval;
- **Precedent-setting Effects**: This refers to the potential for a project to establish a precedent for allowing more growth, that will likely be copied by other, future projects; and
- **Economic Effects:** This refers to the potential for a proposed project to cause increased activity in the local or regional economy.

Elimination of Obstacles to Growth

The elimination of physical obstacles to growth is considered a growth-inducing effect. Growth within the East of 101 Area and the City of South San Francisco as a whole is affected by the capacity of utility systems serving the City including the wastewater and drainage, water supply, and electrical systems. Growth within the City is also affected by the roadway circulation system, public transit infrastructure and services and bikeway/pedestrian facilities.

The implementation of the proposed GOP 4 Density Transfer project would not result in the elimination of obstacles to growth. The proposed project is located within an urban area of the City. The proposed project would not include localized circulation improvements, other than on-site driveways and pathways, and thus would not expand the capacity of area roadways. As described in the EIR, existing service systems for drainage and wastewater within the GOP Master Plan area are either adequate to serve the proposed project, or would require improvements to accommodate the incremental increase in demand proposed by the GOP 4 Density Transfer project. Improvements to utility infrastructure would be intended to serve the proposed project; they would not be sized to provide substantial excess capacity beyond what is needed to serve the proposed GOP 4 Density Transfer project. Therefore, improvements associated with the proposed project would not expand the capacity of local infrastructure to the extent that current constraints to development in surrounding areas would be eliminated. As such, the proposed GOP 4 Density Transfer project would not eliminate obstacles to further growth within the East of 101 Area and the City of South San Francisco.

Accordingly, no new or more severe significant impacts with respect to the elimination of obstacles to growth are anticipated beyond those anticipated and analyzed in the EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Precedent-Setting Effects

The proposed project includes legislative changes to allow an expansion. Specifically, the applicant seeks amendments to allow the development of additional density to the extent such density would otherwise be available on immediately adjacent property that is (1) subject to an FAR limitation of 1.25 or less; (2) part of the same research & development campus; and (3) deed-restricted to preclude development of the transferred FAR. These legislative changes would not be precedent-setting, as the circumstances under which the density transfer would be allowed are narrow and there are no other known sites that could qualify. Further, the legislative changes would allow only a transfer of density and would not set a precedent for increasing the amount of development that is allowed overall.

Economic Effects

As is presented in Chapter 2, *Project Description*, under the future conditions it is anticipated that the expansion proposed by the GOP 4 Density Transfer project would employ 321 workers. In addition to employment growth generated by the proposed project, employment could be generated in the local and regional economy through what is commonly referred to as the "Multiplier Effect." The Multiplier Effect generally refers to the secondary economic effects caused by spending from project-generated employees and resulting in additional employment in the local and regional economy.

Indirect employment includes those additional jobs that are generated through the expenditure patterns of employees associated with the project. *Induced* employment follows the economic effect of employment beyond the expenditures of the employee within the project vicinity to include jobs created by the stream of goods and services necessary to construct the proposed project and support businesses within the South San Francisco area.

It is estimated that the proposed GOP 4 Density Transfer project would employ 321 workers. The environmental consequences of economic growth resulting from this relatively low number of employees are too speculative to predict or evaluate, since they can be spread throughout the Bay Area region and beyond.

The future cumulative context of citywide and regional growth used for the cumulative analyses in the City of South San Francisco's General Plan EIR and the cumulative analyses in the Association of Bay Area Governments (ABAG) Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) EIR includes the multiplier effects of the project. Consequently, the cumulative impact analyses in the General Plan EIR and the MTP/SCS EIR account for additional growth beyond the GOP 4 project site that would be generated by the proposed GOP 4 Density Transfer project.

It should be noted that, while the proposed GOP 4 Density Transfer project would contribute to direct, indirect, and induced growth in the region, it would develop employment land uses in a manner that is efficient, and utilizes existing and planned urban resources. As is described in

Section 3.2, *Other Resource Topics*, development of the proposed project is consistent with the goals and policies of the City's General Plan. Contributing to the vitality of the community is also a General Plan goal, which would be achieved as a result of the proposed GOP 4 Density Transfer project.

Accordingly, no new or more severe significant impacts with respect to economic effects are anticipated beyond those anticipated and analyzed in the 2010 EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

Environmental Effects of Induced Growth

Because the proposed project will not induce growth, there will be no environmental effects of induced growth. Furthermore, the incremental increase in economic activity created by the indirect and induced employment associated with the proposed project would be a small part of the overall future growth in economic activity in the Bay Area region. Local governments throughout the region are planning for additional residential and employment-generating land uses, some of which could meet the demands created indirectly by the proposed GOP 4 Density Transfer project. Through their planning and entitlement actions, the future actions of those local agencies would be subject to environmental review under CEQA, and would be required to be consistent with regional and state plans and regulations. To the extent that future development that accommodates indirect and induced growth from the proposed project is undertaken in a manner consistent with the South San Francisco General Plan and SACOG MTP/SCS, as well as a multitude of planning and regulatory documents, many of the potential adverse environmental consequences would be reduced in magnitude or avoided altogether.

Accordingly, no new or more severe significant impacts with respect to the environmental effects of induced growth are anticipated beyond those anticipated and analyzed in the 2010 EIR. Thus, in accordance with Sections 15162 and 15163 of the State CEQA Guidelines, no additional environmental review is required.

CHAPTER 6
List of Preparers and Persons Consulted

6.1 Report Authors

Lead Agency

The City of South San Francisco is the CEQA lead agency for preparation of this SEIR.

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City of South San Francisco
Department of Economic and Community Development
315 Maple Avenue
South San Francisco, California 94080

Environmental Science Associates (ESA)

The following ESA staff contributed to the preparation of the SEIR.

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Paul Stephenson, AICP: B.S. Environmental Policy Analysis and Planning; M.A. Planning. 17 years of experience. Project Manager. Responsible for EIR preparation, day-to-day project management,

Jonathan Teofilo: B.S. Environmental Studies. 8 years of experience. Responsible for EIR preparation.

Kristine Olsen: A.S. Natural Science. 20 years of experience. Responsible for managing, coordinating, and ensuring word processing and publication quality control for all elements of document production for the EIR.

James Songco: B.F.A. Graphic Design. 20 years of experience. Responsible for preparation of graphics, figures and exhibits in the EIR.

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6.2 Persons Consulted

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Other Organizations

California Department of Transportation

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San Francisco International Airport

Nupur Sinha, Director of Planning and Environmental Affairs

Project Applicant Team

BioMed Realty Group

Ethan Warsh, Senior Project Manager

Appendix A
Notice of Preparation

NOTICE OF PREPARATION
OF AN SEIR AND SCOPING MEETING FOR THE
PROPOSED GOP 4 DENSITY TRANSFER PROJECT
MODIFYING THE PREVIOUSLY APPROVED GATEWAY
BUSINESS PARK MASTER PLAN PROJECT
SCH #2008062059

To: Agencies, Organizations, and Interested Parties

From: City of South San Francisco, Economic and Community Development Department

Subject: Notice of Preparation (NOP) of a Focused Supplemental Environmental Impact Report (SEIR) in Compliance with Public Resources Code section 21166 and section 15163 of Title 14 of the California Code of Regulations (CEQA Guidelines). The City of South San Francisco (City) is the Lead Agency under CEQA for the proposed project identified below. The City will prepare an SEIR focused on transportation issues (including Vehicle Miles Traveled) for the proposed project identified below.

Project Title and Description: The Project is entitled the "GOP 4 Density Transfer Project." This Project would modify the previously-approved Gateway Business Park Master Plan project. The GOP 4 Density Transfer Project proposes to transfer up to 120,221 square feet of development potential from some undeveloped adjacent property, and use it to expand one of the buildings approved for Phase 4 of the Gateway Business Park Master Plan project ("GOP 4") by that amount, to be configured in four additional floors. Additional details are set forth below.

Project Location: GOP 4 is located at 850 and 900 Gateway Boulevard, southeast of the intersection of Gateway Boulevard and Oyster Point Boulevard, in the City of South San Francisco, County of San Mateo. Modifications to the GOP Master Plan, which also encompasses 1000 Gateway (GOP 1), 750 Gateway (GOP 2), and 700 Gateway (GOP 3), will be required to implement the GOP 4 Density Transfer Project. Conforming amendments to or repeal of the Gateway Specific Plan would also be required. The Specific Plan encompasses the area generally bounded by Oyster Point Boulevard on the north, East Grand Avenue on the south, Forbes Boulevard extending northerly along a line generally west of and parallel to Eccles Avenue on the east, and Poletti Way on the west.

Prior Environmental Review: The Gateway Business Park Master Plan project was studied in an EIR, SCH #2008062059. The City Council certified the EIR and adopted CEQA findings in Resolution No. 18-2010. The project was subsequently modified to reconfigure the layout and update the architecture. The City Council found the EIR adequate for the modified Master Plan project and for a Precise Plan for Phase 1, and re-adopted CEQA findings, in Resolution No. 43-2013. The Planning Commission later adopted Addenda addressing Precise Plans for Phases 2, 3 and 4 of the Master Plan project, in Resolutions No. 2834-2018 and No. 2858-2020.

Current Environmental Review: The Supplemental EIR will supplement the prior EIR with a project-level discussion of the transportation impacts of the 120,221 square foot expansion proposed by the GOP 4 Density Transfer Project. The SEIR also will include evaluations of all other resource areas, for which it is probable there will be no new or more severe significant environmental impacts, to demonstrate that no supplemental or subsequent analysis is required for those resource areas. The SEIR will be prepared in compliance with CEQA and the CEQA Guidelines. An Initial Study has not been prepared. Further details are provided below.

Agency/Public Comments: The City requests your comments regarding the scope and content of the environmental review to be conducted for the proposed GOP 4 Density Transfer Project. The City will accept written comments on this NOP between **November 16, 2021 and December 20, 2021**, a period of thirty four (34) days to account for the Thanksgiving holiday. Please send your comments by email to Billy.Gross@ssf.net or by mail to:

City of South San Francisco
Department of Economic and Community Development
Attn: Billy Gross, Principal Planner
315 Maple Avenue
South San Francisco, CA 94080

Scoping Meeting: Pursuant to Public Resources Code Section 21083.9 and Sections 15206 and 15082 of the CEQA Guidelines, the Lead Agency also hereby gives notice of a public scoping meeting on this project to receive comments on the scope of the EIR. In accordance with current shelter-in-place mandates related to COVID-19, the Lead Agency will conduct a **virtual scoping meeting on December 6, 2021, beginning at 4:00 PM**, via webinar and telephone conference line. During the scoping meeting, agencies, organizations, and the public will have an opportunity to submit comments. The scoping meeting will include a presentation providing an overview of the project and the CEQA process, followed by a question and answer session for online and phone attendees. Please note that comments are limited to three minutes per speaker.

Join Zoom Meeting
https://ssf-net.zoom.us/j/84108657411?pwd=OUlubEdrZlV5eUdnWlNVdW9OSlU4UT09

Meeting ID: 841 0865 7411
Passcode: 712141

One tap mobile
+16699006833,,84108657411#,,,,*712141# US (San Jose)
+13462487799,,84108657411#,,,,*712141# US (Houston)

Dial by your location
+1 669 900 6833 US (San Jose)
+1 346 248 7799 US (Houston)
+1 253 215 8782 US (Tacoma)
+1 301 715 8592 US (Washington DC)
+1 312 626 6799 US (Chicago)
+1 929 205 6099 US (New York)
833 548 0282 US Toll-free
877 853 5257 US Toll-free
888 475 4499 US Toll-free
833 548 0276 US Toll-free

Find your local number: https://ssf-net.zoom.us/u/kb3KEBS50m

Please note that there are three ways to comment during the meeting:

1. ***Send a comment via email to Billy.Gross@ssf.net.*** City staff will monitor emails during the meeting and any email comment received during the meeting will be read into the record. Your email should be limited so that it complies with the 3-minute time limitation for public comment.

