# 328 ROEBLING ROAD PROJECT

## 1ST ADDENDUM

## TO THE 2012 RECIRCULATED IS/MND

STATE CLEARINGHOUSE NUMBER 2009022013

**Lead Agency:**

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

**Prepared By:**

Lamphier–Gregory
1944 Embarcadero
Oakland, CA 94606

**May 2020**

# Table of Contents



**Attachments**

# I. Project Characteristics

| | |
|---|---|
| **1. Project Title:** | 328 Roebling Road Project |
| **2. Lead Agency Name and Address:** | City of South San Francisco<br>Economic & Community Development Department<br>315 Maple Avenue<br>South San Francisco, CA 94083-0711 |
| **3. Contact Person and Phone Number:** | Billy Gross, Senior Planner<br>City of South San Francisco, Economic & Community Development Department<br>315 Maple Avenue<br>South San Francisco, CA 94083-0711<br>Phone: 650-877-8535 |
| **4. Project Location:** | 328 / 340 Roebling Road and 233 East Grand Avenue, South San Francisco |
| **5. Project Sponsors' Names and Addresses:** | Healthpeak Properties<br>950 Tower Lane, Suite 1650<br>Foster City, CA 94404 |
| **6. Existing General Plan Designations:** | Business and Technology Park |
| **7. Existing Zoning:** | Business and Technology Park (BTP) |
| **8. Requested Approvals:** | Design Review Modification, Development Agreement Amendment |

# II. Background, Purpose, and Organization

## Background

On January 28, 2009, the City of South San Francisco published an Initial Study/Mitigated Negative Declaration (IS/MND) as the Lead Agency for the 328 Roebling Road (Britannia Modular Labs 3) Project in the East of 101 Area of South San Francisco. That document concluded that, although the proposed Project could have a significant effect on the environment, the potentially significant effect could be reduced to less than significant levels through incorporation of mitigation measures.

A Recirculated IS/MND was subsequently circulated on July 2009. This document had been revised in response to comments received from public agencies and recirculated per California Environmental Quality Act (CEQA) Guidelines section 15073.5(b)(1) because a new potentially significant effect was identified (vehicle queuing at the Airport Boulevard/Grand Avenue U.S. 101 off-ramp) along with mitigation to reduce the impact to less than significant.

Neither the original January 2009 IS/MND, nor the July 2009 Recirculated IS/MND were adopted by the Lead Agency. Because of the time that had gone by and changes to various conditions and analysis techniques, the Lead Agency decided to recirculate the IS/MND in 2012. The 2012 Recirculated IS/MND was certified and adopted along with project approval in 2012. This constitutes the "Prior MND" (State Clearinghouse Number 2009022013) for purposes of this analysis.

As detailed in Section IV: Project Description, project-level details have been revised since the 2012 Project analyzed in the Prior MND.

## Purpose

The purpose of this CEQA document is to analyze the current Project to determine if it qualifies for an Addendum pursuant to Public Resources Code Section 21166 and State CEQA Guidelines Section 15164 such that no additional environmental review is required.

The current Project is a modification of the 2012 Project located on the same site. The 2012 Project was approved in 2012 along with adoption of the Prior MND in which it was assessed. The Prior MND 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: https://weblink.ssf.net/weblink/ under Planning /Environmental Reports.

CEQA Guidelines section 15164 specifies that an addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary or none of the conditions described in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred.

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

1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or

3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR or negative declaration 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 or negative declaration;

   C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR or negative declaration would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

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

## Organization

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

Section II, Purpose and Organization (this section).

Section III, Project Description details the proposed project.

Section IV, Summary of CEQA Findings summarizes the findings of this document.

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

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

# III. Project Description

## Project Site and Vicinity

The approximately 3-acre (2.97-acre) Project site is located on Roebling Road, a cul-de-sac off of East Grand Avenue, in the "East of 101 Area", the traditional and continued core of South San Francisco's industrial and technology businesses, including Research and Development (R&D) offices. The site is in a Business and Technology Park area, with similar uses nearby. The location of the project is shown in **Figure 1**.

The East of 101 Area consists of roughly 1,700 acres of land and is bounded by San Francisco Bay on the east side, U.S. Highway 101 (U.S. 101) and railway lines on the west, the City of Brisbane on the north, and San Francisco International Airport on the south. The area has a mix of land uses, including industry, warehousing, retail, offices, hotels, marinas, and bioscience research and development facilities. The area is separated from the majority of residential uses by U.S. 101, though some houseboats are permitted at the nearby Oyster Point and Oyster Cove Marinas. While the East of 101 Area has little vacant land, redevelopment remains extremely active as existing facilities are upgraded as industry continues to evolve toward high-technology and research and development uses.

Adjacent and to the east of the Project site is the location of a recent office and R&D project at 249-279 East Grand Avenue. The property to the west of the Project site, across Roebling Road, is the site of another recent office and R&D redevelopment project at 213 – 221 East Grand Avenue.

The project site is physically the same as it was during review of the 2012 Project in the Prior MND. Three office/warehouse buildings currently occupy the Project site totaling 79,501 square feet, as shown in **Figure 2**. The addresses are 233 East Grand Avenue, 328 Roebling Road, and 340 Roebling Road. Since approval of the 2012 Project, tenants have been vacating the buildings in preparation of anticipated demolition. Partial or total vacancy in preparation of redevelopment is a common occurrence during CEQA review of a project and it is standard practice to consider the baseline use to be the normal use of the site before vacancies were begun to be initiated for development. Because the buildings currently remain and could be re-occupied with uses consistent with those historically located in these buildings with no need for additional approvals, the baseline use for purposes of CEQA analysis remains the same as it was in the Prior MND.

Construction is projected to take approximately 24 months to complete. The applicants noted a target start date of January 2021, but a later start date would not change the conclusions in this document.

## Proposed Project and Comparison to 2012 Project

The Prior MND analyzed the 2012 Project, which proposed demolition of existing buildings and construction of two buildings with a total of 105,536 square feet of office and R&D above several stories of underground parking.

The current Project description has been revised to include one building with up to 129,919 square feet of Office/R&D and a separate parking structure on the site. The current project plans are shown on **Figure 3** and the previous 2012 Project plan is included for comparative purposes as **Figure 4**.

