

# 439 ECCLES AVENUE PROJECT

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## ENVIRONMENTAL CHECKLIST

TO DETERMINE WHETHER THE PROJECT IS WITHIN THE SCOPE OF THE ENVIRONMENTAL IMPACT REPORT FOR THE SOUTH SAN FRANCISCO GENERAL PLAN UPDATE EIR (SCH#2021020064)

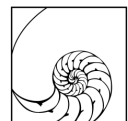
**Lead Agency:**

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



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- Attachment 2: Air Quality Calculations
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# I. Project Characteristics

- 1. Project Title:** 439 Eccles Avenue Project
- 2. Lead Agency Name and Address:** City of South San Francisco  
Economic & Community Development Department  
315 Maple Avenue  
South San Francisco, CA 94083-0711
- 3. Contact Person and Phone Number:** Stephanie Skangos, Senior Planner  
City of South San Francisco, Economic & Community  
Development Department  
315 Maple Avenue  
South San Francisco, CA 94083-0711  
Phone: 650-877-8535
- 4. Project Location:** 439 Eccles Avenue, South San Francisco, CA  
Assessor's Parcel Number: 015-071-260
- 5. Project Sponsor's Name and Address:** 439 Eccles Ave, LLC  
Contact 1: David Fowler  
200 Vesey St., 24<sup>th</sup> Floor  
New York, NY 10281
- Contact 2: Mike Sanford  
Sanfo Group LLC  
3351 Greenview Drive  
El Dorado Hills, CA 96762
- 6. Existing General Plan Designations:** Business Technology Park High
- 7. Existing Zoning:** Business Technology Park-High (BTP-H)
- 8. Description of Project:** 298,470 square feet of office/R&D with structured parking.  
See Section IV. Project Description.
- 9. Surrounding Land Uses and Setting:** East of 101 tech uses. See Section IV. Project Description.
- 10. Other Public Agencies whose Approval is Required:** No other public agency approvals are required for the proposed project.
- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

No consultation has been requested. See Section V.E:  
Cultural and Tribal Cultural Resources.

## II. Executive Summary

The project site is within the area planned for development as a part of the South San Francisco 2040 General Plan Update (SSF GPU) and associated 2022 Environmental Impact Report (EIR) (State Clearinghouse Number 2021020064) and consistent with allowable development for this site. The project is located in the East of 101 area.

The project proposes to demolish the existing warehouse and construct a new 7-story, 122-foot tall (with rooftop elements reaching 146 feet), 298,470 square foot building (including a basement level), and an associated 6-story, 66-foot-tall parking garage with 448 parking stalls. The specific tenant(s) have not been identified, but the applicant is targeting research & development, office, or technology tenants.

Public Resources Code Section 21083.3 provides a limited statutory exemption from CEQA for projects consistent with the general plan of a local agency and the associated certified environmental impact report. The California Environmental Quality Act (CEQA) Guidelines outline the process for determining the applicability of this statutory exemption in Sections 15168/15162 and 15183.

CEQA Guidelines Section 15168 provides that when a Programmatic EIR has been prepared and certified, later activities (such as the proposed project) determined by the lead agency as being within the scope of the EIR do not require subsequent environmental review, unless the criteria set forth in CEQA Guidelines Section 15162 triggering subsequent environmental review are met. CEQA Guidelines Section 15183 allows for streamlining the environmental review process for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

This document serves as substantial evidence that the proposed project is within the scope of the SSF GPU EIR and that subsequent environmental review is not required since the project would not have effects that were not examined in the program EIR, and no substantial changes or new information has arisen that would result in new significant environmental impacts or a substantial increase in the severity of previously identified significant impacts. Pursuant to Public Resources Code Section 21083.3 and CEQA Guidelines Sections 15168/15162 and 15183, this document therefore serves as substantial evidence that the proposed project qualifies for streamlining as a project consistent with the SSF GPU and SSF GPU EIR and no further environmental review is warranted.

### **III. Background, Purpose, and Organization**

#### **Background**

The project site is within the 2040 General Plan Update (SSF GPU) planning area. The SSF GPU was adopted in October 2022, including amendments to the South San Francisco Zoning Code and Climate Action Plan, and the associated SSF GPU EIR was certified. The SSF GPU land use designation is Business Technology Park – High, which is intended for high-density corporate headquarters, offices, and research and development (R&D) uses.

The SSF GPU, being a general plan, was analyzed in the SSF GPU EIR (State Clearinghouse Number 2021020064) on a programmatic level.

The SSF GPU EIR for South San Francisco is hereby incorporated by reference and can be obtained from the City of South San Francisco Economic & Community Development Department at 315 Maple Avenue in South San Francisco, and on the City of South San Francisco website at: <http://weblink.ssf.net> under Planning Division/Environmental Reports/2022 General Plan.

#### **Purpose**

This document has been prepared in accordance with the relevant provisions of CEQA (California Public Resources Code §§ 21000 et seq.) and the CEQA Guidelines as implemented by the City of South San Francisco.

Public Resources Code Section 21083.3 provides a limited statutory exemption from CEQA pursuant to which projects may proceed without additional CEQA analysis. Section 21083.3(b) reads as follows:

“If a development project is consistent with the general plan of a local agency and an environmental impact report was certified with respect to that general plan, the application of this division to the approval of that development project shall be limited to effects on the environment which are peculiar to the parcel or to the project and which were not addressed as significant effects in the prior environmental impact report, or which substantial new information shows will be more significant than described in the prior environmental impact report.”

CEQA Guidelines Section 15168 and the referenced Section 15162 (excerpted in full below) explain the relationship of a programmatic EIR such as the SSF GPU EIR to subsequent analysis of projects within the program area. As outlined in these sections, the proposed project would require further environmental review if the project would result in new or substantially more severe significant environmental effects than what was analyzed in the SSF GPU EIR. CEQA Guidelines Section 15183 further clarifies how CEQA assessment proceeds for projects consistent with a community plan or zoning, such as the SSF GPU and associated zoning.

This Environmental Checklist examines whether the project qualifies for a statutory exemption under Public Resources Code Section 21083.3 as a project consistent with the SSF GPU EIR, according to the criteria and process outlined in CEQA Guidelines Sections 15168/15162 and 15183.

## **CEQA Guidelines Code References**

CEQA Guidelines Section 15168(c) provides that later activities in the program must be examined in the light of the program EIR – in this case, the SSF GPU EIR – to determine whether an additional environmental document must be prepared and specifies how a program EIR is used with those later activities.

### **15168. Program EIR**

- (c) Use With Later Activities. Later activities in the program must be examined in the light of the program EIR to determine whether an additional environmental document must be prepared.
  - (1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.
  - (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
  - (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
  - (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.
  - (5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

CEQA Guidelines Section 15168 above indicates that the criteria in Section 15162 should be utilized for determining when additional environmental review is required for subsequent projects within a programmatic EIR (subsections a and b including applicable criteria are excerpted below):

### **15162. Subsequent EIRs and Negative Declarations**

- (a) When an EIR has been certified or a Negative Declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:
  - (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
  - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
  - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
  - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.
- (b) If changes to a project or its circumstances occur or new information becomes available after adoption of a negative declaration, the lead agency shall prepare a subsequent EIR if required under subdivision (a). Otherwise, the lead agency shall determine whether to prepare a subsequent negative declaration, an addendum, or no further documentation.

CEQA Guidelines Section 15183 outlines how to analyze a project consistent with a community plan or zoning, such as the SSF GPU EIR and associated zoning (subsections a through c including applicable criteria are excerpted below):

**15183. Projects Consistent with a Community Plan, General Plan, or Zoning**

- (a) CEQA mandates that projects which are consistent with the development density established by existing zoning, community plan, or general plan policies for which an EIR was certified shall not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.
- (b) In approving a project meeting the requirements of this section, a public agency shall limit its examination of environmental effects to those which the agency determines, in an initial study or other analysis:
  - (1) Are peculiar to the project or the parcel on which the project would be located,
  - (2) Were not analyzed as significant effects in a prior EIR on the zoning action, general plan or community plan with which the project is consistent,
  - (3) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or



- (4) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR.
- (c) If an impact is not peculiar to the parcel or to the project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, as contemplated by subdivision (e) below, then an additional EIR need not be prepared for the project solely on the basis of that impact.

## **Organization**

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

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

Section III, Purpose and Organization (this section).

Section IV, Project Description details the proposed project.

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

Section VI, Environmental Checklist details the potential environmental impacts of the project, including the impact findings of the SSF GPU EIR and relevant Mitigation Measures (MMs) and explains whether the project would result in new or more significant environmental impacts than those identified in the 2022 SSF GPU EIR.

Attachment 1 includes full text of the standard conditions and MMs applicable to the project in the proposed Standard Conditions and Mitigation Monitoring and Reporting Program.

## IV. Project Description

### Project Site and Vicinity

#### East of 101 Area and Technology Businesses

The South San Francisco General Plan Update (SSF GPU) planning area includes all properties located within the incorporated boundary of the City and the lands within the City's Sphere of Influence, approximately 4,456-acres. The project site is located in the City of South San Francisco's "East of 101" planning area, the traditional and continued core of South San Francisco's industrial and technological businesses. The East of 101 area consists of roughly 1,700 acres of land bound by San Francisco Bay on the east side, U.S. 101 and railway lines on the west, the City of Brisbane and San Francisco Bay on the north, and San Francisco International Airport and San Bruno on the south. The area has a mix of land uses, including industry, warehousing, retail, offices, hotels, marinas, and bioscience R&D facilities. The area is also currently separated from most of South San Francisco's residential uses by U.S. 101.

During the recent 2040 General Plan Update and related implementation actions, the General Plan designation and zoning of 493 acres of the East of 101 area north of the east-west rail spur, including the project site, were changed from a designation and zoning for industrial or office/R&D/biotech development to a new Business Technology Park High designation and zoning. This new land use designation is intended for higher density corporate headquarters, R&D facilities, and offices with a base maximum floor area ratio (FAR) of 0.5, and an allowable FAR of up to 2.0 with provision of additional community benefits. The SSF GPU EIR projected jobs in the Business Technology Park High area to grow from 24,458 jobs to 40,656 jobs at full buildout anticipated by the SSF GPU and the square footage to grow from the existing 10,026,728 square feet to 17,814,915 square feet.

#### Project Site and Adjacent Development

The 2.63-acre project site (Assessor's Parcel Number 015-071-260) is located on the north side of Eccles Avenue approximately 700 feet north of the intersection with Forbes Boulevard. The project site has an existing 40,224 square foot, single-story tilt-up warehouse, and associated surface parking, which was unoccupied at the time of this analysis. The site is mostly flat, with elevations ranging from approximately 94 to 105 feet above mean sea level.

The project site is flanked by a biotechnology company to the southwest, an event management company to the northeast, and a research and development center to the northwest. A freight forwarding center is across Eccles Avenue to the southeast, separated from the road by a Southern Pacific Railroad track. A Rails-to-Trails Path runs behind the northwest property line, separated from the project site by an approximately 20-foot-tall retaining wall. The location of the project is shown in **Figure 1**.

#### Proposed Project

Figures follow the descriptive text, showing the existing conditions (**Figure 2**), project site plan with site access (**Figure 3**), visual model (**Figure 4**), and building elevations (**Figures 5 through 7**).

The project proposes to demolish the existing warehouse and construct a new 7-story, 298,470 square foot building, including basement level, and an associated 6-story parking garage with 448 parking stalls.

The specific tenant(s) have not been identified, but the applicant is targeting R&D, office, or technology tenants (abbreviated as “office/R&D” in this document).

The proposed office/R&D building has an approximately 32,500 square foot footprint, reaching a building height of 122 feet above grade, with rooftop elements reaching 146 feet. Starting on the third floor, each floor is designed to have a private outdoor balcony terrace, with sizes varying. The parking garage is proposed to reach a height of 66 feet, with a footprint of 27,631 square feet. FAR for the project is calculated at 2.0.

### Access and Circulation

*Vehicular Access:* The project proposes two vehicular driveways to access the main entrance and the parking garage and a third connection that would act as a fire and service lane, all on Eccles Avenue.

*Bicycle & Pedestrian Circulation:* Pedestrians could enter the building by accessing the main entrance via an internal sidewalk that connects to the sidewalk on Eccles Avenue, or by exiting the parking garage and crossing the central plaza. Two access points would connect the Rails-to-Trails path to the project site, providing bicycle access from the rear of the site.

*Transit Facilities & Network Configuration:* The project site is located within walking distance of shuttle and bus service, while regional rail and ferry service may be accessed via first/last mile shuttles.

The South San Francisco Caltrain Station is approximately 0.5 miles from the project site. The nearest shuttle stop for the Glen Park BART Station is approximately 0.25 miles from the project site, but due to the lack of a direct route, pedestrians from the project would need to walk 2,300 to 2,500 feet to reach this nearest bus/shuttle stop. Due to asymmetry in the northbound/southbound stops for shuttles, the nearest northbound shuttle stop is presently located 2,200 feet to the north in front of 1000 Gateway Boulevard.

*Parking:* 448 vehicle parking spaces would be provided in the parking garage. Parking for 46 bikes is proposed, including 23 long term and 23 short term spaces.

### Utilities

The project site is a developed lot already served with utilities. Localized lines may need to be extended or relocated within the project site. There is an existing 8-inch water main and an existing City owned 8-inch sanitary sewer pipe, both in Eccles Avenue. There are existing City owned 12-inch and 15-inch storm drainpipes in Eccles Avenue that drain directly to the San Francisco Bay. The site is not located within San Mateo County’s Hydromodification Management Control Area.

The project proposes to include natural gas connections and use as allowable under South San Francisco Municipal Code (SSFMC) Section 15.26.020 (“Amendments to the Energy Code/Building Energy Efficiency Standards”) if granted an exception for scientific laboratories equipment and space conditioning systems. A canopy of photovoltaic panels is proposed on the top level of the parking garage to provide electricity to the project. It is anticipated that the project will include two 2-megawatt emergency generators (Tier 4 emissions equipment) located on the northwest side of the project site.

## Construction

Project construction activities are anticipated to span approximately 26 months with an assumed start for purposes of this analysis in late-2024 or later. Demolition and site preparation, including excavation for the basement, is planned to take approximately four months. Construction of the office/R&D building is expected to take approximately 24 months, and the parking garage is expected to be built over approximately 14 months, with a projected start date 10 months after the start of the office/R&D building construction. Exterior construction is expected to be finished at the end of 2026 or later.<sup>1</sup>

The project is estimated to involve earthmoving in the amount of 40,000 cubic yards of cut and a fill of 500 cubic yards. Excavation for the basement would extend to depths of up to about 25 feet below ground surface.

## **Project Entitlements**

Development of the project would require the following approvals from the City of South San Francisco: Design Review, and approval of Transportation Demand Management Plan.

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<sup>1</sup> While this analysis was performed with an assumption of a construction start in late-2024, if construction is initiated later, impacts would be the same or lessened (due to increasing emissions controls) from those analyzed here.



**Figure 1: Project Location**

Source: Fehr & Peers

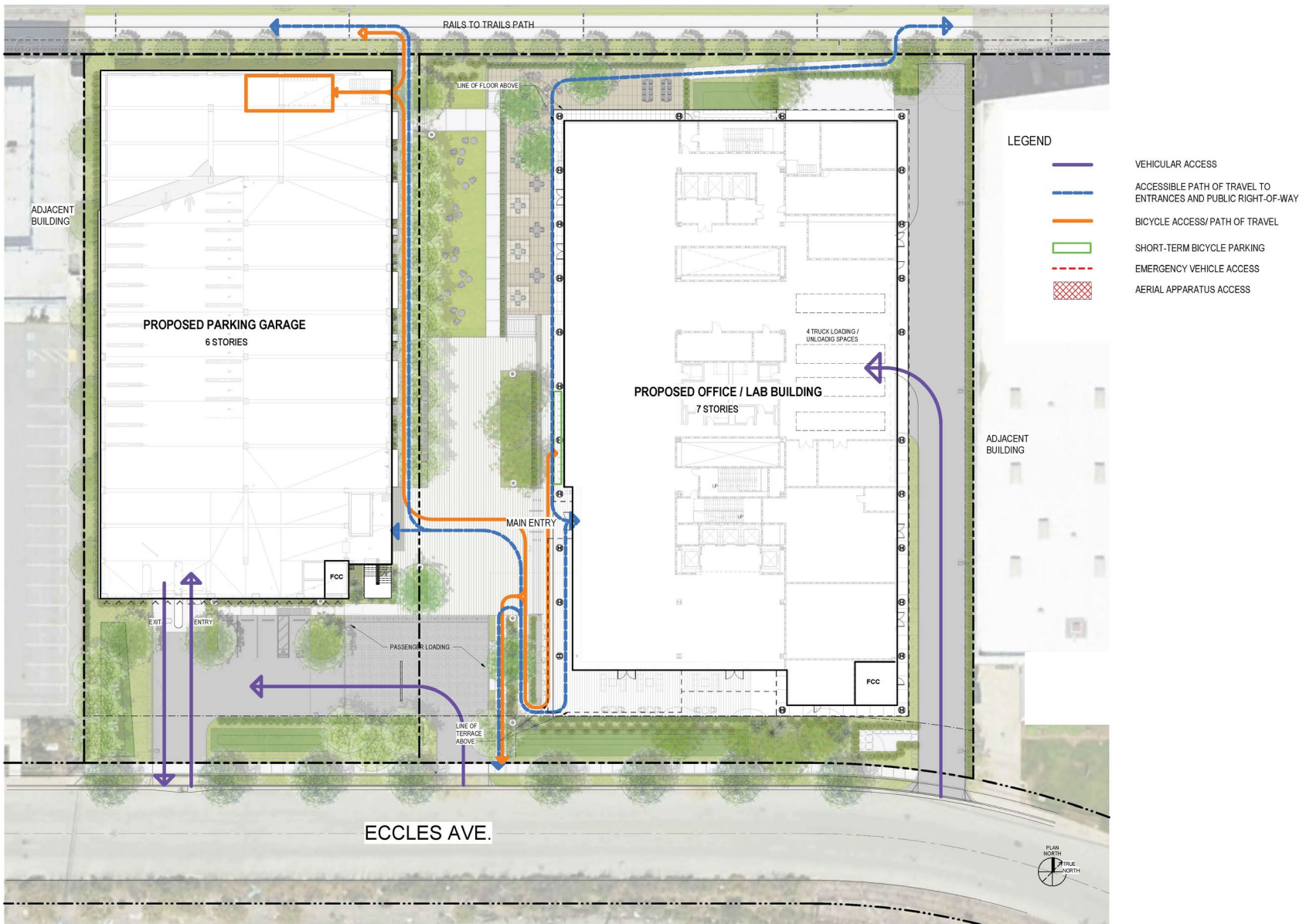




**Figure 2: Existing Conditions**

Source: Google Earth, modified to show project site





**Figure 3: Site Plan Including Site Access**

Source: DGA Architects, Project Plan Set, dated 1/5/24



**Figure 4: Visual Model**

Source: DGA Architects, Project Plan Set, dated 1/5/24





**Figure 5: Building Elevation, West**

Source: DGA Architects, Project Plan Set, dated 1/5/24

Note: This figure includes the site elevation of 100 feet above mean sea level at ground level. Heights with respect to ground level can be calculated by subtracting 100 feet.