2. ***Call the Planning Division Hotline at (650) 829-4669.*** Voice Messages will be monitored during the meeting and read into the record. Your voicemail should be limited so that it complies with the 3-minute time limitation for public comment.

3. ***Submit a comment via the "chat" function in the Zoom meeting app.*** City staff will monitor the chat and will read comments and questions into the record.

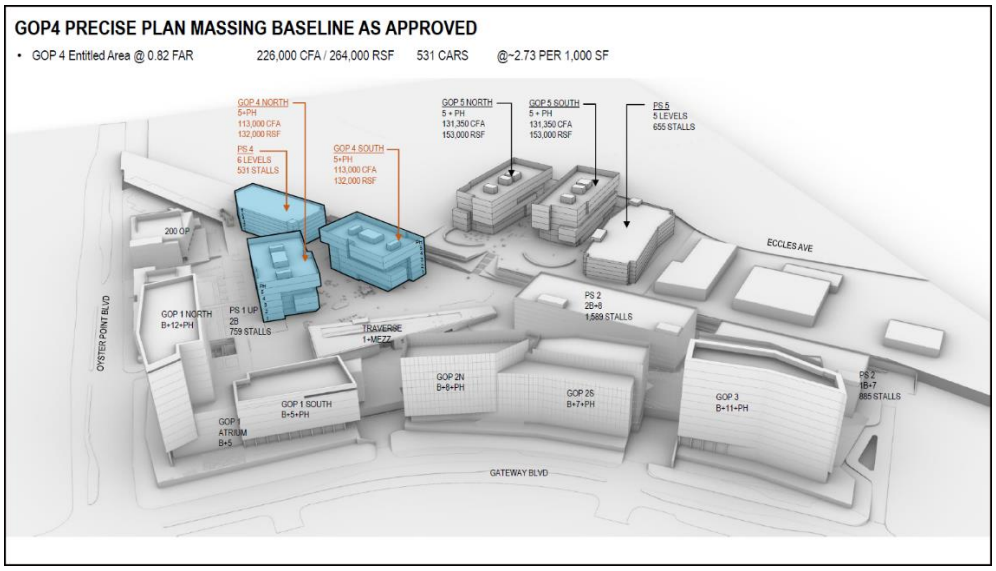
EIR Process: Following the close of the NOP comment period, a Draft Supplemental Focused EIR will be prepared that will take into consideration NOP comments. The Draft Supplemental Focused EIR will be released for public review and comment for the required 45-day review period. Following the close of the public review period, the City will prepare a Final Supplemental Focused EIR that will include responses to all substantive comments received on the Draft Supplemental Focused EIR. The Draft SFEIR and Final SFEIR will be considered by City decisionmakers in making the decision to certify the SFEIR and to approve or deny the components of the proposed project. If certified by the City, the SFEIR may be relied on by other agencies for purposes of carrying out portions of the proposed project within their respective jurisdictions. The certified SFEIR may also be relied upon by the City and other agencies in connection with subsequent activities within the Master Plan project, and to determine the nature and scope of any supplemental or subsequent environmental review.

Project Description, Location and Property Ownership

Affiliates of BioMed Realty (BMR) propose to modify the approvals for Phase 4 of the GOP Master Plan project to implement what is, in essence, a transfer of density from some adjacent former rail spur properties included in the separate GOP 5 project. Specifically, BMR proposes to deed restrict the rail spur properties to eliminate development of the transferred FAR. In exchange, BMR has applied to the City to modify the Precise Plan for Phase 4 (GOP 4) to add 4 floors to the northern GOP 4 building. This modification would allow BMR to take advantage of up to 120,221 additional square feet that could otherwise be built on the adjacent rail spur properties.

I. Background.

The GOP Master Plan project and the adjacent GOP 5 project are both located in the City's East of 101 Area. Though the entitlements for each project remain separate, the physical development is intended to integrate the two projects into one life sciences campus connected by pedestrian pathways and a grand staircase. As currently entitled, the GOP Master Plan project and GOP 5 project are as follows, with GOP 4 highlighted in blue:



A. Approved GOP Master Plan Project and Location.

In 2013, the City approved a modified master plan for the Gateway Business Park Master Plan project, which is now known as the Gateway of Pacific, or GOP project. The GOP Master Plan project site is located southeast of the intersection of Gateway Boulevard and Oyster Point Boulevard, at 1000 Gateway (GOP 1), 750 Gateway (GOP 2), 700 Gateway (GOP 3), and 850 & 900 Gateway (GOP 4), in San Mateo County. The Master Plan project site is designated Business Commercial in the General Plan, is subject to the Gateway Specific Plan, and is in the Gateway Specific Plan zoning district. The project is vested into these plans and regulations by a Development Agreement.

The GOP Master Plan contemplates phased development. The City has approved precise plans for four phases, and has approved Lot Line Adjustments that accommodate these phases.

The General Plan currently imposes an FAR limitation of 1.25 on the GOP Master Plan site. The Master Plan currently reflects this 1.25 FAR limitation and permits individual parcels to be developed at FARs greater than 1.25, so long as development of the entire Master Plan site does not exceed 1.25.

1. GOP 1.

The Precise Plan for GOP 1 was approved by City Council Resolution 44-2013 in 2013. Construction started around May 2017 and the first tenants occupied the building in early 2021. GOP 1 has north and south towers. GOP 1 also hosts an amenity building designed to serve the entire campus, known as "Traverse." There are two parking levels under the plaza and amenity building.

2. GOP 2.

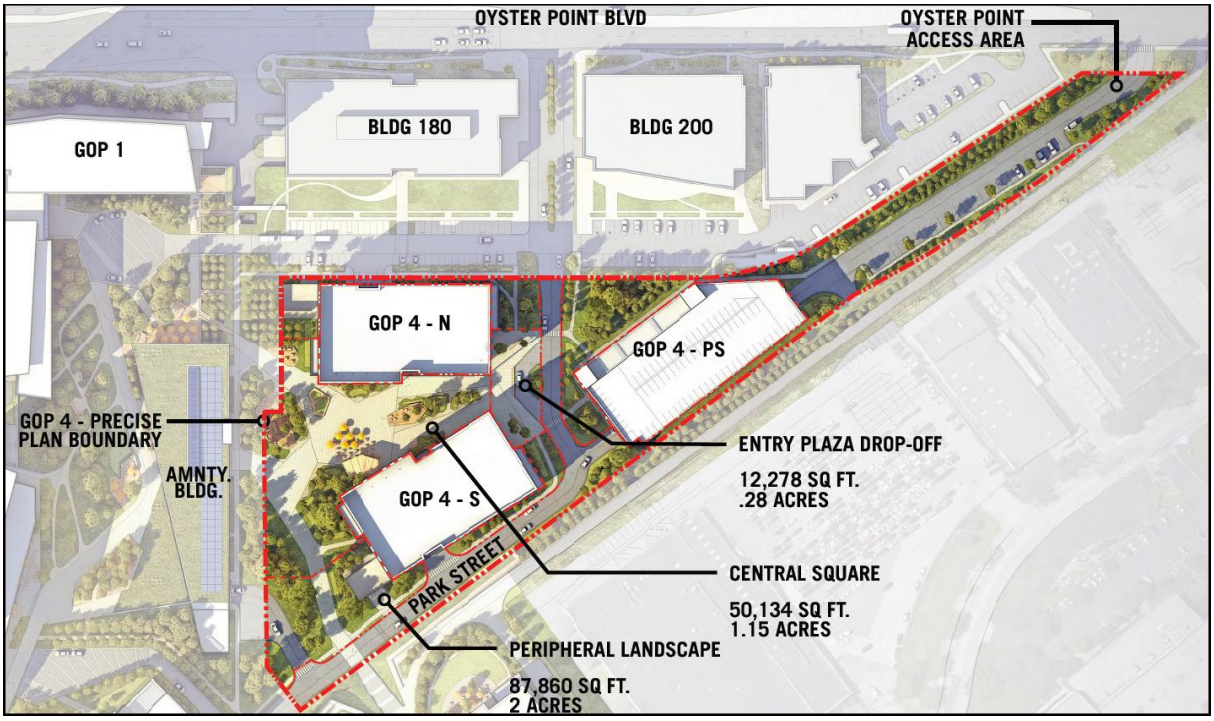
The Precise Plan for GOP 2 was approved by Planning Commission Resolution No. 2835-2018 in 2018. Construction started around April 2019, and occupancy is projected in approximately March 2022. GOP 2 has north and south towers, with parking accommodated in a parking structure on the GOP 2 site.

3. GOP 3.

The Precise Plan for GOP 3 also was approved by Planning Commission Resolution No. 2835-2018 in 2018. Construction started around August 2019, and occupancy is targeted for late 2022. GOP 3 has a single building, with parking accommodated in a parking structure on the GOP 3 site.

4. GOP 4.

The GOP 4 Precise Plan was approved by Planning Commission Resolution No. 2859-2020 in 2020. Neither demolition nor construction have commenced. GOP 4 was approved for two five-story buildings and a parking structure of 6 levels, with a partial floor on the 6th level. The approved GOP 4 Precise Plan allows the following development:



5. GOP Master Plan Parking Ratio.

The GOP Master Plan and the Phase 1 Precise Plan were approved in 2013 subject to condition of approval A.2, which states:

> The parking ratio for the Master Plan and Precise Plan project shall not exceed 2.73 spaces per 1,000 square feet at any time. The current and all future Precise Plan applications shall include site development plans that specify the campus-wide parking ratio does not exceed 2.73 spaces per 1,000 square feet. If the campus-wide ratio exceeds the 2. 73 spaces per 1,000 square feet ratio, the developer shall provide a site plan that indicates how parking spaces on the entire campus will be allocated and used.

Accordingly, GOP 1 through 4, as currently entitled, are parked at a ratio of 2.73 spaces per 1,000 square feet of Floor Area . The total number of parking spaces built, under construction or approved is 3,776.

6. Prior GOP Master Plan Environmental Review.

The GOP Master Plan was approved based upon a comprehensive EIR the City re-certified in 2013. For each Precise Plan approval, the City relied upon an Addendum to that EIR, which had been prepared to address any changes that had arisen since the EIR was certified. The City determined that there were no changes to the project or the surrounding circumstances, and no significant information, that showed any new or more severe impacts. The most recent such decision was made in Resolution 2858-2020, adopted on August 6, 2020 in connection with approval of the GOP 4 Precise Plan. No challenges were filed against that Resolution.

7. GOP Master Plan Land Ownership.

BMR is seeking modified entitlements on behalf of the following affiliates, which own the lands within the GOP Master Plan site as follows:

GOP 1 - BMR-Gateway of Pacific I LP

GOP 2 - BMR-Gateway of Pacific II LP

GOP 3 - BMR-Gateway of Pacific III LP

GOP 4 - BMR-Gateway of Pacific IV LP

B. Approved GOP 5 Project.

No modifications are proposed to the GOP 5 Project approvals. However, GOP 5 is described here because it is the source of the density transfer.