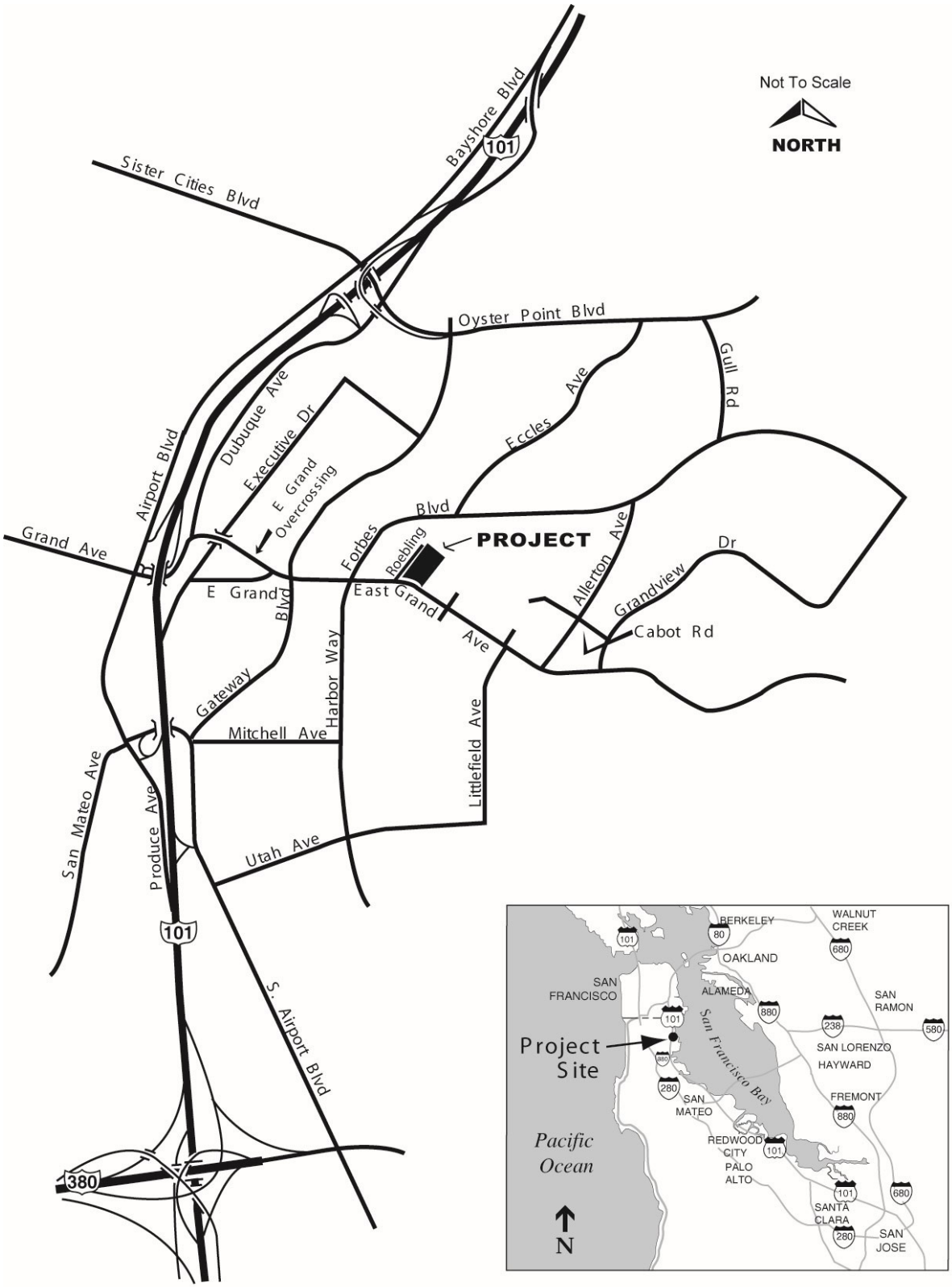


**Figure 1: Project Location**
Source: Prior MND

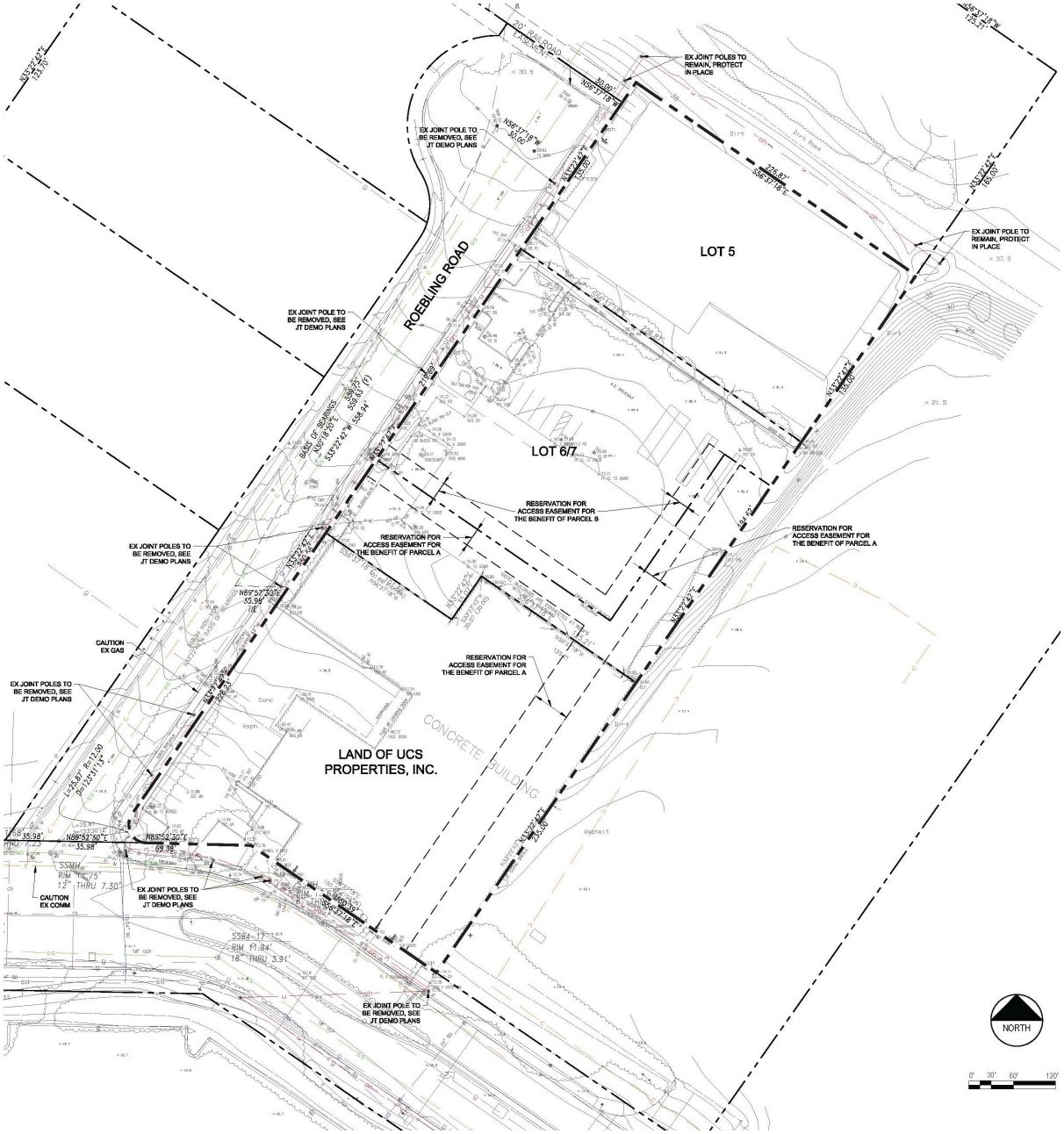


**Figure 2: Existing Site**
Source: Applicants, dated 3/23/2020

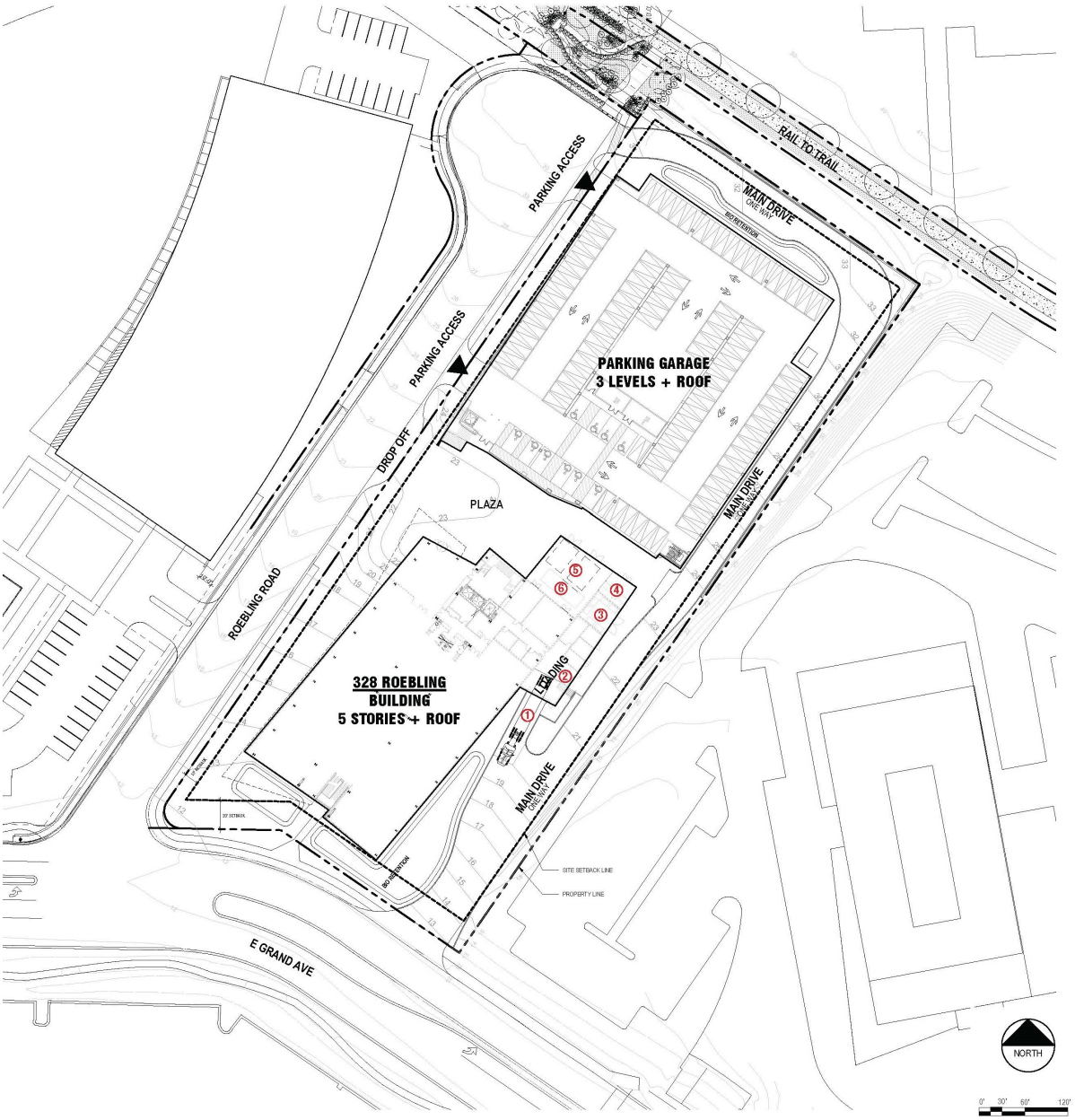


**Figure 3: Current Project Site Plan**
Source: Applicants, dated 3/23/2020

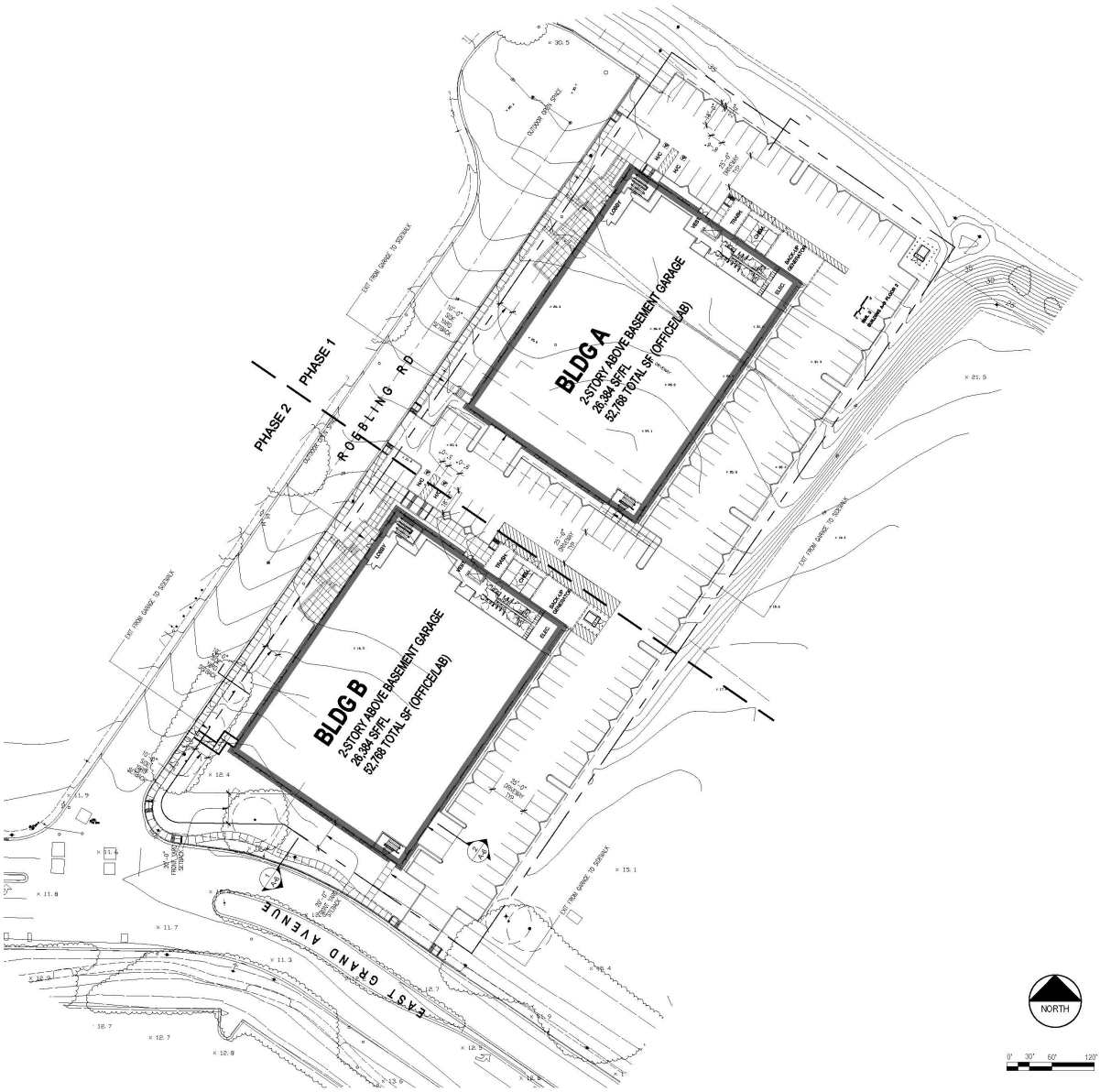


**Figure 4: 2012 Project Site Plan (for comparison)**
Source: Applicants, dated 3/23/2020

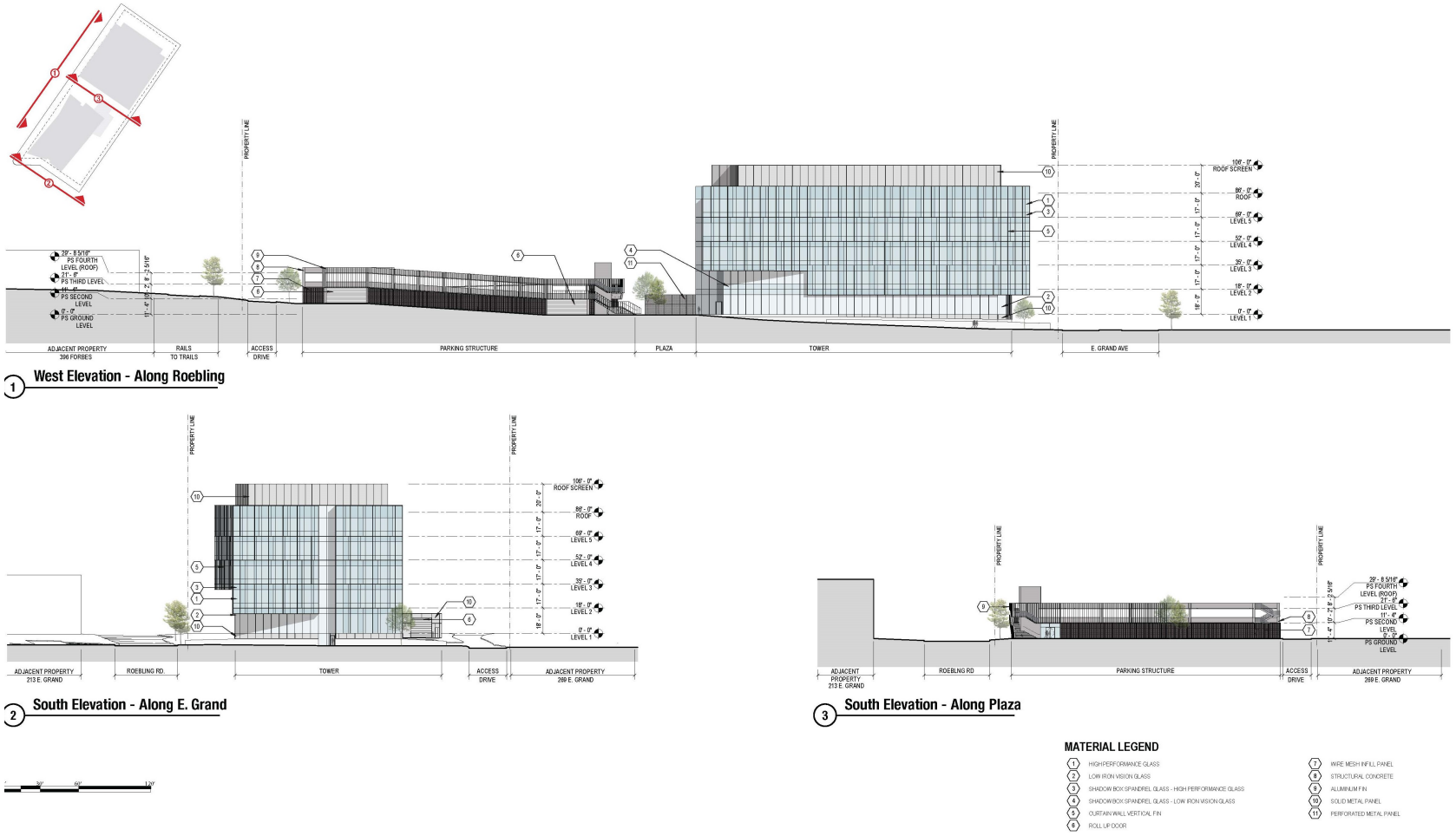


**Figure 5: Current Project Elevations**
Source: Applicants, dated 3/23/2020

# IV. Summary of CEQA Findings

Given the substantial evidence included in this Addendum document and attachments and the Prior MND, the current project would not require subsequent analysis to the Prior MND pursuant to CEQA Guidelines Section 15162, for the following reasons and supported by the analyses and conclusions of the environmental checklist contained herein:

(1) The current project would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

(2) There are no changes in circumstances that would result in the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; and

(3) There is no new information resulting in a new significant effect not discussed in new significant environmental effects, a substantial increase in the severity of previously identified significant effects, or a change in the feasibility (or acceptance) of mitigation measures.

While the project has been revised since the Prior MND, this assessment has determined that this Addendum, in conjunction with the Prior MND, serve to satisfy requirements under CEQA and no further documentation is required per CEQA Guidelines Sections 15164 and 15162. This addendum only includes necessary minor technical changes and none of the conditions described in CEQA Guideline section 15162 requiring the preparation of a subsequent EIR or negative declaration have occurred.

_____ _____

Sailesh Mehra, Chief Planner
City of South San Francisco

Date

# V. ENVIRONMENTAL CHECKLIST

## Overview

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

The checklist also lists mitigation measures applicable to the current project impacts. A full list of the MMs applicable to the current project can be found in Attachment A, Mitigation Monitoring and Reporting Program (MMRP). More detail regarding the significance criteria used in this document and the environmental impacts of implementation of the project is available in the Prior MND 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/Environmental Reports.

When a dash (--) appears in the checklist below, it means that the Prior MND did not identify any MMs related to that environmental impact.

# A. Aesthetics

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Scenic Vistas | LTS | ☒ | ☐ | -- | LTS |
| b. Scenic Resources | NI | ☒ | ☐ | -- | NI |
| c. Visual Character | LTS | ☒ | ☐ | -- | LTS |
| d. Light or Glare | LTS | ☒ | ☐ | -- | LTS |

## Discussion

Aesthetic Changes from the 2012 Project

As under the 2012 Project, existing buildings on the project site would be demolished and replaced with new buildings. Visual models and renderings of the proposed development can be seen in Figures 3 through 5.

The 2012 Project was described as consisting of two modest buildings intended for younger-stage companies and each would have reached a height of about 73' (including rooftop equipment and screening), including two floors for office/R&D and one partially subterranean level of parking.

The current Project has a more modern campus-style look with different massing than those shown in the Prior MND and would include a 5-story office/R&D building at the East Grand Avenue frontage reaching a height of 106' (including rooftop equipment and screening) with a 3-story parking garage (including rooftop parking as the 4$^{th}$ level) behind that reaching a height of approximately 30'.

Scenic Vistas

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as there are no scenic vista viewpoints in the area and therefore the potential to impact views is generally the same as under the 2012 Project despite revisions to the specifics of building massing and location.*

As noted in the Prior MND, San Bruno Mountain is a prominent visual landmark in South San Francisco, and can be seen from many locations throughout the city, including many portions of the East of 101 Area. Construction of the proposed Project may block a small portion of the existing views to the north from locations to the south. However, the areas from which views of the mountain may be blocked are not designated scenic overlooks; and are not places where people gather in order to gain a view of San Bruno Mountain. Therefore, blockage of existing views by the proposed Project, particularly given the Project site's urban setting, would be considered less-than-significant. The conclusion of less-than-significant in regard to scenic vistas would remain the same even with the specific massing and location of buildings proposed with the current project.

Scenic Resources

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion related to scenic highways, as the lack of scenic designation of the nearby highways is the same as under the 2012 Project.*

Visual Character

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant impact conclusion as re-development consistent with applicable design criteria would not be considered a degradation of character or quality of the environment.*

The visual character of the East of 101 area consists of a mixture of older and newer office and industrial buildings, with differing amounts of associated landscaping. Development of the current project would involve replacement of older office/warehouse buildings with new construction of modern buildings with a modern design including landscaping and pedestrian improvements. While the heights and massing will substantially increase over the existing conditions, the proposed conditions are within that allowed under the zoning and consistent with other office/R&D development in the East of 101 area. Therefore, consistent with conclusions of the Prior MND, while the site would look different following construction, the construction of modern buildings meeting or exceeding the City's design criteria would not "degrade the existing visual character or quality of the site" or have a significant adverse impact in this regard.

Light and Glare

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as the proposed lighting levels and potential for light and glare would be consistent with lighting standards and design guidelines and typical of existing surrounding commercial/industrial urban development.*

While the development proposed with the current project has different specific building massing and locations, as specified in the Prior MND, building materials are required to have low glare potential and new lighting would be required to conform to standards that limit the amount of light that can spill over to other properties, all of which would be imposed as standard conditions of project approval. The potential for light and glare impacts would remain substantially the same as under the 2012 Project and less-than-significant.

## B. Agricultural and Forest Resources

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

### Discussion

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

# C. Air Quality

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Conflict with Air Quality Plan | LTS | ☒ | ☐ | -- | LTS |
| b. Criteria Air Pollutants | LTS w/MM | ☒ | ☐ | MM AIR-1: Basic Construction Best Management Practices | LTS w/MM |
| c. Sensitive Receptors | LTS | ☒ | ☐ | -- | LTS |
| d. Odors | LTS | ☒ | ☐ | -- | LTS |

## Discussion

Air Quality Setting Changes from the 2012 Project

Since the 2012 Project, the Bay Area Air Quality Management District (BAAQMD) has updated its CEQA Air Quality Guidelines (BAAQMD Guidelines), which assist lead agencies in evaluating and mitigating air quality impacts. The latest draft of the BAAQMD guidelines was issued in May 2017 and includes thresholds consistent with those assessed in the Prior MND.

Since the 2012 Project, the Bay Area 2017 Clean Air Plan updated the 2010 Clean Air Plan utilized in the Prior MND assessment. The latest update to the Clean Air Plan includes similar but updated control measures as discussed below.

Conflict with Air Quality Plan

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion related to conflict with an Air Quality Plan.*

BAAQMD recommends analyzing a project's consistency with current air quality plan primary goals and control measures. The impact would be significant if the project would conflict with or obstruct attainment of the primary goals or implementation of the control measures.

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

- Attain all state and national air quality standards
- Eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants
- Reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 (This standard is addressed in Section 8: Greenhouse Gas Emissions.)

The Project would be required to comply with all applicable rules and regulations related to emissions and health risk and would therefore not result in a new substantial source of emissions or toxic air contaminants (see topics below) or otherwise conflict with the primary goals of the 2017 Clean Air Plan.

Many of the Clean Air Plan's control measures are targeted to area-wide improvements, large stationary source reductions, or large employers, and these are not applicable to the proposed Project. However, the Project would be consistent with all rules and regulations related to construction activities and the proposed development would meet current standards of energy and water efficiency (Energy Control Measure EN1 and Water Control Measure WR2) and recycling and green waste requirements (Waste Management Control Measures WA3 and WA4) and does not conflict with applicable control measures aimed at improving access/connectivity for bicycles and pedestrians (Transportation Control Measure TR9) or any other control measures.

The Project, therefore, would be consistent with the Clean Air Plan and have a less than significant impact in this regard. While the Clean Air Plan and BAAQMD recommendations for determining consistency have been updated since the Prior MND, this conclusion is consistent with the Prior MND.