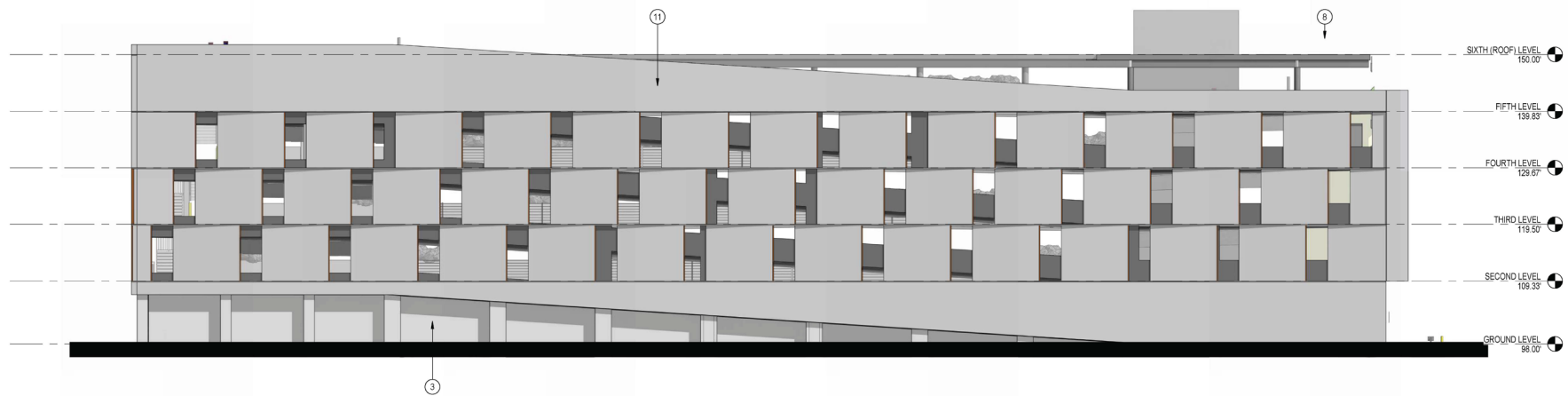
**Figure 6: Building Elevation, South**

Source: DGA Architects, Project Plan Set, dated 1/5/24

Note: This figure includes the site elevation of 100 feet above mean sea level at ground level. Heights with respect to ground level can be calculated by subtracting 100 feet.



GARAGE SOUTH ELEVATION



GARAGE WEST ELEVATION

**Figure 7: Parking Garage Elevation, South and West**

Source: DGA Architects, Project Plan Set, dated 1/5/24

Note: This figure includes the site elevation of 98 feet above mean sea level at ground level. Heights with respect to ground level can be calculated by subtracting 98 feet.

## V. Summary of CEQA Findings

This Environmental Checklist demonstrates that none of the conditions described in CEQA Guidelines Sections 15162 or 15168 have occurred because, as proposed, the project would not result in new or substantially more severe significant environmental effects than what was analyzed in the SSF GPU EIR; therefore, no further environmental review is required. This Environmental Checklist also demonstrates that the proposed project qualifies for streamlining under CEQA Guidelines Section 15183 as there are no project-specific significant effects which are peculiar to the project or its site.

- Program EIR: The analysis conducted in this document indicates that the project is consistent with the analysis and conclusions in the Program EIR (SSF GPU EIR) and would not require subsequent analysis per CEQA Guidelines Section 15162, as confirmed by the following statements:
  - (1) The project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
  - (2) There are no changes in circumstances that would result in the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
  - (3) There is no new information resulting in a new significant effect or a substantial increase in the severity of previously identified significant effects, or a change in the feasibility (or acceptance) of mitigation measures.

The project is within the scope of the SSF GPU Program EIR, and no new environmental document is required (per CEQA Guidelines Section 15168(c)) as confirmed by the following statements:

- (1) The project is a subsequent project within the scope of the Project Description as analyzed in the Program EIR for the SSF GPU.
  - (2) The project will have no significant environmental effects not previously addressed in the SSF GPU Program EIR, and will not have any significant effects that are more severe than those previously addressed in the SSF GPU Program EIR
  - (3) No substantial changes to the SSF GPU are proposed as part of this project. No substantial changes have occurred with respect to the circumstances under which the SSF GPU Program EIR was certified, and no new information, which was not known and could not have been known at the time that the SSF GPU Program EIR was certified as complete, has become available.
  - (4) No new or additional mitigation measures or alternatives are required.
  - (5) All applicable regulations and mitigation measures identified in the SSF GPU Program EIR will be applied to the project or otherwise made conditions of approval of the project.
- Community Plan Exemption: Based on the analysis conducted in this document, and pursuant to CEQA Guidelines Section 15183, this project as a separate and independent basis qualifies for the exemption for projects consistent with a community plan, general plan, or zoning. This CEQA document considers the analysis in the SSF GPU EIR as applicable to this project. The project is

permitted in the zoning district where the project site is located and is consistent with the bulk, density, and land use standards envisioned in the SSF GPU. The CEQA Analysis provided herein concludes that the project would not result in significant impacts that (1) would be peculiar to the project or project site; (2) were not identified as significant project-level, cumulative, or off-site effects in the program EIR; or (3) were previously identified as significant but later determined as having a more severe adverse impact than that discussed in the program EIR.

Examination of the analysis, findings, and conclusions of the Program EIR, as summarized in the CEQA analysis below, indicates that the prior CEQA document adequately analyzed and covered the potential environmental impacts associated with this project. The project would not result in a new, peculiar, significant environmental impact or a substantial increase in the severity of a significant environmental impact than determined in previous Program EIRs. Therefore, no further review or analysis, under CEQA, is required.

## VI. ENVIRONMENTAL CHECKLIST

### Environmental Factors Potentially Affected

Environmental factors that may be affected by the project are listed alphabetically below. Factors marked with an “X” (☒) were determined to be potentially affected by the project, involving at least one impact that is a potentially significant impact as indicated by the Checklist on the following pages. Unmarked factors (☐) were determined to not be significantly affected by the project, based on discussion provided in the Checklist, including the application of mitigation measures.

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agricultural/Forest Resources | <input checked="" type="checkbox"/> Air Quality             |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources            | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions      | <input type="checkbox"/> Hazards/Hazardous Material         |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning             | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing            | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input checked="" type="checkbox"/> Transportation     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                      | <input type="checkbox"/> Mandatory Findings of Significance |

Impacts related to Air Quality and Transportation would remain significant and unavoidable with mitigation. These impacts are consistent with the findings of the SSF GPU EIR. There are no impacts that were found to be unique or peculiar to the project that would indicate a new significant impact, or a substantial increase in a previously identified significant environmental impact. Applicable conditions and mitigation measures are listed in the relevant sections and in Attachment 1.

### Evaluation of Environmental Effects

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

The checklist also lists applicable mitigation measures from the SSF GPU EIR. A full list of the MMs applicable to the project can be found in Attachment 1, Mitigation Monitoring and Reporting Program (MMRP). More detail regarding the significance criteria used in this document and the environmental impacts of implementation of the SSF GPU is available in the SSF GPU Draft and Final EIR available from the City of South San Francisco Economic & Community Development Department at 315 Maple Avenue in South San Francisco, and on the City of South San Francisco website at: <http://weblink.ssf.net> under Planning Division/Environmental Reports/General Plan/2022 General Plan.

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

## A. Aesthetics

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Have a substantial adverse effect on a scenic vista	LTS	■	□	-	LTS
b) Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway	LTS	■	□	-	LTS
c) As the project is located in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality	LTS	■	□	-	LTS
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area	LTS	■	□	-	LTS

### Discussion

#### a) Scenic Vistas

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with the SSF GPU EIR Impact AES-1 and the less-than-significant conclusion related to scenic vistas, as the project does not have the potential to interfere with designated scenic viewing locations and would be required to comply with all applicable design and zoning policies.*

The SSF GPU EIR concluded under Impact AES-1 that while new development might alter views of San Bruno Mountain, the South San Francisco Hillside Sign at Sign Hill, and the San Francisco Bay, among other existing views, with mandatory compliance with design review regulations and policies in the SSFMC and General Plan Updates, which would require consistency with setback, scale, landscape, and character requirements to minimize the potential to impact views, the impact would be less than significant.

There are no designated public viewing locations in the vicinity of the project. Views from public roadways across the site toward the Bay, Sign Hill, and San Bruno Mountain are already substantially blocked at road level by existing area development, topography, and landscaping, and the development proposed under the project would not significantly change that condition. The taller project height would briefly block views towards the Bay from US 101, but the existing view is already blocked by other buildings and topography. As indicated in the SSF GPU EIR, development projects, including the proposed project, would be required to comply with the site's zoning district requirements and all applicable municipal codes and would undergo design review by the City, which would minimize the

potential to impact views. Zoning Ordinance Chapter 20.480 (“Design Review”) establishes the procedure for Design Review, to ensure that projects comply with development standards, including building heights, building setbacks, and landscaping requirements, which assist in protecting scenic vistas and views throughout the City.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to scenic vistas than analyzed in the SSF GPU EIR.

#### b) Scenic Resources

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact AES-2 and the less-than-significant conclusion related to scenic resources, as the project is not near a designated or eligible scenic highway.*

The SSF GPU EIR concluded under Impact AES-2 that the impact in regard to scenic highways would be less than significant, as there are no designated State Scenic Highways within the SSF GPU planning area. A portion of State Route 35 is eligible for designation as a State Scenic Highway; however, existing trees block most of the views of the City and San Bruno Mountain and therefore development under the SSF GPU was determined not to have the potential to significantly impact State Route 35.

State Route 35 is over three miles away from the project site. The project site is within the SSF GPU, and therefore not within an area with the potential for development to significantly impact a designated or eligible state scenic highway.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to scenic resources than analyzed in the SSF GPU EIR.

#### c) Visual Character

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact AES-3 and the less-than-significant conclusion related to visual character, as the project would be required to comply with all applicable design and zoning policies and regulations.*

The SSF GPU EIR concluded under Impact AES-3 that the impact in regard to visual character would be less than significant, as all new development is required to comply with the policies and actions in the SSF GPU and rules and regulations in the SSFMC intending to ensure cohesiveness and visually appealing development.

The visual character of the East of 101 area consists of a mixture of older and newer office, industrial, and hotel buildings, with differing amounts of associated landscaping. Development of the project would involve new construction of a modern building including landscaping. While the height would substantially increase over the existing conditions, the proposed conditions are within those allowed under zoning and consistent with other development in the East of 101 area. The project would be required to comply with all applicable municipal codes, including those related to tree removal and landscaping, and would undergo design review by the City. Zoning Ordinance Chapter 20.480 (“Design Review”) establishes the procedure for Design Review, to ensure that projects comply with development standards, including building heights, building setbacks, and landscaping requirements, which assist in protecting the character of the City’s different neighborhoods and the quality of life of City residents.



With compliance with development standards confirmed through Design Review, the project would not have a significant impact on visual character.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to visual character than analyzed in the SSF GPU EIR.

d) Light and Glare

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact AES-4 and the less-than-significant conclusion related to light and glare, as the project would be required to comply with all applicable policies and regulations aimed at minimizing new sources of light and glare.*

The SSF GPU EIR concluded under Impact AES-4 that the impact in regard to light and glare would be less than significant, as all new development is required to undergo design review and comply with the policies and actions in the SSF GPU and rules and regulations in the SSFMC, intending to minimize visual impacts of additional light and glare created by new development.

The project site is located in an urban area of the City, on a currently developed lot that generates light and glare. The project would result in development and lighting treatments typical of the existing commercial and industrial urban setting. Potential sources of light and glare from the project are interior and exterior lights, and headlights and glare from additional project vehicles.

As with all new development, the project would be required to comply with design review regulations and applicable policies in the SSFMC. The project applicant will be required to submit photometric data from lighting manufacturers to demonstrate that the lighting plan meets requirements. The SSF Zoning Ordinance contains architectural guidelines, design review criteria and other regulations to reduce the possibility of light and glare impacts, including general standards for outdoor lighting, including maximum heights for lighting fixtures, locations and shielding for lighting fixtures, and prohibits the use of certain types of outdoor lighting, including lighting that results in glare to motor vehicles on public right-of-way, such as outdoor floodlighting, search lights, flood lights, laser lights, or similar high intensity light. With compliance with the Zoning Ordinance, the potential for light and glare impacts of the project would not be significant.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to light and glare than analyzed in the SSF GPU EIR.

## B. Agriculture and Forestry Resources

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use	NI	■	□	-	NI
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract	NI	■	□	-	NI
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))	NI	■	□	-	NI
d) Result in the loss of forestland or conversion of forestland to non-forest use	NI	■	□	-	NI
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forestland to non-forest use	NI	■	□	-	NI

### Discussion

#### a-e) Agriculture and Forestry Resources

**Same Conclusion (Conclusion remains NI):** *The project would be consistent with the SSF GPU EIR conclusions of no-impact for all agriculture and forestry resource impact questions, as the project site is in an urban area with no existing agricultural or forestry resources or uses.*

The SSF GPU EIR determined that the project is located within an urban environment and no existing agriculture or forestry land use activities occur. No portion of the GP planning area is designated as relevant for agriculture or forestry resources by the City of South San Francisco or by the State of

California. As such, construction and operation pursuant to the General Plan would not result in the conversion of Prime Farmland or Farmland of Statewide Importance to nonagricultural uses, nor would it conflict with any zoning for agricultural use or a Williamson Act Contract, or any zoning for forestland or timberland and would not result in loss or conversion of forestland to non-forest uses. Therefore, no impacts related to agriculture and forestry resources would occur.

Based on a current search of the California Department of Conservation's Farmland Mapping and Monitoring Program, the project site does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland, and does not meet the state definition of "forest land".<sup>2</sup> The project site does not contain active farmlands or grazing lands, is not encumbered by Williamson Act contracts, and is not included within any agricultural or forest resources zoning district. The project would not convert Important Farmland to non-agricultural use and would not result in loss of an active forest resource. Consistent with the conclusions of the SSF GPU EIR, there would be no impact from the project on agriculture and forestry resources.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to agriculture and forestry resources than analyzed in the SSF GPU EIR.

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<sup>2</sup> California Department of Conservation, Farmland Mapping and Monitoring Program accessed December 2023 at: <https://maps.conservation.ca.gov/DLRP/CIFF/>

## C. Air Quality

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Conflict with or obstruct implementation of the applicable air quality plan	SU w/ MM	■	□	SSF GPU MM AIR-1a: Basic Construction Mitigation Measures	SU w/ MM
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard	SU w/ MM	■	□	SSF GPU MM AIR-1a: Basic Construction Mitigation Measures	SU w/ MM
c) Expose sensitive receptors to substantial pollutant concentrations	LTS w/ MM	■	□	N/A	LTS
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people	LTS	■	□	-	LTS

## Discussion

### a) Conflict with Air Quality Plan

**Same Conclusion (Conclusion remains SU w/ MM):** Impact AIR-1 and the SU w/ MM conclusions would apply to the project, as development and trip characteristics under the project would be consistent with estimated projections in the SSF GPU EIR. SSF GPU MM AIR-1a would apply to the project to control dust during construction activities. SSF GPU MM AIR-2b would not apply to the project as there are no nearby sensitive receptors. The project would be required to implement a project-specific Transportation Demand Management (TDM) program, which would serve to reduce operational emissions, as required under SSF Zoning Ordinance Section 20.400.005 (adopted to satisfy SSF GPU MM TRANS-1, which applied to the City and not individual projects).

The SSF GPU EIR determined under Impact AIR-1 that with the full buildout planned in the SSF GPU, there would be a significant and unavoidable impact in regard to conflict with the Bay Area Air Quality Management District's (BAAQMD) Clean Air Plan (2017 Bay Area Clean Air Plan), even though the SSF GPU would support its primary goals and applicable control measures, because the plan's projected vehicle miles traveled (VMT) would increase more than its projected population growth. The SSF GPU EIR determined that with SSF GPU MM AIR-1a, buildout under the SSF GPU would not have a significant impact on construction fugitive dust thresholds and that with SSF GPU MM AIR-1b, buildout would not have a significant impact on sensitive receptors, and would support the primary goals of the 2017 Bay Area Clean Air Plan. The SSF GPU EIR determined that with implementation of SSF GPU policies and

actions and the SSFMC, the SSF GPU buildout would include applicable control measures from the 2017 BAAQMD Clean Air Plan and would not disrupt or hinder any applicable control measures. However, the SSF GPU would not reduce VMT per capita. Population growth facilitated by the SSF GPU buildout was estimated at 61% growth, but VMT growth was estimated at 94%.

The project would be consistent with all applicable rules and regulations related to emissions and health risk and would not result in a new substantial source of emissions or toxic air contaminants or otherwise conflict with the primary goals of the 2017 Bay Area Clean Air Plan. The project is consistent with all rules and regulations related to construction activities and would be required to implement SSF GPU MM AIR-1a to control fugitive dust during construction activities (see next section). The proposed development would meet current standards of energy and water efficiency as well as recycling and green waste requirements.

SSF GPU MM AIR-1b pertains to requirements that a project must meet when there are sensitive receptors within 1,000 feet of the project site. There are no sensitive receptors within 1,000 feet of the project site and therefore SSF GPU MM AIR-1b would not apply to the project (see *Sensitive Receptors*, below).