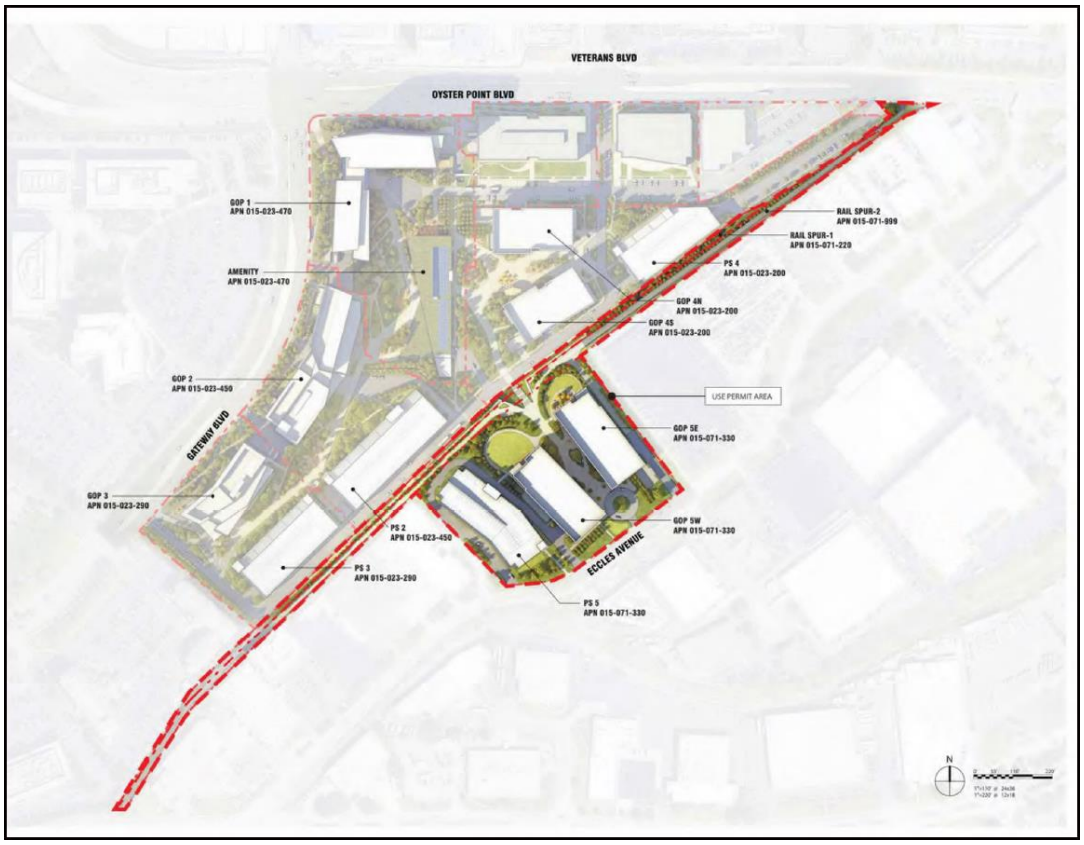
The GOP 5 project site is designated Business and Technology Park in the General Plan, and is located in the Business Technology Park zoning district. The General Plan and zoning both limit FAR at the site to 1.0. The GOP 5 project is vested into these plans and regulations by a Development Agreement.

In 2016, the City Council adopted Resolution 94-2016 approving a use permit, design review, transportation demand management plan and alternative landscape plan for a project then known as 475 Eccles. The 475 Eccles project approvals allowed construction of two life sciences buildings, which achieved the 1.0 FAR on the 475 Eccles parcel, and a parking structure. At that time, 475 Eccles was separated from the GOP Master Plan site by some former rail spurs that connect Oyster Point Boulevard to Forbes Boulevard.

BMR subsequently acquired the rail spur property, and proposed to use it to connect the GOP Master Plan site with the 475 Eccles project site. Specifically, BMR proposed to develop the rail spurs into a publicly accessible multi-use path connecting Oyster Point Boulevard with Forbes Boulevard, with pedestrian amenities, all to implement the City's draft "rails to trails" plan. A grand staircase allowing access from the lower elevation of the GOP Master Plan site to the higher elevation of the 475 Eccles site was also proposed.

Accordingly, BMR submitted applications to modify the 2016 approvals for 475 Eccles to expand the project to encompass the rail spurs and include this development. At the same time, BMR also sought approval to update the 475 Eccles design to bring it up to date and make it more compatible with the neighboring GOP Master Plan project, without increasing the square footage previously approved for 475 Eccles. This revised 475 Eccles project, including the addition of the rail spur development, is known as "GOP 5."

In 2020, the City Council adopted Resolution 119-2020 approving the GOP 5 project. The approvals allow up to 262,287 square feet of Floor Area in two new buildings, plus a parking structure. The approved project is depicted as follows:



Because the GOP 5 project does not include any development that would take advantage of the 1.0 FAR applicable to the rail spurs, the Development Agreement the City entered into for GOP 5 recognizes that:

> L. WHEREAS, the modified development proposal is 262,287 square feet . . . based on the application of an FAR of approximately 1.0 to the [475 Eccles parcel], and does not include the density that could be available to Owner based on the application of allowable FAR to the [rail spurs]; and
>
> M. WHEREAS, by entering into this Agreement, Owner has not waived any right it may have for future additional development on the Property based on the application of allowable FAR to the Property.

The rail spurs consist of two legal parcels. APN 015-071-220 has 39,802 square feet (0.91 acres) and APN 015-071-340 has 80,419 square feet (1.85 acres). Together, this totals 120,221 square feet, or 2.76 acres. Accordingly, the 1.0 FAR allows an additional 120,221 square feet of development that was not used in the GOP 5 project.

II. Proposed GOP 4 Density Transfer Project.

A. Deed Restriction To Reduce FAR of Rail Spurs.

BMR proposes to deed-restrict the rail spur property to eliminate the 1.0 FAR development potential on the rail spurs. The deed restriction would not allow any of the density transferred to GOP 4 to be constructed on the rail spur property. This deed restriction would be required by a condition of approval to the GOP 4 Density Transfer Project approvals. This deed restriction would be recorded in favor of the City and bind the land. Accordingly, the practical effect of this deed restriction would be to reduce the current FAR at the rail spurs to zero.

B. Use of Rail Spur FAR at GOP 4.

The square footage that could be developed under the 1.0 FAR applicable to the rail spurs would be transferred to GOP 4. The GOP 4 North building would be expanded by 4 floors and 120,221 square feet. The resulting building would provide a step-down transition between the GOP 1 North building, which was built at 12 stories above ground level plus a penthouse, and GOP 4 South, which will remain as approved at 5 floors and a penthouse. The approved architectural scheme of the buildings would be extended to the new floors, without any substantive changes in architecture. The Density Transfer Project also includes a generator yard at ground level in the landscaped area on the northwest side of the GOP 4 parking structure.

1. Resulting Square Footage and FAR.

In exchange for effectively reducing the FAR on the rail spurs to zero, the FAR would be increased at GOP 4, and the GOP Master Plan would be amended to conform, as follows:

	GOP 1 Parcel C	**GOP 2 Parcel B**	**GOP 3 Parcel A**	**GOP 4 Parcel D**	**GOP Master Plan (1-4)**
Lot Square Footage, after most recent LLA	284,584 (6.53 acres)	237,986 (5.46 acres)	185,262 (4.25 acres)	276,639[a] (6.35 acres)	984,471
As Built or Entitled – Before GOP 4 Density Transfer Project					
Building Floor Area	479,116	371,648	302,722	225,621[b]	1,379,107
Building Floor Area that counts towards FAR	427,104	312,130	265,734	225,621	1,230,589
FAR	1.50	1.31	1.43	0.82	1.25
After Implementation of the GOP 4 Density Transfer Project, Which Proposes to Transfer 120,221 SF from the Rail Spurs to GOP 4					
Building Floor Area	479,116	371,648	302,722	345,842	1,499,328
Building Floor Area that counts towards FAR	427,104	312,130	265,734	345,842	1,350,810
FAR	1.50	1.31	1.43	1.25	1.37

Notes

Floor Area is calculated pursuant to Municipal Code § 20.040.008. Floor Area Ratio (FAR) is calculated pursuant to Municipal Code § 20.040.009.

a. The GOP 4 parcel was 276,422 SF when BMR first applied for the GOP 4 Precise Plan. Pursuant to a Lot Line Adjustment subsequently approved by the City, the GOP 4 parcel is now 276,639 SF.

b. The approved plan set for GOP 4 shows 226,000 SF of Floor Area. However, subsequent calculations that took into account the exact square footage of GOP 1 – 3 revealed that only 225,261 SF of Floor Area (a difference of 379 square feet) is available to be built at GOP 4 under the 1.25 FAR currently applicable to the entire GOP Master Plan site.

2. Resulting Parking.

The GOP 4 parking structure was approved at 6 levels (including 5 full floors and a partial level on the 6th floor) and 531 stalls. The parking structure would be expanded by 2.5 floors and 240 stalls, resulting in a structure of 8 levels and 771 stalls. These additional spaces will park the increment of additional square footage at 2.0 spaces per 1,000 square feet of Floor Area. The remainder of the approved GOP Master Plan campus will remain subject to the 2.73/1,000 parking ratio limitation of the Master Plan. After development of the GOP 4 Density Transfer Project, the blended parking ratio for the GOP Master Plan campus as a whole will be 2.67 spaces per 1,000 SF.

C. Approvals Requested.

The approvals anticipated for the GOP 4 Density Transfer Project are:

1. Minor General Plan Amendment to Allow Density Transfer.

A minor amendment to the General Plan would be required to allow a density transfer. Specifically, BMR seeks to add text to the notes in General Plan FAR tables 2.2-1 and 2.2-2 that apply to the Business Commercial land use. The notes would be amended to add the following underlined text:

> The Gateway Business Park Master Plan and the Oyster Point Specific Plan are permitted to develop up to a FAR of 1.25 with a TDM, and are allowed to develop additional density to the extent such density would otherwise be available on immediately adjacent property that is (a) subject to an FAR limitation of 1.25 or less; (b) part of the same research & development campus; and (c) deed-restricted to preclude development of the transferred FAR.

2. Specific Plan Repeal or Amendment.

Because the Gateway Specific Plan may be considered outdated, and because the relevant components of the Specific Plan have already been incorporated into the applicable zoning district regulations, the Specific Plan could be repealed. Barring repeal, the Specific Plan would be amended to allow a transfer of density from adjacent property into the Specific Plan area, using the same text as quoted above.

3. Zoning Text Amendment.

The Gateway Specific Plan Zoning District regulations would be amended to allow a transfer of density from an adjacent zoning district, using the same text as quoted above.

4. GOP Master Plan Amendment.

The GOP Master Plan would be amended to allow a transfer of density from adjoining property, using the same text as quoted above.

5. GOP 4 Precise Plan Modification and Design Review.

The GOP 4 Precise Plan would be modified to incorporate an additional 120,221 square feet, with four additional floors on the GOP 4 North building, and 2.5 additional floors on the parking structure. The modifications would undergo associated design review.

6. GOP Master Plan Development Agreement Amendment.

The Development Agreement for the GOP Master Plan project would be amended to encompass the above approvals.

III. Environmental Review of the GOP 4 Density Transfer Project.

The physical changes to the approved Master Plan project that are proposed by the GOP 4 Density Transfer Project consistent of a relatively small expansion of 120,221 square feet configured in four floors to be added to the approved design for the GOP 4 North building. Under CEQA, the City is required to evaluate whether, since the most recent CEQA determination was made on August 6, 2020, this change to the GOP Master Plan project, or any changes in the surrounding circumstances, or significant new information relevant to the scope of approvals requested for the GOP Density Transfer Project, result in new or more severe significant adverse environmental impacts.