Criteria Air Pollutants

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impact Air-1 and the less-than-significant with mitigation conclusion related to construction-period emissions and dust.*

As noted in the Prior MND, short-term degradation of air quality may occur due to the release of fugitive dust, criteria pollutants, and diesel exhaust particulate matter generated by demolition, grading, hauling, and other construction related activities. While the proposed size of development has gone up from 105,536 square feet to 129,919 square feet, this remains well below the BAAQMD construction screening size of 277,000 square feet. As noted in the Prior MND, despite construction-period emissions levels below BAAQMD thresholds, BAAQMD considers construction emissions and dust generated to be a significant impact unless controlled by best management practices. These basic measures are included in Mitigation Measure Air-1, which would be applicable to the current Project to reduce the potential impact of construction dust and emissions to a less-than-significant level.

For operational emissions, the Prior MND quantified operational emissions using the URBEMIS model and found them to be well below threshold levels. While the URBEMIS model is no longer used, a comparison to the BAAQMD screening table shows that the project size of 129,919 square feet of office-type uses remains well below the BAAQMD operational screening size of 346,000 square feet and can therefore be assumed to have a less-than-significant impact related to operational criteria pollutant emissions, consistent with the Prior MND conclusions.

Sensitive Receptors

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion related to exposure of sensitive receptors.*

As noted in the Prior MND, the Project could result in emissions related to health risks from construction equipment emissions and stationary equipment. BAAQMD requires appropriate permitting consistent with health and safety requirements for any stationary equipment that may be installed. For CEQA analysis, BAAQMD recommends assessment of health risk for sources/sensitive receptors within a 1,000 foot radius. As noted in the Prior MND, an office/R&D project is not itself considered a sensitive receptor and the Project site is within an industrial/commercial area with no sensitive receptors located within 1,000 feet of the Project. Therefore, it can be concluded that construction-period and operational-period health risk would be less-than-significant, consistent with conclusions in the Prior MND.

Odors

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

As noted in the Prior MND, office/R&D uses are not the types of uses that generate frequent or substantial odors, nor are there sensitive receptors to odors in the vicinity. Therefore, consistent with the Prior MND, the impact related to odors would be less-than-significant.

# D. Biological Resources

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Special-Status Species | LTS w/MM | ☒ | ☐ | Bio-1: Pre-Construction Nesting Bird Survey | LTS w/MM |
| b. Riparian/Sensitive Habitat | NI | ☒ | ☐ | -- | NI |
| c. Wetlands | NI | ☒ | ☐ | -- | NI |
| d. Wildlife Corridors/ Nursery Sites | NI | ☒ | ☐ | -- | NI |
| e. Conflict with Local Biological Policies | NI | ☒ | ☐ | -- | NI |
| f. Conflict with Conservation Plans | NI | ☒ | ☐ | -- | NI |

## Discussion

Special-Status Species

***Same Conclusion (conclusion remains LTS w/MM)****: The current project would not change Impact Bio-1 and the less-than-significant with mitigation conclusion related to the potential to disturb nesting birds.*

As noted in the Prior MND, the Project site is characterized by an urban setting and is entirely surrounded by like development. The General Plan EIR identified no biological habitat or occurrences of sensitive species on or adjacent to the Project site. The site and its vicinity has little or no habitat value and would not have a substantial adverse effect, either directly or through habitat modifications, on special status species, except for possibly migrating birds, as discussed below.

The federal Migratory Bird Treaty Act and Fish and Game Code of California protect special-status bird species year-round, as well as their eggs and nests during the nesting season. The list of migratory birds includes almost every native bird in the United States. On-site or adjacent trees could be used by protected birds. Construction activities could adversely affect nesting birds protected by the Migratory Bird Treaty Act and/or Fish and Game Code of California. Surveying for nesting birds and appropriate protections if found, as detailed in Mitigation Measure Bio-1, would continue to be applicable to the current Project to reduce the potential impact on nesting birds to a less-than-significant level.

All Other Topic Areas

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

As noted in the Prior MND, the Project site is located in an industrial/commercial area, on a site that has previously been developed, and is predominantly covered with asphalt and buildings. The existing limited vegetation consists of parking lot and screening landscaping and there are no significant biological resources or conservation plans on the Project site.

# E. Cultural and Tribal Cultural Resources

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

## Discussion

Cultural and Tribal Cultural Resources Setting Changes from the 2012 Project

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

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

Updated records searches were performed in 2020 to confirm no new information had become available since the Prior MND, including a records search by the Northwest Information Center (NWIC) at Sonoma State University, part of the California Historical Resources Information System, and a search of the Sacred Lands Files by the Native American Heritage Commission (both included in Attachment B). No tribes requested consultation under AB52.

Cultural and Tribal Cultural Resources

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion related to cultural and tribal cultural resources.*

As under the Prior MND, the project site has been previously disturbed and is covered with paving and buildings. Updated records searches confirmed no known cultural or tribal cultural resources at the project site. As noted in the Prior MND, there are no historic resources on the site and while currently unknown underground resources could be unexpectedly discovered during ground disturbance, such discoveries are required to be handled appropriately according to Section 21083.2 of the Public Resources Code dealing with the treatment and handling of underground cultural/tribal cultural resources, Section 21084.1 dealing with the treatment of handling of historical resources, and Section 7050.5 of the Health and Safety Code/ Section 5097.98 of the Public Resources Code dealing with discovery of human remains. Consistent with the conclusions in the Prior MND, with adherence to applicable regulations, impacts related to accidental discovery of cultural/tribal cultural resources would be less-than-significant.

# F. Geology and Soils

| Impacts Related To: [1] | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Seismic Hazards | LTS w/ MM | ☒ | ☐ | Geo-1a: Compliance with California Building Code<br>Geo-1b: Compliance with a design-level Geotechnical Investigation and with Structural Design Plans<br>Geo-1c: Obtain a Building Permit<br>Geo-2a: Compliance with a design-level Geotechnical Investigation and with Structural Design Plans<br>Geo-2b: Obtain a Building Permit<br>Geo-3: Compliance with recommendations of a Geotechnical Investigation | LTS w/ MM |
| b. Soil Erosion | LTS w/MM | ☒ | ☐ | Geo-4: Storm Water Pollution Prevention Plan (SWPPP) | LTS w/MM |
| c. Unstable Soil | LTS w/ MM | ☒ | ☐ | Geo-5: Investigate unstable fill soils and Bay Mud | LTS w/ MM |
| d. Expansive Soil | LTS w/ MM | ☒ | ☐ | Geo-6: Compliance with recommendations of a Geotechnical Investigation and in conformance with Structural Design Plans | LTS w/ MM |
| e. Septic Tanks | NI | ☒ | ☐ | -- | NI |

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

## Discussion

Geology and Soils Setting Changes from the 2012 Project

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

The current project would be required to meet current rules and regulation, including the updated California Building Code. These regular updates to regulatory documents would not change the conclusions of the Prior MND.

Seismic Hazards

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impacts Geo-2 through Geo-3, mitigation measures Geo-2a through Geo-3, or the less-than-significant with mitigation conclusion as the known seismically active character of the region and potential for seismically induced ground failure has not changed since the 2012 Project. The current project would also not change Impact Geo-1 or the less-than-significant conclusion related to fault hazards as there are no known faults at the site, and this has not changed since the 2012 Project.*

Consistent with conclusions in the Prior MND, while there are no known faults at the project site, the region where the project is located is known to be seismically active and the project will need to comply with the California Building Code and project-specific geotechnical recommendations and building permit requirements to address the potential for seismic hazards as detailed in mitigation measures Geo-1a, Geo-1b, Geo-1c, Geo-2a, Geo-2b, and Geo-3.

Soil Erosion

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impact Geo-4, mitigation measure Geo-4, or the less-than-significant with mitigation conclusion as the potential for soil erosion and requirement to include best management practices to reduce soil erosion potential have not changed since the 2012 Project.*

Unstable Geologic Unit and Expansive Soils

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impacts Geo-5 and Geo-6, mitigation measures Geo-5 and Geo-6, or the less-than-significant with mitigation conclusion as the need to account for unstable or expansive underlying fill soils and Bay Mud have not changed since the 2012 Project.*

Septic Tanks

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion related to septic systems as the project area is serviced by the city's sewer system, which has not changed since the 2012 Project.*

# G. Greenhouse Gas Emissions

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. GHG Emissions | LTS | ☒ | ☐ | -- | LTS |
| b. Conflict with GHG Reduction Plans | LTS | ☒ | ☐ | -- | LTS |

## Discussion

Greenhouse Gas Emissions Setting Changes from the 2012 Project

Since the 2012 Project, the Bay Area Air Quality Management District (BAAQMD) has updated its CEQA Air Quality Guidelines (BAAQMD Guidelines), which assist lead agencies in evaluating and mitigating air quality impacts. The latest draft of the BAAQMD guidelines was issued in May 2017 and includes thresholds consistent with those assessed in the Prior MND.

Since the 2012 Project, the Bay Area 2017 Clean Air Plan updated the 2010 Clean Air Plan utilized in the Prior MND assessment. The latest update to the Clean Air Plan includes similar but updated control measures as discussed below.

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

GHG Emissions

***Same Conclusion (Conclusions remains LTS)****: The current project is consistent with the Climate Action Plan, which has been adopted since the Prior MND and would not change the less-than-significant conclusion related to greenhouse gas emissions.*

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

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

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

While the Prior MND had included modeling of GHG emissions and found them to be below applicable threshold levels, since the Prior MND, the City has adopted a Climate Action Plan, which is a qualified GHG reduction strategy. The Climate Action Plan includes reduction measures to be implemented to meet city-wide reduction goals and per BAAQMD Guidelines, consistency with this plan is used in place of project-specific GHG emissions modeling for assessment of project impacts.

Many of the Climate Action Plan's reduction measures are targeted to city-wide strategies that are not directly applicable to development projects. The project would include pedestrian/bicycle connections and participate in a Transportation Demand Management program to promote transit and reduce trips (contributing to Measures 1.1 through 1.3). The project would include new tree plantings (Measure 3.4) and would meet current standards of energy and water efficiency (Measures 3.1 and 6.1), and occupants would participate in recycling for waste reduction (Measure 5.1).

Development projects in the city, including the current project, are required to complete a GHG Compliance Checklist during the plan review process demonstrating that all applicable requirements are met. The preliminary checklist demonstrating compliance is included as Attachment C. The current project will comply with the Climate Action Plan and impacts related to GHG emissions would be less than significant.

Consistency with GHG Reduction Plans

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

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

BAAQMD recommends analyzing a project's consistency with current air quality plan primary goals and control measures. The impact would be significant if the project would conflict with or obstruct attainment of the primary goals or implementation of the control measures. The primary goal of the 2017 Clean Air Plan as it relates to GHG emissions is:

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

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

The current project does not conflict with applicable control measures and is consistent with the Clean Air Plan as well as the City's Climate Action Plan. GHG emissions were assessed in this document per the BAAQMD May 2017 CEQA Air Quality Guidelines. BAAQMD's thresholds and methodologies take into account implementation of state-wide regulations and plans, such as the AB 32 Scoping Plan and adopted state regulations such as Pavley and the low carbon fuel standard.

Therefore, as determined in the Prior MND, the impact in relation to consistency with GHG reduction plans would be less-than-significant.

# H. Hazards and Hazardous Materials and Wildfire

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Routine Hazardous Materials Use | LTS w/MM | ☒ | ☐ | Haz-1a: Registration in the Hazardous Materials Business Plan Program<br>Haz-1b: Compliance with US Department of Transportation, State of California and local laws, ordinances and procedures for transportation of hazardous materials and hazardous wastes | LTS w/MM |
| b. Risk of Upset | LTS w/MM | ☒ | ☐ | Haz-2a: Demolition Plan and Permitting<br>Haz-2b: Additional Soil Sampling of Site Soils<br>Haz-2c: Implementation of a Site Soil Management Plan<br>Haz-2d: California Accidental Release Prevention Program (CalARP) | LTS w/MM |
| c. Hazardous Materials within a ¼-mile of a School | LTS w/MM | ☒ | ☐ | Haz-3: Mitigation Measures Haz-2a, Haz-2b, Haz-2c, and Haz-2d | LTS w/MM |
| d. Hazardous Materials Site | LTS w/MM | ☒ | ☐ | Haz-4: Mitigation Measures Haz-2a, Haz-2b, Haz-2c, and Haz-2d | LTS |
| e. Airport Hazards | LTS | ☒ | ☐ | -- | LTS |
| f. Emergency Access Routes | NI | ☒ | ☐ | -- | NI |
| g. Wildfire [1] | NI | ☒ | ☐ | -- | NI |

[1] Note that the current CEQA Guidelines include wildfire as an independent section. This topic has been addressed here as it was in the Prior MND.

## Discussion

Hazards and Hazardous Materials Setting Changes from the 2012 Project

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

Since the Prior MND, the CEQA Guidelines have been updated to include more detailed threshold questions related to wildfire impacts in its own section. As had been standard practice at the time, the Prior MND considered wildfire risk as part of the hazards and hazards materials section, so this topic is discussed here. The expanded wildfire considerations apply to projects in areas that are very high fire severity zones, which does not apply to the project, so are not further detailed.

Routine Hazardous Materials Use

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

This section pertains to recurring transportation, use or disposal of hazardous materials as part of long term operation. Short-term transportation, use or disposal of hazardous materials related to construction and development is discussed in the following sections.

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

Risk of Upset

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impact Haz-2, mitigation measures Haz-2a through Haz-2d, or the less-than-significant with mitigation conclusion as the potential for hazardous building materials in structures to be demolished and in site soils and potential for accidental release of laboratory chemicals during operations remain unchanged since the 2012 Project.*

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

Hazardous Materials Near Schools

***Same Conclusion (conclusion remains LTS w/MM)****: The current project would not change impact Haz-3, mitigation measure Haz-3, or the less-than-significant with mitigation conclusion related to hazardous materials near schools as the need to handle hazardous materials appropriately has not changed since the 2012 Project.*

As noted in the Prior MND, the closest school-type use is the Gateway Childcare Center located approximately 0.21 miles from the Project site, with all others being over one quarter mile from the project site. With implementation of appropriate measures to minimize the potential for release of hazardous materials, the impact would be less-than-significant, consistent with conclusions in the Prior MND.

Hazardous Materials Site

***Same Conclusion (conclusion remains LTS w/MM)****: The current project would not change impact Haz-4, mitigation measure Haz-4, or the less-than-significant with mitigation conclusion related to hazardous materials sites as the need to handle hazardous materials appropriately has not changed since the 2012 Project.*

As noted in the Prior MND, the site is not included on the "Cortese List" of hazardous materials sites. However, because of the industrial history of the site, the site was conservatively considered to have the potential for listing on such a site and the impact mitigated through appropriate handling of any site contamination. This conclusion is consistent with the Prior MND.

Airport Hazards

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion related to airport hazardous because the Project remains consistent with the Airport Land Use Plan, consistent with conclusions for the 2012 Project.*

The airport land use plan for San Francisco International Airport has been updated since the Prior MND. The Project site, is mapped in an area where critical aeronautical surfaces are between approximately 300 and 325 feet, which is well above the proposed building heights, as it was for the 2012 Project. This is adequate to reach conclusions for this analysis though the applicant is required to comply with any applicable FAA filing and notification requirements.

Emergency Access Routes

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion as the current Project is redevelopment of an existing site and would not substantially change major access and evacuation routes, which has not changed since the 2012 Project.*

Wildfire

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion as the project site is in a developed area and the lack of wildfire risk in the vicinity has not changed since the 2012 Project.*

# I. Hydrology and Water Quality

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | Applicable MMs | Project Level of Significance |
| | | Equal or Less Severity | Substantial Increase in Severity | | |
| a., e. Water Quality and Water Plans | LTS w/MM | ☒ | ☐ | Hydro-1: Preparation and Implementation of Project SWPPP<br>Hydro-3: Mitigation Measure Hydro-1 | LTS w/MM |
| b. Groundwater | NI | ☒ | ☐ | -- | NI |
| c. Alter Drainage | LTS w/MM | ☒ | ☐ | Hydro-2: Mitigation Measure Hydro-1 | LTS w/MM |
| d. Inundation | LTS | ☒ | ☐ | -- | LTS |

## Discussion

Hydrology and Water Quality Setting Changes from the 2012 Project

The NPDES General Construction Permit Requirements apply to clearing, grading, and disturbances to the ground such as excavation and has been updated since the Prior MND, though these changes are not substantial as they relate to current project development. All construction and Stormwater Pollution Prevention Plan (SWPPP) activity would be in compliance with the Construction General Permit Order 2009-2009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ.