While the project would implement a TDM program consistent with SSF Zoning Ordinance Section 20.400.005 (adopted in satisfaction of SSF GPU MM TRANS-1, which would reduce the project's VMT below City-wide projections), the increased VMT for the project would remain above significance thresholds for VMT (see Section P: Transportation). Therefore, the project would contribute to the significant and unavoidable impact in regard to conflict with the 2017 Bay Area Clean Air Plan's VMT policy found in the SSF GPU EIR but would not exacerbate the previously identified impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to conflict with an air quality plan than analyzed in the SSF GPU EIR.

#### b) Criteria Air Pollutants

***Same Conclusion (Conclusion remains SU w/ MM):*** The project would be consistent with SSF GPU EIR Impact AIR-2 and the significant and unavoidable conclusion related to criteria air pollutants and ozone precursors. SSF GPU MM AIR-1a would apply to the project to control fugitive dust during construction activities. The project would be required to implement a project-specific TDM program, which would serve to reduce operational emissions, as required under of the SSF Zoning Ordinance Section 20.400.005 (adopted to satisfy SSF GPU MM TRANS-1, which applied to the City and not individual projects).

The SSF GPU EIR determined under Impact AIR-2 that with the full buildout planned in the SSF GPU, criteria air pollutants would be above significance thresholds. During construction activities, projects would be required to implement SSF GPU MM AIR-1a, resulting in a less than significant impact with mitigation during construction. However, during operations, with the increase in VMT as discussed above, the buildout would exceed the plan-level significance threshold for criteria air pollutants, resulting in a significant impact. Even with the City's TDM ordinance adopted to satisfy SSF GPU MM TRANS-1, the VMT would have a greater increase than the population growth, which would be considered a significant and unavoidable plan-level impact.

Project-related air quality impacts fall into two categories: short-term impacts that would occur during construction of the project and long-term impacts due to project operation. BAAQMD's adopted

thresholds are average daily emissions during construction or operation of 54 pounds per day or operational emissions of 10 tons per year of nitrogen oxides (NOx), reactive organic gasses (ROG) or suspended particulate matter (PM<sub>2.5</sub>) and 82 pounds per day or 15 tons per year of PM<sub>10</sub>.

Construction and operational emissions for the project were modeled using the California Emissions Estimator Model (“CalEEMod”) Version 2020.4.0. Project details were entered into the model including the proposed land uses and generators, TDM plan trip reductions, Peninsula Clean Energy carbon intensity factors, demolition/earthwork volumes, and construction schedule. Model defaults were otherwise used. The CalEEMod inputs and outputs are included in Attachment 2.

*Construction Emissions*

Construction of the project would involve excavation, site preparation, building erection, paving, and finishing and landscaping. Although these construction activities would be temporary, they would have the potential to cause both nuisance and health-related air quality impacts.

The results from emissions modeling for construction are summarized in **Table 1** (and included in full in Attachment 2).

**Table 1: Daily Regional Air Pollutant Emissions for Construction (Pounds per Day)**

Description	ROG	NOx	PM <sub>10</sub> *	PM <sub>2.5</sub> *
Average Daily Emissions	1.07	10.49	<1	<1
<i>BAAQMD Daily Thresholds</i>	<i>54</i>	<i>54</i>	<i>82</i>	<i>54</i>
<i>Exceeds Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

\* Applies to exhaust emissions only

Source: CalEEMod, see Attachment 2, converted from tons per year to pounds per day across the active construction days (approximately 585 days).

Construction-period emissions levels are below BAAQMD thresholds presented in Table 1. However, BAAQMD considers dust generated by grading and construction activities to be a significant impact associated with project development if uncontrolled and recommends implementation of construction mitigation measures to reduce construction-related emissions and dust for all projects, regardless of comparison to their construction-period thresholds. These basic measures are included in SSF GPU MM AIR-1a, which would implement BAAQMD-recommended best management practices to further reduce construction-period criteria pollutant impacts.

**SSF GPU MM**

**AIR-1a: Basic Construction Management Practices.** [The project applicant / owner / sponsor] shall incorporate the following Basic Construction Mitigation Measures recommended by the Bay Area Air Quality Management District (BAAQMD):

- All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.
- All haul trucks transporting soil, sand, or other loose material off-site shall be covered.
- All visible mud or dirt trackout onto adjacent public roads shall be removed using wet power vacuum street sweepers at least once per day. The use of dry power sweeping is prohibited.

- All vehicle speeds on unpaved roads shall be limited to 15 mph.
- All roadways, driveways, and sidewalks to be paved shall be completed as soon as possible. Building pads shall be laid as soon as possible after grading unless seeding or soil binders are used.
- Idling times shall be minimized either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes (as required by the California Airborne Toxics Control Measure [ATCM] Title 13, Section 2485 of the California Code of Regulations). Clear signage shall be provided for construction workers at all access points.
- All construction equipment shall be maintained and properly tuned in accordance with manufacturer's specifications. All equipment shall be checked by a certified mechanic and determined to be running in proper condition prior to operation.
- Prior to the commencement of construction activities, individual project proponents shall post a publicly visible sign with the telephone number and person to contact at the Lead Agency regarding dust complaints. This person shall respond and take corrective action within 48 hours. The BAAQMD phone number shall also be visible to ensure compliance with applicable regulations.

Note that the brackets in the above mitigation measure show where text has been revised from the original measure to make clear that the measures would be implemented by this project. With implementation of SSF GPU MM AIR-1a, the impact related to construction-period criteria pollutant impacts would be less than significant with mitigation.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to construction-period criteria air pollutants than analyzed in the SSF GPU EIR.

#### *Operational Emissions*

Emissions from operation of the project could cumulatively contribute to air pollutant levels in the region. Emissions of air pollutants associated with the project were predicted using CalEEMod as discussed above. Results of operational emissions modeling are included in full in Attachment 2 and summarized in **Table 2**, below.

**Table 2: Regional Air Pollutant Emissions for Operations**

Description	ROG	NOx	PM10	PM2.5
2025 Project Emissions, Annual (tons/yr)	2.08	1.60	1.41	0.42
Project Generator Emissions (tons/yr)	0.16	0.73	0.02	0.02
Total Operational Emissions (tons/yr)	2.25	2.33	1.43	0.44
<i>BAAQMD Annual Significance Thresholds (tons/yr)</i>	<i>10</i>	<i>10</i>	<i>15</i>	<i>10</i>
<i>Exceeds Annual Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>
Project Emissions, Daily (lbs/day)	12.30	12.79	7.85	2.43
<i>BAAQMD Daily Significance Thresholds (lbs/day)</i>	<i>54</i>	<i>54</i>	<i>82</i>	<i>54</i>
<i>Exceeds Daily Threshold?</i>	<i>No</i>	<i>No</i>	<i>No</i>	<i>No</i>

Source: CalEEMod, see Attachment 2. Average daily emissions were calculated by converting from tons per year (tons/yr) to pounds/days (lbs/day).

As summarized in Table 2, the project’s operational emissions would not exceed applicable thresholds, and the project would not result in individually significant impacts from operational criteria pollutant emissions. However, the project would contribute to the increase in VMT that creates a significant and unavoidable impact found in the SSF GPU EIR, but as discussed above, would not exacerbate the previously identified impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to operational criteria air pollutants than analyzed in the SSF GPU EIR.

### c) Sensitive Receptors

***Less Significant Conclusion (Conclusion changes from LTS w/ MM to LTS):*** *The project would not exacerbate SSF GPU EIR Impact AIR-3, and SSF GPU MM AIR-1b would not be necessary to reach a less-than-significant conclusion related to sensitive receptor pollutant exposure as there are no sensitive receptors within 1,000 feet of the project.*

The SSF GPU EIR concluded under Impact AIR-3 that new development in the planning area could have a potentially significant impact on sensitive receptors, as new developments could result in construction activities near sensitive receptors, or new residences could place sensitive receptors near sources of pollutants. The SSF GPU EIR further concluded that SSF GPU MM AIR-1b, requiring a project specific health risk assessment for projects that bring sensitive receptors and potential sources of pollution within 1,000 feet of each other, would result in a less than significant impact with mitigation.

The project would not be located within 1,000 feet of sensitive receptors, nor would it introduce new sensitive receptors to the project site. SSF GPU MM AIR-1b is only applicable to projects within 1,000 feet of sensitive receptors, and therefore would not apply to this project. With no sensitive receptors within the 1,000-foot range, the impact of the construction and operation of the project on sensitive receptors would not be significant.



Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to sensitive receptors than analyzed in the SSF GPU EIR.

d) Odors

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact AIR-4 and the less-than-significant conclusion related to odors, as the project is not a land use that has the potential to generate substantial odor complaints.*

As discussed in the SSF GPU EIR under Impact AIR-4, the SSF Zoning Ordinance restricts uses, activities and processes that produce objectionable odors, concluding that impacts in regard to odors would be less than significant.

As discussed above, the project would not be located within 1,000 feet of sensitive odor receptors. The project would be required to comply with any applicable regulations in the SSF Zoning Ordinance. The intended uses of office, technology, and/or R&D are not the types of uses that generate frequent or substantial odors, and the impact related to odors would not be significant. Odors from construction activities would be transient and temporary in nature and, per Chapter 20.300.010 (“Performance Standards”) of the Zoning Ordinance, are exempt from odor standards.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to odors than analyzed in the SSF GPU EIR.

## D. Biological Resources

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service	LTS w/ MM	■	□	SSF GPU MM BIO-1: Special-status Species, Migratory Birds, and Nesting Birds	LTS w/ MM
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service	LTS	■	□	-	LTS
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means	LTS w/ MM	■	□	N/A	NI
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites	LTS w/ MM	■	□	N/A	LTS
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	LTS	■	□	-	LTS
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan	LTS	■	□	-	NI

## Discussion

### a) Special-Status Species

**Same Conclusion (Conclusion remains LTS w/ MM):** *The project would be consistent with SSF GPU EIR Impact BIO-1, the requirement for SSF GPU MM BIO-1, and the less-than-significant with mitigation conclusion related to nesting birds, as there are trees on the site with the potential for nesting birds to be present.*

The SSF GPU EIR concluded under Impact BIO-1 that new development in the planning area could be potentially significant, as there are 48 special-status plant species and 51 special-status animals recorded as being within five miles or less of the planning area. Particularly sensitive areas include riparian habitat, near the shoreline, or in the hillsides or San Bruno Mountain. To reduce the impact on special-status species to less than significant, SSF GPU MM BIO-1 was established.

### SSF GPU MM

**BIO-1: Special-status Species, Migratory Birds, and Nesting Birds.** Special-status species are those listed as Endangered, Threatened or Rare, or as Candidates for listing by the United States Fish and Wildlife Service (USFWS) and/or California Department of Fish and Wildlife (CDFW), or as Rare Plant Rank 1B or 2B species by the California Native Plant Society (CNPS). This designation also includes CDFW Species of Special Concern and Fully Protected Species. Applicants or sponsors of projects on sites where potential special-status species, migratory birds, or nesting birds are present shall retain a qualified Biologist to conduct a focused survey per applicable regulatory agency protocols to determine whether such species occur on a given project site. The project applicant or sponsor shall ensure that, if development of occupied habitat must occur, species impacts shall be avoided or minimized, and if required by a regulatory agency or the CEQA process, loss of wildlife habitat or individual plants shall be fully compensated on the site. If off-site mitigation is necessary, it shall occur within the South San Francisco planning area whenever possible, with a priority given to existing habitat mitigation banks. Habitat mitigation shall be accompanied by a long-term management plan and monitoring program prepared by a qualified Biologist, and include provisions for protection of mitigation lands in perpetuity through the establishment of easements and adequate funding for maintenance and monitoring.

Consistent with conclusions in the SSF GPU EIR, some special-status bird species could potentially nest in trees on the project site. The loss of any active nests due to construction noise and activity or removal of the trees would be in violation of federal and state laws and therefore new development would require pre-construction nesting surveys.

The project site does not contain suitable habitat as designated in the SSF GPU EIR as a potential home for most endangered animal species. The project site contains manmade structures, which may be used as nesting habitat for a few endangered birds. The project site also contains trees, which may provide nesting habitat for birds. For these reasons SSF GPU MM BIO-1 would apply to this project, which requires a focused survey by a qualified biologist, and that special-status species impacts are avoided or minimized, if such species would be affected by the project. Consistent with the intent of the above mitigation measure, the project would require a pre-construction nesting bird survey to ensure that development of the project does not have a significant impact to special-status species.

The following Condition of Approval shall be applied to the project in satisfaction of SSF GPU MM BIO-1:

Prior to issuance of any construction or grading permits, if initiation of construction activities would occur during the avian nesting season (February 1 through August 31), the project applicant / owner / sponsor shall have pre-construction nesting bird surveys conducted by a qualified biologist within 14 days before initial ground disturbance or vegetation removal to avoid disturbance to active nests, eggs, and/or young of nesting birds protected by the Migratory Bird Treaty Act (MBTA) and California Fish & Game Code. Surveys shall encompass the entire construction phase area and the surrounding 100 feet. An exclusion zone where no construction would be allowed shall be established around any active nests of any protected avian species found in the project site until a qualified biologist has determined that all young have fledged and are independent of the nest. Suggested exclusion zone distances differ depending on species, location, and placement of nest, and shall be at the discretion of the biologist (typically 300 feet for raptors and 100 feet for other species). These surveys would remain valid as long as construction activity is consistently occurring in a given area and shall be completed again if there is a lapse in construction activities of more than 14 consecutive days during the nesting bird season.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to special-status species than analyzed in the SSF GPU EIR.

b) Riparian/Sensitive Habitat

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact BIO-2 and the less-than-significant conclusion as the project site and adjacent land do not contain riparian habitat or other sensitive communities.*

The SSF GPU EIR concluded under Impact BIO-2 that the impact in regards to riparian and sensitive habitats would be less than significant, as all new development is required to comply with all applicable adopted State, federal and local regulations, as well as comply with the policies and actions in the SSF GPU, and rules and regulations in the SSF Zoning Ordinance, which seek to minimize impacts in areas with ecologically sensitive habitats and to enhance riparian habitat near Colma Creek.

The project site does not contain riparian habitat, nor is it listed in the SSF GPU EIR as being located in the Special ES Overlay District that has been identified as ecologically sensitive habitat. The project site is a fully developed site surrounded by similar development. The closest ecologically sensitive habitat to the project site is tidal marshes more than ½ -mile to the northeast. Colma Creek is approximately 0.7 miles away from the project site at its closest point. Development of the project would not have a significant impact on riparian or other sensitive habitat.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to riparian or sensitive habitat than analyzed in the SSF GPU EIR.

c) Wetlands or Aquatic Habitats

**Less Significant Conclusion (Conclusion changes from LTS w/ MM to NI):** *SSF GPU EIR Impact BIO-3 and SSF GPU MM BIO-3 would not apply to this project as there are no wetlands or waterway features on or within impact range of the project site.*

The SSF GPU EIR concluded under Impact BIO-3 that new development in the planning area could be potentially significant, as there are sensitive wetlands and aquatic habitats in the planning area, including along the coastline of the Bay and parts of Colma Creek and San Bruno Creek. SSF GPU MM BIO-3 requires projects to assess potential wetlands impacts and comply with permitting processes of any jurisdictional waters if the project site contains those features or is within 150 feet of the Bay or 80 feet of those Creeks. With implementation of SSF GPU MM BIO-3, requiring assessment of potential wetland impacts, the impact of new development as described in the SSF GPU would be less than significant with mitigation.

The closest body of water to the project site is the San Francisco Bay, approximately 2,100 feet to the north at its closest point. Colma Creek is approximately 3,700 feet to the southwest. As mapped in the SSF GPU EIR, there are no wetlands or aquatic habitats within the vicinity of the project site. SSF GPU MM BIO-3, which requires a professional assessment of potentially jurisdictional wetlands or other waters, would not apply to this project. This project would have no impact on wetlands or jurisdictional waters.

Given the above analysis, the project would not result in any new or substantially more severe impacts related to wetlands or aquatic habitats than analyzed in the SSF GPU EIR.

#### d) Wildlife Corridors/Nursery Sites

***Less Significant Conclusion (Conclusion changes from LTS w/ MM to LTS):*** SSF GPU EIR Impact BIO-4, and SSF GPU MM BIO-1 would not fully apply to this project because the project would supplement identified tree-covered areas for wildlife connections and does not otherwise contain wildlife corridors or the necessary habitat for nursery sites. The less-than-significant with mitigation measures conclusion from the SSF GPU EIR would instead change to a less-than-significant conclusion with no mitigation measures necessary.

The SSF GPU EIR concluded under Impact BIO-4 that new development in the planning area could be potentially significant, as there are wetlands, parks/open space, and creeks and drainages that provide wildlife corridors and/or nursery sites that could be impacted by development.

According to SSF GPU EIR Exhibit 3.3-3: Potential Connectivity for Wildlife Species, trees along the project site street frontage and the Rails-to-Trails pathway immediately northwest of the project site are identified as “tree-covered areas” that may provide wildlife connections between other open areas in the City. No other wildlife corridors were identified in the SSF GPU EIR for this urbanized project site and vicinity. Per SSF GPU EIR Exhibit 3.3-3, the project site does not contain wetlands, creeks, or parks, and does not contain the necessary habitat to be identified as a wildlife nursery site.

On the existing project site, there are currently four trees near Eccles Avenue and no trees along the Rails-to-Trails path. The project would add 17 trees along the Rails-to-Trails path and would replace the existing four trees near Eccles Avenue with eight street trees and more in adjacent landscaping (for a total of 37 proposed trees). The project would contribute to more robust tree-covered areas along Eccles Avenue and the Rails-to-Trails path and would therefore not have a negative impact related to their use for wildlife connections.

SSF GPU MM BIO-1, as discussed under Special Status Species above with respect to nesting birds, would not be applicable under this topic because the project would supplement identified tree-covered areas for wildlife connections and does not otherwise contain wildlife corridors or the necessary habitat for

nursery sites, as shown on SSF GPU EIR Exhibits 3.3-1: Existing Habitat Types and Protected Areas and 3.3-3: Potential Connectivity for Wildlife Species. As discussed under Wetlands or Aquatic Habitats above, the project site does not contain wetlands or creeks and SSF GPU MM BIO-3 would not be applicable to the project.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to wildlife corridors or nursery sites than analyzed in the SSF GPU EIR.

e) Conflict with Local Policies

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact BIO-5, and the less-than-significant conclusion as the project would be required to comply with the City's Tree Ordinance.*

The SSF GPU EIR determined under Impact BIO-5 that development as analyzed in the EIR would have a less than significant impact on conflict with local policies, as all new development must comply with the City's Tree Ordinance.