Because the GOP 4 Density Transfer Project proposes to add additional floors to the approved project without changing building footprints, no new or more severe significant impacts are anticipated in relation to agricultural/forestry resources, biological resources, cultural resources, geology/soils, hydrology/water quality, wildfire, mineral resources, tribal cultural resources or exposure to any hazardous materials resulting from demolition of existing buildings or grading. Due to building, operational and transportation efficiencies that have developed since the EIR was certified, it is anticipated that the 120,221 square-foot expansion will not cause the Master Plan project, as modified by the GOP 4 Density Transfer Project, to exceed the projections of the original EIR with respect to air quality emissions, water demand, or greenhouse gas emissions. The relatively minor expansion without any changes to land uses is not anticipated to result in material changes with respect to impacts related to population/housing, energy demand, public services and utilities, recreation, noise, growth-inducing impacts or land use/planning. The additional floors will provide a visual transition between the GOP 1 buildings and the GOP 4 south building, such that no new or more severe significant aesthetic impacts are anticipated. No changes are proposed to height limitations, and the expansion proposed by the GOP 4 Density Transfer Project would remain subject to mitigation imposed regarding aircraft noise. Accordingly, the Density Transfer Project is not anticipated to change any conclusions relating to consistency with the applicable Airport Land Use Plan. The expansion area will be subject to the same regulations relating to the handling of hazardous materials as the rest of the site, so no new or more severe impacts are anticipated in that context. The SEIR will document the conclusion and none of these resource areas trigger the need for supplemental or subsequent review.

The Supplemental EIR will evaluate whether the vehicle miles travelled associated with the 120,221 square-foot expansion would be significant, and explore mitigation if the impact is found to be significant. The Supplemental EIR also will evaluate whether there are any new or more significant impacts to any other transportation-related resources. The SEIR will evaluate the no project alternative and will assess whether any other potentially feasible alternatives to the GOP 4 Density Transfer Project would reduce or offset any significant Vehicle Miles Traveled impacts.

Appendix B
NOP Scoping Comment Letters

California Department of Transportation

DISTRICT 4
OFFICE OF TRANSIT AND COMMUNITY PLANNING
P.O. BOX 23660, MS–10D | OAKLAND, CA 94623-0660
www.dot.ca.gov

December 15, 2021

SCH #: 2008062059
GTS #: 04-SM-2021-00398
GTS ID: 24810
Co/Rt/Pm: SM/101/22.7

Billy Gross, Principal Planner
City of South San Francisco
Department of Economic and Community Development
315 Maple Avenue
South San Francisco, CA 94080

Re: GOP 4 Density Transfer Project Notice of Preparation (NOP)

Dear Billy Gross:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the GOP 4 Density Transfer Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the November 2021 NOP.

Project Understanding

The project would modify the previously approved Gateway Business Park Master Plan project. The Gateway Business Park Master Plan project ("GOP 4") Density Transfer Project proposes to transfer up to 120,221 square feet of development potential from undeveloped adjacent property to expand one of the buildings approved for Phase 4 of the GOP 4 by that amount, to be configured in four additional floors. The project also proposes the addition of 240 parking stalls. Furthermore, the City of South San Francisco (City) will conduct a Supplemental EIR (SEIR) to evaluate impacts related to vehicle miles travelled associated with the 120,221 square-foot expansion and to other transportation-related resources. The project is located roughly 0.4 miles southeast of the US Route (US)-101/Oyster Point Boulevard interchange.

Travel Demand Analysis

With the enactment of Senate Bill (SB) 743, Caltrans is focused on maximizing efficient development patterns, innovative travel demand reduction strategies, and multimodal improvements. For more information on how Caltrans assesses

Transportation Impact Studies, please review Caltrans' Transportation Impact Study Guide.

If the project meets the screening criteria established in the City's adopted Vehicle Miles Traveled (VMT) policy to be presumed to have a less-than-significant VMT impact and exempt from detailed VMT analysis, please provide justification to support the exempt status in align with the City's VMT policy. Projects that do not meet the screening criteria should include a detailed VMT analysis in the SEIR, which should include the following:

- VMT analysis pursuant to the City's guidelines. Projects that result in automobile VMT per capita above the threshold of significance for existing (i.e. baseline) city-wide or regional values for similar land use types may indicate a significant impact. If necessary, mitigation for increasing VMT should be identified. Mitigation should support the use of transit and active transportation modes. Potential mitigation measures that include the requirements of other agencies such as Caltrans are fully enforceable through permit conditions, agreements, or other legally-binding instruments under the control of the City.

- A schematic illustration of walking, biking and auto conditions at the project site and study area roadways. Potential traffic safety issues to the State Transportation Network (STN) may be assessed by Caltrans via the Interim Safety Guidance.

- The project's primary and secondary effects on pedestrians, bicycles, travelers with disabilities and transit performance should be evaluated, including countermeasures and trade-offs resulting from mitigating VMT increases. Access to pedestrians, bicycle, and transit facilities must be maintained.

Mitigation Strategies
Location efficiency factors, including community design and regional accessibility, influence a project's impact on the environment. Using Caltrans' *Smart Mobility 2010: A Call to Action for the New Decade*, the proposed project site is identified as a Close-In Compact Community where community design is moderate and regional accessibility is variable.

Given the place, type and size of the project, the SEIR should include a robust Transportation Demand Management (TDM) Program to reduce VMT and greenhouse gas emissions from future development in this area. The measures listed below have been quantified by California Air Pollution Control Officers Association (CAPCOA) and shown to have different efficiencies reducing regional VMT:

- Project design to encourage mode shift like walking, bicycling and transit access;
- Transit and trip planning resources such as a commute information kiosk;

- Real-time transit information systems;
- Transit access supporting infrastructure (including bus shelter improvements and sidewalk/ crosswalk safety facilities);
- New development vehicle parking reductions;
- Implementation of a neighborhood electric vehicle (EV) network, including designated parking spaces for EVs;
- Designated parking spaces for a car share program;
- Unbundled parking;
- Wayfinding and bicycle route mapping resources;
- Participation/Formation in/of a Transportation Management Association (TMA) in partnership with other developments in the area;
- Aggressive trip reduction targets with Lead Agency monitoring and enforcement;
- VMT Banking and/or Exchange program; and/or
- Area or cordon pricing.

Using a combination of strategies appropriate to the project and the site can reduce VMT, along with related impacts on the environment and State facilities. TDM programs should be documented with annual monitoring reports by a TDM coordinator to demonstrate effectiveness. If the project does not achieve the VMT reduction goals, the reports should also include next steps to take in order to achieve those targets.

Please reach out to Caltrans for further information about TDM measures and a toolbox for implementing these measures in land use projects. Additionally, Federal Highway Administration's Integrating Demand Management into the Transportation Planning Process: A Desk Reference (Chapter 8). The reference is available online at: http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf.

Transportation Impact Fees

Please identify project-generated travel demand and estimate the costs of transit and active transportation improvements necessitated by the proposed project; viable funding sources such as development and/or transportation impact fees should also be identified. We encourage a sufficient allocation of fair share contributions toward multi-modal and regional transit improvements to fully mitigate cumulative impacts to regional transportation. We also strongly support measures to increase sustainable mode shares, thereby reducing VMT.

Lead Agency
As the Lead Agency, the City of South San Francisco is responsible for all project mitigation, including any needed improvements to the State Transportation Network (STN). The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

Equitable Access
If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, or for future notifications and requests for review of new projects, please email LDR-D4@dot.ca.gov.

Sincerely,

Mark Leong

MARK LEONG
District Branch Chief
Local Development Review

c: State Clearinghouse

San Francisco International Airport

December 20, 2021

TRANSMITTED VIA E-MAIL and U.S. MAIL
billy.gross@ssf.net

Billy Gross, Principal Planner
City of South San Francisco
Department of Economic and Community Development
315 Maple Street
South San Francisco, California 94080

Subject: ***Notice of Preparation of a Supplemental Environmental Impact Report (SEIR) Comments for the GOP 4 Density Transfer Project (SCH #2008062059)***

Dear Mr. Gross:

San Francisco International Airport (SFO or the Airport) staff have reviewed the Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) for the GOP 4 Density Transfer Project (the Proposed Project), located in the City of South San Francisco. We appreciate this opportunity to provide comments on the NOP.

The Proposed Project is located at 850 and 900 Gateway Boulevard, southeast of the intersection of Gateway Boulevard and Oyster Point Boulevard, in the City of South San Francisco. The Proposed Project includes transfer of up to 120,221 square feet of development potential from undeveloped adjacent property (at GOP 5) and use it to expand one of the buildings approved for Phase 4 of the Gateway Business Park Master Plan Project (GOP 4). GOP 4 was originally approved by the Planning Commission in 2020 for two five-story buildings (at an elevation of 137 feet above the North American Datum of 1988 [NAVD88]) and a six-story parking structure. The Proposed Project would include expansion of the GOP 4 North building by four floors, for a total of nine floors estimated at an elevation of 201 feet NAVD88.[1]

The Proposed Project site is inside Airport Influence Area B as defined by the *Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport* (ALUCP). The entire Proposed Project site would be located outside the 65 decibel (dB) Community Noise Equivalent Level (CNEL) contour and the Safety compatibility zones, and therefore appear compatible with the ALUCP.

As described in Exhibit IV-17 of the ALUCP, the critical airspace surfaces at the Proposed Project location are 510-540 feet NAVD88. Thus, the heights of the buildings would be below the critical airspace surfaces and the Proposed Project would be compatible with the ALUCP, subject to the issuance of a Determination of No Hazard from the Federal Aviation Administration (see below) for any proposed structures.

[1] The total proposed height of GOP 4 North was not provided in the NOP. The proposed elevation was calculated by assuming 16 feet per floor, based on the GOP 4 Precise Plan (available at: https://ci-ssf-ca.legistar.com/LegislationDetail.aspx?ID=4605845&GUID=169A73FE-0F56-4B24-8B15-05740E1C5112). The original plan for GOP 4 North was for an elevation of 137 feet NAVD88. An additional four floors would add 4 x 16 feet (or 64 feet) for a total of 201 feet NAVD88.

Post Office Box 8097 San Francisco, California 94128 Tel 650.821.5000 Fax 650.821.5005 www.flysfo.com

This determination does not negate the requirement for the Project proponent to undergo Federal Aviation Administration review as described in 14 Code of Federal Regulations Part 77 for both the permanent structures and any temporary cranes or other equipment taller than the permanent buildings which would be required to construct those structures.

* * *

The Airport appreciates your consideration of these comments. We look forward to reviewing the Supplemental Environmental Impact Report when made public. If I can be of assistance, please do not hesitate to contact me at (650) 821-9464 or at nupur.sinha@flysfo.com.

Sincerely,

Nupur Sinha

Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport

cc: Susy Kalkin, ALUC
Audrey Park, SFO, Acting Environmental Affairs Manager

Appendix C
Vehicle Miles Traveled Analysis

HEXAGON TRANSPORTATION CONSULTANTS, INC.

Gateway of Pacific (GOP) Phase 4 Expansion

Transportation Analysis – CEQA Analysis

Prepared for:

BioMed Realty – Gateway of Pacific IV LP

December 29, 2021

Hexagon Transportation Consultants, Inc.
Hexagon Office: 4 North Second Street, Suite 400
San Jose, CA 95113
Phone: 408.971.6100
Hexagon Job Number: 21TD06
Client Name: BMR – Gateway of Pacific IV LP

Project Description

This report presents the results of the California Environmental Quality Act (CEQA) transportation analysis (TA) conducted for the proposed expansion of an approved Office/Research and Development (R&D) building in the East of 101 Area in South San Francisco, California. The project consists of a transfer of density from adjacent undeveloped former rail spurs, resulting in a 120,221 square foot (s. f.) expansion of “Gateway of Pacific (GOP) 4 North”, an R&D building that was approved as part of phase 4 development of the Gateway of the Pacific (GOP) Master Plan. The GOP Master Plan currently consists of a total of 1,231,000 s.f. of R&D uses that would be built in 4 phases and was approved in 2013. The GOP Phase 4 Precise Plan consists of two R&D buildings and a parking structure and was approved recently in 2020. The project is seeking to modify the Precise Plan and related entitlements to allow an expansion of 120,221 s.f. to be configured in four extra floors added to the GOP 4 North building and adding 2.5 additional levels to the GOP 4 parking structure.