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

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

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

Water Quality and Water Plans

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impacts Hydro-1 and Hydro-3, mitigation measures Hydro-1 and Hydro-3, or the less-than-significant with mitigation conclusion as the potential for contamination of Bay water due to stormwater pollutants and erosion or siltation remains substantially unchanged since the 2012 Project.*

Construction activities at the site would present a threat of soil erosion from soil disturbance by subjecting unprotected bare soil areas to the erosional forces of runoff during construction activities and the potential for increased erosion and/or parking lot pollutants to impair water quality. These impacts

would be mitigated through compliance with applicable permitting requirements and a project-specific stormwater pollution prevention plan as detailed in the mitigation measures.

Groundwater

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion related to groundwater depletion as the project area is nearly fully covered with impervious area under existing conditions and is not used for groundwater supply and therefore development under the current project would not result in the potential for groundwater depletion, which has not changed since the 2012 Project.*

Alter Drainage

***Same Conclusion (conclusion remains LTS w/MM)****: The current project would not change Impact Hydro-2, mitigation measure Hydro-2, or the less-than-significant with mitigation conclusion as the Project would be required to meet the same or more stringent control of runoff, which has not substantially changed since the 2012 Project.*

As noted in the Prior MND, the Project site is not located in a flood zone. While the specific design of the proposed Project has been revised, consistent with conclusions in the Prior MND, it would not ultimately alter the drainage pattern in a manner that would increase erosion, siltation, or flooding on- or off-site, as the Project is required to adhere to applicable regulations controlling runoff, including those detailed in the mitigation.

Inundation

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusions related to inundation as the Project site is not subject to inundation hazards, which has not substantially changed since the 2012 Project.*

As noted in the Prior MND, the Project site is not located near an inland body of water (potential source of seiches), a soil slope susceptible to rapid mass wasting or mudflows, or downstream of a dam or levee and therefore is not at risk of inundation from these sources. Project site elevations range from 12 feet to 31 feet above mean sea level, which are above tsunami wave run up inundation estimates (6 feet) and updated climate change induced sea level rise inundation estimates (5.5 feet). Therefore, there is no change to the less-than-significant conclusion in the Prior MND.

# J. Land Use

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

## Discussion

Land Use Setting Changes from the 2012 Project

There have been no substantial changes to the land use environmental setting of the Project site. Development of the area has proceeded according to area plans and recent development.

Since the Prior MND, the City's Housing Element of the General Plan was updated in 2015, but would not substantially change impacts or conclusions for the proposed office/R&D development. The entire General Plan is currently being updated but the updated document is not yet in effect and is not anticipated to be substantially revised in relation to the project site and proposed development.

Division of an Existing Community

***Same Conclusion (NI)****: The current Project would not change the no impact conclusion as the Project would involve construction of on an already urbanized site, which has not changed since the 2012 Project.*

Conflict with Land Uses / Land Use Plans

***Same Conclusion (NI)****: The current project would not change the no impact conclusion as there are no conflicts with land uses/land use plans, which has not changed since the 2012 Project.*

As noted in the Prior MND, the proposed office/R&D use is specifically permitted by right and encouraged for the area in the General Plan and Zoning Ordinance. While more square footage than the 2012 Project, the current Project remains within the allowable development intensity at a Floor Area Ratio of 1.0.

# K. Mineral Resources

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

## Discussion

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

# L. Noise

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Noise | LTS w/MM | ☒ | ☐ | Noise-1: Construction Noise Abatement and Limitation of Construction Hours | LTS w/MM |
| b. Vibration | NI | ☒ | ☐ | -- | NI |
| c. Airport Noise | LTS | ☒ | ☐ | -- | LTS |

## Discussion

Noise Setting Changes from the 2012 Project

While the noise environment has not changed substantially from that assessed in the Prior MND and remains primarily characterized by ambient noise, local traffic noise generated along arterial streets and U.S. 101, and aircraft over-flights associated with San Francisco International Airport. The types and locations of noise sensitive land uses in the vicinity have not substantially changed since the Prior MND. The nearest noise sensitive receptors are over 1,000 feet away.

Noise

***Same Conclusion (conclusion remains LTS w/MM)****: The current project would not change Impact Noise-1, mitigation measure Noise-1, or the less-than-significant with mitigation conclusion as the potential for loud construction activities has not substantially changed since the 2012 Project.*

As noted in the Prior MND, the type of use and operational noise is consistent with that in the existing environment and would not result in a significant impact. Operation of heavy construction equipment could result in a substantial temporary increase in ambient noise levels, but these would be mitigated through construction noise abatement and construction hours limitations as detailed in the mitigation. These conclusions are consistent with those made for the 2012 Project.

Vibration

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion as the potential for groundborne vibration has not changed since the 2012 Project.*

As noted in the Prior MND, the proposed uses are not the type that will generate substantial groundborne vibration during operations and construction activities are of the type and distance from existing structures that there is no potential for significant vibration impacts.

Airport Noise

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as the site is outside the area significantly impacted by aircraft noise, which has not changed since the 2012 Project.*

The airport land use plan for San Francisco International Airport has been updated since the Prior MND, but the Project site remains well outside the airport's noise-affected 65 dBA CNEL noise contour. The exterior noise environment at the Project site resulting from aircraft would be considered compatible with proposed uses.

# M. Population & Housing

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

## Discussion

Population and Housing Setting Changes from the 2012 Project

The relevant planning document for this project and the analysis at issue is the City's Housing Element under its General Plan. The Housing Element was last adopted in 2015 and incorporates the Association of Bay Area Governments' (ABAG) Regional Housing Needs Allocation (RHNA) for South San Francisco. Like other local and regional planning documents, the City's Housing Element and General Plan are regularly updated.

Population Growth

***Same Conclusion (conclusion remains LTS)****: The current project would not change Impact Pop-1 or the less-than-significant conclusion as the potential for indirect population growth due to increased employment has not changed since the 2012 Project.*

The 2012 Project was assessed to have the potential to support between 192 and 264 employees. The current Project is slightly larger and using the same methodology, could support between 236 and 325 employees. An increase in employees in the city could result in an indirect increase in population and demand for housing. Consistent with conclusions in the Prior MND, the project would increase employment and contribute to the high jobs to housing ratio in the city but would be consistent with local and area planning and would therefore have a less-than-significant impact related to indirect population growth.

Displacement of Housing or People

***Same Conclusion (conclusion remains NI)****: The current project would not change the no impact conclusion as there have been no changes in the lack of existing housing or residents on the site since the 2012 Project.*

# N. Public Services & Recreation

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

## Discussion

Public Services and Recreation Setting Changes from the 2012 Project

Area-wide development has continued throughout the vicinity and public service and recreation plans and operations are regularly assessed and updated. The SSFPD operates generally out of one main station (as opposed to having substations), which is currently located at 33 Arroyo Drive but is planned to move to the City's Community Civic Campus project, near the current SSFPD location, once constructed. The closest Fire Station to the project site will remain #62 at 249 Harbor Way, approximately 0.6 miles away.

Public Services and Recreation

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as the potential to increase demand for services and recreation has not changed since the 2012 Project.*

As under the 2012 Project, the current Project will be served by existing facilities (or those relocated through separate projects), will meet emergency vehicle access standards, and will pay appropriate development fees toward public services. The conclusion of a less-than-significant impact with respect to public services remains unchanged for the current Project.

As noted in the Prior MND, while it is possible that some users of the Project site would make use of City recreational facilities, the increase in daytime worker population would represent a negligible increase in the use of parks and would not substantially deteriorate existing parks or recreational facilities or require the construction of new facilities. As under the 2012 Project, the current Project would be required to pay development fees, including a park in-lieu fee. The conclusion of a less-than-significant impact with respect to recreation remains unchanged for the current project.

# O. Transportation and Circulation

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | Applicable MMs | Project Level of Significance |
| | | Equal or Less Severity | Substantial Increase in Severity | | |
| a. Conflict with Circulation Plans or Policies | LTS | ☒ | ☐ | -- | LTS |
| b. Conflict with Transportation Impact Reduction Goals* | LTS w/MM | ☒ | ☐ | Traf-1: Airport Boulevard / Grand Avenue Signal Timing<br>Traf-3: E. Grand Avenue / Roebling Road Turn Lane Extension<br>Traf-3: E. Grand Avenue / Roebling Road Signalization | LTS w/MM |
| c. Increase Hazards | LTS w/MM | ☒ | ☐ | Traf-4: Improvements to Grade Crossing Approach Signing & Pavement Striping | LTS w/MM |
| d. Inadequate Emergency Access | LTS | ☒ | ☐ | -- | LTS |

[a] State CEQA Guidelines have been revised since the Prior MND such that intersection and roadway specific service level analysis will be replaced by an analysis of the amount of vehicle miles traveled per CEQA Section 15064.3. However, such a change does not apply statewide until July 2020, and has not been implemented by City of South San Francisco. Therefore, it is not further discussed here.

## Discussion

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

Transportation Setting Changes from the 2012 Project

Area-wide development has continued throughout the vicinity as anticipated under area plans and included in the cumulative traffic analysis in the Prior MND.

Since the adoption of the Prior MND, the California Natural Resources Agency certified and adopted new CEQA Guidelines in 2018 to implement the requirements of California Senate Bill (SB) 743 that would render impacts based on vehicular delay no longer a consideration under CEQA by July 2020. Specifically, SB 743 and the resulting CEQA Guideline section 15064.3 changed the CEQA transportation impact analysis significance criteria to eliminate auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as a basis for determining significant impacts under CEQA (although a jurisdiction may choose to maintain these measures under its General Plan, as South San Francisco does). The changes in CEQA Guidelines to implement SB 743 present vehicle miles traveled (VMT) as an appropriate measure of transportation impacts. However, the requirements of section 15064.3 do not apply statewide until July 2020 and at that point would only apply prospectively. At present, the City of South San Francisco has not adopted VMT as a transportation impact criterion or established VMT significance thresholds and they are not yet required to do so. As a result, a VMT analysis is not included as part of this CEQA analysis.

Conflicts with Circulation Plans or Policies

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as the City's TDM ordinance continues to require alternative mode shift and the current project would include pedestrian and bicycle facilities meeting applicable requirements and safety standards as under the 2012 Project.*

As under the 2012 Project, per the City's TDM Ordinance, the current project is required to implement a TDM Plan to increase use of alternative modes to reduce vehicular trips to/from the project site. Consistent with conclusions in the Prior MND, with implementation of a TDM Plan, the Project's impact on adopted policies, plans or programs supporting alternative transportation would be less-than-significant.

Conflict with Transportation Impact Reduction Goals

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impacts Traf-1 and Traf-3, mitigation measures Traf-1 and Traf-3, or the less-than-significant with mitigation conclusion as trip generation under the current project would be substantially the same as under the 2012 Project and area growth was analyzed under the cumulative analysis in the Prior MND.*

Traffic engineers Fehr & Peers prepared a trip generation comparison between the 2012 Project office and the current Project, as shown in **Table 1** below.

**Table 1: Updated Trip Generation and Comparison to 2012 Project**

| Land Use | Size (KSF)[1] | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|
| | | In | Out | Total | In | Out | Total |
| **Current Project** | | | | | | | |
| Office/R&D[2] | 129.9 | 77 | 17 | 94 | 12 | 65 | 77 |
| TDM Reduction (35%)[3] | | 27 | 6 | 33 | 4 | 23 | 27 |
| ***Current Project Trips*** | | ***50*** | ***11*** | ***61*** | ***8*** | ***42*** | ***50*** |
| **2012 Project** | | | | | | | |
| Office/R&D[2] | 105.5 | 63 | 14 | 76 | 10 | 53 | 63 |
| TDM Reduction (20%)[4] | | 13 | 3 | 15 | 2 | 11 | 13 |
| ***2012 Project Trips*** | | **50** | **11** | **61** | **8** | **42** | **50** |
| ***Net Difference in Project Trips[5]*** | | ***0*** | ***0*** | ***0*** | ***0*** | ***0*** | ***0*** |
| Baseline Site Trips [6] | | 14 | 15 | 29 | 0 | 3 | 3 |
| ***Net Difference in Trips Added to the Network[7]*** | | ***+14*** | ***+15*** | ***+29*** | ***0*** | ***+3*** | ***+3*** |

Notes:

1. KSF = thousand square feet
2. A combined Office/R&D rate, based on *Trip Generation Manual 8th Edition* (2008) rates for land use 710 and 760, and TJKM East of 101 Study (2011), consistent with rates used in the Prior MND
3. 35% reduction in peak hour vehicle trips based on updated City mandated TDM program and Development Agreement
4. 20% reduction to peak hour vehicle trips based on City mandated TDM program at that time
5. Current Project Trips minus 2012 Project Trips
6. Baseline Site Trips are the trips from existing uses that reported in the Prior MND.
7. Because the site has been transitioning to vacant since the previous analysis and approval, it was assumed for the traffic assessment that there are currently no existing trips at the site. While there is no net difference in Project trips for CEQA purposes, this difference in trips added to the network was used to assess the project against current roadway network conditions to determine applicability of mitigation and conclusions.

Source: Fehr & Peers, 2020

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

Fehr & Peers used the above trip generation information with recent roadway counts to assess the Prior MND mitigation measures and conclusions and found them to remain applicable given the current Project and current roadway conditions. Current roadway levels are within those identified under cumulative conditions in the Prior MND and as concluded in the Prior MND, identified mitigation would mitigate impacts under existing and cumulative conditions. Roadway level of service mitigation includes signal timing at Airport Boulevard / Grand Avenue, and signalization and turn lane extension at E. Grand Avenue / Roebling Road and would remain applicable to the current Project.

While not yet required as the City has not yet adopted applicable thresholds, the project's VMT was also assessed by Fehr & Peers. Since the City has not yet established a VMT impact threshold, the most recent research conducted by California Air and Resources Board (CARB) was used to set an interim threshold for this informational assessment. CARB's assessment of progress toward state goals concluded that the statewide VMT reduction needed to meet long term GHG reduction targets is 16.8 percent below the regional baseline. Therefore, the threshold of 16.8 percent below the regional average is used and expressed as average home-based work (HBW) VMT per employee across the nine-county Bay Area. The nine county Bay Area average HBW VMT per employee of 14.2 VMT.

Based on the C/CAG model, which includes detailed roadway network and local land use data for the Project area, employees in the East of 101 Area have an average HBW VMT of 16.0, which is 13% above the regional average and therefore would not meet the proposed threshold of 16.8% below the regional average. Because the C/CAG model is based on existing land use and traffic patterns, it already accounts for some level of shift to alternative modes under the TDM Plans of existing uses and therefore cannot be fully discounted by the Project's required TDM Plan reductions. That being said, the enhanced 35% reduction required under the current TDM Ordinance would likely further reduce the project's VMT reported here.

Note that there would be no difference in the VMT numbers between the 2012 Project and the current Project because it is based on project location and type and not the specific amount of square footage or design.

Hazards and Emergency Access

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change Impact Traf-5, mitigation measure Traf-5, or the less-than-significant with mitigation conclusion as the site has been designed to meet safety standards and would be substantially the same as under the 2012 Project.*

As concluded in the Prior MND, Project traffic would exacerbate an existing safety hazard caused by lack of appropriate signs and markings at the nearby at-grade railroad crossings running diagonally across the East Grand Avenue / Forbes Boulevard / Harbor Way intersection and the Project would be required to contribute toward all needed sign and pavement markings. This remains applicable to the current Project.

Fehr & Peers also assessed circulation of the current Project site plan and determined it would not result in site hazards or lack of emergency access. This is consistent with the conclusions of the Prior MND.

# P. Utilities and Service Systems and Energy

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | Applicable MMs | Project Level of Significance |
| | | Equal or Less Severity | Substantial Increase in Severity | | |
| a. New or Expanded Facilities | LTS | ☒ | ☐ | -- | LTS |
| b. Water Supplies | LTS | ☒ | ☐ | -- | LTS |
| c. Wastewater Capacity | LTS | ☒ | ☐ | -- | LTS |
| d-e. Solid Waste | LTS | ☒ | ☐ | -- | LTS |
| f. Energy [1] | (LTS)[1] | ☒ | ☐ | -- | LTS |
| [1] Note that the current CEQA Guidelines include energy as an independent section. Energy was not formally assessed in the Prior MND, which under CEQA is a presumption of a less-than-significant impact as discussed below. | | | | | |

## Discussion

Utilities and Service Systems Setting Changes from the 2012 Project

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

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

New or Expanded Facilities

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion related to new or expanded facilities as the need for new or expanded facilities has not changed since the 2012 Project.*

As under the 2012 Project, the current project will be served by existing facilities (or those relocated through separate projects). As with the 2012 Project, the current Project would not itself require new or expanded off-site facilities. The conclusion of a less-than-significant impact with respect to new or expanded utility facilities remains unchanged for the current project.