A Tree Inventory and Assessment Report was completed on August 16, 2023, for the applicant by Monarch Consulting Arborists and is available as part of the project application materials. There are four trees at the project site, none of which qualify as protected under City ordinance based on species and trunk size. All four trees are of the same species, London plane (*Platanus x hispanica*), and would all be removed for development of the project. The applicant is required to comply with the City's Tree Preservation Ordinance (Title 13, Chapter 13.30 of the SSFMC) as applicable, which requires demonstrating adequate replacement and obtaining a permit for removal of "protected" trees.<sup>3</sup> A total of 37 trees are proposed with the project, which would meet or exceed replacement requirements. With compliance with the City's mandatory Tree Ordinance, the project would not have a significant impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to conflict with local policies than analyzed in the SSF GPU EIR.

f) Conflict with Conservation Plans

**Less Significant Conclusion (Conclusion changes from LTS to NI):** *SSF GPU EIR Impact BIO-6 would not apply to the project, as it is not in the areas covered by local conservation plans, and the project would result in no impact.*

The SSF GPU EIR concluded under Impact BIO-6 that new development in the planning area would have a less than significant impact with respect to conflict with conservation plans. There are two areas in the City that contain sensitive habitat that is covered by a conservation plan, Sign Hill Park and San Bruno Mountain State Park; and any area near the Bay that is subject to tidal action is under the jurisdiction of the San Francisco Bay Conservation and Development Commission (BCDC). Development near these

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<sup>3</sup> SSFMC 13.30.080 lists the replacement of protected trees as three fifteen-gallon-size or two twenty-four-inch minimum size landscape trees for each tree removed.

areas would require site specific biological assessments to ensure that all appropriate regulations are followed, reducing any impacts to less than significant.

The project site is not within or adjacent to any of the areas covered by a conservation plan. There are no other local, regional, or State conservation plans that are applicable to the planning area included in the SSF GPU EIR, including the project site. The project would have no impact on conflict with conservation plans.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to conflict with conservation plans than analyzed in the SSF GPU EIR.

## E. Cultural and Tribal Cultural Resources

Would the Project:	SSF GPU EIR Findings	Relationship to GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Cause a substantial adverse change in the significance of a historic resource pursuant to Section 15064.5	LTS	■	□	-	LTS
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5	LTS	■	□	-	LTS
c) Disturb any human remains, including those interred outside of formal cemeteries	LTS	■	□	-	LTS
d) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: <ul style="list-style-type: none"> <li>i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or</li> <li>ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.</li> </ul>	LTS	■	□	-	LTS



## Discussion

### a) Historical Resources

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact CUL-1 and the less-than-significant conclusion as the structure on the site is not historically significant.*

The SSF GPU EIR concluded under Impact CUL-1 that any development planned in the City under the General Plan buildout would have a less than significant impact on historical resources, as each new development proposed that would alter a historic aged building (defined as 45 years old or older) would need to be individually reviewed to ensure that the development would be in compliance with applicable federal and local regulations.

The project site is not in a historic district but does contain a historic-age structure. The existing warehouse building on the project site is of historic age, as the warehouse was built in 1964. A Historic Resource Evaluation was completed for this analysis by Preservation Architecture and is included in Attachment 3. The Historic Resource Evaluation concluded that the existing building is without any historical design or construction distinction. Furthermore, there are no associated events of any potential historical importance because no individual developments, discoveries, innovations or inventions of importance are identifiably associated with the existing warehouse building, nor is there any direct association with any person or persons of potential historical importance. Therefore, per the California Register evaluation criteria, the property and building at the project site do not have any potential for a finding of historical significance. There would not be a significant impact on any historical resources.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to historical resources than analyzed in the SSF GPU EIR.

### b) Archeological Resources

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact CUL-2 and the less-than-significant conclusion as the project would be required to comply with regulations intended to minimize impacts to archaeological resources.*

The SSF GPU EIR determined under Impact CUL-2 that new development in the planning area would have a less than significant impact on archeological resources as all new development is required to comply with the policies and actions in the SSF GPU, designed to protect archeological resources upon discovery.

While there are no known archaeological resources at the project site, any ground disturbance, including that proposed as a part of project construction activities, would have the potential to discover and disturb unknown archaeological resources.

SSF GPU Policy ES-10.3 requires development proposals be referred to the Northwest Information Center (NWIC), Native American Heritage Committee (NAHC), and local tribes for review and recommendation. These last two items are discussed under the Tribal Cultural Resources topic below. A records search was requested from NWIC. In their letter dated August 8, 2023, (see Attachment 3) the NWIC concluded that there was a moderate potential for archeological resources to be discovered on the site. SSF GPU Policy ES-10.1 requires the City to maintain formal procedures for minimizing and

mitigating impacts to archaeological resources, such as worker training and halting work upon discovery and contacting appropriate experts/authorities. The project would be required to comply with applicable procedures, formalized as conditions of project approval. If significant historic or prehistoric archeological resources are discovered during construction or grading activities, SSF GPU Policy ES-10.5 requires work to stop within 100 feet until properly examined. With mandatory adherence to applicable regulations, impacts related to accidental discovery of archeological resources would be less than significant.

The following Conditions of Approval shall be applied to the project in satisfaction of identified SSF GPU Policies:

In satisfaction of SSF General Plan Policy ES-10.1, prior to issuance of any construction or grading permits, the Applicant shall retain or ensure that a qualified archaeologist is retained to conduct a Worker Environmental Awareness Program training for all construction personnel on the project site prior to construction and ground-disturbing activities. The training shall include basic information about the types of artifacts that might be encountered during construction activities, and procedures to follow in the event of a discovery. This training shall be provided for any personnel with the potential to be involved in activities that could disturb native soils. If archaeological resources are encountered during excavation or construction, construction personnel shall immediately suspend all activity within 100 feet of the suspected resources and the City and a licensed archaeologist shall be contacted to evaluate the situation, including determining the significance of the find.

In satisfaction of SSF General Plan Policy ES-10.5, if construction or grading activities result in the discovery of historic or prehistoric archaeological artifacts that are determined to be significant, then all work within 100 feet of the discovery shall remain suspended, the Chief Planner shall be notified; the resources shall be examined by a qualified archaeologist for appropriate protection and preservation measures; and work may only resume when appropriate protections are in place and have been approved by the Chief Planner.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to archaeological resources than analyzed in the SSF GPU EIR.

#### c) Human Remains

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact CUL-3 and the less-than-significant conclusion as the project would be required to comply with applicable regulations and policies regarding accidental discovery of human remains.*

The SSF GPU EIR determined under Impact CUL-3 that new development in the planning area would have a less than significant impact as all new development is required to comply with actions and policies in the SSF GPU, the SSFMC and other applicable State regulations, such as Section 7050.5 of the California Health and Safety Code/Section 5097.98 of the Public Resources Code that deal with discovery of human remains.

While there are no known human remains at the project site, any ground disturbance, including that proposed as a part of project construction activities, would have the potential to discover and disturb unknown human remains. With mandatory adherence to applicable regulations of the Public Resources

Code that list required procedures to follow if human remains are discovered, impacts related to accidental discovery of human remains would be less than significant for this project.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to human remains than analyzed in the SSF GPU EIR.

d) Tribal Cultural Resources

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impacts CUL-4 and CUL-5 and the less-than-significant conclusions as the project would be required to comply with all applicable policies and actions of the SSF GPU intended to minimize impacts to tribal cultural resources.*

The SSF GPU EIR determined under Impacts CUL-4 and CUL-5 that new development in the planning area would have a less than significant impact on tribal cultural resources as all new development is required to comply with the policies and actions in the SSF GPU designed to protect tribal cultural resources upon discovery, including SSF GPU Policies ES-10.1, ES-10.3, and ES-10.5 as discussed above.

SSF GPU Policy ES-10.3 requires development proposals be referred to the NWIC, NAHC, and local tribes for review and recommendation. A record search of the NAHC Sacred Lands File was completed for the project and indicated there are no known sacred lands present in the vicinity of the site (see Attachment 3). While no tribes have requested consultation for projects in this area, notice was sent to listed tribes on August 8, 2023, per recommendation of the NAHC. No comments on the project or requests for consultation were received in return.

A records search was requested from NWIC. In their letter dated August 8, 2023, (see Attachment 3) the NWIC concluded that there is a moderate potential for unrecorded Native American resources to be located in the vicinity. While not expected, standard procedures related to unexpected accidental discovery as required by SSF GPU Policy ES-10.1 and ES-10.5 (discussed in more detail under the Archaeological Resources topic above) would be followed per conditions of project approval.

The project would be required to comply with Section 5097.98 of the California Public Resources Code in the event of discovery of Native American human remains.

With adherence to applicable procedures and regulations as detailed above, impacts related to accidental discovery of tribal cultural resources would be less than significant.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to tribal cultural resources than analyzed in the SSF GPU EIR.

## F. Energy

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Result in potentially significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources, during project construction or operation	LTS	■	□	-	LTS
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	LTS	■	□	-	LTS

## Discussion

### a) Energy Resources

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact ENER-1 and the less-than-significant conclusion as the project would be required to comply with all applicable regulations and building codes that minimize energy use in new buildings.*

The SSF GPU EIR determined under Impact ENER-1 that new development in the planning area would have a less than significant impact on energy resources during both construction and operation, as all new development is required to comply with Climate Action Plan (CAP) Actions, and rules and regulations in the SSFMC designed to reduce energy use. SSF GPU Policy LU-8.4 requires street trees at new developments. SSF GPU Policy SA-28.5 requires the incorporation of sustainable and environmentally sensitive design and equipment, energy conservation features, water conservation measures and drought-tolerant or equivalent landscaping, and sustainable stormwater management features. Section 15.26.010 of the SSFMC adopts the California Green Building Code by reference with certain local “Reach Code” amendments, which has updated to the 2022 Edition since the SSF GPU EIR was written.

The project would include short-term demolition and construction activities that would consume energy, primarily in the form of diesel fuel (e.g., mobile construction equipment), gasoline (e.g., vehicle trips by construction workers), and electricity (e.g., power tools). Energy would also be used for conveyance of water used in dust control, transportation and disposal of construction waste, and energy used in production and transport of construction materials.

During operation, energy demand from the project would include fuel consumed by employees’ and delivery vehicles, and electricity consumed by the proposed structures, including lighting, research equipment, water conveyance, heating and air conditioning.

**Table 3** shows the project’s estimated total construction energy consumption and annual energy consumption.

As summarized in Table 3, project construction would require what equates to 19,966 MMBtu of energy use. The project would implement construction management practices per SSF GPU MM AIR-1a (see Section C: Air Quality). While focused on emissions and dust reduction, the construction management practices would also reduce energy consumption through anti-idling measures and proper maintenance of equipment. The project would comply with the requirements of the California Green Building Standards Code (CALGreen) to divert a minimum of 65 percent of construction and demolition debris. By reusing or recycling construction and demolition debris, energy that would be used in the extraction, processing and transportation of new resources is reduced. Therefore, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction, and the project’s construction energy consumption.

As also summarized in Table 3, project annual energy consumption would equate to 34,366 MMBtu of energy use. The project’s required TDM program (see Section P: Transportation) will also include various measures designed to reduce total vehicle trips, which would reduce the consumption of fuel for vehicles; the calculations in Table 3 include a 21% reduction in VMT to account for the TDM program. The roof of the parking garage would hold solar panels to reduce the project’s reliance on nonrenewable energy sources.

**Table 3: Construction and Operational Energy Usage**

Source	Energy Consumption	
	Amount and Units	Converted to MMBtu
<b>Construction Energy Use (Total)</b>		
Construction Worker Vehicle Trips (Gasoline)	37,131 gallons	4,076 MMBtu
Construction Equipment and Vendor/Hauling Trips (Diesel)	115,662 gallons	15,890 MMBtu
<b>Total Construction Energy Use</b>		<b>19,966 MMBtu</b>
<b>Operational Vehicle Fuel Use (Annual)</b>		
Gasoline	131,069 gallons	14,390 MMBtu
Diesel	14,233 gallons	1,955 MMBtu
<b>Operational Built Environment (Annual)</b>		
Electricity	3.16 GWh	10,778 MMBtu
Natural Gas	7,242,870 kBtu	7,243 MMBtu
<b>Total Annual Operational Energy Use</b>		<b>34,366 MMBtu</b>

Note: The energy use reported in this table is gross operational energy use for the proposed project with no reduction to account for energy use of existing development (which is currently unoccupied).

Source: Energy Calculations included as Attachment 4.

While representing a change from the former uses at the site, the project is consistent with the type of development in the area and allowed under the land use designation and zoning and would be replacing a less efficient older building.

Therefore, although the project would incrementally increase energy consumption, proposed development is consistent with area planning and applicable energy regulations and would not result in a significant impact related to energy consumption in a wasteful, inefficient, or unnecessary manner.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to energy use than analyzed in the SSF GPU EIR.

b) Conflict with State or Local Plans

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact ENER-2 and the less-than-significant conclusion as the project is within the SSF GPU planning area and would be required to comply with all applicable regulations, which do not conflict with State or local plans for renewable energy or energy efficiency.*

The SSF GPU EIR determined under Impact ENER-2 that new development in the planning area would have a less than significant impact, as the new development would not conflict with or obstruct State or local plans for renewable energy or energy efficiency, as all new development is required to comply with the policies and actions in the SSF GPU, CAP Actions, and rules and regulations in the SSFMC designed to reduce energy use. These local regulations do not conflict with any applicable State plans for renewable energy or energy efficiency and therefore development under the SSF GPU was determined not to have the potential to have a significant impact on conflict with State or local energy conservation plans.

The project site is within the SSF GPU planning area and would be required to comply with all applicable regulations in the CAP and adhere to development standards in the SSFMC, and therefore impacts related to conflicts with State and local energy plans would not be significant.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to conflict with State or local plans than analyzed in the SSF GPU EIR.

## G. Geology and Soils

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death, involving: <ul style="list-style-type: none"> <li>i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map issued by the State Geologist for the area or based on other substantial evidence of a known fault</li> <li>ii. Strong seismic ground shaking</li> <li>iii. Seismic-related ground failure, including liquefaction</li> <li>iv. Landslides</li> </ul>	LTS	■	□	-	LTS
b) Result in substantial soil erosion or the loss of topsoil?	LTS	■	□	-	LTS
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	LTS	■	□	-	LTS
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	LTS	■	□	-	LTS
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	LTS	■	□	-	NI
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	LTS w/MM	■	□	N/A	NI

## Discussion

This section utilizes information from the Preliminary Geotechnical Site Assessment prepared for the applicants by Langan, dated June 22, 2022, which is available as part of the project application materials.

### a) Seismic Hazards

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact GEO-1, and the less-than-significant conclusion as the project would be required to comply with all applicable regulations regarding construction and geotechnical engineering.*

The SSF GPU EIR determined under Impact GEO-1 that the proposed buildout of the SSF GPU would not have a significant impact on seismic hazards, as all new development projects would be required to comply with the current California Building Code (CBC), as well as any other SSF GPU policies and actions and the SSFMC, which all contain measures to minimize danger from seismic hazards. Chapter 15.08 (“California Building Code”) of the SSFMC, which implements the CBC and includes certain local amendments to address special conditions within the City including geological and topographical features, requires that foundations and other structural support features would be designed to resist or absorb damaging forces from strong ground shaking, liquefaction, and subsidence.

Consistent with conclusions in the SSF GPU EIR, while there are no known active faults at the project site, the region is known to be seismically active and the project would need to comply with the CBC and building permit requirements as required by the SSFMC, and by policies and actions in the SSF GPU, specifically Action CR-4.4.1, which requires projects to prepare site-specific soils and geologic reports for review and approval by the City Engineer, and to incorporate the recommended actions during construction. The site is anticipated to experience strong to violent ground shaking from seismic events within the project’s lifetime. The effects of this on the project would be reduced by following the recommendations of the design-level Geotechnical Report and by adhering to the latest edition of the CBC.

Despite the presence of the inactive Hillside fault in the northwest portion of the site, the chance of fault rupture was determined to be low. The project site is not in a designated liquefaction hazard zone. The Preliminary Geotechnical Investigation determined that due to shallow bedrock, liquefaction, lateral spreading, and seismic densification would be low.

The project site is underlain by undocumented fill over shallow bedrock. These soil conditions, combined with the weight of the project buildings, could lead to serious total and differential settlements. The preliminary recommendation is for the undocumented fill to be replaced with engineered fill, with shallow foundations bearing on either the engineered fill or directly on bedrock to support the buildings.

The potential seismic hazards would be minimized by following project-specific geotechnical recommendations, as required under SSF GPU Action CR-4.4.1.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to seismic hazards than analyzed in the SSF GPU EIR.



## b) Soil Erosion

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact GEO-2 and the less-than-significant conclusion as the project would be required to comply with all applicable regulations intended to minimize erosion during construction and operation of new development.*

The SSF GPU EIR determined under Impact GEO-2 that the proposed buildout of the SSF GPU would not have a significant impact on soil erosion, as all new development projects would be required to comply with SSF GPU policies and actions and the SSFMC, which all contain measures to reduce soil erosion and loss of topsoil. SSF GPU Policy ES-7.3 requires new projects to meet federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, stormwater infiltration, peak flow reduction, and trash capture.

Construction activities, particularly grading and site preparation, can result in erosion and loss of topsoil. The project also proposes additional excavation for a basement under the office/R&D building. While intentional removal of soil from the site would not be considered erosion, the disturbance of the site could result in the potential for unintended erosion.

The project would be required to obtain coverage under the statewide National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity, Construction General Permit Order 2009-0009-DWQ (Construction General Permit), administered by the State Water Resources Control Board (SWRCB). Coverage under the NPDES Permit would require implementation of a Stormwater Pollution Prevention Plan (SWPPP) and various site-specific best management practices (BMPs) to reduce erosion and loss of topsoil during site demolition and construction. Compliance with the NPDES permit and BMPs during demolition and construction such as straw wattles, silt fencing, concrete washouts, and inlet protection during construction, would reduce impacts resulting from loss of topsoil. The project would be required to comply with SSFMC Section 15.56.030 ("Methods of reducing flood losses"), which would require the development of the project site to control filling, grading, and dredging which may increase flood damage.