The potential project related transportation deficiencies were evaluated in accordance with the standards and methodologies set forth by the City of South San Francisco. This study evaluates the potential impacts on vehicle miles traveled (VMT), transit, pedestrian and bicycle facilities, safety, and emergency access.

CEQA Analysis

VMT Analysis

Pursuant to SB 743, the CEQA 2019 Update Guidelines Section 15064.3, subdivision (b) states that vehicle miles travelled (VMT) will be the metric in analyzing transportation impacts for land use projects for California Environmental Quality Act (CEQA) purposes. Consistent with the State CEQA guidelines, the City of South San Francisco has adopted the thresholds of significance based on type of development projects to guide in determining when a project will have a significant transportation impact.

Thresholds of significance identify whether a project's effect on VMT is significant. According to the City of South San Francisco's VMT guidelines (adopted in June 2020), a significant impact would occur for employment generating projects if the baseline project-generated home-based work (HBW) VMT per employee is higher than 85% of the existing nine-county Bay Area-Wide average for employee VMT. According to the City/County Association of Governments (C/CAG) – Valley Transportation Authority (VTA) Travel Demand Model, the existing Bay Area-wide regional average daily VMT per employee is 14.2, so the threshold is 12.1 daily VMT per employee (see Table 1). The 2040 cumulative Bay Area-wide regional average daily VMT per employee is 14.6, so the threshold is 12.4 VMT per employee for cumulative conditions.

Table 1
Home-Base Work Vehicle Miles Traveled Per Employee Thresholds

Location	Estimated HBW VMT	Estimated Employees	Estimated HBW VMT per Employee
Bay Area Region (Existing)	63,336,200	4,461,670	14.2
		VMT Reduction Factor	-15%
		HBW VMT Per Employee Threshold	12.1
Bay Area Region (2040 Cumulative)	78,980,240	5,406,190	14.6
		VMT Reduction Factor	-15%
		HBW VMT Per Employee Threshold	12.4
Source: Fehr & Peers 2020; C/ CAG-VTA Bi-County Transportation Demand Model, 2019.			

Project-generated HBW VMT per employee is estimated based on the HBW VMT for the project's transportation analysis zone (TAZ) in the C/CAG travel demand model. A TAZ is the smallest resolution available in the C/CAG model. Each TAZ included in the model contains information related to the existing and proposed land uses and transportation options in that zone. Therefore, the transportation properties of the project's TAZ are an appropriate proxy for transportation properties of the project itself. A significant project impact would occur under the following conditions.

- If the existing HBW VMT per employee in the travel demand model TAZ that encompasses the project is greater than 12.1 under existing conditions.

- If the 2040 HBW VMT per employee in the travel demand model TAZ that encompasses the project is greater than 12.4 under cumulative conditions.

The existing land use and transportation characteristics of the East of 101 area contribute to the East of 101 Area's higher-than-average VMT per employee. As a single-use employment center, all homebased trips begin or end outside the East of 101 area, requiring longer travel along auto-oriented roadways. Longer trips also result from the fact that South San Francisco, and especially the East of 101 area, is bounded by the Bay on its eastern side, further limiting the locations where housing could be located. Also, transit service to the area is limited. As a result, all employment-based uses in the East of 101 Area are likely to have longer commute trips compared to average HBW trips in the Bay Area. It is noted that the higher-than-average VMT per employee is not unique to South San Francisco and is common for many cities in the peninsula.

Based on the C/CAG travel demand model, the VMT per employee within the 120,221 square foot expansion proposed by the density transfer project would be 16.2 under existing Conditions (see Table 2). This is above the threshold of 12.1 for existing conditions. Under cumulative 2040 conditions, the project VMT per employee would be 12.9, which is above the threshold of 12.4 HBW VMT per employee. Therefore, the project would result in a significant VMT impact under existing and cumulative conditions.

Table 2
Project VMT Impact Determination

Location	Estimated HBW VMT	Estimated Employees	Estimated HBW VMT per Employee	VMT per Employee Threshold	VMT Impact
Project (Existing)	5,194	321	16.2	12.1	Yes
Project (2040 Cumulative)	4,136	321	12.9	12.4	Yes
Source: Fehr & Peers 2020; C/ CAG-VTA Bi-County Transportation Demand Model, 2019.					

The GOP Master Plan is required to implement a TDM program designed to achieve a 40% non-drive alone mode share during peak periods under the City's current TDM requirements and policy direction to reduce single-occupant vehicle trips. Because the expansion proposed by the density transfer project would become part of the GOP Master Plan and is expected to generate more than 100 average daily trips, the 120,221 square-foot expansion would be subject to this TDM program, and it would become part of a life sciences campus that is already subject to this program. The purpose of the TDM plan is to develop a set of strategies, measures, and incentives to encourage future employees of GOP to walk, bicycle, use public transportation, carpool, or use other alternatives to driving alone when traveling to and from work. Some of the GOP Master Plan TDM Measures (based on *Gateway Business Park Transportation Demand Management Program, April 2013)* include:

- The tenants of GOP will join *commute.org*, a joint powers agency (JPA) located in San Mateo County whose mission is to reduce the VMT generated by commuters to decrease congestion, improve the environment, and enhance quality of life by encouraging and supporting the use of sustainable alternatives to driving alone.
- Transportation options will be outlined in the tenant's employee handbook, or on an intranet site.
- The GOP building lobbies, employee break rooms, or other common areas will include permanent displays of commute alternative information.

- Bicycle storage will be provided on-site as racks, cages, lockers, or within a secured area inside the buildings. Both long- and short-term bicycle parking will be accommodated in accordance with requirements of the South San Francisco Municipal Code.
- Shower facilities with clothing lockers will be provided within each building to ensure shower access is available to all employees.
- Free preferential parking spaces will be provided for carpools and vanpools at a ratio of not less than 10% of all parking spaces.
- The tenants of the buildings will designate an individual TDM Coordinator(s) (or may share a coordinator with other tenants).
- The TDM Coordinator will provide new employee orientation packets, flyers, posters, email, and educational programs on a quarterly basis.
- The TDM Coordinator will provide ride-matching services for carpool and vanpool users through 511.org and/or an internal program.
- Employees will be able to utilize commute.org's free guaranteed ride home program for emergencies via taxicabs or rental cars. If commute.org discontinues its program, employers/tenants will provide an equal program in order to maintain access to free guaranteed rides home for emergencies.
- A well-lit path or sidewalk will be provided on site to the most direct route to the nearest transit or shuttle stop from the building.
- A future shuttle stop for northbound shuttles will be located along the GOP frontage directly across from 751 Gateway Boulevard.
- The landlord will complement existing shuttle services with additional shuttles as necessary to ensure adequate connections to transit.
- A loading zone for vanpool and carpool rides will be provided near the building entrances.
- Lighted paths and sidewalks will be provided between the buildings, and parking areas.
- Tenants will be required to offer flextime options such as compressed workweeks and alternative work hours.
- Employees will have the option to forego their parking space for a cash benefit.
- Bicycle connections will be provided to bicycle parking areas from bicycle routes.
- The site will contain several amenities, such as a restaurant establishment, convenience store, and outdoor spaces.
- Transit ticket sales will be provided on-site and facilitated online.
- While parking spaces for vanpools and carpools will be free and in preferential locations, employees driving alone must pay a monthly fee for parking.
- The tenants will subsidize transit tickets. This will be done through the Commuter Check Program which allows employees to make additional pre-tax payroll contributions to purchase transit tickets or monthly passes.
- The TDM Coordinator will administer an annual survey to determine alternative transportation mode use and opportunities to TDM strategy adjustments.

Based on *U. S. Census Bureau, 2006-2010 American Community Survey*, the non-drive alone mode share for commute trips in San Mateo County is 29%. The project will be required to achieve a 40% non-drive alone mode share, which represents an additional 11% percent reduction in non-drive alone mode share from baseline conditions.

However, reductions in non-drive alone mode share are not necessarily interchangeable with VMT reductions on a percentage point for percentage point basis because mode share targets do not necessarily correlate with trip generation and trip length. Although many East of 101 employers meet their non-drive alone mode share targets, and while trip generation is lower than ITE rates due to TDM programs, vehicle trip generation and trip lengths in this area are slightly higher than regional averages

based on the C/CAG travel demand model outputs. Therefore, project HBW VMT per employee was not adjusted based on the GOP TDM plan.

Mitigation Measures

First- and last-mile transit connections and active transportation improvements are likely to yield the greatest VMT reductions. These measures would not only serve the density transfer project but also the entire GOP campus and all of the existing and planned development in the area. Thus, the new VMT generated by the project would be partially offset by reductions in VMT for other development. The following mitigation measures support and enable the first-and last-mile non-auto commute strategies in the GOP Master Plan TDM Plan. The mitigation measures described below are appropriate under both existing plus project conditions and cumulative plus project conditions. These improvements are shown on Figure 1.

- The project applicant has acquired the rail spur property adjacent to GOP Phase 4 and shall use it to connect the GOP Master Plan site with the 475 Eccles project site, which is currently referred to as GOP Phase 5, approved for two office/R&D buildings totaling 262,287 s.f. and one parking structure. The applicant proposes to develop the rail spurs into a publicly accessible multi-use path connecting Oyster Point Boulevard with Forbes Boulevard, with pedestrian amenities, all to implement the City's draft "rails to trails" plan. A grand staircase allowing access from the lower elevation of the GOP Master Plan site to the higher elevation of the 475 Eccles site is also proposed. This multi-use path shall connect to Class II bicycle lanes on Oyster Point Boulevard and to the multi-use trail on Forbes Boulevard.

- The project shall make a fair-share contribution towards upgrades to the trail connection between the GOP Master Plan's multi-use trail and Caltrain access at E. Grand Avenue as identified in the *Mobility 2020 East of 101 Transportation Plan* for the Caltrain Access Improvement Concept (see attachment). The City is upgrading the block on E. Grand Avenue (south of Grand Avenue) to be a wider multi-use trail, but the remaining segment on E. Grand Avenue (east of Grand Avenue) and Forbes Boulevard is currently a split sidewalk/narrow trail that would not support long-term capacity needs. Improvements to Caltrain access along East Grand Avenue will help maximize station ridership and provide convenient bicycle and pedestrian connectivity between downtown and the entire East of 101 Area.

  The amount of the fair share contribution shall be determined in the conditions of approval of the modified Precise Plan for GOP 4. The project shall pay a fair share fee towards the cost of these trail connection upgrade improvements without regard to whether the project would otherwise be vested against payment of that fee, but in no event will the project be required to pay both a fair share fee and a citywide fee that will help fund the trail connection upgrade improvements.

  If fair share responsibilities for the cost of these trail connection upgrade improvements have already been determined as part of the City's development impact fee program, then the project shall pay a fee for each square foot of the approved expansion area (up to 120,221 square feet) equal to the portion of the Citywide fee for R&D/Office uses that is attributable to the cost of these trail connection upgrade improvements. If fair share responsibilities have not been determined, then the project's fair share shall be calculated by using vehicle trips as an approximation of pedestrian and bicycle trips. The project's fair share will be equal to the percentage of trips the expansion (up to 120,221 square feet) will generate on the roadways adjacent to the trail connection upgrade improvements compared to all vehicle trips on such

roadways. The city has advised that it is considering construction of certain bicycle connections instead, which would mitigate with more certainty than the fair share contribution would.

Implementation of these mitigation measures include improvements that support and enable the first- and last-mile non-auto commute strategies. However, the mitigation measure's effectiveness is unknown and may not reduce the project's HBW VMT below the existing and cumulative thresholds to reach a less-than-significant level. Therefore, the project's effect on VMT would be significant and unavoidable.