Water Supply

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

The size of the project does not trigger a need for a project-specific Water Supply Assessment, and as noted in the Prior MND, the proposed project is consistent with development potential of the site, which is included in local and regional water supply planning. The conclusion of a less-than-significant impact with respect to water supply remains unchanged for the current Project.

Wastewater

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as the current project would not substantially change projected wastewater generation or planned capacity.*

The applicant has submitted a Sewer Demand Assessment taking into account the previous and current project details and current water usage and wastewater standards and demonstrated that wastewater generation of the project would be marginally less than what would have been anticipated under the 2012 Project (average flow of 0.01650 million gallon per day compared to 0.01657 under the 2012 Project). The Sewer Demand Assessment is included as Attachment E. As noted in the Prior MND, the proposed project is consistent with development potential of the site, which is included in local and regional wastewater capacity planning. The conclusion of a less-than-significant impact with respect to wastewater capacity remains unchanged for the current Project.

Solid Waste

***Same Conclusion (conclusion remains LTS)****: The current project would not change the less-than-significant conclusion as the project would comply with applicable solid waste regulations.*

The Prior MND determined that the Project would utilize solid waste services provided in South San Francisco and would comply with applicable recycling standards intended to meet applicable regulations or goals. While specific requirements for commercial solid waste service are regularly updated, the current project would meet all current requirements and the impact would remain less-than-significant and consistent with Prior MND conclusions.

Energy

***Same Conclusion (conclusion remains LTS)****: The Prior MND did not explicitly address energy (assumed LTS) but both the 2012 Project and the current Project are consistent with area-wide planning and would comply with applicable energy efficiency regulations.*

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

The current project would be required by the City to comply with all standards of Title 24 of the California Code of Regulations and the new California Green Building Standards Code (CALGREEN), as applicable, aimed at the incorporation of energy-conserving design and construction. PG&E infrastructure exists on the current project site, and any on-site and immediately adjacent improvements and extensions required to accommodate the redevelopment would be determined in consultation with PG&E prior to installation. The Project is consistent with area planning and by itself would not result in the need for new or expanded off-site facilities. As a result, although the Project could incrementally increase energy consumption, it would not result in a significant impact related to the provision of energy services.

# Q. Mandatory Findings of Significance

| Impacts Related To: | Prior MND Findings with Implementation of MM (If Required) | PROJECT | | | |
|---|---|---|---|---|---|
| | | Relationship to Prior MND Findings | | | |
| | | Equal or Less Severity | Substantial Increase in Severity | Applicable MMs | Project Level of Significance |
| a. Quality of the Environment | LTS w/MM | ☒ | ☐ | See checklist topics above | LTS w/MM |
| b. Cumulatively Considerable Impacts | LTS w/MM | ☒ | ☐ | See checklist topics above | LTS w/MM |
| c. Adverse Effects on Human Beings | LTS w/MM | ☒ | ☐ | See checklist topics above | LTS w/MM |

## Discussion

Quality of the Environment

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change the impacts, mitigation measures, or the less-than-significant with mitigation conclusions from the Prior MND and, with mitigation, would not significantly degrade the quality of the environment.*

Consistent with conclusions in the Prior MND, while Project implementation could lead to development with the potential to adversely affect the environment in terms of impacts to various CEQA issue topics, as demonstrated in this document, impacts of the Project are considered to be less than significant with mitigation. Therefore, implementation of the Project would not degrade the quality and extent of the environment provided all policies, rules, and regulations of all relevant governing bodies are adhered to, and the mitigation measures contained within this document are implemented.

Cumulative Impacts

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change the impacts, mitigation measures, or the less-than-significant with mitigation conclusions from the Prior MND and, with mitigation, would not result in cumulatively considerable significant impacts.*

As noted in the Prior MND, while the East of 101 Area is substantially built-out, redevelopment of sites with higher-intensity uses occurs throughout the area, as it is on this site, and would be considered the cumulative context. Through conformity with applicable regulations and design-level plans, the potentially significant Project-specific impacts would be reduced below significance levels, which include those related to nesting birds, seismic ground shaking and other geological hazards, erosion and pollutant runoff, hazardous materials, water quality, drainage, noise, and traffic impacts. With the onsite reduction of these impacts, the Project's contribution to cumulative increases in these areas would not be considered cumulatively considerable. Consistent with conclusions in the Prior MND, cumulative impacts of the Project are considered to be less than significant with mitigation.

Adverse Effects on Human Beings

***Same Conclusion (conclusion remains LTS w/ MM)****: The current project would not change the impacts, mitigation measures, or the less-than-significant with mitigation conclusions from the Prior MND and, with mitigation, would not result in adverse effects on human beings.*

Consistent with conclusions in the Prior MND, while human beings could be affected by a variety of impacts described above, as demonstrated in this document, impacts of the Project are considered to be less than significant with mitigation. Impacts with the potential to adversely affect humans, including those in topics of noise, hazardous materials, air quality, and traffic would be less than significant with mitigation. Therefore, implementation of the Project would not result in adverse effects on human beings provided all policies, rules, and regulations of all relevant governing bodies are adhered to, and the mitigation measures contained within this document are implemented.

# Mitigation Monitoring and Reporting Program

# Attachment A

to the

328 Roebling Road Project
1st Addendum to the Recirculated IS/MND

# 328 Roebling Road Project Mitigation Monitoring and Reporting Program (May 2020)

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| **Air-1: Basic Construction Best Management Practices.** The Project shall demonstrate proposed compliance with all applicable regulations and operating procedures prior to issuance of demolition, building or grading permits, including implementation of the following BAAQMD "Basic Construction Mitigation Measures".<br>a. All exposed surfaces (e.g., parking areas, staging areas, soil piles, graded areas, and unpaved access roads) shall be watered two times per day.<br>b. All haul trucks transporting soil, sand, or other loose material off-site shall be covered.<br>c. All visible mud or dirt track-out 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.<br>d. All vehicle speeds on unpaved roads shall be limited to 15 mph.<br>e. 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.<br>f. 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 Title 13, Section 2485 of California Code of Regulations [CCR]). Clear signage shall be provided for construction workers at all access points.<br>g. 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.<br>h. 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. | During construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Verify requirements are met during construction | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| The Air District's phone number shall also be visible to ensure compliance with applicable regulations. | | | | | |
| **Bio-1: Pre-Construction Nesting Bird Survey.** Pre-construction surveys for nesting birds protected by the Migratory Bird Treaty Act of 1918 and/or Fish and Game Code of California within 100 feet of a development site in the Project area shall be conducted within 30 days of initiation of construction activities. If active nests are found, the Project shall follow recommendations of a qualified biologist regarding the appropriate buffer in consideration of species, stage of nesting, location of the nest, and type of construction activity. The buffer shall be maintained until after the nestlings have fledged and left the nest. If there is a complete stoppage in construction activities for 30 days or more, a new nesting-survey shall be completed prior to re-initiation of construction activities. | Prior to construction if during nesting period | Applicant for the development (Private developer for private development projects, City for City development projects) | Completion of survey and, if birds present, provision of buffer | SSF Planning Division | |
| **Geo-1a: Compliance with California Building Code.** Project development shall meet requirements of the California Building Code as modified by the amendments, additions and deletions adopted by the City of South San Francisco. Incorporation of seismic construction standards would reduce the potential for catastrophic effects of ground shaking, such as complete structural failure. | Prior to construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Adherence to code, completion of report and issuance of permit | SSF Building Division | |
| **Geo-1b: Compliance with a design level Geotechnical Investigation report and with Structural Design Plans.** Proper foundation engineering and construction shall be performed in accordance with the recommendations of a Registered Geotechnical Engineer or Civil Engineer experienced in geotechnical design and a Registered Structural Engineer or Civil Engineer experienced in structural design.<br>The structural engineering design shall incorporate seismic parameters as outlined in the California Building Code. The Project Geotechnical Investigation shall establish the seismic design parameters, as determined by the geotechnical engineer in accordance with requirements of the California Building Code. | Prior to construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Adherence to code, completion of report and issuance of permit | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| **Geo-1c: Obtain a building permit and complete final plan review.** The Project applicant shall obtain a building permit through the City of South San Francisco Building Division. Plan Review of planned buildings and structures shall be completed by the Building Division for adherence to the seismic design criteria for planned commercial and industrial sites in the East of 101 Area of the City of South San Francisco. According to the East of 101 Area Plan, Geotechnical Safety Element, buildings shall not be subject to catastrophic collapse under foreseeable seismic events, and will allow egress of occupants in the event of damage following a strong earthquake. | Prior to construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Adherence to code, completion of report and issuance of permit | SSF Building Division | |
| **Geo-2a: Compliance with recommendations of a Geotechnical Investigation and in conformance with Structural Design Plans.** A Design Level Geotechnical Investigation shall be prepared for the site under the direction of a California Registered Geotechnical Engineer, or Civil Engineer experienced in geotechnical engineering, and shall include analysis for liquefaction potential of the underlying sediments. Proper foundation engineering and construction shall be performed in accordance with the recommendations of the Geotechnical Investigation. The Geotechnical Investigation shall be reviewed and approved by the City's Geotechnical Consultant and by the City Engineer. A Registered Structural Engineer, or civil engineer experienced in structural engineering shall prepare Project structural design plans. Structures shall be designed to minimize the effects of anticipated seismic settlements. The Geotechnical Engineer shall review the Structural Design Plans and provide approval for the geotechnical elements of the plans. The design plans shall identify specific mitigation measures to reduce the liquefaction potential of surface soils. Mitigation measures may include excavation and replacement as engineered fill, reduced foundation loading, and ground improvement by methods such as stone columns or pressure grouting. | Prior to construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Completion of adequate report, adherence of plans to the report and issuance of permit | SSF Building Division | |
| **Geo-2b: Obtain a building permit and complete plan review.** The Project applicant shall obtain a building permit through the City of South San Francisco Building Division. Plan Review of planned | Prior to construction | Applicant for the development (Private developer | Completion of adequate report, | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| buildings and structures shall be completed by the Building Division for adherence to the seismic design criteria for planned commercial and industrial sites in the East of 101 Area of the City of South San Francisco. According to the East of 101 Area Plan, Geotechnical Safety Element, buildings shall not be subject to catastrophic collapse under foreseeable seismic events, and will allow egress of occupants in the event of damage following a strong earthquake. | | for private development projects, City for City development projects) | adherence of plans to the report and issuance of permit | | |
| **Geo-3: Compliance with recommendations of a Geotechnical Investigation.** A Design Level Geotechnical Investigation shall be prepared for the site under the direction of a California Registered Geotechnical Engineer, or Civil Engineer experienced in geotechnical engineering, and shall include analysis of the site slope stability. Proper foundation engineering and retaining wall design shall be performed in accordance with the recommendations of the Geotechnical Investigation. The Geotechnical Investigation shall be reviewed and approved by the City's Geotechnical Consultant and by the City Engineer. | Prior to building permit issuance | Applicant for the development (Private developer for private development projects, City for City development projects) | Completion of adequate report | SSF Building Division | |
| **Geo-4: Storm Water Pollution Prevention Plan (SWPPP)**. In accordance with the Clean Water Act and the State Water Resources Control Board, the Applicant shall file a SWPPP prior to the start of construction. The SWPPP shall include specific best management practices to reduce soil erosion. This is required to obtain coverage under the General Permit for Discharges of Storm Water Associated with Construction Activity. | Prior to construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Verification that adequate plan prepared | SSF Building Division | |
| **Geo-5: Investigate unstable fill soils and Bay Mud**. A Design Level Geotechnical Investigation shall be performed to determine the depth and extent of potentially unstable fill soil and Bay Mud. Based on results of this study, the Geotechnical Engineer shall determine appropriate measures to stabilize the potentially unstable site soils. Consolidation testing of any Bay Mud soils present shall be performed, as part of the Design Level Geotechnical Investigation, and estimates of settlement for the site shall be developed. | Prior to building permit issuance | Applicant for the development (Private developer for private development projects, City for City development projects) | Completion of adequate report | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| Methods of unstable soil stabilization may include construction of driven pile foundations that support structures on materials located below fill soils and Bay Mud, and other methods as recommended by the Geotechnical Engineer. | | | | | |
| **Geo-6: Compliance with recommendations of a Geotechnical Investigation and in conformance with Structural Design Plans**. A Design Level Geotechnical Investigation shall be prepared for the site under the direction of a California Registered Geotechnical Engineer and shall include analysis for expansion potential of the site soils. Proper foundation engineering and construction shall be performed in accordance with the recommendations of the Geotechnical Investigation. The Geotechnical Investigation shall be reviewed and approved by the City's Geotechnical Consultant and by the City Engineer. A Registered Structural Engineer shall prepare Project structural design plans. The design plans shall identify specific mitigation measures to reduce the effects of expansive surface soils. Mitigations measures may include the following: Excavate expansive soils and replace with at least one foot of non-expansive fill. Design and construct structures to withstand expected stresses by the implementation of the following: minimize use of slab-on-grade floors; support buildings and slabs on non-expansive materials; chemically treat expansive materials to reduce expansion potential; avoid siting structures across soil materials of substantially different expansive properties; extend foundations below the zone of seasonal moisture change; utilize pier-and-grade-beam foundation systems where appropriate; utilize special bending resistant design; and prevent accumulation of surface water adjacent to buildings. | Prior to building permit issuance | Applicant for the development (Private developer for private development projects, City for City development projects) | Completion of adequate report | SSF Building Division | |
| **Haz-1a: Registration in the Hazardous Materials Business Plan Program.** Qualifying businesses occupying and/or operating at the development must submit a Hazardous Materials Business Plan for the safe storage and use of chemicals to the San Mateo County Environmental Health Department prior to the start of operations, and must review and update the entire Business Plan at least once every two years, or within 30 days of any significant change. Plans shall be submitted to the San Mateo County Environmental Health | Prior to the start of operations by businesses using hazardous materials | Applicant for the development (Private developer for private development projects, City for City development projects) | Verification of adherence to measures | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| Business Plan Program, which may be contacted at (650) 363-4305 for more information.<br><br>Businesses qualify for the Hazardous Materials Business Plan Program if they store a hazardous material equal to or greater than the minimum reportable quantities. These quantities are 55 gallons for liquids, 500 pounds for solids and 200 cubic feet (at standard temperature and pressure) for compressed gases. Exemptions include businesses selling only pre-packaged consumer goods; medical professionals who store oxygen, nitrogen, and/or nitrous oxide in quantities not more than 1,000 cubic feet for each material, and whom store or use no other hazardous materials; or facilities that store no more than 55 gallons of a specific type of lubricating oil, and for which the total quantity of lubricating oil not exceed 275 gallons for all types of lubricating oil. These exemptions are not expected to apply to Class A laboratory facilities.<br><br>The Business Plan must include the type and quantity of hazardous materials, a site map showing storage locations of hazardous materials and where they may be used and transported from, risks of using these materials, included in material safety data sheets for each material, a spill prevention plan, an emergency response plan, employee training consistent with OSHA guidelines, and emergency contact information. | | | | | |
| **Haz-1b: Compliance with US Department of Transportation, State of California and local laws, ordinances and procedures for transportation of hazardous materials and hazardous wastes.** All transportation of hazardous materials and hazardous waste to and from the site will be in accordance with Title 49 of the Code of Federal Regulations, US Department of Transportation, State of California, and local laws, ordinances and procedures including placards, signs and other identifying information. | During operations by businesses using hazardous materials | Applicant for the development (Private developer for private development projects, City for City development projects) | Adherence to stated laws and regulations | SSF Fire Department | |
| **Haz-2a: Demolition Plan and Permitting.** A demolition plan with permit applications shall be submitted to the City of South San Francisco Building Department for approval prior to demolition. The Demolition Plan for safe demolition of existing structures shall | Prior to demolition and soil disturbance | Applicant for the development (Private developer for private | Preparation of adequate plan | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| include asbestos dust control and incorporate recommendations from the site surveys for the presence of potentially hazardous building materials, as well as additional surveys when required by the City. The Demolition Plan shall address both on-site worker protection and off-site resident protection from both chemical and physical hazards. All contaminated building materials shall be tested for contaminant concentrations and shall be disposed of to appropriate licensed landfill facilities. Prior to building demolition, hazardous building materials such as peeling, chipping and friable lead based paint and asbestos containing building materials shall be removed in accordance with all applicable guidelines, laws, and ordinances. The Demolition Plan shall include a program of air monitoring for dust particulates and attached contaminants. Dust control and suspension of work during dry windy days shall be addressed in the plan. Prior to obtaining a demolition permit from BAAQMD, an asbestos demolition survey shall be conducted in accordance with the requirements of BAAQMD Regulation 11, Rule 2. | | development projects, City for City development projects) | | | |
| **Haz-2b: Additional Soil Sampling of Site Soils.** The applicant shall retain a licensed Civil Engineer or Professional Geologist to complete additional surface and subsurface soil sampling to determine if elevated levels of toxic metals, herbicides, motor oil, or wood preservatives are present in site soils. These tests shall take place throughout the Project site. If contamination exceeding commercial/industrial guidelines including the Regional Water Quality Control Board Environmental Screening Levels for commercial/ industrial sites, USEPA Preliminary Remediation Goals for commercial/ industrial sites, and the California Department of Toxic Substances Control Human Health Screening Levels is detected, then a Site Soil Management Plan and Health and Safety Plan shall be prepared and implemented, as discussed in Mitigation Measure Haz-2c. | Prior to demolition and soil disturbance | Applicant for the development (Private developer for private development projects, City for City development projects) | Preparation of adequate plan | SSF Building Division | |
| **Haz-2c: Implementation of a Site Soil Management Plan.** If contamination of site soils is detected, then results shall be submitted to the State of California EPA, pursuant to the Brownfield Memorandum of Agreement, Request for Oversight of a Brownfield | Prior to demolition and soil disturbance | Applicant for the development (Private developer for private | Preparation of adequate plan | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| Site process, and a Site Soil Management Plan shall be prepared in accordance with recommendations of the environmental consultant and established procedures for safe removal. Specific mitigation measures designed to protect human health and the environment will be provided in the plan. At a minimum the plan shall include, but not be limited to the following:<br>(1) Documentation of the extent of previous environmental investigation and remediation at the site.<br>(2) Requirements for site specific Health and Safety Plans (HASPs) to be prepared by all contractors at the Project site. This includes a HASP for all demolition, grading and excavation on the site, as well as for future subsurface maintenance work. The HASP shall include appropriate training, any required personal protective equipment, and monitoring of contaminants to determine exposure. The HASP will be reviewed and approved by a Certified Industrial Hygienist.<br>(3) Description of protocols for the investigation and evaluation of previously unidentified hazardous materials that could be encountered during Project development, including engineering controls that may be required to reduce exposure to construction workers and future users of the site.<br>(4) Requirements for site-specific construction techniques that would minimize exposure to any subsurface contamination found to occur. This shall include treatment and disposal measures for any contaminated groundwater removed from excavations, trenches, and dewatering systems in accordance with San Francisco Bay Regional Water Quality Control Board guidelines.<br>(5) Sampling and testing plan for excavated soils to determine suitability for reuse or acceptability for disposal at a state licensed landfill facility.<br>(6) Restrictions limiting future excavation or development of the subsurface by residents and visitors to the proposed development if determined necessary through coordination with California EPA. | | development projects, City for City development projects) | | | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| (7) The plan shall be reviewed and approved by the responsible jurisdiction prior to issuance of any demolition, grading and construction permits for the Project. | | | | | |
| **Haz-2d: California Accidental Release Prevention Program (CalARP).** Future businesses at the development shall check the state and federal lists of regulated substances available from the San Mateo County Environmental Health Department (SMCEHD). Chemicals on the list are chemicals that pose a major threat to public health and safety or the environment because they are highly toxic, flammable or explosive. Businesses shall determine which list to use in consultation with the SMCEHD.<br><br>Should businesses qualify for the program they shall complete a CalARP registration form and submit it to Environmental Health. Following registration, they shall submit a Risk Management Plan (RMP). RMPs are designed to handle accidental releases and ensure that businesses have the proper information to provide to emergency response teams if an accidental release occurs. All businesses that store or handle more than a threshold quantity (TQ) of a regulated substance must develop a RMP and follow it.<br><br>Risk Management Plans describe impacts to public health and the environment in the event that a regulated substance is released near schools, residential areas, hospitals and childcare facilities. RMPs must include procedures for: keeping employees and customers safe, handling regulated substances, training staff, maintaining equipment, checking that substances are stored safely, and responding to an accidental release. | After construction, prior to start of operations by businesses using hazardous materials | Applicant for the development (Private developer for private development projects, City for City development projects) | Assurance qualifying businesses prepare RMP | SSF Planning Division | |
| **Hydro-1: Preparation and Implementation of Project SWPPP.** Pursuant to NPDES requirements, the Project applicant shall develop a SWPPP to protect water quality during construction and submit the SWPPP as part of project application submittals with the Planning Permit Application and Building Permit Application. The Project SWPPP shall include, but is not limited, to the following mitigation measures for the construction period: | Prior to construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Verification that adequate plan prepared | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| 1) Grading and earthwork shall be allowed with the appropriate SWPPP measures during the wet season (October 1 through April 30) and such work shall be stopped before pending storm events.<br>2) Erosion control/soil stabilization techniques such as straw mulching, erosion control blankets, erosion control matting, and hydro-seeding, shall be utilized, in accordance with the regulations outlined in the Association of Bay Area Governments Manual of Standards for Erosion and Sediment Control Measures. Silt fences used in combination with fiber rolls shall be installed down slope of all graded slopes. Fiber rolls shall be installed in the flow path of graded areas receiving concentrated flows and around storm drain inlets.<br>3) "Best management practices" (BMPs) for preventing the discharge of other construction-related NPDES pollutants beside sediment (i.e. paint, concrete, trash, etc.) to downstream waters such as covered and contained storage areas, contained wash-out areas, and prompt and appropriate disposal.<br>4) After construction is completed, all drainage facilities shall be inspected for accumulated sediment and trash, and these drainage structures shall be cleared of debris and sediment.<br>In accordance with the handbook C.3 Stormwater Technical Guidance, permanent mitigation measures for stormwater shall be submitted as part of project application submittals with the Planning Permit Application and Building Permit Application. Elements that shall be addressed in the submittals include the following:<br>5) Description of potential sources of erosion, sediment, and trash at the Project site. Industrial activities and significant materials and chemicals that could be used at the proposed Project site should be described. This will include a thorough assessment of existing and potential pollutant sources.<br>6) Identification of BMPs to be implemented at the Project site based on identified industrial activities and potential pollutant sources, including non-point source pollutants. Emphasis shall be placed on source control BMPs, with treatment controls used as needed. | | | | | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| 7) Development of a monitoring and implementation plan. Maintenance requirements and frequency shall be carefully described including vector control, clearing of clogged or obstructed inlet or outlet structures, trash removal, vegetation/landscape maintenance, replacement of media filters, regular sweeping of parking lots and other paced areas, etc. Wastes removed as a result of the BMPs described above may be hazardous, therefore, maintenance costs shall be budgeted to include disposal at a proper site. Parking lot areas shall be cleared of debris that may enter the storm drain system on a daily basis.<br>8) The monitoring and maintenance program shall be conducted at the frequency agreed upon by the RWQCB and/or City of South San Francisco. Monitoring and maintenance shall be recorded and submitted annually to the State Water Resources Control Board. The SWPPP shall be adjusted, as necessary, to address any inadequacies identified through the monitoring.<br>9) Proposed locations and sizing of stormwater treatment measures shall be included.<br>The applicant shall prepare informational literature and guidance on industrial and commercial BMPs to minimize pollutant contributions from the proposed development. This information shall be distributed to all employees at the Project site. At a minimum the information shall cover: a) proper disposal of commercial cleaning chemicals; b) proper use of landscaping chemicals; c) clean-up and appropriate disposal of hazardous materials and chemicals; and d) prohibition of any washing and dumping of materials and chemicals into storm drains. | | | | | |
| **Noise-1: Construction Noise Abatement and Limitation of Construction Hours.** Construction hours shall be limited to the hourly restrictions specified in the City Noise Ordinance, and the Project sponsor shall require by contract specification that construction best management practices be implemented by contractors to reduce noise levels to the 90-dBA at 25 feet noise limit specified in the City Noise Ordinance. Required practices shall include but not be limited to: | During construction | Applicant for the development (Private developer for private development projects, City for City development projects) | Adherence to measures during construction | SSF Building Division | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| • Ensuring that construction equipment is properly muffled according to industry standards,<br>• Implementing noise attenuation measures such as noise barriers or noise blankets, and<br>• Requiring heavily loaded trucks used during construction to be routed away from noise and vibration sensitive uses. | | | | | |
| **Traf-1: Airport Boulevard / Grand Avenue Signal Timing.** Adjust signal timing to the approval of the South San Francisco Public Works Department in order to reduce Base Case + Project 95th percentile vehicle queuing for the left turn movement on the southbound Airport Boulevard approach to Grand Avenue to a shorter distance than Base Case queuing for this movement. | Prior to occupancy | Applicant for the development (Private developer for private development projects, City for City development projects) | Coordinate to implement | SSF Public Works Department | |
| **Traf-2: E. Grand Avenue / Roebling Road Turn Lane Extension.** The following improvement is not included in the East of 101 Transportation Improvement Program and will not be funded via the Project's traffic impact fee contribution for this program. The Project proponent will be responsible for implementation of the following improvement:<br>Extend the left turn lane on the eastbound E. Grand Avenue approach to Roebling Road from 75 feet to a minimum of 125 feet and a maximum of 175 feet (as determined by the City Engineer). | Prior to occupancy | Applicant for the development (Private developer for private development projects, City for City development projects) | Coordinate to implement | SSF Public Works Department | |
| **Traf-3: E. Grand Avenue / Roebling Road Signalization.** The following improvements are not currently included as part of the East of 101 Transportation Improvement Program and will not be funded via the Project's traffic impact fee contribution to this program. The Project proponent will be responsible for implementation of the following improvement or fair-share reimbursement (as determined by the City Engineer) if implemented by another party prior to initiation of construction for this Project: | Prior to occupancy | Applicant for the development (Private developer for private development projects, City for City development projects) | Payment of fair share contribution or coordinate to implement | SSF Public Works Department | |