Soil erosion after construction would be controlled by implementation of approved landscape and irrigation plans. With the implementation of a SWPPP and Erosion Control Plan to prevent erosion, sedimentation, and loss of topsoil during and following construction – which are required under existing regulations – the soil erosion impacts of the project would not be significant.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to soil erosion than analyzed in the SSF GPU EIR.

## c) Unstable Soils

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impacts GEO-3 and the less-than-significant conclusion as the project would be required to comply with all applicable regulations regarding construction and geotechnical engineering.*

The SSF GPU EIR determined under Impact GEO-3 that the proposed buildout of the SSF GPU would not have a significant impact due to unstable soils, as all new development projects would be required to comply with the CBC and building permit requirements as required by policies and actions in the SSF GPU, the SSFMC, which all address development on areas containing unstable geologic units or in areas

where soil is unstable. SSF GPU Action CR-4.4.1 requires projects to prepare site-specific soils and geologic reports for review and approval by the City Engineer, and to incorporate the recommended actions during construction.

The project site is covered by approximately one to eight feet of undocumented fill over shallow bedrock. The undocumented fill could result in settlement under the parking garage following building construction due to the weight of the building. The basement of the office/R&D building would need to be excavated through the shallow bedrock. Replacement of the undocumented fill with engineered fill and appropriate foundation design based on ground conditions would incorporate project-specific geotechnical recommendations as approved by the City Engineer. The project would be required to comply with the CBC and building permit requirements as required by policies and actions in the SSF GPU and the SSFMC, which would keep unstable soils from having a significant impact on the project.

An existing soil-nail retaining wall with a height of approximately 20-feet is located near the northwest property line. If the proposed building footprint is located near the retaining wall, load transfer elements, such as deep foundations or ground improvement, should be designed to prevent the load from bearing on the wall, and be located to avoid damaging the existing soil nails.

Shoring to laterally restrain the sides would be necessary during excavation below shallow groundwater levels to limit the movement of adjacent improvements.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to unstable soils than analyzed in the SSF GPU EIR.

#### d) Expansive Soils

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact GEO-4 and the less-than-significant conclusion related to expansive soils as the project would be required to comply with all applicable regulations.*

The SSF GPU EIR determined under Impact GEO-4 that the proposed buildout of the SSF GPU would not have a significant impact due to expansive soils, as all new development projects would be required to comply with the CBC and building permit requirements as required by policies and actions in the SSF GPU and the SSFMC, which all address development on areas containing expansive soils. SSF GPU Action CR-4.4.1 requires projects to prepare site-specific soils and geologic reports for review and approval by the City Engineer, and to incorporate the recommended actions during construction.

The potential for expansive soil would be low with the replacement of the undocumented fill with engineered fill and would be further examined in the design-level geotechnical investigation. The project would be required to comply with the CBC and building permit requirements as required by policies and actions in the SSF GPU and the SSFMC, including any project-specific geotechnical recommendations to address ground improvement and proper design and construction techniques to minimize impacts of expansive soils on the project.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to expansive soils than analyzed in the SSF GPU EIR.

e) Septic Tanks

**Less Significant Conclusion (Conclusion changes from LTS to NI):** SSF GPU EIR Impact GEO-5 would not apply to the project, as the project would not use septic tanks, and there would be no impact.

The project would connect to the City sewer system and would not use any septic tanks; therefore, the project would have no impact related to septic tanks.

f) Geologic Features

**Less Significant Conclusion (Conclusion changes from LTS w/ MM to LTS):** The project would be consistent with SSF GPU EIR Impact GEO-6, but SSF GPU MM GEO-6 would not apply to this project, as it is not located in the Colma Foundation or Merced Formation. The impact would be reduced to less than significant as the project would be required to comply with Section 5097 of the Public Resources Code.

The SSF GPU EIR concluded under Impact GEO-6 that the new development included in the SSF GPU could have a potentially significant impact on geologic features or paleontological resources, as there are potentially fossiliferous areas in two areas of the planning area, the Colma Foundation and the Merced Formation. SSF GPU MM GEO-6 requires paleontological monitoring during ground disturbing activities in these areas, reducing the potential impact to less than significant with mitigation.

The project site is not located on either the Colma Foundation or Merced Formation. The project site is located in an area with low paleontological potential and is covered with variable amounts of undocumented fill over shallow bedrock, but grading and removal of existing improvements could disturb native soils. If unknown paleontological resources are discovered during ground disturbing activities, the project would be required to comply with Public Resources Code 5097, minimizing potential impacts on unknown paleontological resources.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to geologic features than analyzed in the SSF GPU EIR.

## H. Greenhouse Gas Emissions

Would the Project:	SSF GPU EIR Findings	Relationship to GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment	LTS	■	□	-	LTS
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases	LTS	■	□	-	LTS

### Discussion

#### a) GHG Emissions

**Same Conclusion (Conclusion remains LTS):** The project would be consistent with SSF GPU EIR Impact GHG-1 and the less-than-significant conclusion as the project would comply with the City's Climate Action Plan.

The SSF GPU EIR concluded under Impact GHG -1 that the buildout planned for in the SSF GPU would have a less than significant impact on greenhouse gas (GHG) emissions during construction as all new projects would be required to comply with SSF GPU MM AIR-1a, SSFMC and SSF GPU actions and policies that reduce GHG emissions during construction.

The project would be required to comply with all applicable regulations during construction, including anti-idling of diesel equipment, salvaging and redirecting materials from demolition, and the provisions of SSF GPU MM AIR-1a. With regulatory compliance, the project would not have a significant impact on GHG emissions during construction.

The SSF GPU EIR concluded that the SSF GPU would have a less than significant impact on GHG emissions. The SSF GPU EIR projected the GHG emissions would be 3.55 metric tons (MT) CO<sub>2e</sub> per service population in 2040, which is less than the 4.0 MT threshold that was used at the time of analysis.

Since the SSF GPU EIR, BAAQMD issued new Guidelines (April 2022). For purposes of assessment of a General Plan with a CAP component, the new threshold requires the CAP to meet the statewide GHG reduction targets of 40 percent by 2030 and to achieve carbon neutrality by 2045.

The City's CAP was updated as a part of the SSF GPU. The updated 2022 CAP aligns the City with Statewide emission reduction targets and a reduction strategy to reduce GHG emissions by 40 percent below its 2005 baseline by 2030 and achieve carbon neutrality by 2045. As an adopted GHG reduction plan that quantifies existing and projected GHG emissions, including from specific identified actions with

performance standards and monitoring mechanisms, the CAP meets the criteria under State CEQA Guidelines Section 15183.5(b) as a qualified GHG reduction plan against which a project can be compared for CEQA streamlining purposes. While the updated BAAQMD guidelines would not constitute new information for purposes of CEQA, it can be noted that the SSF GPU would have been determined to have a less than significant impact under the new plan-level thresholds as well.

Similarly, under either the BAAQMD CEQA Guidelines in place at the time of the SSF GPU EIR or the current 2022 Guidelines, a project within an area with a qualified CAP would be determined to have a less-than-significant impact if the project is consistent with the CAP.

There is not currently a checklist for development projects, but the following strategies and actions are indirectly applicable to this proposed project through action and enforcement by the City:

**BNC 1.1** Improve the energy efficiency of new construction. Provide a combination of financial and development process incentives (e.g., Expedited permitting, FAR increase, etc.) to encourage new development to exceed Title 24 energy efficiency standard.

Supports – The project would be required to meet or exceed applicable Title 24 requirements.

**BNC 2.1** All-Electric Reach Code for Nonresidential New Construction. Implement residential all-electric reach code and adopt all-electric reach code for nonresidential new construction.

Supports – The project will submit an exception per the published methodology to determine the cost effectiveness for scientific laboratories to allow gas for space conditioning systems.

**BE 1.3** Energy Efficiency Programs. Update zoning and building codes to require alterations or additions at least 50% the size of the original building to comply with minimum CALGreen requirements.

Supports – The project would meet minimum applicable CALGreen requirements.

**TL 2.2** TDM Program. Implement, monitor, and enforce compliance with the City's TDM Ordinance.

Supports – The project would incorporate a TDM program that follows the City's TDM Ordinance.

**TL 2.6** Complete Streets Policy. Ensure that all roadway and development projects are designed and evaluated to meet the needs of all street users, and that development projects contribute to multimodal improvements in proportion to their potential impacts on vehicle miles traveled. Incorporate bicycle and pedestrian improvements identified in the Active South City Plan.

Supports – The project would enhance the streetscape of Eccles Avenue consistent with General Plan Goals MOB-1: South San Francisco prioritizes safety in all aspects of transportation planning and engineering, MOB-2: South San Francisco provides a multimodal network with convenient choices for everyone, and MOB-5: South San Francisco residents have easy access to play, fitness, and active transportation networks, and the Active South City Plan. A pedestrian and bicycle connection would be provided to the multi-use trail along the project's border.

WW 2.1 Indoor Water Efficiency Standards. Require high-efficiency fixtures in all new construction and major renovations, comparable to CALGreen Tier 1 or 2 standards.

Supports – The project would be required to meet the CALGreen and the Title 24 Building Code, which requires high-efficiency water fixtures and water-efficient irrigation systems.

Using the current GHG thresholds, the project would be compliant with the City's CAP, meeting Criteria B of BAAQMD's thresholds.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to GHG emissions than analyzed in the SSF GPU EIR.

b) Consistency with GHG Reduction Plans

***Same Conclusion (Conclusion remains LTS):*** *The current project would not change Impact GHG-2 or the less-than-significant conclusion related to consistency with GHG reduction plans as the project is consistent with the SSF CAP, which in turn is consistent with State and local GHG reduction plans.*

The SSF GPU EIR concluded under Impact GHG-2 that the buildout planned for in the SSF GPU would have a less than significant impact on consistency with applicable plans to reduce GHG emissions, as all new projects would be required to comply with the City's updated 2022 CAP, the SSFMC, and applicable SSF GPU actions and policies, which are all consistent with State and regional GHG reduction plans. Therefore, development under the SSF GPU was determined not to have the potential to significantly impact consistency with GHG reduction plans.

The project site is within the SSF GPU, and therefore must comply with all State, regional, and local GHG reduction plans, and would not significantly impact consistency with GHG reduction plans.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to consistency with GHG reduction plans than analyzed in the SSF GPU EIR.

## I. Hazards and Hazardous Materials

		Relationship to GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials	LTS	■	□	-	LTS
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment	LTS	■	□	-	LTS
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school	LTS	■	□	-	NI
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment	LTS	■	□	-	LTS
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area	LTS	■	□	-	NI
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan	LTS	■	□	-	LTS
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires	LTS	■	□	-	NI

## Discussion

### a) Routine Hazardous Materials Use

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact HAZ-1 and the less-than-significant conclusion related to the routine transport, use or disposal of hazardous materials as the project would be required to comply with applicable regulations related to hazardous materials handling.*

The SSF GPU EIR determined under Impact HAZ-1 that the proposed buildout would not have a significant impact on routine hazardous materials use, as all new development projects would be required to comply with applicable federal and State regulations, as well as SSF GPU policies and actions and the SSFMC, which all contain measures to reduce the risk to the public or the environment from the routine handling of hazardous materials. Federal, State, and regional agencies that regulate hazardous materials include the Environmental Protection Agency (EPA), the Occupational Safety and Health Administration (OSHA), U.S. Department of Transportation (USDOT), Department of Toxic Substances Control (DTSC), California Department of Transportation (Caltrans), California Highway Patrol (CHP), local Certified Unified Program Agency (local CUPA), and BAAQMD.

It is likely that equipment used at the site during construction activities could utilize substances considered by regulatory bodies as hazardous, such as diesel fuel and gasoline. However, all construction activities would be required to conform with Title 49 of the Code of Federal Regulations, US Department of Transportation, State of California, and local laws, ordinances, and procedures.

R&D uses that could occupy the proposed project, such as biotech and pharmaceutical research laboratories, typically use limited quantities of materials considered to be biological hazards and/or chemical hazards. The San Mateo County Environmental Health Division enforces regulations pertaining to safe handling and proper storage of hazardous materials to prevent or reduce the potential for injury to human health and the environment. Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health Administration (Cal/OSHA) is responsible for developing and enforcing workplace safety standards and ensuring worker safety in the handling and use of hazardous materials. Depending on the amounts and types of hazardous materials being used, further agencies may have applicable regulations. Given the strict regulations that would minimize any safety or environmental concerns related to the routine handling of hazardous materials, the project would not have a significant impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to routine hazardous materials use than analyzed in the SSF GPU EIR.

### b) Risk of Upset

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact HAZ-2 and the less-than-significant conclusion related to hazardous materials upset risk as the project site does not contain contaminated soil and would follow all applicable regulations for the presence of asbestos.*

The SSF GPU EIR determined under Impact HAZ-2 that the proposed buildout analyzed for the SSF GPU would not have a significant impact, as all new development projects would be required to comply with



applicable federal and State regulations, as well as SSF GPU policies and actions and the Zoning Ordinance, which all contain measures to reduce the risk to the public or the environment from the accidental upset of hazardous materials.

A Phase I Environmental Site Assessment of the project site was conducted by EBI Consulting for the applicant on June 28, 2022, which is available as part of the project application materials. The report concluded that there was no evidence of current or historical environmental conditions that would require regulatory oversight or additional safety measures to protect workers or the public during project construction due to contaminated soil or water at the site, nor is the project site on the Cortese list as a location of hazardous materials release.

The project would be required to comply with the California Code of Regulations. Title 8 contains requirements for public and worker protection, including equipment requirements and accident prevention. If excavated soil is found to contain previously unknown contaminants, the soil would be regulated under Title 22.

The Phase I Environmental Site Assessment reported asbestos containing materials in the existing building. Any suspected such materials must be abated by a licensed abatement contractor and disposed of according to all state and local regulations during demolition.

The Preliminary Geotechnical Investigation conducted by Langan determined that there was a possibility of naturally occurring asbestos (NOA) in the shallow bedrock. If further investigation determines that enough NOA is present on the project site, the project would be subject to the Asbestos Airborne Toxic Control Measure for Construction, Grading, Quarrying, and Surface Mining Operations under the California Air Resource Board, which requires construction and grading projects to implement best available dust mitigation measures where naturally occurring asbestos rock is likely to be encountered. In accordance with Title 17 of the California Code of Regulations, Section 93105, the project must prepare and submit an Asbestos Dust Mitigation Plan to BAAQMD for review and approval, indicating how construction and grading operations will minimize emissions and ensure that no equipment or operation will emit visible dust across the property line. Upon completion of construction activities, disturbed surfaces must be stabilized (e.g., with vegetative cover or pavement) to prevent visible emissions of asbestos-containing dust caused by wind speeds of 10 miles per hour or more. In addition, a Certified Industrial Hygienist would provide health and safety recommendations for potential worker exposure to NOA per Cal/OSHA requirements.

During construction, the project would need a SWPPP (see Section G: Geology and Soils and Section I: Hydrology and Water Quality), which must include measures for erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, maintenance responsibilities, and non-stormwater management controls. The BMPs in the SWPPP include measures to prevent spills and require on-site materials for cleanup. With implementation of an approved SWPPP and compliance with regulations, the project would not have a significant impact with regard to risk of upset of hazardous materials.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to risk of upset than analyzed in the SSF GPU EIR.

c) Hazardous Materials Near Schools

**Less Significant Conclusion (Conclusion changes from LTS to NI):** SSF GPU EIR Impact HAZ-3 would not apply to the project, as the project site is not within a ¼ mile of a school.

The project site is not located within one-quarter mile of a school site. The project would have no impact in regard to hazardous materials near schools.

d) Hazardous Materials Site

**Same Conclusion (Conclusion remains LTS):** The project would be consistent with SSF GPU EIR Impact HAZ-4 and the less-than-significant conclusion related to a known hazardous materials site as the project is not a known hazardous materials site.

The SSF GPU EIR determined under Impact HAZ-4 that the proposed SSF GPU buildout would not have a significant impact, as all new development projects would be required to comply with applicable federal and State regulations, as well as SSF GPU policies and actions and the Zoning Ordinance, which all contain measures to reduce the risk to the public or the environment from contaminated sites during construction activities.

The project site is not on the Cortese list, and the Phase I Environmental Site Assessment completed at the site did not find any indications of past or present contamination. If unexpectedly contaminated soils were discovered during construction activities, the handling, transportation, and disposal of hazardous materials would be required to comply with the requirements and regulations set forth by the City, EPA, OSHA, USDOT, DTSC, Caltrans, CHP, local CUPA, and BAAQMD. With compliance with all applicable regulations, any potential impact would be reduced to a less than significant level.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to hazardous materials sites than analyzed in the SSF GPU EIR.

e) Airport Hazards

**Same Conclusion (Conclusion remains LTS):** The project would be consistent with SSF GPU EIR Impact HAZ-5 and the less-than-significant conclusion, as the proposed heights under the project remain within height levels considered safe in relation to the airport.

The SSF GPU EIR determined under Impact HAZ-5 that the proposed buildout would not have a significant impact in regard to airport hazards, as all new development projects would be required to comply with applicable SSF GPU policies and actions and the Zoning Ordinance. The SSF GPU includes policies and actions that minimize the exposure of people working in the East of 101 area to a safety hazard or excessive noise from the San Francisco International Airport (SFO), including SSF GPU Policy SA-21.3 to allow building heights in the East of 101 area up to but not exceeding the maximum limits permitted under the Federal Aviation Administration (FAA) regulations.

The project is located in an area with a maximum allowable height of 860 feet above mean sea level. Factoring in the height of the site of approximately 100 feet above mean sea level, the proposed buildings would reach heights up to 222 feet above mean sea level plus an additional approximately 24 feet of rooftop elements for a maximum height of 246 feet, all of which would be well below the FAA height limit at the site of 860 feet. The project is consistent with airport-related building safety policies

identified in the Airport Land Use Compatibility Plan (ALUCP), including avoidance of potential flight hazards such as laser displays, searchlights, radar, etc., and therefore would not have a significant impact.<sup>4</sup>

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to airport hazards than analyzed in the SSF GPU EIR.

f) Emergency Access Routes

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact HAZ-6 and the less-than-significant conclusion, as the project is within the planned buildout of the SSF GPU.*

The SSF GPU EIR determined under Impact HAZ-6 that the proposed buildout would not have a significant impact, as current evacuation routes have sufficient capacity for the planned buildout, and the San Mateo County Emergency Operations Plan (EOP) is updated regularly. As new development occurs, the EOP would be updated to ensure it accommodates the subsequent growth, and therefore development under the SSF GPU was determined not to have the potential to significantly impact emergency access routes.