Transit, Pedestrian and Bicycle Analysis

A significant impact would occur if the proposed project conflicted with applicable or adopted policies, plans or programs related to pedestrian facilities or otherwise decreased the performance or safety of pedestrian facilities. The GOP Master Plan would develop a pedestrian-friendly Central Commons open space in the area created by the parking structures and the office buildings. The master plan would enhance public street frontages and foster transit use by providing multiple pedestrian connections to and from the internal campus and shuttle system stops. The proposed expansion would be compatible with the Master Plan and the existing GOP 4 Precise Plan. Therefore, the project would not have a detrimental impact to pedestrian circulation and would not trigger any new or more severe significant pedestrian circulation impacts.

Bicycle access to the project is provided via the bicycle lanes on Oyster Point Boulevard and the bike route on Gateway Boulevard. As part of GOP Phase 5, the existing rail spur that separates the phases 4 and 5 sites would be redeveloped into a multi-use trail. This multi-use trail would provide an additional connection between the Class II bicycle lanes on Oyster Point Boulevard and the existing multi-use trail on Forbes Boulevard. The proposed project would not conflict with existing and planned bicycle facilities; therefore, the impact to bicycle facilities would be less-than-significant.

The 120,221 square foot expansion proposed by the density transfer project is expected to generate trips via transit services, which can be accommodated by the existing/planned transit capacity. According to OPR guidelines, the addition of new transit riders should not be treated as an adverse impact as such development also improves regional flow by adding less vehicle travel onto the regional network. Therefore, the project will not cause any new or more severe significant transit service impacts.

Safety

A project safety impact is considered significant if the proposed project would provide inadequate design features that present safety concerns within the project site or on the adjacent streets. The proposed expansion would not alter any design components of the recently approved GOP Phase 4 Precise Plan, and thus the project would not result in any new or more severe safety impacts.

Emergency Access

The proposed project would not reroute or change any of the city streets in its vicinity that would impact emergency vehicle access to the GOP Master Plan site. Access to GOP Master Plan sites would be provided via driveways along Oyster point Boulevard and Gateway Boulevard. Park Street, a new internal access roadway would be constructed along the east side of the parking garages and would connect to Oyster Point Boulevard to the north and Gateway Boulevard to the south. The emergency vehicles would utilize all entries and supplemental access points as necessary to reach Park Street and the central pedestrian walkway which would be wide enough to serve as an emergency vehicles route. Thus, the project would not result in any new or more severe adverse emergency vehicle access impact.

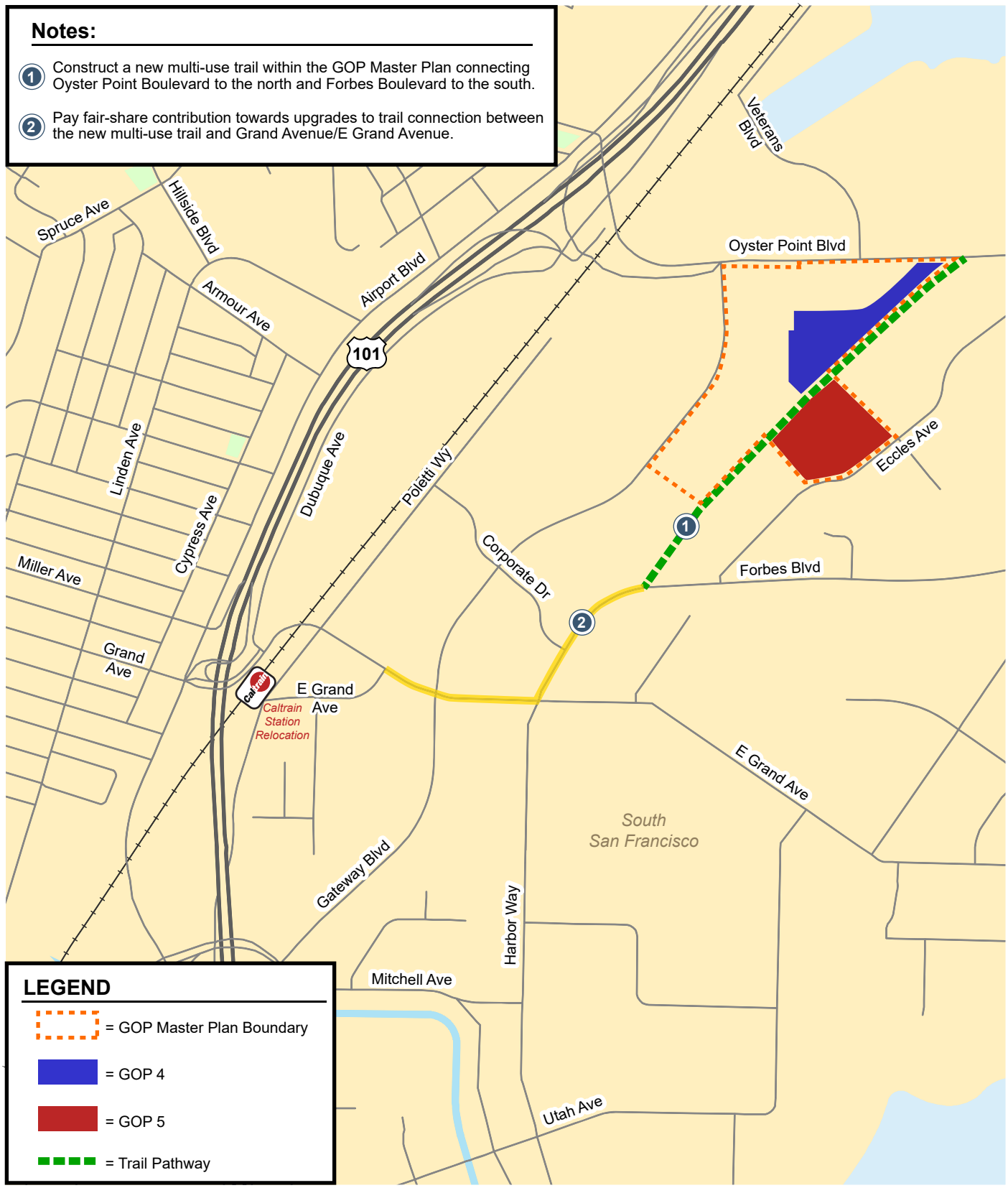
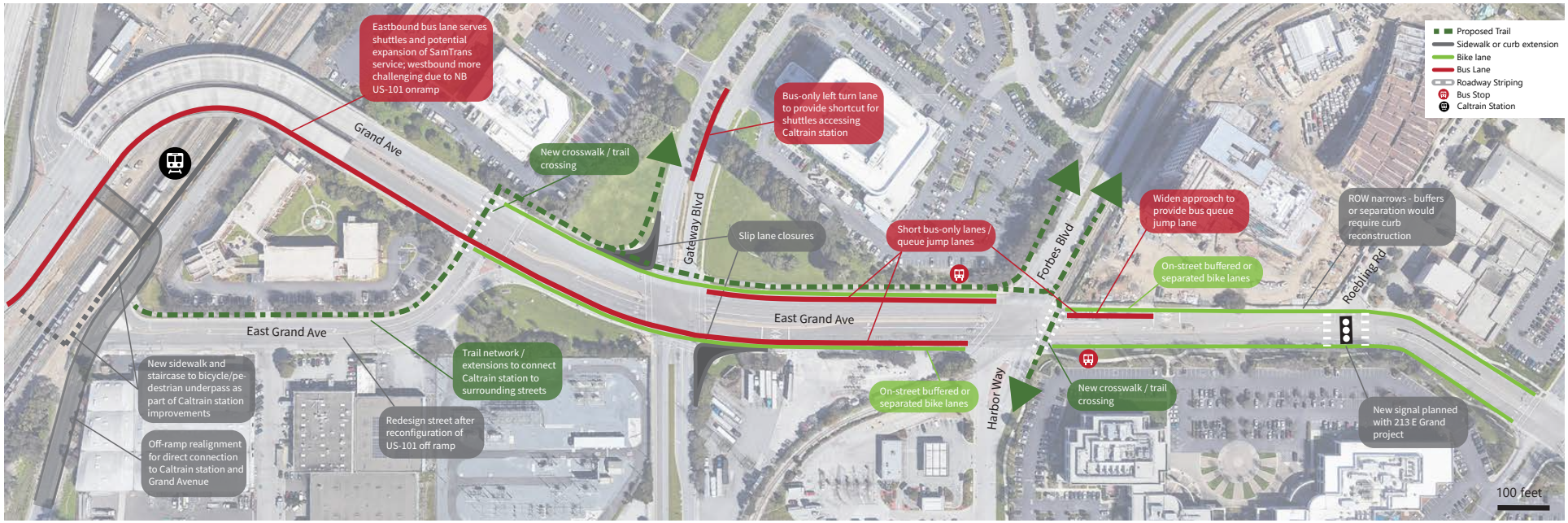


Figure 1
Project Mitigation Measures

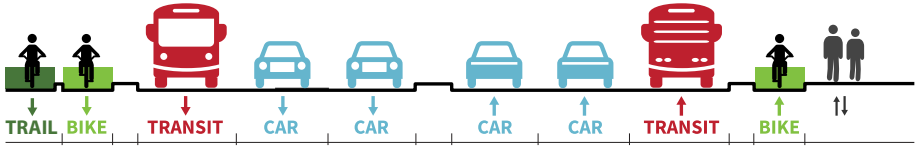
Attachment

East Grand Avenue – Caltrain Access Improvement Concept

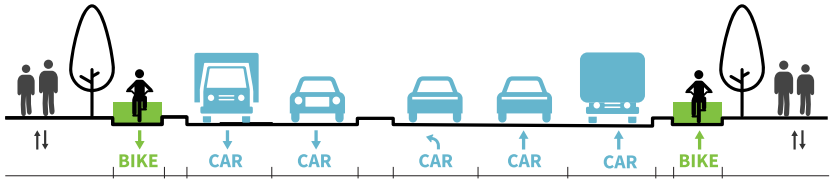
Figure 17: East Grand Avenue - Caltrain Access Improvement Concept



Improvements to Caltrain access along East Grand Avenue will help maximize station ridership and provide convenient bicycle and pedestrian connectivity between downtown and the entire East of 101 Area. Over the long term, the reconfiguration of the northbound US-101 offramp presents an opportunity to redesign East Grand Avenue adjacent to the Caltrain station.



Cross-section west of Forbes/Harbor



Cross-section west of Forbes/Harbor

Appendix D

Air Quality and Greenhouse Gas Emissions Report

RAMBOLL

ENVIRONMENT
& HEALTH

MEMO

Date: **December 1, 2021**

To: **Paul Stephenson, AICP, ESA**

From: **Michael Keinath, PE**
Rishabh Shah, PhD

Subject: **OPERATIONAL EMISSIONS OF CRITERIA AIR POLLUTANTS AND GREENHOUSE GAS AND ENERGY CONSUMPTION FOR REVISED GOP MASTER PLAN, SOUTH SAN FRANCISCO, CALIFORNIA**

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Ramboll evaluated operational emissions of criteria air pollutants (CAPs) and greenhouse gases (GHG) for the GOP 4 density transfer project in South San Francisco, California. The GOP 4 density transfer project will modify the Gateway of Pacific (GOP) project, which is formerly known as the Gateway Business Park Master Plan project, resulting in an expansion of up to 120,221 square feet. We compared the emissions of the modified GOP project to the emissions projected in the EIR for the original project and determined that the density transfer project will not result in increased emissions.

As used in this report, "Original Project" refers to the Gateway Business Park Master Plan project studied in the EIR, and "Modified Project" refers to the GOP project as modified to incorporate the 120,221 additional square feet proposed by the GOP 4 density transfer project.