| Mitigation Measure | Timing/ Schedule | Implementation Responsibility | Verification | | |
|---|---|---|---|---|---|
| | | | Monitoring Action | Monitoring Responsibility | Date Completed |
| a) Signalize the intersection and coordinate operation with the signal at East Grand Avenue / Forbes Boulevard / Harbor Way.<br><br>b) Lengthen the single left turn lane on the westbound E. Grand Avenue approach to the Forbes/Harbor intersection to a minimum of 225 feet and a maximum of 260 feet (as determined by the City Engineer). Prohibit left turns to/from all driveways along E. Grand Avenue between these two locations.<br><br>If this Project implements the above improvements, the City would determine appropriate fair-share reimbursement from the 213 East Grand Avenue project if/when that project proceeds (as determined by the City Engineer.) | | | | | |
| **Traf-4: Impacts to Grade Crossing Approach Signing & Pavement Striping.** The Project shall provide a fair share contribution towards all needed signs and pavement markings on the approaches to the East Grand Avenue / Forbes Boulevard / Harbor Way intersection "at grade railroad crossing" to meet minimum State Public Utilities Commission requirements as detailed in the 2003 Manual of Uniform Traffic Control Services by the Federal Highway Commission. | Prior to occupancy | Applicant for the development (Private developer for private development projects, City for City development projects) | Payment of fair share contribution | SSF Public Works Department in coordination with California Public Utilities Commission | |

# Updated Cultural Records Searches

# Attachment B

to the

328 Roebling Road Project
1st Addendum to the Recirculated IS/MND

# NATIVE AMERICAN HERITAGE COMMISSION



**NAHC HEADQUARTERS**
1550 Harbor Boulevard
Suite 100
West Sacramento,
California 95691
(916) 373-3710
nahc@nahc.ca.gov
NAHC.ca.gov

March 12, 2020

Sharon Wright, Environmental Planner
Lamphier-Gregory

Via Email to: swright@lamphier-gregory.com

**Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, 328 Roebling Road Revised Project, San Mateo County**

Dear Ms. Wright:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

*Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.*

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

   - Any report that may contain site forms, site significance, and suggested mitigation measures.

     All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was negative.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Sarah.Fonseca@nahc.ac.gov.

Sincerely,

Sarah Fonseca
*Cultural Resources Analyst*

Attachment

CALIFORNIA HISTORICAL RESOURCES INFORMATION SYSTEM

ALAMEDA
COLUSA
CONTRA COSTA
DEL NORTE
HUMBOLDT
LAKE
MARIN
MENDOCINO
MONTEREY
NAPA
SAN BENITO
SAN FRANCISCO
SAN MATEO
SANTA CLATA
SANTA CRUZ
SOLANO
SONOMA
YOLO

**Northwest Information Center**
Sonoma State University
150 Professional Center Drive, Suite E
Rohnert Park, California 94928-3609
Tel: 707.588.8455
nwic@sonoma.edu
http://www.sonoma.edu/nwic

April 7, 2020 NWIC File No.: 19-1586

Sharon Wright
Lamphier-Gregory
1944 Embarcadero
Oakland, CA 94606

Re: Record search results for the proposed 328 Roebling Project

Dear Ms. Sharon Wright:

Per your request received by our office on March 10, 2020, a records search was conducted for the above referenced project by reviewing pertinent Northwest Information Center (NWIC) base maps that reference cultural resources records and reports, historic-period maps, and literature for San Mateo County. Please note that use of the term cultural resources includes both archaeological resources and historical buildings and/or structures.

Review of this information indicates that there have been no cultural resource studies that cover the 328 Roebling project area. This 328 Roebling project area contains no recorded archaeological resources. The State Office of Historic Preservation Built Environment Resources Directory (OHP BERD), which includes listings of the California Register of Historical Resources, California State Historical Landmarks, California State Points of Historical Interest, and the National Register of Historic Places, lists no recorded buildings or structures within or adjacent to the proposed 328 Roebling project area. In addition to these inventories, the NWIC base maps show no recorded buildings or structures within the proposed 328 Roebling project area.

At the time of Euroamerican contact the Native Americans that lived in the area were speakers of the Ramaytush language, part of the Costanoan language family (Levy 1978: 485). There are no Native American resources in or adjacent to the proposed 328 Roebling project area referenced in the ethnographic literature (Nelson 1909, Bocek 1991).

Based on an evaluation of the environmental setting and features associated with known sites, Native American resources in this part of San Mateo County have been found in areas marginal to San Francisco Bay, inland near the base of hills, and near freshwater courses. The 328 Roebling project area is located south of San Bruno Mountain at the southern base of hills located just West of San Bruno Point. The project area contains lands near the edge of former marshland just north of San Bruno Canal. Given the similarity of these environmental factors, there is a moderate potential for unrecorded Native American resources to be within the proposed 328 Roebling project area.

Review of historical literature and maps gave no indication of the possibility of historic-period activity within the 328 Roebling project area. Historic San Mateo County maps indicated the project area was located within the lands of *South San Francisco Land & Improvements Co.,*but did not indicate any buildings or structures within those lands (Bromfield 1894). With this in mind, there is a low potential for unrecorded historic-period archaeological resources to be within the proposed 328 Roebling project area.

The 1947 San Francisco South USGS 7.5-minute topographic quadrangle depicts one or more buildings or structures within the 328 Roebling project area. If present, these unrecorded buildings or structures meet the Office of Historic Preservation's minimum age standard that buildings, structures, and objects 45 years or older may be of historical value.

**RECOMMENDATIONS:**

1) There is a moderate potential of identifying Native American archaeological resources and a low potential of identifying historic-period archaeological resources in the project area. Given the potential for archaeological resources in the proposed 328 Roebling project area, our usual recommendation would include archival research and a field examination. The proposed project area, however, has been highly developed and is presently covered with asphalt, buildings, or fill that obscures the visibility of original surface soils, which negates the feasibility of an adequate surface inspection.

Therefore, prior to demolition or other ground disturbance, we recommend a qualified archaeologist conduct further archival and field study to identify archaeological resources, including a good faith effort to identify archaeological deposits that may show no indications on the surface. Field study may include, but is not limited to, hand auger sampling, shovel test units, or geoarchaeological analyses as well as other common methods used to identify the presence of buried archaeological resources. Please refer

to the list of consultants who meet the Secretary of Interior's Standards at http://www.chrisinfo.org.

2) We recommend the lead agency contact the local Native American tribe(s) regarding traditional, cultural, and religious heritage values. For a complete listing of tribes in the vicinity of the project, please contact the Native American Heritage Commission at 916/373-3710.