The project would not include any changes to existing public roadways that provide emergency access to the site or surrounding area. The proposed project would be designed to comply with the California Fire Code and the City Fire Marshal's code requirements that require on site access for emergency vehicles, a standard condition for any new project approval.

No substantial obstruction in public rights-of-way has been proposed with the project's construction activities. However, any construction activities can result in temporary intermittent roadway obstructions, but these would be handled through standard procedures with the City as part of the building permit process to ensure adequate clearance is maintained. The project is part of the anticipated growth in the East of 101 area analyzed in the SSF GPU EIR and therefore is part of the less than significant impact to emergency access routes.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to emergency access routes than analyzed in the SSF GPU EIR.

g) Significant Risk Involving Wildland Fires

**Less Significant Conclusion (Conclusion changes from LTS to NI):** *SSF GPU EIR Impact WILD-1 would not apply to the project as it is not located in or near fire-prone wildland areas and would therefore not result in significant risk involving wildland fires.*

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<sup>4</sup> City/County Association of Governments of San Mateo County, November 2012, Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport, including Exhibit IV-14, and pages IV-59 to IV-60. Available at: [http://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated\\_CCAG\\_ALUCP\\_November-20121.pdf](http://ccag.ca.gov/wp-content/uploads/2014/10/Consolidated_CCAG_ALUCP_November-20121.pdf)

The SSF GPU EIR determined that development in or near fire-prone wildland areas, identified as Sign Hill Park and the San Bruno Mountain State Park, would require a landscape design plan that addresses fire safety and prevention.

The project site is not located near the SSF GPU EIR-identified fire-prone areas (Sign Hill Park and the San Bruno Mountain State Park), which are both located on the other side of US 101. The project would have no impact related to risk involving wildland fires.

## J. Hydrology and Water Quality

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality	LTS	■	□	-	LTS
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin	LTS	■	□	-	LTS
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows	LTS	■	□	-	LTS
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation	LTS	■	□	-	LTS
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	LTS	■	□	-	LTS

## Discussion

### a) Water Quality

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact HYD-1 and the less-than-significant conclusion, as the project would be required to comply with all applicable regulations listed in the SSF GPU EIR.*

The SSF GPU EIR determined under Impact HYD-1 that the proposed buildout would not have a significant impact on water quality during anticipated construction activities, dewatering or operations. All new development projects would be required to comply with all applicable Regional Water Quality Control Board (RWQCB) regulations, as well as SSF GPU policies and actions, CAP Actions, and the SSFMC, which all contain measures to protect water quality during construction. All new development projects that require dewatering during excavation or trenching would be required to comply with mandatory NPDES permit requirements and the SSFMC during dewatering activities. All new development would be required to comply with federal, State, regional and local stormwater requirements, and SSF GPU policies and actions, the SSFMC, and CAP Actions related to stormwater.

Construction activities have the potential to impact water quality through erosion and through debris and oil/grease carried in runoff which could result in pollutants and siltation entering stormwater runoff and downstream receiving waters if not properly managed. The project would be required to obtain coverage under the General Construction Permit issued by the SWRCB. Coverage under this permit requires preparation of a SWPPP for review and approval by the City. At a minimum, the SWPPP would include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; a list of provisions to eliminate or reduce discharge of materials to stormwater; BMPs; and an inspection and monitoring program. Furthermore, the County of San Mateo's Water Pollution Prevention Program would require the project site to implement BMPs during project construction to reduce pollution carried by stormwater such as keeping sediment on site using perimeter barriers and storm drain inlet protection and proper management of construction materials, chemicals, and wastes on site. Additional BMPs required by SSFMC Section 14.04.180 ("Reduction of pollutants in stormwater") would also be implemented during project construction. Per standard City procedures, compliance with SWPPP requirements and BMPs would be verified during the construction permitting process.

The project site is approximately 84 percent impervious surface area in its existing state. The project would add 438 square feet of pervious area, resulting in 83.5 percent impervious surface area across the site. The project would meet federal, State, regional and local stormwater requirements pertaining to site design, stormwater treatment, and stormwater infiltration, and would not have a significant impact on water quality.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to water quality than analyzed in the SSF GPU EIR.

### b) Groundwater

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact HYD-2 and the less-than-significant conclusion, as the project would be required to comply with all applicable stormwater regulations.*

The SSF GPU EIR determined under Impact HYD-2 that the proposed buildout would not have a significant impact on groundwater, as all new development projects would be required to comply with applicable SSF GPU policies and actions, and the SSFMC, which all contain measures to maximize stormwater infiltration and rainwater retention and minimize impacts to groundwater recharge. SSF GPU Policy ES-7.3 requires new development and redevelopment projects to meet federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, and stormwater infiltration. SSFMC Section 14.04.134 (“Low Impact Development (LID) requirements”) requires that all regulated projects implement LID requirements as specified in NPDES Permit No. CAS612008 to reduce runoff and mimic a site’s predevelopment hydrology.

The proposed project would be required to comply with all applicable regulations, policies and actions of the SSF GPU and SSFMC. The project site is not in a flood overlay zone, which has stricter regulations to minimize impacts on groundwater recharge. The project would comply with stormwater drainage requirements, including bio-retention areas to address both quality and volumes of runoff and is consistent with expected use of the site in basin planning. The project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge and would not have a significant impact related to groundwater.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to groundwater than analyzed in the SSF GPU EIR.

c) Alter Drainage

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact HYD-3 and the less-than-significant conclusion, as the project would be required to comply with the applicable regulations related to stormwater drainage.*

The SSF GPU EIR determined under Impact HYD-3 that the proposed buildout would not have a significant impact from altered drainage patterns leading to erosion and siltation, as all new development projects would be required to comply with applicable State Water Board permits, SSF GPU policies and actions, and the SSFMC, which all contain measures to manage sites during construction and manage stormwater in order to minimize erosion and siltation. As discussed under the Water Quality section, projects that disturb more than one acre of ground require development of a SWPPP, which must describe the site, the facility, erosion and sediment controls, runoff water quality monitoring, means of waste disposal, implementation of approved local plans, control of construction sediment and erosion control measures, maintenance responsibilities, and non-stormwater management controls. Inspection of construction sites before and after storms is also required to identify stormwater discharge from the construction activity and to identify and implement erosion controls, where necessary.

The SSF GPU EIR determined that the proposed buildout would not have a significant impact from increased stormwater runoff or storm drain capacity, as all new development projects would be required to comply with applicable SSF GPU policies and actions, and the SSFMC, which all contain measures to maximize stormwater infiltration and rainwater retention, which would reduce runoff. SSF GPU Policy ES-7.3 requires new development and redevelopment projects to meet federal, State, regional, and local stormwater requirements, including site design, stormwater treatment, and stormwater infiltration. SSFMC Chapter 14.04 (“Stormwater Management and Discharge Control”)

contains regulations that seek to minimize impacts from stormwater runoff and follow LID requirements.

The SSF GPU EIR determined that the proposed buildout would not have a significant impact from flood flows, as all new development projects in flood hazard zones would be required to comply with applicable SSF GPU policies and actions, and the SSFMC, which contain measures to reduce the risk of flooding.

The project site is currently developed and consists of approximately 84% impervious surfaces. The project would result in approximately 83.5% impervious surfaces. As discussed under the Inundation topic below, the project is not located in a flood hazard zone and would therefore not redirect flood waters. The project is proposing to remove any existing storm drainpipes and replace them with new drainpipes that run from in front of the parking garage, between the two buildings on the site, and behind the office/R&D building. In compliance with City requirements, the project would implement LID stormwater management best practices to minimize runoff and encourage stormwater infiltration, including using bioretention areas to manage stormwater on the project site. The project would be required to limit flows into the public storm drain system to pre-project conditions (or less), in accordance with City requirements.

A Storm Drainage analysis was completed by BKF Engineers for the applicant on September 21, 2023 (available as part of the project application materials). The project would decrease the existing impervious area and install treatment measures for stormwater runoff. After project development, the peak stormwater runoff during a 10-year event was estimated to be 3.93 cubic feet per second (cfs), which is less than the existing site condition of 4.27 cfs. Therefore, the project would reduce peak runoff that discharges to the City's public storm drain system.

Through compliance with applicable regulations, runoff from site would be the same or reduced from that existing and would not cause erosion, siltation, pollution, or flooding and as discussed above, changes to on-site conditions would meet applicable requirements and would not exceed capacity of the stormwater drainage system or result in on- or off-site flooding. The project would not cause a significant impact due to altered drainage.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to altered drainage than analyzed in the SSF GPU EIR.

#### d) Inundation

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact HYD-4 and the less-than-significant conclusions related to inundation as the project will not place new structures within the 100-year flood hazard zone or a location with potential for flooding due to levee or dam failure or sea level rise.*

The SSF GPU EIR determined under Impact HYD-4 that the proposed buildout would not have a significant impact on inundation, as all new development in flood hazard zones would be required to comply with applicable regulations in the SSF GPU and SSFMC, which all contain construction standards to minimize flood hazards.



Based on SSF GPU EIR Exhibits 3.9-2 and 3.9-3, the project is not located within a 100-year flood hazard zone, nor is the project site in an area for the potential for flooding from a dam or levee failure or sea level rise by 2100. The project would not have a significant impact on inundation.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to inundation than analyzed in the SSF GPU EIR.

e) Water Plans

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact HYD-5 and the less-than-significant conclusion, as the project would be required to comply with all applicable regulations.*

The SSF GPU EIR determined under Impact HYD-5 that the proposed buildout would not have a significant impact from conflict with water quality control plans or groundwater management plans, as all new development projects would be required to comply with applicable State Water Board permits, SSF GPU policies and actions, and the SSFMC, and therefore development under the SSF GPU was determined not to have the potential to significantly impact conflict with water plans.

The project would be required to comply with all applicable State Water Board permits, SSF GPU policies and actions, and the SSFMC. The project site is within the GPU, and therefore does not have the potential for development to significantly impact conflicts with water quality or groundwater management plans.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to water quality or groundwater management plans than analyzed in the SSF GPU EIR.

## K. Land Use

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Physically divide an established community	LTS	■	□	-	NI
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect	LTS	■	□	-	LTS

### Discussion

#### a) Division of an Existing Community

**Less Significant Conclusion (Conclusion changes from LTS to NI):** SSF GPU EIR Impact LAND-1 would not apply to the project, as the project site is not near an established community.

The project site is a currently developed commercial site, surrounded by like development in the East of 101 area of the City. There are no established communities in the vicinity of the project site, therefore the project would have no impact.

#### b) Conflict with Land Uses / Land Use Plans

**Same Conclusion (Conclusion remains LTS):** The project would be consistent with SSF GPU EIR Impact LUP-2 and the less-than-significant conclusion, as the project is compatible with land use as specified in the SSF GPU.

The SSF GPU EIR found under Impact LUP-2 the Zoning Code Amendments and the land use as updated in the SSF GPU to be a less than significant impact. Future development under the SSF GPU would be required by the City to demonstrate consistency with applicable federal, State, and local policies including those mitigating or avoiding environmental impacts through the mechanisms of project permitting and approvals. The SSF GPU planned new development to be consistent with Plan Bay Area 2050 and the ALUCP of the San Francisco International Airport.

The project is consistent with the development type and density established by the SSF GPU and the Zoning Code Amendments. The proposed FAR of 2.0 is allowable under the zoning standards applicable to the project site with payment of a community benefits fee. The project would be required to comply with all applicable federal, State and local environmental policies. The project's proposed height is compatible with the ALUCP with all project elements at or below 246 feet above mean sea level compared to FAA height limits of 860 feet (see Airport Hazards topic under Section I: Hazardous Materials for additional discussion). The project is consistent with development anticipated under Plan Bay Area 2050 and the SSF GPU and therefore would not have a significant impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to land use than analyzed in the SSF GPU EIR.

## L. Mineral Resources

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state	NI	■	□	-	NI
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan	NI	■	□	-	NI

### Discussion

#### a-b) Mineral Resources

**Same Conclusion (Conclusion remains NI):** *The project would be consistent with the SSF GPU EIR conclusions of no-impact for all mineral resource impact questions, as there are no known mineral deposits or active mineral extraction operations at the project site.*

The SSF GPU EIR determined that there are no mineral resource recovery sites within the City. Therefore, no impacts related to mineral resources would occur.

There are no known important mineral deposits or active mineral extraction operations identified by the California Department of Conservation at the project site.<sup>29</sup> Consistent with the findings of the SSF GPU EIR, the project would have no impact on important mineral resources.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to mineral resources than analyzed in the SSF GPU EIR.

<sup>29</sup> U.S. Geological Survey, Mineral Resources Data System: U.S. Geological Survey, Reston, Virginia. Accessed December 2023, at: <https://mrdata.usgs.gov/mrds/>.

## M. Noise and Vibration

Would the Project result in:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	LTS (construction)	■	□	-	LTS
	LTS w/MM (operation)			N/A	LTS
b) Generate excessive groundborne vibration or groundborne noise levels	LTS	■	□	-	LTS
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels	LTS w/MM	■	□	N/A	NI

### Discussion

#### a) Noise (Construction)

**Same Conclusion (Conclusion remains LTS for Construction):** *The project would be consistent with SSF GPU EIR Impact NOI-1 during construction and the less-than-significant conclusion as the project would be required to comply with Noise Ordinances for construction activities.*

The SSF GPU EIR determined under Impact NOI-1 that noise during construction of the new development anticipated under the SSF GPU would have a less than significant impact, as construction activities would be restricted to certain days and times as detailed in the SSFMC and policies and actions in the SSF GPU.

The project would be required to comply with all restrictions and regulations related to construction activities, including hours and days when construction activities are authorized and not to exceed 90 decibels (dBA) at a distance of 25 feet. With compliance with regulations, the project's impact in regard to construction noise would not be significant.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to construction noise than analyzed in the SSF GPU EIR.

## Noise (Operations)

***Less Significant Conclusion (Conclusion changes from LTS w/ MM to LTS for Operation):*** The project would not exacerbate Impact NOI-1 and SSF GPU MM NOI-1 would not apply to the project for the operational period as there are no residential receptors within 300 feet of the project site.

The SSF GPU EIR determined under Impact NOI-1 that noise caused by the new development anticipated under the SSF GPU would have a less than significant impact, as zoning restrictions and acoustical design requirements for noise impacted areas would limit increased ambient noise, as detailed in the SSFMC, Zoning Ordinance and policies and actions in the SSF GPU. The SSF GPU EIR also established SSF GPU MM NOI-1 to reduce noise from commercial or industrial land uses within 300 feet of residential uses and exterior mechanical systems within 50 feet of residences. No residential uses are located within these distances from the project site and therefore, SSF GPU MM NOI-1 is not applicable to the proposed project.

The SSF GPU EIR also discussed traffic noise increases under this impact. A characteristic of noise is that audible increases in noise levels generally refer to a change of 3 decibels (dBA) or more, as this level has been found to be barely perceptible to the human ear in outdoor environments. A change of 5 dBA is considered the minimum readily perceptible change to the human ear in outdoor environments. The SSF GPU EIR modeled traffic noise increases resulting from build-out under the plan and determined that roadways would experience cumulative increases up to 1.7 dBA, which would be below the level that would be perceptible (5 dBA outdoors) and would therefore not result in a significant traffic-related noise impact. This project would be consistent with the conclusions in the SSF GPU EIR and would have a less than significant impact with respect to increases in traffic noise.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to operational noise than analyzed in the SSF GPU EIR.

## b) Vibration

***Same Conclusion (Conclusion remains LTS):*** The project would be consistent with SSF GPU EIR Impact NOI-2 and the less-than-significant conclusion as the project would be required to comply with all regulations listed in the SSF GPU EIR during construction activities.

The SSF GPU EIR determined that vibration during construction of the new development anticipated under the SSF GPU would have a less than significant impact, as construction activities would be required to take steps to reduce vibrations that have the potential to produce high groundborne vibration levels as detailed in the SSFMC and policies and actions in the SSF GPU. SSF GPU Policy NOI-2.1 requires a vibration impact analysis for any construction activities, located within 100-feet of residential or sensitive receptors that require the use of pile driving or other construction methods that have the potential to produce high groundborne vibration levels. SSF GPU Policy NOI-3.1 requires vibration impact analysis for historic structure protection for construction activities within 150 feet of historic structures. The project is not within 100-feet of residences or other sensitive receptors, nor within 150 feet of historic structures that might be damaged by construction generated vibrations, so neither of these policies would apply to the project.

The proposed uses of the project are not the type that will generate substantial groundborne vibration during operations as they are proposed to be office/R&D uses. The project would not have a significant impact on groundborne vibration.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to vibration than analyzed in the SSF GPU EIR.

c) Airport Noise

***Less Significant Conclusion (Conclusion changes from LTS w/ MM to LTS):*** *The project would not exacerbate SSF GPU EIR Impact Noise-3 and SSF GPU MM NOI-3 would not apply to the project as the project site is outside the 65-decibel (dBA) contour line of the San Francisco International Airport.*

The SSF GPU EIR determined under Impact NOI-3 that noise from the San Francisco International Airport would have a potentially significant impact, as portions of the planning area of the SSF GPU is within the area substantially affected by airplane flyover noise and requires SSF GPU MM NOI-3 to reduce noise impacts on affected projects.

The ALUCP notes that under state noise law (California Code of Regulations, Title 21, Division 2.5, Chapter 6, Section 5006), the area in which an airport causes noise levels of 65 dBA or more that is occupied by incompatible uses is called the “noise impact area.” As shown in Exhibit 3.11-2 of the SSF GPU EIR, while the project site is within the boundary of the ALUCP, it is not within an area exposed to 65 dBA or higher from the airport. Nor would it be considered an incompatible use (such as a residence or hospital). SSF GPU MM NOI-3 would not be necessary to reach a less than significant conclusion.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to airport noise than analyzed in the SSF GPU EIR.