PROJECT UNDERSTANDING

The Gateway Business Park Master Plan project was originally entitled in 2010 for a total 1,230,570 square feet to replace the then existing 284,000 square feet at the site (Draft EIR dated October 2009 and Final EIR dated January 2010). It was originally anticipated to be constructed in five phases over roughly 9 years from 2011 through 2020. The project was modified in 2013 to update the architecture, provide for a different site layout and alter the phasing, all without changing the square footage, at which point it became known as the Gateway of Pacific (GOP) project. BMR is currently executing the project in four phases (called GOP 1-4). Construction on GOP 1 began in May 2017, and first occupancy was in March 2021. Construction on GOP 2 began in April 2019, and occupancy is expected to begin March 2022. Construction on GOP 3 began in August 2019, and occupancy is expected to begin in the third financial quarter of 2022. A Precise Plan for GOP 4 was approved on August 6, 2020, and construction has not commenced.

BMR is currently pursuing the GOP 4 density transfer project to transfer floor-area ratio (FAR) from some adjacent former rail spur properties to GOP 4, to allow a potential expansion of up to 120,221 SF at GOP 4. This will likely take the form of

adding four full floors to GOP 4 North and an additional 2.5 floors to the GOP 4 parking garage, collectively referred to as the "GOP 4 Density Transfer Project."

In this report, we present our analyses which demonstrate that due to emissions reductions in the vehicle fleet as well as building design which exceed the increasingly stringent energy requirements from California Building Code (Title 24), the operational emissions associated with the Modified Project are within equal to or lower than the net operational emissions that were estimated for the Original Project as part of the EIR. Consequently, the Modified Project buildout, including the proposed expansion, will not exceed the emissions disclosed in the EIR.

SUMMARY OF RESULTS

Operational emissions of CAPs and GHGs are presented in **Table 1**. As shown in the table, re-evaluated operational emissions are below those disclosed in the EIR. Energy use will also be lower than those evaluated in the EIR.

DATA SOURCES AND EMISSIONS METHODOLOGIES

The following sections describe the input data and methodologies used in the operational emissions analysis.

Emissions Estimation

Ramboll utilized the California Emission Estimator Model version 2020.4.0 (CalEEMod®)[1] to quantify all operational CAP emissions. CalEEMod® is a statewide program designed to calculate both CAP and GHG emissions for development projects in California. It utilizes widely accepted models for emission estimates combined with appropriate default data that can be used if site-specific information is not available. CalEEMod® uses sources such as the US Environmental Protection Agency (USEPA) AP-42 emission factors,[2] California Air Resources Board's (CARB) on-road and off-road equipment emission models such as the EMission FACtor model (EMFAC2017) and the Emissions Inventory Program model (OFFROAD), and studies commissioned by California agencies such as the California Energy Commission (CEC) and CalRecycle. It calculates both the daily maximum and annual average for CAPs as well as total or annual GHG emissions.

Updates to CalEEMod® Default Assumptions

In preparing Project operational emissions, the Project sponsor made several updates to the CalEEMod® default factors and assumptions. These are described below:

- Project energy usage intensity was provided by the Project sponsor for GOP 1, 2, and 3. This includes electricity and natural gas consumption for the buildings that was developed through energy modelling used for LEED and Title 24 compliance. Since energy intensity was not provided for GOP 4, we modelled a scenario for GOP 4 by averaging the energy intensities of GOP 1, 2, and 3 instead of using CalEEMod® defaults.
- Project indoor water demand was provided by Project sponsor for GOP 1, 2, 3, and 4. Since outdoor water demand was not provided, CalEEMod® defaults were applied.
- Project vehicle trip rate (trips/day) was provided by Hexagon, the Project sponsor's traffic consultant. The total trip length for all employee trips was also provided by Hexagon. Trip

[1] California Air Pollution Control Officers Association (CAPCOA). 2016. California Emissions Estimator Model. Available at: http://www.CalEEMod.com/.

[2] The USEPA maintains a compilation of Air pollutant Emission Factors and process information for several air pollution source categories. The data is based on source test data, material balance studies, and engineering estimates. Available at: http://epa.gov/ttnchie1/ap42/.

information data provided by Hexagon were more up-to-date and representative of the project compared to the data that were used in the original EIR. CalEEMod® defaults were used to extrapolate the total trip length for visitors, such as vendors.

- Information on on-site emergency generators (horsepower, engine tier, fuel type) was provided by Project sponsor. CalEEMod® default emission factors were replaced with factors appropriate for provided tier level and horsepower, per CARB guidance.[3] A maximum of 50 operational hours per year was assumed for each generator, in accordance with BAAQMD limits.
- Reactive organic gas (ROG) emissions from consumer products (e.g., cleaners, personal care products, paints, etc.) were not considered in the original EIR. For consistency, we also did not consider ROG emissions from consumer products in this analysis.

DAILY OPERATIONAL EMISSIONS OF ROG, NO_X, AND PM_{10}

Operational emissions of ROG, NO_X, and PM_{10} associated with the project originate from area sources (e.g., architectural coating, landscaping), energy use (electricity and natural gas consumption), transportation (employee and vendor trips to and from the site), and on-site emergency generators. While emissions in the original EIR were predicted using the URBEMIS 2007 emissions model, the re-evaluated emissions were predicted using CalEEMod® which has more up-to-date emission sources and factors. As shown in **Table 1**, the Modified Project (including GOP 4 expansion) would be significantly below the mass emissions disclosed in the EIR for the Original Project.

ANNUAL OPERATIONAL EMISSIONS OF GREENHOUSE GASES (GHG)

Operational emissions of GHGs associated with the project originate from two major sources: energy use (electricity and natural gas consumption) and transportation (employee and vendor trips to and from the site). In the EIR for the Original Project, GHG emissions from on-site emergency generators were not evaluated. While relatively trivial, we include GHG emissions from on-site emergency generators in our evaluation of the Modified Project. As shown in **Table 1**, the Modified Project would be significantly below the mass emissions of the Original Project as disclosed in the EIR. The GHGs considered in our analysis are carbon dioxide (CO_2), nitrous oxide (N_2O), and methane (CH_4). Since these GHGs have different global warming potentials, we converted all emissions to "CO_2e" (CO_2-equivalent), consistent with the EIR.

ENERGY CONSUMPTION

As shown through the reduction in CAP and GHG emissions from the Original Project to the Modified Project, energy use will be lower for a variety of reasons. First, the vehicle fleet is now more fuel efficient due to increasingly stringent state and federal fuel efficiency standards. Additionally, California building code has increasingly stringent energy requirements with each iteration of the Title 24 code. As all buildings in GOP are designed to be lower than the current (at time of plan approval) Title 24 code, energy use in buildings is lower than it would have been at the time of the EIR. Lastly, the overall electrical grid is much cleaner as a result of the statewide renewable portfolio standard, which mandates increasingly higher percentages of renewable energy sources. As such, electricity emissions are lower than was projected at the time of the EIR, and as a result, the 120,221 square-foot expansion can be accommodated without increasing the projected energy demand. This is shown explicitly by the reduction in CAP and GHG emissions.

[3] CARB. Non-road Diesel Engine Certification Tier Chart. Available at: https://ww2.arb.ca.gov/resources/documents/non-road-diesel-engine-certification-tier-chart. Accessed: November 24, 2021.

CLOSING

The analysis presented above represents operational emissions of CAPs (ROG, NO_X, and PM_{10}), and GHGs (represented as CO_2e) associated with the originally permitted and proposed expansion of the GOP development project in South San Francisco, California. Our analyses show that the Modified Project will have operational emissions of CAPs and GHGs well under the emissions originally disclosed in the EIR. Additionally, our analysis shows that energy demand will be lower for the Modified Project.

Attachment:

Table

TABLE

Table 1
Summmary of operational emissions
Gateway of Pacific
South San Francisco, CA

	Criteria Air Pollutant Emissions (lbs/day)			CO_2e Emissions (metric tons/year)
	ROG	**NO_x**	**PM_{10}**	
Original Project	44.8	59.4	151.4	19,909
Modified Project	26.5	44.1	41.9	13,452
Difference	-18.3	-15.3	-109.5	-6,457

Appendix E
Water Capacity Study

MADDAUS WATER MANAGEMENT INC.

Technical Memorandum

Date: December 13, 2021

To: Ethan Warsh, BioMed Realty

From: Maddaus Water Management Inc.

Title: Water Capacity Study for GOP Master Plan Project

Overview

A Water Supply Assessment was undertaken for the GOP Master Plan project in 2009. The owner now proposes to expand the site by 120,221 square feet (sq ft). This study determines that, due to water efficiencies developed since 2009 and implemented in the project, the expanded project will not demand any more water than was projected in the 2009 Water Supply Analysis.

Introduction

This technical memorandum presents a Water Capacity Study (WCS), or preliminary site water use analysis, prepared by Maddaus Water Management Inc. (MWM) for BioMed Realty (BMR) for a biomedical facility in South San Francisco, CA. The GOP Master Plan site (also called the Gateway of Pacific site or Gateway Business Park site) development project consists of four phases: GOP 1, GOP 2, GOP 3, and GOP 4. Overall project construction began in May 2017 for GOP 1, the majority of which is now occupied. Construction of GOP 2 started in April 2019 with occupancy expected in March 2022. GOP 3 construction commenced in August 2019 with occupancy targeted for fall 2022. A Precise Plan for GOP 4 was approved in 2020, but construction has not commenced. BMR is now pursuing the GOP 4 Density Transfer Project, which proposes to transfer unused density from an adjacent offsite parcel to the GOP 4 site, resulting in a 120,221 sq ft expansion. A total overall site area increase of 10% is being proposed, which would result in a campus of 1,350,810 square feet.

In the January 2009 Water Supply Assessment (2009 WSA) for the GOP Master Plan site, the estimated net increase in site water demand due to the replacement of then-existing 284,000 square feet with the GOP campus was 49,411 gallons per day (potable water demand). The 2009 WSA addressed a proposed project that, as revealed by the more detailed and precise calculations conducted for subsequent approvals, was 19 square feet less than the square footage that could be developed under the FAR[1] approved for the Master Plan. **This WCS concludes that the entire GOP Master Plan site, including the GOP 4 Density Transfer Project and the additional 19 square feet, will result in a net increase that does not exceed the 49,411 gallons per day that was projected in the 2009 WSA.** This conclusion is supported by water savings realized as a result of two elements that will be implemented as part of the project based on current construction plans, water management practices, and building codes: (1) more efficient indoor fixtures being installed than was estimated as part of the baseline demand assumptions; and (2) significantly more water-efficient cooling tower technologies and management protocols: and (3) leak detection technology to GOP 1-4, and a water meter tied to the building management system for the cooling tower makeup.

The conclusion that water demand will not exceed that studied in the 2009 WSA is conservative. The WSA studied a then-proposed Master Plan project with 383,500 square feet of drought-tolerant plants that would replace 295,100 square feet of then-existing turf. The WSA projected that landscape irrigation demand would not change, since the substitution of drought-tolerant plants for turf would offset the increase in landscaped area. This current analysis assumes that irrigation demand will not change from that assumed in the WSA. However, that assumption may overstate irrigation demand. Including the live roof on the amenity building, the current GOP Master Plan proposes only 358,742 square feet of irrigated landscaping area, which is 24,758 square feet less than studied in

[1] Floor Area Ratio, or FAR, is the ratio of square footage that can be developed on a parcel to the square footage of the underlying parcel (total lot size).

the WSA. In addition, landscaping requirements have become more strict since the 2009 WSA was prepared, making it likely that the proposed plants will demand less water than the plants considered in 2009.