3) If the proposed project area contains buildings or structures that meet the minimum age requirement, prior to commencement of project activities, it is recommended that this resource be assessed by a professional familiar with the architecture and history of San Mateo County. Please refer to the list of consultants who meet the Secretary of Interior's Standards at http://www.chrisinfo.org.

4) Review for possible historic-period buildings or structures has included only those sources listed in the attached bibliography and should not be considered comprehensive.

5) If archaeological resources are encountered **during construction,** work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations. Project personnel should not collect cultural resources. Native American resources include chert or obsidian flakes, projectile points, mortars, and pestles; and dark friable soil containing shell and bone dietary debris, heat-affected rock, or human burials. Historic-period resources include stone or adobe foundations or walls; structures and remains with square nails; and refuse deposits or bottle dumps, often located in old wells or privies.

6) It is recommended that any identified cultural resources be recorded on DPR 523 historic resource recordation forms, available online from the Office of Historic Preservation's website: https://ohp.parks.ca.gov/?page_id=28351

Due to processing delays and other factors, not all of the historical resource reports and resource records that have been submitted to the Office of Historic Preservation are available via this records search. Additional information may be available through the federal, state, and local agencies that produced or paid for historical resource management work in the search area. Additionally, Native American tribes have historical resource information not in the California Historical Resources Information System (CHRIS) Inventory, and you should contact the California Native American Heritage Commission for information on local/regional tribal contacts.

The California Office of Historic Preservation (OHP) contracts with the California Historical Resources Information System's (CHRIS) regional Information Centers (ICs) to maintain information in the CHRIS inventory and make it available to local, state, and federal agencies, cultural resource professionals, Native American tribes, researchers, and the public. Recommendations made by IC coordinators or their staff regarding the interpretation and application of this information are advisory only. Such recommendations do not necessarily represent the evaluation or opinion of the State Historic Preservation Officer in carrying out the OHP's regulatory authority under federal and state law.

Thank you for using our services. Please contact this office if you have any questions, (707) 588-8455.

Sincerely,

Jillian Guldenbrein
Researcher

**LITERATURE REVIEWED**

In addition to archaeological maps and site records on file at the Northwest Information Center of the Historical Resources Information System, the following literature was reviewed:


Bromfield, Davenport
1894 Official Map of San Mateo County, California

General Land Office
1854, 1866, 1868 Survey Plat for Township 3 South/Range 5 West.

Helley, E.J., K.R. Lajoie, W.E. Spangle, and M.L. Blair
1979 *Flatland Deposits of the San Francisco Bay Region - Their Geology and Engineering Properties, and Their Importance to Comprehensive Planning*. Geological Survey Professional Paper 943. United States Geological Survey and Department of Housing and Urban Development.

Levy, Richard
1978 Costanoan. In *California*, edited by Robert F. Heizer, pp. 485-495. Handbook of North American Indians, vol. 8, William C. Sturtevant, general editor. Smithsonian Institution, Washington, D.C.

Nelson, N.C.
1909 *Shellmounds of the San Francisco Bay Region*. University of California Publications in American Archaeology and Ethnology 7(4):309-356. Berkeley. (Reprint by Kraus Reprint Corporation, New York, 1964)

Nichols, Donald R., and Nancy A. Wright
1971 Preliminary Map of Historic Margins of Marshland, San Francisco Bay, California. U.S. Geological Survey Open File Map. U.S. Department of the Interior, Geological Survey in cooperation with the U.S. Department of Housing and Urban Development, Washington, D.C.

State of California Department of Parks and Recreation
1976 *California Inventory of Historic Resources*. State of California Department of Parks and Recreation, Sacramento.

State of California Department of Parks and Recreation and Office of Historic Preservation
1988 *Five Views: An Ethnic Sites Survey for California*. State of California Department of Parks and Recreation and Office of Historic Preservation, Sacramento.

State of California Office of Historic Preservation **
2019 *Built Environment Resources Directory*. Listing by City (through December 17, 2019). State of California Office of Historic Preservation, Sacramento.


**Note that the Office of Historic Preservation's *Historic Properties Directory* includes National Register, State Registered Landmarks, California Points of Historical Interest, and the California Register of Historical Resources as well as Certified Local Government surveys that have undergone Section 106 review.

# Climate Action Plan Preliminary Compliance Checklist

## Attachment C

to the

328 Roebling Road Project
1st Addendum to the Recirculated IS/MND

**Flad** Architects

650 California Street/17th Floor San Francisco, CA 94108 P 415 398-1600 www.flad.com

| | |
|---|---|
| Billy Gross/City of South San Francisco<br>To | 3/25/2020<br>Date |
| Joseph Marshall<br>From | 19419<br>Flad Project Number |
| Climate Action Plan Items Response<br>Subject | 328 Roebling<br>Project Name |
| <br>Copies | 1 of 4<br>Page |

The following matrix is built from an email from Billy Gross/SSF to Joseph Marshall dated of items that the City will incorporate into in the subsequent Conditions of Approval. These are our responses to those items in the first section of the following table. The second portion of the table deals with the project team's responses to the questions asked of new commercial construction above 5000 sf in Appendix E of the City of South San Francisco Climate Action Plan adopted 2/13/2014.

| | |
|---|---|
| For Commercial Projects: Prior to issuance of any building or construction permits, the developer shall revise the development plans to include the following Climate Action Plan requirements, subject to review and approval by the Chief Planner or designee: | |
| A) Electric Vehicle Charging Installations Measure 2.1, Action 5: Require new large-scale nonresidential developments to provide conduit for future electric vehicle charging installations, and encourage the installation of conduits or electric vehicle charging stations for all new development. | The project includes 23 (6%) parking spaces for eV stations in the parking structure. |
| B) Heat Island Reductions Measure 3.4, Action 1: Encourage the use of high-albedo surfaces and technologies as appropriate, as identified in the voluntary CALGreen standards. | The project will utilize high-albedo roofing with a Solar Reflectance Index rating of 78 minimum. |
| C) Alternative Energy Facilities Measure 4.1, Action 2: Require the construction of any new nonresidential conditioned space of 5,000 square feet or more, or the conversion of unconditioned space 5,000 square feet or more, to comply with one of the following standards: | |
| i) Meet a minimum of 50% of modeled building electricity needs with on-site renewable energy sources. To calculate 50% of building electricity needs for the new conditioned space, the applicant shall calculate building electricity use as part of the Title 24 compliance process. Total electricity use shall include total use for the new conditioned space excluding process energy. | Please see item ii) below. |
| ii) Participate in a power purchase agreement to offset a minimum of 50% of modeled building electricity use. | The project will comply with this measure through a power purchase agreement. |

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650 California Street/17th Floor San Francisco, CA 94108 P 415 398-1600 www.flad.com

| | |
|---|---|
| Billy Gross/City of South San Francisco<br>To | 3/25/2020<br>Date |
| Joseph Marshall<br>From | 19419<br>Flad Project Number |
| Climate Action Plan Items Response<br>Subject | 328 Roebling<br>Project Name |
| <br>Copies | 2 of 4<br>Page |

| | |
|---|---|
| Building electricity use shall be calculated using the method identified above. | |
| iii) Comply with CALGreen Tier 2 energy efficiency requirements to exceed mandatory energy efficiency requirements by 20% or more. For additions to existing development of 5,000 square feet or more, CALGreen Tier 2 shall be calculated as part of the Title 24 compliance. Existing building space already permitted shall not be subject to CALGreen Tier 2 requirements. | Please see item ii) above. |
| d) Solar Wiring Installation Measure 4.1, Action 3: Require all new development to install conduit to accommodate wiring for solar. | The project will have conduit for a future solar array in the parking structure. |
| e) Water Demand Reduction Measure 6.1, Action 2: Revitalize implementation and enforcement of the Water Efficient Landscape Ordinance by undertaking the following: | |
| i) Establishing a variable-speed pump exchange for water features. | The project does not have any water features on site. |
| ii) Restricting hours of irrigation to occur between 3:00 a.m. and two hours after sunrise. | Irrigation controllers are part of project and will restrict use as required. |
| iii) Installing irrigation controllers with rain sensors. | The project includes irrigation controllers with rain sensors. |
| iv) Landscaping with native, water-efficient plants. | Drought tolerant planting is used in the project. |
| v) Installing drip irrigation systems. | The project includes drip irrigation. |
| vi) Reducing impervious surfaces. | Project pervious site area includes 25,000sf of planted area and 14,300sf of specialty site finishes which is approximately 30% of project site. |
| | |
| *From Appendix E: SSF Climate Action Plan adopted 2/13/2014* | |
| Does the project include bicycle facilities | Bicycle parking will be included in the parking structure. |

**Flad** Architects

650 California Street/17th Floor San Francisco, CA 94108 P 415 398-1600 www.flad.com

| | |
|---|---|
| Billy Gross/City of South San Francisco<br>To | 3/25/2020<br>Date |
| Joseph Marshall<br>From | 19419<br>Flad Project Number |
| Climate Action Plan Items Response<br>Subject | 328 Roebling<br>Project Name |
| <br>Copies | 3 of 4<br>Page |

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|---|---|
| Will the project support bike sharing/rental programs | The project is not supporting bikeshare programs currently. |
| Will there be a commute shuttle or public transit stop on-site or within 500 feet? | There is a transit bus stop (Stop ID 3643643) at 230 E. Grand, approx.. 300 feet from the southeast corner of our site. |
| Is the project within ¼ mile of a Caltrain or Bart stop | Yes, the site is within ¼ mile of the CalTrain platform at 590 Dubuque Ave, South San Francisco, CA 94080. |
| Will the project include high-density housing and a diverse range of housing | The project has no housing. |
| Will the project provide traffic calming treatments | Roebling Road is a dead-end street and will not have significant traffic. |
| Is the project paying a traffic impact fee to fund bicycle and pedestrian improvements? | The project is paying traffic impact fees. |
| Will the project provide shared or reduced parking? | Parking will meet city zoning requirements for quantity. |
| Will the project provide designated parking spaces for electric vehicles, carpool vehicles, or other low emission vehicles | The project includes designated spaces for electric vehicles. |
| Will the project have any ground level commercial space | No commercial ground level space is planned for the core & shell building, but a future tenant may elect to provide something that is accessible by the public. |
| Does the project include any alternative fuel stations | The project includes eV charging stations. |
| Will the project have any pre-wiring or conduit construction to easily add electric vehicle charging stations or alternative energy facilities at a later date? | Project will include electric vehicle charging stations in the parking structure. |
| If this project is replacing an existing building, is the building being replaced more than 30 years old? | Yes, we are replacing a structure on site beyond that age threshold. |
| Will certification of the building be sought under LEED or any other green building criteria? | The project is seeking LEED Silver. |
| Will the project include any high-reflectivity roof or surface paving? | The project will include high albedo roofing. |
| Will there be a net increase in the number of mature trees on-site when the project is completed? | The project will include a net add of mature trees. |

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650 California Street/17th Floor San Francisco, CA 94108 P 415 398-1600 www.flad.com

Billy Gross/City of South San Francisco
To

3/25/2020
Date

Joseph Marshall
From

19419
Flad Project Number

Climate Action Plan Items Response
Subject

328 Roebling
Project Name

Copies

4 of 4
Page

| | |
|---|---|
| Will any renewable energy system be installed as part of this project? | No, but we will participate in a renewable energy purchase plan. |
| Is the project a new nonresidential conditioned space of 5,000 sf or more? | Yes. |
| Will this project use renewable energy generated off-site? | Yes. |
| Will there be compost collection on-site? | Yes. |
| Will any water fixtures exceed CALGreen standards? | The project will comply with CALGreen standards. |
| Will the project incorporate low-impact development (LID) practices? | Yes, the project is using stormwater management practices from LID guidelines. |
| Will any xeriscaping be installed? | Yes. |
| Will captured rainwater or greywater be used for irrigation? | No. |

END.

# Fehr & Peers Traffic Operations and Vehicle Miles Assessments

# Attachment D

to the

328 Roebling Road Project
1st Addendum to the Recirculated IS/MND

FEHR PEERS

# MEMORANDUM

Date: April 8, 2020

To: Rebecca Auld, Lamphier-Gregory

From: Mike Hawkins, PE, Fehr & Peers

**Subject: 328 Roebling Road Transportation Assessment Comparison**

*SF19-1030*

This memorandum presents the results of the transportation assessment comparison for the proposed development at 328 Roebling Road (the "Project"). The Project was previously studied and environmentally cleared in 2009 and 2012; the Initial Study / Mitigated Negative Declaration (IS/MND) was originally circulated in February 2009, was revised and recirculated in July 2009, and was revised and recirculated again in February 2012, ultimately adopted in 2012. A Transportation Impact Study (TIS) was prepared by Crane Transportation Group in October 2011 to identify potential significant impacts of the Project on the transportation system as input to the 2012 recirculated IS/MND. The TIS is included as an attachment to this memo. The currently proposed Project is slightly larger than the Project in 2012. Fehr & Peers reviewed the previously prepared TIS, prepared trip generation estimates for the current Project, compared the results to the trip generation estimates in the TIS, and used the results to assess whether new or more severe transportation impacts are likely. Fehr & Peers also prepared a vehicle mile traveled (VMT) assessment.

## Project Characteristics

The Project site spans approximately three acres and is located at 328 Roebling Road, near East Grand Avenue in South San Francisco. The Project site includes several vacant industrial/warehouse buildings scheduled for removal. Vehicular access to the site would be provided via Roebling Road and East Grand Avenue. The Project site is located slightly more than one-half mile from the South San Francisco Caltrain Station within the East of 101 Area.

The IS/MND TIS prepared in 2011 analyzed a Project that included two buildings with a total of 105,536 square feet of office and research and development (R&D) above several stories of

underground parking. The Project description has been revised to include one building with up to 129,919 square feet of Office/R&D and a separate parking structure on the site.

# Trip Generation Comparison

Trip generation refers to the process of estimating the amount of vehicular traffic a project might add to the roadway network. Estimates for the peak one-hour periods during the weekday morning (AM) and evening (PM) commute periods, when traffic volumes on adjacent streets are typically at their highest, are analyzed to represent the worst-case scenario.

The IS/MND TIS used a blended trip generation rate based on values published in *Trip Generation Manual, 8th Edition* (Institute of Transportation Engineers - ITE, 2008) and rates published in a Traffic Study for the East of 101 Area (TJKM Transportation Consultants, 2011) to estimate trip generation for the Project, based on the combined office/R&D rates. ITE contains data based on research conducted at sites throughout the United States over the past several decades for various land use types while the TJKM study included local roadway data collected in the East of 101 Area of South San Francisco.

The IS/MND TIS, for purposes of trip generation, assumed that all 105,536 square feet of the Project would be used as Office/R&D space. The TIS also included a 20 percent reduction in peak hour trips to account for a Transportation Demand Management (TDM) program and a reduction to account for existing (2011) activity on the site. **Table 1** summarizes the Project trip generation as presented in the TIS. As shown in **Table 1**, the TIS assumed that the Project would generate 32 additional AM trips (+36 inbound, -4 outbound) and 47 additional PM trips (+8 inbound, +39 outbound) after subtracting the existing site trips at the time.

**Table 1: IS/MND Trip Generation**

| Land Use | Size (KSF)[1] | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|
| | | In | Out | Total | In | Out | Total |
| Office/R&D[2] | 105.5 | 63 | 14 | 76 | 10 | 53 | 63 |
| TDM Reduction[3] | | 13 | 3 | 15 | 2 | 11 | 13 |
| **Total Project Trips** | | **50** | **11** | **61** | **8** | **42** | **50** |
| Existing Site Trips[4] | | 14 | 15 | 29 | 0 | 3 | 3 |
| **Net New Project Trips** | | **36** | **-4** | **32** | **8** | **39** | **47** |

Notes:
1. KSF = thousand square feet
2. A combined Office/R&D rate, based on *Trip Generation Manual 8th Edition* (2008) rates for land use 710 and 760, and TJKM East of 101 Study (2011)
3. 20% reduction to peak hour vehicle trips based on City mandated TDM program
4. Based on driveway counts at the existing site in 2011

Source: Crane Transportation Group, 2011; Fehr & Peers, 2020

The City of South San Francisco has updated their TDM requirements for the East of 101 Area with a more aggressive 35 percent reduction in vehicle trips through TDM measures, as required in the City's Municipal Code[1]. This more robust TDM requirement is also written into the Project's Development Agreement (DA). **Table 2** summarizes the Project trip generation for the revised Project description, using trip rates and methodologies consistent with those used in the 2011 TIS for office/R&D uses and updated TDM requirements.