## N. Population and Housing

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)	LTS	■	□	-	LTS
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere	LTS	■	□	-	NI

### Discussion

#### a) Population Growth

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact POP-1 and the less-than-significant conclusion as the potential for indirect population growth due to increased employment is planned growth under the SSF GPU.*

Under Impact POP-1, the SSF GPU EIR determined that residential and on-residential population growth under buildout of the SSF GPU would be a less-than-significant impact because the SSF GPU would be considered a long-range planning document, and therefore the population growth would be planned. The SSF GPU EIR analyzed an increase in population of 40,068 by 2040, with related employment growth of 42,267 jobs.

The proposed project would provide approximately 995 jobs (calculated using the highest intensity proposed use of an office, which would have approximately 300 square feet per employee) and contribute to indirect population growth. This would be consistent with local and area planning and would therefore not be considered unplanned growth. The project is consistent with the employment growth analyzed in the SSF GPU EIR, and therefore would not have a significant impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to population growth than analyzed in the SSF GPU EIR.

#### b) Displacement of Housing or People

**Less Significant Conclusion (Conclusion changes from LTS to NI):** *SSF GPU EIR Impact POP-2 would not apply to the project as there are no existing residences on the site.*



The project site is currently developed with industrial buildings, and there are no residences that would be displaced by the proposed project. The project would have no impact on displacement of housing or people.

## O. Public Services and Recreation

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: <ul style="list-style-type: none"> <li>• Fire protection</li> <li>• Police protection</li> <li>• Schools</li> <li>• Parks</li> <li>• Other public facilities</li> </ul>	LTS	■	□	-	LTS
b) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated	LTS	■	□	-	LTS
c) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment	LTS	■	□	-	LTS

### Discussion

#### a-c) Public Services and Recreation

**Same Conclusion (Conclusion remains LTS):** The project would be consistent with SSF GPU EIR Impacts PUB-1 through PUB-5, and Impacts REC-1 and REC-2, and the less-than-significant conclusion as the potential to increase demand for services and recreation would not change from the analysis in the SSF GPU EIR.

The SSF GPU EIR determined under Impacts PUB-1 through PUB-5 that the increased need for public services and possible construction of new facilities for those services that the planned population and

employment growth may require would be a less than significant impact, as all public services would be required to keep pace with increased population, and all new facilities would be under the planned “Public” land use, and would be required to comply with all applicable regulations.

As part of the anticipated growth planned for in the SSF GPU (see Section N: Population & Housing), the project would not increase the need for public services or new facilities for those services beyond the level that was analyzed in the SSF GPU EIR. Therefore, the project would not have a significant impact on public services.

The SSF GPU EIR determined under Impacts REC-1 and REC-2 that the increased need for parks and recreational facilities and possible construction of new parks or facilities that the planned population and employment growth may require would be a less than significant impact, as increased parks are planned for in the SSF GPU, and new development would pay a Parks and Recreation Impact Fee.

As part of the anticipated growth planned for in the SSF GPU, the project would not increase the need for parks or new recreational facilities beyond the level that was analyzed in the SSF GPU EIR. Plaza and landscaped areas would be publicly accessible and the project would contribute in-lieu fees toward the cost of public parks. The project would not have a significant impact on recreation.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to public services and recreation than analyzed in the SSF GPU EIR.

## P. Transportation and Circulation

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subsection (b) re: VMT	SU w/MM	■	□	SSF GPU MM TRANS-1: Transportation Demand Management [for Development Projects]	SU w/MM
b) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	LTS	■	□	-	LTS
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)	LTS w/MM	■	□	N/A	LTS
d) Result in inadequate emergency access	LTS	■	□	-	LTS

### Discussion

This section utilizes information from the transportation assessment prepared by Fehr & Peers, included in full as Attachment 5.

#### a) Conflict with Transportation Impact Reduction Goals

**Same Conclusion (Conclusion remains SU w/MM):** *The project would be consistent with SSF GPU EIR Impact Trans-1, the requirements in SSF GPU MM TRANS-1, and the significant and unavoidable with mitigation conclusion related to transportation impact reduction goals.*

The SSF GPU EIR determined under Impact TRANS-1 that with the full buildout planned in the SSF GPU, VMT would be above significance thresholds. SSF GPU MM TRANS-1 requires the City to implement a mandatory TDM ordinance, and East of 101 Trip Cap and parking reductions; however, the SSF GPU EIR determined that the Total VMT per Service Population and Work-Based VMT per Employee would remain significant and unavoidable even with mitigation. SSFMC Chapter 8.73 (“Transportation Impact Fee”) requires that new developments pay a Transportation Impact Fee towards transportation system improvements. Section 20.400.005 (“Submittal Requirements and Approvals”) of the SSF Zoning Ordinance, commonly known as the TDM Ordinance, requires project specific TDM documentation. SSF

GPU policies and actions contain multiple requirements intended to increase use of alternative modes of transportation.

To reduce the impact related to VMT and transportation impact reduction goals, the project would implement applicable provisions of SSF GPU MM TRANS-1.

**SSF GPU MM**

**TRANS-1: Transportation Demand Management [for Development Projects].** [The project applicant / owner / sponsor] shall implement a combination of TDM programs (pursuant to Sections 20.400.003 and 20.400.004 of the Zoning Ordinance), services, and infrastructure improvements, including but not limited to: establishing trip reduction programs; subsidizing transit and active transportation use; coordinating carpooling and vanpooling; encouraging telecommuting and flexible work schedules; designing site plans to prioritize pedestrian, bicycle, and transit travel; funding first/last mile shuttle services; establishing site-specific trip caps; managing parking supply; and constructing transit and active transportation capital improvements. [The project applicant / owner / sponsor] shall be subject to annual reporting and monitoring.

Note that the measure above includes only those provisions applicable directly to a development project, as opposed to City actions, and the brackets in the above mitigation measure show where text has been revised from the original measure to make clear that it would be implemented by this project.

The project would implement a TDM program pursuant to the City’s TDM Ordinance and would be compliant with the City’s maximum parking allowance. The project’s TDM program must achieve a maximum of 60% of commuting employees by single occupancy vehicles per City requirements. This would reduce daily trips by 21% (see Attachment 5 for more details). Traffic engineers Fehr & Peers prepared a VMT analysis for the project and compared it to the City-level VMTs calculated for the SSF GPU EIR, as summarized in **Table 4**. The VMT results in Table 4 represent VMT for the project after trip reductions for the TDM program and reduced parking.

**Table 4: Home-Based Work VMT per Employee Thresholds**

Scenario	Topic	Estimated Home-Based Work VMT per Employee
Existing	Bay Area Regional Average	14.9
	Threshold of Significance (15% Below Regional Average)	12.7
	City	16.6
	<b>Project<sup>1</sup></b>	<b>16.5</b>
Cumulative (2040)	Bay Area Regional Average	14.7
	Threshold of Significance (15% Below Regional Average)	12.5
	City General Plan Buildout	13.4
	<b>Project<sup>1</sup></b>	<b>12.2</b>

<sup>1</sup> Based off the project’s transportation analysis zone in the C/CAG VTA Model

Source: Fehr & Peers, 2023, Table 3.2. See Attachment 5.

As summarized in Table 4, the VMT for the project is above the significance threshold under both existing and cumulative conditions, though lower than the City VMT determined in the SSF GPU EIR. This conclusion factors in implementation of a TDM program meeting City requirements (adopted to satisfy GPU EIR MM TRANS-1). The project would contribute to the significant and unavoidable impact in regard to VMT found in the SSF GPU EIR but would not exacerbate the previously identified impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to VMT than analyzed in the SSF GPU EIR.

#### b) Conflicts with Circulation Plans or Policies

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact TRANS-2 regarding bicycle and pedestrian facilities, and Impact TRANS-3, regarding transit facilities, and the less-than-significant conclusions as the project would be required to comply with City plans and policies.*

The SSF GPU EIR determined under Impacts TRANS-2 and TRANS-3 that the proposed buildout would not have a significant impact, as all new development projects would be required to comply with the City's TDM ordinance and parking maximum. SSF GPU Policy MOB-2.1 requires all development projects to incorporate complete street improvements. SSF GPU policies and actions are consistent with the Active South City Plan and contain measures to reduce the impact on bicycle and pedestrian facilities. Transit-related SSF GPU actions and policies are not on an individual project level.

The project is consistent with City transportation plans and policies. The project would enhance the streetscape of Eccles Avenue consistent with SSF GPU Goals to provide safe, active, and multimodal networks, and the Active South City Plan. Additional bike lanes on Eccles Avenue are planned as part of the Active South City Plan; the project would not obstruct those nor any other Active South City Plan improvements in the vicinity. A pedestrian and bicycle connection would be provided from the project site to the adjacent multi-use trail as well. The project's TDM program would meet the requirements of the City's TDM Ordinance and support the SSF GPU Goals of managing traffic and parking demands and reducing VMT.

The project would not exceed the City's parking maximums consistent with SSF GPU Action MOB-3.3.1. The project would not preclude the City from implementing proposed transportation or transit projects identified in the SSF GPU or Active South City Plan. With compliance with the City's TDM ordinance, SSF GPU goals and actions, and the Active South City Plan, the project would not have a significant impact on circulation plans and policies.

The South San Francisco Caltrain station is located approximately 0.5 miles from the project site. Although the project site is located only 700 to 900 feet from bus/shuttle stops at 700/701 Gateway Boulevard, no direct pedestrian connection is present (a retaining wall blocks access via the Gateway of the Pacific site). Pedestrians may divert to the north via the Gateway of the Pacific site, but this adds approximately 1,600 feet (about six minutes) of walking distance to reach the stop. Due to asymmetry in the northbound/southbound stops, the nearest northbound shuttle stop is presently located 2,200 feet to the north in front of 1000 Gateway Boulevard.

The South San Francisco Ferry Terminal is 1.0 miles to the northeast. Oyster Point Mobility operates a shuttle service between the Glen Park BART Station to the Genentech Campus via Gateway Boulevard.

The nearest stop is located approximately ¼ -mile from the project site. The project would increase the use of nearby transit services, providing benefits to the environment, and would not have a significant impact on transit facilities.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to conflicts with circulation plans or policies than analyzed in the SSF GPU EIR.

While the transportation assessment (Attachment 5) determined that the project would result in a less than significant impact with no mitigation required with respect to consistency with plans and policies, it did indicate that the added travel time and meandering diversion for pedestrians to reach the nearest bus/shuttle stop may discourage transit use and affect the project's ability to meet its TDM targets.

The following Condition of Approval shall be applied to the project in partial satisfaction of SSF GPU MM TRANS-1, along with Standard Condition Transportation Demand Management (TDM):

The project applicant / owner / sponsor shall implement the following measures to ensure adequate access to transit services can be provided:

- Provide a letter of support from the owners of Gateway of the Pacific into the final TDM Plan stating that the two developments will make a good faith effort to ensure pedestrian access from 439 Eccles to bus and shuttle stops on Gateway Boulevard via the Gateway of the Pacific site.
- Incorporate space for an on-street shuttle stop along the project's frontage on southbound Eccles Avenue to provide the ability for shuttles to serve the site (including red curb, an eight foot by five foot accessible landing pad and a pole that operators may attach signage to).

#### c) Hazards

***Less Significant Conclusion (Conclusion changes from LTS w/ MM to LTS):*** The project would not exacerbate identified Impact TRANS-4 regarding roadway hazards and SSF GPU MM TRANS-4 would not apply as Impact TRANS-4 and SSF GPU MM TRANS-4 are not on an individual project level.

The SSF GPU EIR determined under Impact TRANS-4 that with the full buildout planned in the SSF GPU, increased vehicle trips along U.S. 101 would have a potential impact in regard to hazardous conditions, as increased vehicle trips on freeway ramps could exacerbate vehicle queues along ramps in excess of their storage capacity and present a potentially hazardous condition under cumulative conditions. SSF GPU MM TRANS-4 relates to freeway off-ramp queueing and would not be applicable to the project.

The project would replace two existing driveways with three new driveways. Most vehicles would use the driveway at the western edge of the project site, which would serve the parking garage. The driveway at the center would primarily serve passenger loading activity associated with visitors, as well as facilitate emergency vehicle access. The eastern driveway would function as the service driveway for deliveries and refuse collection while also serving emergency vehicles. All three driveways would provide adequate sight distances of at least 250 feet with compliance with landscaping requirements.

Pedestrian and bicycle access would be provided via a walkway that connects to the sidewalk on the north side of Eccles Avenue. Two connections would also be provided to the under-construction trail on the northern frontage of the project site: a stairwell at the center of the site and a ramp at the eastern edge of the site. From the trail, pedestrians and bicyclists may access bus/shuttle stops on Gateway

Boulevard via the Gateway of the Pacific site or continue north to the ferry terminal or south to the Caltrain Station.

A pedestrian plaza would be located at the center of the site adjacent to the main building, parking garage, trail, and passenger loading area. Long-term bicycle parking would be provided in a bike room in the parking garage, while short-term parking would be located adjacent to the main building entrance.

All driveways, pedestrian connections, bicycle connections, and loading zones can be accessed without exacerbating conflicts between roadway users. The project's site plan is therefore consistent with applicable design standards and does not present any potential design hazards. The project would not include any uses that are incompatible with the surrounding land use or the existing roadway system.

The project would increase vehicle trips along U.S.-101 freeway off-ramps at Oyster Point Boulevard and East Grand Avenue. The project would generate a daily total of 2,311 net new trips, with 212 net new trips in the AM peak hour and 201 net new trips in the PM peak hour. As the project is part of the analyzed buildout of the SSF GPU, this additional traffic would contribute to the Impact TRANS-4 analyzed in the SSF GPU EIR but would not exacerbate the previously identified impact.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to hazards than analyzed in the SSF GPU EIR.

#### d) Emergency Access

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact TRANS-5 regarding emergency access and the less-than-significant conclusion as the project would be required to comply with California Fire Code requirements and design standards.*

The SSF GPU EIR determined under Impact TRANS-5 that the proposed buildout would not have a significant impact, as all new development projects would be required to comply with the California Fire Code and applicable design standards regarding emergency vehicle access to the project site.

The project would provide adequate emergency vehicle access consistent with applicable design standards. Each driveway would accommodate all types of emergency vehicles and meet the requirements of the California Fire Code. Emergency vehicles would access the site via Eccles Avenue and may circulate through the passenger loading area, parking garage, plaza, and service driveway. The project would not introduce roadway features that would alter emergency vehicle access routes or roadway facilities. With compliant emergency vehicle access to the project site, the project would not have a significant impact on emergency access.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to emergency access than analyzed in the SSF GPU EIR.



## Q. Utilities and Service Systems

Would the Project:	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects	LTS	■	□	-	LTS
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years	LTS	■	□	-	LTS
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments	LTS	■	□	-	LTS
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals	LTS	■	□	-	LTS
e) Comply with federal, state, and local statutes and regulations related to solid waste	LTS	■	□	-	LTS

### Discussion

#### a) Discussion New or Expanded Facilities

**Same Conclusion (Conclusion remains LTS):** The project would be consistent with SSF GPU EIR Impact UTIL-1 and the less-than-significant conclusion related to new or expanded facilities as the project can be served by current utilities as described in the SSF GPU EIR.

The SSF GPU EIR concluded under Impact UTIL-1 that existing or planned facilities would be adequate to service the anticipated buildout of the SSF GPU. No new water treatment facilities would be needed. Any new development would be subject to the latest adopted edition of the California Plumbing Code and CALGreen Code, per City requirements, including the provisions for water-efficient fixtures and

toilets, which would reduce the amount of effluent entering the wastewater system. New development projects would also be required to install on-site storm drainage infrastructure that would detain stormwater and release runoff at a rate no greater than the pre-development condition of the project site.

As the project site is currently developed it is already serviced by utilities. The project is within the buildout that was analyzed in the SSF GPU EIR, and therefore would not increase demand such that unplanned new or expanded facilities would be needed. The project would not have a significant impact on utility facilities.

A Storm Drainage Analysis was completed by BKF Engineers for the applicant on September 21, 2023 (available as part of the project application materials). The project would decrease the existing impervious area and install treatment measures for stormwater runoff. After project development, the peak stormwater runoff during a 10-year event was estimated to be 3.93 cfs, which is less than the existing site condition of 4.27 cfs. Therefore, the project would reduce peak runoff that discharges to the City's public storm drain system.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to new or expanded facilities than analyzed in the SSF GPU EIR.

#### b) Water Supply

***Same Conclusion (Conclusion remains LTS):*** *The project would be consistent with SSF GPU EIR Impact UTIL-2 and the less-than-significant conclusion as the project would not substantially change projected increases in water demand.*

The SSF GPU EIR concluded under Impact UTIL-2 that there would be sufficient water to supply the planned buildout under the SSF GPU through 2045, based on Cal Water's Urban Water Management Plan (UWMP) and Water Shortage Contingency Plan, and therefore the SSF GPU would have a less than significant impact on water supply. The SSF GPU EIR also stated that each new development project would need to obtain either a will serve letter from their water supplier or a Water Supply Assessment (WSA) confirming that there would be enough water to service that development.

As part of the planned SSF GPU buildout, development of the project site has been included in local and regional water supply planning. A separate WSA was prepared for the project per Senate Bill 610 through coordination between the City and Cal Water (available as part of the project materials on file with the City). The WSA prepared by EKI Environment & Water, Inc., in November 2023, estimates the project's net annual water demand to be approximately 39 acre-feet per year. The project applicants received a WSA from Cal Water, which determined that with compliance with applicable water conservation measures, including low-flow faucets and toilets per CALGreen Code and low-water use landscaping and a high-efficiency irrigation system in accordance with the California Model Water Efficient Landscape Ordinance, proposed water usage would be within available supply. The project would not have a significant impact on water supply.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to water supply than analyzed in the SSF GPU EIR.

c) Wastewater

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact UTIL-3 and the less-than-significant conclusion as the project would not substantially change projected wastewater generation or planned capacity.*

The SSF GPU EIR concluded under Impact UTIL-3 that existing wastewater treatment facilities would be adequate to service the anticipated buildout of the SSF GPU. With the addition of water efficient fixtures required in new developments resulting in reduced wastewater compared to older development, the two wastewater treatment plants that currently serve the City can treat the increased wastewater expected from the full buildout of the SSF GPU.

As the project is within the buildout that was analyzed in the SSF GPU EIR and is part of the planned increase in wastewater analyzed under Impact UTIL-3, the existing wastewater treatment plants would be adequate to treat wastewater from the project. The project would not have a significant impact on wastewater treatment facilities.