Baseline Water Use Review

This section presents a summary review of the net increase in demand volume reported in the 2009 WSA for the GOP Master Plan site. This included a review of potentially available demand values provided in the California Water Service South San Francisco District (Cal Water SSF) 2020 Urban Water Management Plan (UWMP) for the GOP Master Plan site. However, MWM was not able to ascertain a specific demand for the GOP Master Plan site from the 2020 UWMP. Therefore, the demand factors calculated in the 2009 WSA were considered to determine an updated site water use.

Presented in more detail in the 2009 WSA, these demand factors were based on 2007-2008 internal metered water use for existing buildings for primarily office space use and biotechnology research and development laboratory (R&D) space use. The office space average daily water use was estimated to be 0.036 gallons/day/sq ft. The R&D average daily water use was estimated to be 0.063 gallons/day/sq ft. The average daily irrigation water use was estimated to be 0.079 gallons/day/sq ft. As reported in the 2009 WSA, for the GOP Master Plan site development project, it was assumed that water usage rates for new office and new R&D laboratories space would remain the same including the approximate use type profile of 40% office and 60% R&D space.

The GOP Master Plan site landscaped area (which was mainly grass in 2009) was designed to increase by 30% and be replaced with mainly drought-tolerant plants. As part of the 2009 WSA effort, landscape architects estimated a reduction in irrigation rate of at least 33% due to conversion from grass to drought-tolerant plants, thereby balancing out the 30% landscape area increase. Therefore, in the 2009 WSA it was assumed that there would be no change in total water use for irrigation due to the proposed GOP Master Plan site development project and that the only change in water demand would be from the net increase in building space.

The 2009 WSA used the following equation to estimate the rise in water demand from the project's increased building space:

0.036 gallons/day/sq ft x 946,570 sq ft x 40% + 0.063 gallons/day/sq ft x 946,570 sq ft x 60% =
13,631 gallons/day + 35,780 gallons/day =
49,411 gallons/day

The table below summarizes the 2009 WSA estimated increase in water demand.

Table 1. 2009 WSA Net Demand Increase

Demand (gallons per day)		Notes
Demand for Proposed R&D Space (60% of 1,230,570 sq ft)	46,516	Based on internal metered water use for July 2007 – June 2008 for 800 Gateway Blvd, nearly all biotechnology research and development laboratory space. Demand factor: 0.063 gal/day/sq ft.
Demand for Proposed Office Space (40% of 1,230,570 sq ft)	17,720	Based on total internal metered water use for July 2007 – June 2008 for the five pre-existing buildings on Gateway Blvd (700, 1000, 750, 800 and 850). Demand factor: 0.036 gal/day/sq ft.
Demand for Proposed Landscaping	-	The WSA assumed no increase in landscaping demand. The pre-existing landscaped area was mainly grass, and though 30% more landscaped area was proposed, it would be at least 30% more water efficient with mainly drought-tolerant plants.
Demand from Existing Buildings To Be Demolished (284,000 sq ft with 60% R&D space and 40% office space)	(14,825)	The 2009 WSA netted out the demand of the 284,000 sq ft of pre-existing buildings estimated to have 60% R&D and 40% office space proportions that was then proposed to be demolished. This demand volume is subtracted from the sum total of the previous table demand estimate rows.

Demand (gallons per day)		Notes
Net Project Demand	**49,411**	This value was reported in the 2009 WSA and is the net demand that this WCS confirms will not be exceeded by the GOP Master Plan development implementation.

Note: The 2009 WSA new net square footage was 946,570 square feet. This is based on 1,230,570 sq ft total site area less the 284,000 sq ft demolished.

Adjustments to Baseline Water Use/Water Demand Analysis

This section presents the water demand estimate for the GOP Master Plan, with the 120,221 sq ft biomedical building expansion included, based on current plans, practices, and codes as well as analysis outputs.

Because MWM was unable to ascertain a specific site demand from Cal Water SSF's 2020 UWMP, the demand numbers calculated in the 2009 WSA were utilized with considerations made to affect water use reductions similar to the adjustment factors used in the 2020 UWMP. These water use reductions reflect increases in water efficiency due to California building and plumbing codes as well as the fixtures the four projects are installing on site.[2] These demand reductions decreased the estimated baseline demand factors, which were based on older (2007 and 2008) building water use patterns. Fixture flow rates in a commercial building built to 2008 or older codes as compared to a new commercial building built to 2021 codes differ in water use by more than 20% for the site overall. The LEED data for GOP 4 provided by BMR consultants reports indoor water use savings from efficient fixtures to be as high as 45%. Table 2 shows water use efficiency levels for indoor fixtures.

Table 2. Indoor Water Using Fixture Efficiencies

Fixture Type	Ultra-Efficient Flow Rate Proposed	Assumed Flow Rate of Fixture Replaced	California Code as of 2021
Toilets	1.1 gpf	1.6 gpf	1.28 gpf
Urinals	0.125 gpf	1.0 gpf	0.125 gpf
Lavatory Faucets	0.35 gpm	0.5 gpm	0.5 gpm
Non-Lavatory Faucets	1.5 gpm	2.2 gpm	1.8 gpm
Showerheads	1.5 gpm	2.5 gpm	1.8 gpm
Pre-Rinse Spray Nozzles	1.15 gpm*	2.5 gpm	1.15 gpm*

** Federal code*

These fixture savings assumptions were calibrated using estimated employees per square foot factors consistent with the 2009 WSA and the related Environmental Impact Report of one employee per 375 square feet. This estimate was confirmed by BMR personnel as being within the range of typical employee populations at BMR facilities. This analysis conservatively assumes that a reduction of 8% is needed for the site's increased area water use to align with the 2009 WSA's smaller area net water demand; however, it is likely the site will demonstrate a much more significant reduction in use compared to the 2009 WSA demand factors.

Additional site savings estimates also were considered for the integration of an efficient cooling system. At this point in the GOP Master Plan site development, cooling tower efficiency savings were only applied to buildings not yet under construction. This left only GOP 4 since GOP 1 is already built and occupied, and GOP 2 and GOP 3 are under construction. Any water demand management initiatives already in play at GOP 1, GOP 2, and GOP 3 were not included in the cooling tower demand savings estimates. However, these have cooling towers driven by variable frequency drive (VFD). GOP 2 and GOP 3 also have water meters tied to the building management system for the cooling tower makeup water. GOP 4 will have VFDs. In addition we assume leak detection technology to GOP 1-4, and a water meter tied to the building management system for the cooling tower makeup.

[2] Information about what fixtures each site is installing was provided by site LEED (Leadership in Energy and Environmental Design) efforts.

A cooling tower water savings factor of 0.73 gal/year/sq ft was used based on the *2013 California Building Energy Efficiency Standards: Cooling Tower Water Savings* report which was published in October 2011.[3] Climate-zone dependent analysis played a role in this 2013 study and, due to the use of very localized water quality within each of the climate zones, a weighted statewide average was ultimately used to determine water savings. The average annual water savings factor included a conductivity or flow-based controller, a flow meter, overflow alarm, and drifty eliminator. The 2013 report was based on an office building with 117,000 sq ft of conditioned space and cooling operations from 6am-6pm seven days a week. The 85,984 gallons of water per year saved for the 117,000 sq ft protype building yielded the 0.73 gal/year/sq ft savings water factor that was used in this analysis.

The following items and practices would be necessary to achieve the aforementioned cooling tower water savings:

- Cooling towers and chillers for each building
- A chiller should be appropriately sized for each cooling tower
- Each cooling tower should have a conductivity controller, which continuously measures the conductivity of the water in the cooling tower and will initiate blowdown only when the conductivity set point is exceeded
- A high-end central computer controller that has alerts directly to operation staff
- Submeters on the make-up and blowdown lines of each cooling tower
- A building operations manager that runs and manages the cooling tower systems
- Daily visual inspections of system
- Deep cleanings semiannually
- If chemicals are contracted out, should be on a fixed fee, rather than based on amount of chemicals sold
- Cycles of concentration for the San Francisco Bay Area great water quality with low TDS is ideally 10 or higher

The following table reflects the same methodology for calculating the net increase in water demand as was used in the 2009 WSA. However, this table substitutes water demand factors that take into account the 120,221 square-foot expansion, the additional 19 square feet, and the water saving measures noted above. Note that the net increase in site water demand for GOPs 1-4 will not exceed the 49,411 gallons per day that was projected in the 2009 WSA.

Table 3. 2021 Estimated GOP Master Plan Net Demand Increase

Demand (gallons per day)		Notes
Demand for Proposed R&D Space (60% of 1,350,810 sq ft)	46,976	Based on the 2009 WSA 2007- and 2008-based demand factors and conservatively reduced by 8% due to water-using fixture efficiencies that were not present or planned for in that 2009 effort. GOP 4 LEED application reports savings as much as 45% of indoor fixture water use. Estimated fixture savings based on generic commercial account end use water profile over 20%. R&D space demand factor: 0.058 gal/day/sq ft. Office space demand factor: 0.033 gal/day/sq ft.
Demand for Proposed Office Space (40% of 1,350,810 sq ft)	17,896	
Demand for Proposed Landscaping	-	No change in landscaping demand is included in this current analysis. As noted, this assumption is conservative since the landscaped areas in the current plans are smaller than the landscaped areas in the project studied in the WSA, and plant regulations are now stricter.
Demand Savings from Cooling Tower Efficiency Protocols (GOP 4 only at 345,832 sq ft)	(696)	Cooling tower savings are only applicable for buildings not yet under construction (the two R&D buildings in GOP 4). Cooling tower demand factor savings: 0.73 gal/year/sq ft.
Demand from Existing Buildings to be Demolished (284,000 sq	(14,825)	As was done in the 2009 WSA, the demand of this 284,000 sq ft of pre-existing uses, estimated to have 60% R&D and 40% office space

[3] *2013 California Building Energy Efficiency Standards: Cooling Tower Water Savings*. October 2011. http://title24stakeholders.com/wp-content/uploads/2017/10/2013_CASE-Report_Cooling-Tower-Water-Savings.pdf

Demand (gallons per day)		Notes
ft with 60% R&D space and 40% Office space)		proportions, was netted out. This demand volume is the same as that estimated in the 2009 WSA.
Net Project Demand	**49,350**	This value is **0.12% less than** the 49,411 gal/day net added demand reported in the 2009 WSA.

Notes:

1. *Estimated new net square footage in the WCS is 1,066,810 sq ft. This is based on the 2009 WSA 1,230,570 sq ft total site area less the 284,000 sq ft demolished plus the 19 sq ft added in actual building of GOP 1 plus the proposed 120,221 sq ft expansion based on a density transfer being processed as of October 2021. Total proposed site area is 1,350,810 sq ft.*
2. *All 2009 WSA project site and demand assumptions are applicable unless otherwise noted. For example, no further demolition is assumed with the additional 120,221 sq ft development.*

MWM assessed the refined demand factor values to unit water use estimates for biomedical facilities at University of California San Francisco, Stanford University, and Foster City as well as Cal Water SSF records and in consideration of more than 20 years of experience conducting commercial building audits in the region.

Conclusion

This WCS concludes that the increase in site water demand for GOPs 1-4 will not exceed the 49,411 gallons per day that was projected in the WSA; this includes, but is not limited to, the proposed 120,221 sq ft expansion and an additional 19 sq ft that was actually built, for a total of 1,066,810 sq ft of net new development area. This is supported by water savings realized from the installation of more efficient indoor fixtures than what was estimated as part of the baseline demand assumptions, as well as more water-efficient cooling tower technologies and management protocols and leak detection and metering technology.

This analysis has estimated that the GOP Master Plan proposed site water use would be 49,350 gallons/day (potable water demand) after implementation of the GOP 4 Density Transfer project and net of the water use of the 284,000 square feet existing when the 2009 WSA was prepared.