A Sewer Capacity Analysis completed for the applicant on November 17, 2023, by BKF Engineers (available as part of the project application), determined that the existing sanitary sewer system in Eccles Avenue would have sufficient capacity for the additional sewage created by the project and surrounding development.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to wastewater than analyzed in the SSF GPU EIR.

d-e) Solid Waste

**Same Conclusion (Conclusion remains LTS):** *The project would be consistent with SSF GPU EIR Impact UTIL-4 and the less-than-significant conclusion as the site would be adequately served by existing facilities and comply with applicable solid waste regulations.*

The SSF GPU EIR determined under Impact UTIL-4 that the solid waste generated by development anticipated under the full buildout of the SSF GPU would be within availability capacity of applicable landfills and would meet reduction standards and not otherwise conflict with applicable regulations or goals.

While specific requirements for commercial solid waste service are regularly updated, the project would meet all current requirements for recycling and waste-diversion during both construction and operation, including federal, State, and local statutes and regulations related to solid waste, including the California Health and Safety Code, California Code of Regulations, California Public Resources Code, SSF GPU policies and actions, and the SSFMC. The project would not have a significant impact on solid waste and waste facilities.

Given the above analysis, there are no peculiar circumstances or previously unknown information relevant to this project, and the project would not result in any new or substantially more severe impacts related to solid waste than analyzed in the SSF GPU EIR.

## R. Wildfire

If located in or near state responsibility areas or lands classified as Very High Fire Hazard Severity Zones:  <b>Would the Project:</b>	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Substantially impair an adopted emergency response plan or emergency evacuation plan	LTS	■	□	-	NI
b) Due to slope, prevailing winds and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of a wildfire	LTS	■	□	-	NI
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment	LTS	■	□	-	NI
d) Expose people or structures to significant risk, including downslope or downstream flooding or landslides from runoff post-fire slope instability, or drainage changes	LTS	■	□	-	NI

## Discussion

### a-d) Wildland Fires

**Less Significant Conclusion (Conclusion changes from LTS to NI):** SSF GPU EIR Impacts WILD-1 through WILD-5 would not apply to the project as it is not located in or near a State Responsibility Area (SRA) or lands classified as very high fire hazard severity zones or other fire-prone wildland areas.

Pursuant to CEQA Guidelines Appendix G, impacts related to wildfires only apply to projects located in or near state responsibility areas or lands classified as very high fire hazard severity.

The SSF GPU EIR determined that no portion of the City is located in a state responsibility areas or lands classified as Very High Fire Hazard Severity Zones but that development in or near fire-prone wildland areas, identified as Sign Hill Park and the San Bruno Mountain State Park (a State Responsibility Area and “moderate/high” fire hazard severity zone), would require a landscape design plan that addresses fire safety and prevention.

The project site is not located near the SSF GPU EIR-identified fire-prone areas, which are both located on the other side of US 101. The project would have no impact on wildfire.

## S. Mandatory Findings of Significance

	SSF GPU EIR Findings	Relationship to SSF GPU EIR Findings:		Project Conclusions:	
		Equal or Less Severe	New or Substantial Increase in Severity	Applicable MMs	Resulting Level of Significance
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	LTS	■	□	-	LTS
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	LTS	■	□	-	LTS
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly	LTS	■	□	-	LTS

### Discussion

#### a) Degrade the Quality of the Environment

As addressed in the Air Quality, Biology, Cultural Resources, GHG, Hazards, and Hydrology sections of this Environmental Checklist, with implementation of all applicable SSF GPU EIR mitigation measures and other regulatory requirements, the project would not degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. The project would not eliminate important examples of the major periods of California history or prehistory.

- The project would be required to implement BAAQMD's recommended Basic Construction Mitigation Measures for control of construction-related criteria pollutant emissions (per the SSF GPU EIR Mitigation Measure AIR-1a), and these measures would control construction-related emissions to levels of less than significant.

- The project's predicted average daily and annual operational-generated emissions of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> criteria air pollutants are below the operational significance thresholds as recommended by BAAQMD and as relied on in the SSF GPU EIR. Therefore, operational air quality impacts related to cumulatively considerable net increases of criteria pollutants would be less than significant. The project is part of the development assumed in the SSF GPU EIR-identified plan-level significant and unavoidable impact related to greater increases in VMT than in population growth but is not peculiar and would not otherwise exacerbate the previously identified impact.
- The project site is dominated by developed and landscaped habitat that includes paved roads, buildings, parking lots, paved and gravel trails, ornamental and landscaped areas. The habitat suitability for rare or native vegetation in these areas is very low to absent. Similarly, developed habitats as exist at the project site primarily support common, urban-adapted wildlife species, and overall wildlife abundance and diversity are low. The project would be required to implement existing regulatory requirements of the Migratory Bird Treaty Act and/or the California Fish and Game Code that provide for protection of active nests of migratory and other birds and bats, including their roosts, eggs and young. Implementation of these measures would avoid and/or reduce impacts to sensitive status species to levels of less than significant.
- The project site does not contain riparian habitat or other sensitive natural community types. Development of the project site will have no adverse effect on riparian habitat or other sensitive natural community types.
- No potential jurisdictional wetlands or waters occur on the site, and the project would not have a substantial adverse effect on State or federally protected wetlands or waters of the U.S. or waters of the State.
- The project site does not include any waterways, ridgelines or creek corridors, and the project site is not identified as a wildlife corridor or wildlife nursery site. The project would supplement identified tree-covered areas for wildlife connections. The project would not have a substantial adverse effect on wildlife corridors or wildlife nursery sites.
- The project would be required to obtain a Tree Removal Permit for removal of any protected trees on the site. If the City approves that Tree Removal permit, the project will be required to provide replacement tree plantings and/or in lieu fees. These Tree Removal Permit requirements would achieve compliance with local policies or ordinances protecting biological resources and would minimize the impacts related to the loss of trees to a level of less than significant.
- The project site is not located within or near Sign Hill Park, San Bruno Mountain State Park or adjacent to the San Francisco Bay, and would not conflict with any adopted Habitat Conservation Plan or Natural Community Conservation Plan adopted for these areas.
- The existing building has been assessed for historical importance and has been cleared for demolition through a full Historic Resource Evaluation.
- There is at least a moderate potential for the inadvertent discovery of previously unrecorded historic-period archaeological resources at the site during ground-disturbing activity. In the unlikely event of discovery of cultural resources during construction, the project would be

required to comply with SSF General Plan policies and State law that addresses such an unanticipated circumstance. These policies and regulations ensure that the project's construction does not cause a substantial adverse change in the significance of an archaeological resource.

- The project is, and/or will be required to demonstrate consistency with the SSF 2022 CAP. The project's proposed development plans indicate that the project will be consistent with individual CAP Actions related to clean energy, building design, transportation and land use, solid waste, water and wastewater, and carbon sequestration. The project does not present any inherent inconsistencies with other SSF 2022 CAP Actions. As such, the project meets the CEQA threshold of less than a significant impact for GHG emissions.
- Construction activities associated with the project will involve the use of heavy equipment using fuels and oils and will involve the use of other products such as concrete, paints and adhesives. Such hazardous materials will be stored, used, and transported in varying amounts during construction. The project would be required to comply with all Federal, State, and local regulations regulating the handling, storage, and transportation of hazardous materials. With implementation of these regulatory requirements, construction activities would not create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or through a reasonably foreseeable upset and accident condition involving the release of hazardous materials in the environment.
- The project would be required to comply with all federal, State and local regulations regulating the handling, storage and transportation of hazardous materials during operations. With compliance, operational activities would not create a significant hazard to the public or the environment through a reasonably foreseeable upset and accident condition involving the release of hazardous materials in the environment.
- The project would involve grading and removal of existing paved surfaces, buildings and vegetative cover that has the potential to result in runoff that contains sediment and other pollutants. These pollutants could degrade surface and groundwater quality if not properly controlled. The project's effects related to water pollution from non-point sources during construction will be fully addressed through implementation of existing regulations (i.e., by filing a Notice of Intent with the State Water Board and preparing and implementing a project-specific Stormwater Pollution Prevention Plan), and this impact would be reduced to less than significant.
- The project will add new impervious surface area and will replace all of the remaining impervious surface at the site. The new and replaced impervious surfaces could increase the volume of pollutants that are typically associated with urban runoff into the stormwater, as well as increased nutrients and other chemicals from landscaped areas. These constituents could result in water quality impacts to off-site drainages and waterways, potentially including the Bay. The project is subject to Provision C.3 of the Master Regional Permit, which is primarily implemented pursuant to the City's Stormwater Management and Discharge Control Ordinance. The project must comply with these regulatory requirements, which are intended to prevent stormwater pollution during operations, and to provide for compliance with State and federal regulations. The project's design includes provisions for stormwater treatment of the impervious surface areas of the site. This will include construction of stormwater treatment

BMPs such as bio-filtration areas, flow-through planters, and pervious pavers and pavements, among other acceptable stormwater BMP types. These stormwater BMPs will generally be distributed throughout the site and near the individual sources of run-off to the maximum extent practicable. The project's effects related to water pollution from non-point sources will be fully addressed through implementation of existing regulations, and this impact would be reduced to less than significant.

- There is moderate potential that unknown tribal cultural resources are present below the surface at the project site. If undiscovered tribal cultural resources are discovered during this monitoring activity, regulatory requirements would apply. These regulations will ensure that the project's construction does not cause a substantial adverse change in the significance of a tribal cultural resource.

#### b) Cumulative Impacts

CEQA Guidelines Section 15183 provides that future projects analyzed in relationship to a prior Program EIR may be excluded from further analysis of off-site or cumulative impacts, if those off-site or cumulative impacts were adequately discussed in the prior Program EIR.

The SSF GPU EIR determined that, for the majority of environmental topics analyzed, cumulative development consistent with the General Plan Update would result in environmental impacts that would be reduced to levels of less than significant with implementation of existing regulatory requirements, implementation of policies contained within the SSF GPU EIR, and additional mitigation measures as identified in that EIR. However, the SSF GPU EIR determined that the following list of environmental impacts would be cumulatively significant and unavoidable.

##### *Cumulative Vehicle Miles Traveled*

The SSF GPU EIR concluded that cumulative growth and development throughout the City and throughout the nine-county Bay Area would result in a cumulative increase in VMT as measured in total VMT per service population and as home-based work VMT per employee. Although cumulative development within the City of SSF would be required to implement TDM measures, an East of 101 Area Trip Cap, and parking requirements to reduce cumulative VMT increases, the effectiveness of the VMT reduction strategies were not able to be quantified in the SSF GPU EIR analysis, which concluded that the City of South San Francisco may not be able to achieve a cumulative reduction in overall VMT to below threshold level, and this cumulative impact was found to be significant and unavoidable.

##### *Cumulative Roadway Safety*

The SSF GPU EIR concluded that cumulative growth and development throughout the City, as well as cumulative development throughout the nine-county Bay Area, would increase vehicle trips on the City's freeway ramps. That traffic would cause vehicle queues to exceed off-ramp storage capacity or exacerbate off-ramps that already experience off-ramp queues exceeding storage capacity, resulting in a potentially significant cumulative impact. Although the City will continue to work with Caltrans to develop improvement measures for freeway off-ramps and adjacent intersections that help manage off-ramp queues to minimize queuing hazards, the SSF GPU EIR concluded that there is uncertainty around specific operational conditions and the ability to mitigate such conditions in a constrained right-of-way. This cumulative impact was found to remain significant and unavoidable.



### *Conflict with 2017 Bay Area Clean Air Plan*

The SSF GPU EIR concluded that new cumulative development facilitated by the General Plan would increase VMT by approximately 94 percent through 2040, whereas population would grow by only approximately 61 percent during the same period. Forecasted VMT growth would outpace population growth and the SSF GPU EIR concluded that this imbalance between cumulative VMT and cumulative population growth would be inconsistent with the 2017 Clean Air Plan. Because the effectiveness of identified VMT reduction strategies could not be quantified, the SSF GPU EIR determined that City of South San Francisco may not achieve cumulative VMT reductions, and this impact was found to be cumulatively significant and unavoidable.

### *Cumulative Criteria Air Pollutants*

The SSF GPU EIR similarly concluded cumulative VMT growth would result in a cumulatively considerable net increase in criteria pollutants. The EIR determined there is no reasonable mitigation that can be implemented to keep growth in VMT to a minimum, while also increasing population. The cumulative increase in VMT was found to result in a cumulatively considerable net increase in criteria air pollutants and ozone precursors. This cumulative impact was found to remain significant and unavoidable.

### *Project Contributions*

This Environmental Checklist analyzes whether the project may contribute to cumulative environmental effects as identified in the SSF GPU EIR. It also considers whether mitigation measures, development standards, policies and/or regulations identified in the SSF GPU EIR would apply to the project. The analysis in this Environmental Checklist finds that the project would not have environmental impacts that are unique to the project, and that the project's contribution to cumulative effects were fully evaluated and disclosed in the prior SSF GPU EIR, and that certain mitigation measures, development standards, policies and ordinances identified in that prior EIR would apply to the project.

As specifically addressed in the Air Quality and Transportation sections of this Environmental Checklist:

- Factoring in implementation of a TDM program meeting City requirements (adopted to satisfy GPU EIR MM TRANS-1) the VMT for the project is above the significance threshold under both existing and cumulative conditions, though lower than the City VMT determined in the SSF GPU EIR. The project would contribute to the significant and unavoidable impact in regard to VMT found in the SSF GPU EIR but would not exacerbate the previously identified impact.
- Vehicle trips generated by the project represent a small percentage of overall daily and peak hour traffic, but the project would contribute to a cumulative increase in vehicle trips on City freeway ramps. As the project is part of the analyzed buildout of the SSF GPU, this additional traffic would contribute to the Impact TRANS-4 analyzed in the SSF GPU EIR but would not exacerbate the previously identified impact.
- The project's predicted average daily and annual operational-generated emissions of NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> criteria air pollutants are below the operational significance thresholds as recommended by BAAQMD, and as relied on in the SSF GPU EIR. Therefore, operational air quality impacts related to a cumulatively considerable net increase of these non-attainment criteria pollutants would be less than significant.

### c) Effects on Human Beings

As addressed in the Air Quality, Geology, Hazards, Hydrology, Noise and Wildfire sections of this Environmental Checklist:

- The project site is not located within 1,000 feet of the sensitive receptors and would not be within the area of effect in which a project of this type could result in a significant impacts on sensitive receptors as a result of construction- and operation-created air pollution.
- There is a possibility of naturally occurring asbestos (NOA) in the shallow bedrock of the project site. If further investigation determines that enough NOA is present on the project site, the project would be required to implement BAAQMD's Asbestos Airborne Toxic Control Measures, and these measures would control construction-related emissions of naturally occurring asbestos to levels of less than significant.
- The existing building at the project site contains or may contain materials containing lead, asbestos or mold. Proper assessment and abatement shall be completed per State and Federal regulations prior to demolition to reduce the potential impact of these hazardous materials to less than significant levels.
- The project is intended to accommodate future R&D uses. The specific R&D tenants are not known, the types of research and development facilities have not been identified, and the need for research and development equipment that may generate new sources of toxic air contaminants is unknown. However, future R&D tenants may rely on such equipment. Future tenants within the project will be required to obtain from BAAQMD an "Authority to Construct" or a "Permit to Operate" for any new sources of hazardous air pollutant emissions. The requirements of these authorizations or permits would control operational-related emissions of TACs to levels of less than significant.
- The project site is located in a seismically active region. During a major earthquake the project site will experience very strong to violent ground shaking, similar to other areas of the seismically active region. Compliance with the CBC regulations and building standards, with site-specific recommendation as provided by a geotechnical engineer, will reduce the effects of strong ground shaking in the event of a likely earthquake scenario to levels considered acceptable by professional engineers, and a less than significant impact under CEQA.
- The project site is covered by approximately one to eight feet of undocumented fill over shallow bedrock, which could result in settlement under the parking garage due to the weight of the building. Replacement of the undocumented fill with engineered fill and appropriate foundation design based on ground conditions would incorporate project-specific geotechnical recommendations as approved by the City Engineer. The project would be required to comply with the CBC and building permit requirements which would keep unstable soils from having a significant impact on the project.
- The project's new buildings are intended as build-to-suit facilities. The future tenants of these buildings have not yet been identified but are likely to be occupied by a combination of office space and R&D laboratories. The R&D laboratories may handle certain materials considered hazardous biological and/or chemical substances. The project would be required to comply with all applicable city, county, state and federal regulations related to the transport, use and

disposal of hazardous materials. These regulations control the use of hazardous materials to minimize the risk of exposure of the public to substantial adverse effects and would reduce this impact to a level of less than significant.

- No safety zones associated with SFO apply to the project site, and the project would be consistent with land use safety criteria. Additionally, the project site is not located within any of the ALUCP-identified noise impact areas. Thus, the ALUCP land use noise exposure criteria do not apply to the project and the project would not pose a safety hazard by being exposed to excessive noise due to its proximity to SFO.
- The project would not interfere with any emergency evacuation route but would add a less than significant increment of additional traffic relying on this route in the potential event of an evacuation.
- The project site is not located within a 100-Year Flood Hazard Zone (1% Annual Chance Flood Hazard), a 500-Year Flood Hazard Zone (2% Annual Chance Flood Hazard), or a Tsunami Susceptibility location. The project's effects related to inundation hazards are considered less than significant.
- The project site is not located within an area susceptible to SLR under any of the year 2100 mid-level scenarios (100-year flood, 100-year flood plus 2040 SLR, or 100-year flood plus 3 feet of SLR). No SLR adaptation strategies are needed to reduce risks of SLR inundation at the project site.
- The proposed building reaches a height of approximately 246 feet above mean sea level (including rooftop elements). This does not exceed the project site's Critical Aeronautical Surface of approximately 860 feet above mean sea level. The project is consistent with the critical aeronautical surface criteria of the ALUCP.
- The project is located in the industrial and business section of East of 101, where no residential uses currently exist. The project would remove an existing warehouse but would not directly displace people or housing.
- The project site is not located in or near fire-prone areas. Accordingly, the project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrollable spread of a wildfire. The project would not expose people or structures to significant risk, including downslope or downstream flooding or landslides due to post-fire slope instability or drainage changes.