As shown in **Table 2**, with an additional 24,383 square feet of Office/R&D space but also higher TDM requirement (35% reduction requirement compared to the previous 20% reduction requirement), the revised Project would be expected to generate the same amount of trips as the IS/MND Project.

However, the IS/MND TIS subtracted the trips from existing uses at the time, now referred to as Baseline Site Trips. While the site could return to that level of use in the existing buildings with no approvals required, the site has been transitioning to vacant as the owners prepare to demolish the old buildings and it is assumed there are currently no trips to/from the site. Therefore, to more conservatively assess the increase in trips added to the transportation network, this analysis has

[1] As stated in the FAR of 1.0 in the Business and Technology Park district, Section 20.400.003, 35 percent reduction in peak hour vehicle trips is the minimum requirement.

compared the IS/MND Project Trips with the Baseline Site Trips subtracted to the Current Project Trips with no Baseline Trips subtracted. This results in 29 additional AM and 3 additional PM peak hour vehicle trips compared to the trip estimates analyzed in the IS/MND when accounting for updated TDM rates and zero existing site trips.

**Table 2: Updated Trip Generation Estimates and Comparison to the IS/MND**

| Land Use | Size (KSF)[1] | AM Peak Hour | | | PM Peak Hour | | |
|---|---|---|---|---|---|---|---|
| | | In | Out | Total | In | Out | Total |
| Office/R&D[2] | 129.9 | 77 | 17 | 94 | 12 | 65 | 77 |
| TDM Reduction[3] | | 27 | 6 | 33 | 4 | 23 | 27 |
| ***Total Trips*** | | ***50*** | ***11*** | ***61*** | ***8*** | ***42*** | ***50*** |
| *IS/MND Project Trips*[4] | | **50** | **11** | **61** | **8** | **42** | **50** |
| ***Net Difference in Project Trips***[5] | | ***0*** | ***0*** | ***0*** | ***0*** | ***0*** | ***0*** |
| Baseline Site Trips[4, 6] | | 14 | 15 | 29 | 0 | 3 | 3 |
| ***Net Difference in Trips Added to the Network*** | | ***+14*** | ***+15*** | ***+29*** | ***0*** | ***+3*** | ***+3*** |

Notes:

1. KSF = thousand square feet
2. A combined Office/R&D rate, based on *Trip Generation Manual 8th Edition* (2008) rates for land use 710 and 760, and TJKM East of 101 Study (2011), consistent with rates used in the 2011 TIS
3. 35% reduction in peak hour vehicle trips based on updated City mandated TDM program and Development Agreement
4. See also Table 1 for a breakdown of IS/MND Project Trips.
5. Current estimates minus IS/MND Project Trip estimates
6. Baseline Site Trips are the trips from existing uses that were counted in 2011 and reported in the IS/MND. Because the site has been transitioning to vacant since the previous analysis and approval, it is assumed for this traffic assessment that there are currently no existing trips at the site and therefore, the net difference in trips added to the transportation network adds back in the previous Baseline Site Trips.

Source: Fehr & Peers, 2020

# Impact Determination

The IS/MND TIS studied ten intersections surrounding the Project site. As previously mentioned, the original IS/MND was completed and published in 2012; intersection turning movement counts used in the transportation analysis were taken in March or June 2008. Additional intersection counts were collected in 2019 at the ten study intersections. The results of 2019 counts were compared to

the 2008 counts to assess whether the traffic volumes have changed considerably which could result in new significant impacts.

The change in peak hour volumes at study intersections varies between -4 percent to +19 percent when comparing 2008 volumes to 2019 volumes, with the majority of study intersections seeing approximately a ten percent change in volumes or less, generally considered to be within the range of daily fluctuation in traffic. The overall change in volumes for all study intersections is +9 percent and +11 percent during the AM and PM peak hours, respectively. Considering that the revised project is expected to generate a similar level of vehicle trips, and the overall intersection volumes have not substantially changed since the time of the TIS, similar impacts and mitigation measures can be expected.

The IS/MND TIS identified 24 potential impacts to site circulation, study intersections, queueing, and freeway ramps and mainline operation. Impacts were analyzed under Existing (2011), Baseline (2015), and Future Cumulative (2035) scenarios. Of the 24 potential Project impacts, six were identified as significant. Mitigation measures for all six significant impacts were identified and were sufficient to reduce the impacts to less-than-significant levels. The significant impacts identified by the TIS are summarized in **Table 4**.

Mitigation measures related to physical changes to the transportation network (Impacts 5, 13, 19) are still expected to be relevant and necessary in order to mitigate to less-than-significant levels and the project should still be responsible to contribute their fair share towards the improvements. Mitigation measures related to vehicle queuing (Impacts 8, 14, 20) are still expected to be relevant and necessary to mitigate to less-than-significant levels and the project should still be responsible for adjusting the signal timing and lengthening turn pockets as identified in the TIS. All mitigation measures listed in **Table 4** are likely to still be required by the revised Project and are likely still adequate to mitigate impacts to less-than-significant levels after implementation.

**Table 4: 2011 IS/MND TIS Impact Determination**

| Impact # | Impact Description | Impact Determination | Mitigation Measure | TIS Impact Determination after Mitigation | Still Relevant and Adequate to Mitigate Revised Project |
|---|---|---|---|---|---|
| Impact 5 | Grade Crossing Approaches Missing Signing and Pavement Striping | Significant | Contribution towards signing and striping | Less than Significant | Yes |
| Impact 8 | Existing + Project 95th Percentile Vehicle Queuing | Significant | Adjust signal timing at Airport/Grand; Extend turn lane at Grand/Roebling | LTS | Yes |
| Impact 13 | 2015 Intersection Signalization Needs | Significant | Contribution towards signalizing Grand/Roebling; Extend turn lanes at Grand/Roebling and Grand/Forbes/Harbor | LTS | Yes |
| Impact 14 | 2015 95th Percentile Vehicle Queuing | Significant | Adjust signal timing at Airport/Grand; Extend turn lanes at Grand/Roebling | LTS | Yes |
| Impact 19 | 2035 Intersection Signalization Needs | Significant | Contribution towards signalizing Grand/Roebling; Extend turn lanes at Grand/Roebling and Grand/Forbes/Harbor | LTS | Yes |
| Impact 20 | 2035 95th Percentile Vehicle Queuing | Significant | Adjust signal timing at Airport/Grand; Extend turn lanes at Grand/Roebling | LTS | Yes |

Source: Crane Transportation Group, 2011; Fehr & Peers, 2020

# VMT Assessment

California Senate Bill 743 (SB 743) requires California Environmental Quality Act (CEQA) assessment of a project's impact on vehicle miles traveled (VMT) in relation to state greenhouse gas (GHG) reduction planning goals, multimodal transportation, and land use diversity. Additionally, the

California Governor's Office of Planning and Research (OPR) issued a technical advisory memorandum in December 2018 that includes general guidance and information for lead agencies to use in implementing SB 743. Lead agencies have until July 1, 2020 to be fully compliant with SB 743. South San Francisco is currently working to establish citywide VMT threshold(s) as part of the ongoing General Plan update. Since VMT does not need to be included as part of the impact analysis until July 2020 and because the City is yet to establish a threshold of significance, this VMT assessment for the 328 Roebling project is provided for informational purposes only.

Fehr & Peers has developed the following approach to assess VMT for the project prior to the City's planned adoption of a general VMT impact threshold:

1. Determine if the project could potentially be screened from detailed VMT analysis based on relevant criteria identified in the OPR Technical Advisory.
2. Identify the existing average work-based VMT per employee in the nine-county Bay Area region using baseline year (2015) model runs of the C/CAG-VTA Bi-County Regional Travel Demand Model (C/CAG Model).
3. Establish an interim work-based VMT per employee threshold of 16.8 percent less than the existing work-based VMT per employee average for the nine-county Bay Area, based on the C/CAG model.
4. Assess the project's likely average VMT per employee using data from the C/CAG model for average work-based VMT per employee of existing development in the East of 101 area.
5. Assess the project's total effect on VMT compared to existing baseline conditions, by assessing the total daily work-based VMT associated with the increase in employment, as compared to similar employment uses with average levels of VMT generation in the Bay Area.
6. Compare the project's total effect on VMT and rate of home-based VMT per employee to the VMT threshold established in Step 2 of this process.

This approach would not involve developing a forecast for project VMT or the project's effect on VMT, but rather uses available VMT per employee data for existing employment uses in the East of 101 area as a proxy for the project. The rationale behind the assumptions embedded in this preliminary conceptual approach is provided below.

## Screening Approach

The OPR Technical Guidance (2018) lists two screening approaches:

**Proximity to Transit**: CEQA Guidelines Section 15064.3, subdivision (b) (1), states that "generally, projects within ½ mile of an existing major transit stop[2] or a stop along an existing high quality transit corridor[3] should be presumed to cause less-than-significant transportation impact." OPR (2018) advises that the less than significant presumption would not apply, however, if project-specific or location-specific information indicates the project will still generate significant levels of VMT.

While the project site is located approximately ½ mile from the existing South San Francisco Caltrain station as the crow flies, the walking distance to or from the existing Caltrain station is closer to 0.7 to 1.0 miles. There are plans to relocate the Caltrain station approximately 650 feet to the south and the walking distance between the project site and the future station is 0.9 to 1.1 miles, slightly longer than to or from the existing Caltrain station. Because of the number of barriers separating pedestrians and cyclists from the Caltrain Station and the East of 101 area, the project is not fully within the ½ mile radius identified in the OPR advisory. While lead agencies may have some leeway in defining how distance to transit is measured, the intent of this screening is to allow access to transit on-foot within a 7- to 10-minute walk. As such, the project should not be presumed to meet the proximity to transit screening criteria.

**Location in an area of lower VMT**: The OPR guidance also lists a map-based screening approach articulating that residential and office projects located in areas with low VMT and that incorporate similar features will tend to exhibit similarly low VMT. This project site is not located in an area with low VMT as defined by OPR, and therefore the project should not be presumed to meet the area of lower VMT screening criteria.

## VMT Metrics

OPR recommends office project VMT should be compared to a total work-based VMT/employee threshold. This metric helps compare the project's relative transportation efficiency to the regional average (i.e., all else being equal, does creating new employment in this area result in more or less VMT per employee than creating it in other areas?). Based on the available data from regional

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

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

models, Fehr & Peers recommends using home-based work VMT (HBW VMT)[4] per employee as the metric for this project's VMT assessment.

## VMT Accounting

OPR recommends the use of tour-based VMT accounting for residential and office projects and assessing the effect of a project on VMT for retail and transportation projects. However, this method would require the City to conduct a new model run using the MTC model, which is the sole tour-based travel demand model available for South San Francisco. The MTC model lacks the level of local detail for the roadway network and local land use present in the C/CAG model; therefore, we recommend using work-based VMT per employee multiplied by the expected number of employees at the project site to reach an estimate of total HBW VMT. The project's land use program is similar to existing land uses in the East of 101 area, which allows for the use of existing per capita VMT data to reasonably assess project VMT.

## VMT Impact Threshold

Since the City has not yet established a VMT impact threshold, Fehr & Peers recommends using the most recent research conducted by California Air and Resources Board (CARB) to set an interim threshold for this informational assessment. CARB's assessment of progress toward state goals concluded that the statewide VMT reduction needed to meet long term GHG reduction targets is 16.8 percent below the regional baseline of total *light duty vehicle* VMT. Therefore, the threshold of 16.8 percent below the regional average is used and expressed as average work-based VMT per employee across the nine-county Bay Area. The regional average HBW VMT per employee across the nine-county Bay Area is 14.2.

## VMT Assessment

The VMT assessment for this project is relatively straightforward, as the project has substantially similar land use characteristics and context to existing development in the East of 101 plan area.

**Table 5** shows the average HBW VMT per employee based on the C/CAG model in the 2015 base year. As shown, the East of 101 area has an estimated HBW VMT per employee that is 13 percent

[4] Home-based work VMT (HBW VMT) only accounts for commute trips and does not capture work-based other trips that may occur throughout the day (e.g., driving to lunch or to meetings during the middle of the day) due to differences in trip-based and tour-based models, as discussed in more detail under VMT Accounting Methodology. HBW VMT per employee is an appropriate metric to use since it is normalized and compared to similar baseline values.

higher than the regional average. This is an increase over the regional baseline and does not meet the 16.8 percent below the regional average threshold discussed above.

The City of South San Francisco administers requirements for transportation demand management (TDM) programs through an ordinance. Based on the C/CAG model data summarized in **Table 5**, the model already accounts for a non-drive alone mode share for trips generated in the East of 101 area, which is comparable to the requirements of the TDM ordinance. Because the model already accounts for this non-drive alone mode share, model outputs were not further adjusted to account for TDM.

If the project applicant were to strive to reduce VMT to be in line with state goals, the project could consider implementing additional measures to help reduce VMT. Such measures should focus on improving alternative mode share access to key destinations, such as contributing towards physical improvements to connect pedestrian and bicycle access to the Caltrain station.

**Table 5: Home-Based Work VMT per Employee, by Location (2015 Estimates)**

| Location | Total HBW VMT | Total Employment | HBW VMT per Employee |
|---|---|---|---|
| Bay Area Region | 60,995,000 | 4,285,000 | 14.2 |
| East of 101 Area | 572,200 | 35,800 | 16.0 |
| | | **Percent Difference** | **+13%** |

Source: Fehr & Peers, 2020; C/CAG-VTA Bi-County Transportation Demand Model, 2019.

Note that there would be no difference in the above numbers between the IS/MND Project and the current Project because it is based on project location and type and not the specific amount of square footage or design.

While the use of a travel demand model would most accurately assess the project's effect on regional VMT, an estimate of the project's effect on VMT (relative to employment growth in an "average" location) is shown in **Table 6**. The proposed project would result in approximately 236 new employees[5] at the project site, which is within the East of 101 area. These 236 new employees are expected to generate a total weekday daily HBW VMT of 3,780 and a net increase of 430 compared to if those employees were added in a theoretical Bay Area "average" location. Total

[5] The estimated number of employees follows the same methodology as provided in IS/MND; it assumes 100 percent of the proposed square footage would be Office/R&D space and the average square footage per Office/R&D employee would be 550.

project HBW VMT represents an increase of less than one percent for the East of 101 area (3,780/572,200).

**Table 6: Home-Based Work VMT per Employee, by Location (2015 Estimates)**

| Location | Average HBW VMT per Employee | HBW VMT for 236 Net New Employees |
|---|---|---|
| Bay Area Region | 14.2 | 3,350 |
| East of 101 Area | 16.0 | 3,780 |
| **Difference / Project's Effect on Regional HBW VMT** | | **+ 430 average weekday HBW VMT** |

Source: Fehr & Peers, 2020; C/CAG-VTA Bi-County Transportation Demand Model, 2019.

Note that because this is based on the number of employees, the above numbers would be different for the IS/MND Project, but still based on the same HBW VMT per employee rates.

# Conclusions

The TIS prepared in 2011 identified several potentially significant impacts to the transportation network. However, all the significant impacts were reduced to less-than-significant levels with implementation of the identified mitigation measures, as summarized in **Table 4**.

The revised Project includes approximately 24,000 square feet more than was originally approved and environmentally cleared. Factoring in the increased square footage but also more aggressive TDM requirement, the revised project would generate the same number of AM and PM peak hour vehicle trips that were analyzed and environmentally cleared in the 2011 TIS and 2012 recirculated IS/MND. However, because there are currently no existing uses at the site (zero trips), whereas the previous analysis was able to net out Baseline Site Trips, the current project is expected to add to the transportation network 29 more AM peak hour vehicle trips and 3 more PM peak hour vehicle trips when compared to the previous analysis.

Recent intersection counts at several study locations show that vehicle volumes have increased slightly during the AM and PM peak hours but may be within the realm of daily fluctuation of traffic. Since the revised project is expected to generate a similar level of vehicle trips, and the overall intersection volumes have not substantially changed since the time of the IS/MND TIS, similar impacts and mitigation measures can be expected.

Of the 24 potential impacts identified in the TIS, six were found to be significant and required mitigation. The freeway ramp and mainline analysis is unlikely to substantially change due to the relatively small amount of project trips compared to the large freeway volumes. The site circulation analysis is also unlikely to substantially change due to the limited changes to site access for the revised project. No additional site hazards were identified for the current site plan, when compared to the IS/MND site plan. Intersection signalization is also unlikely to change with the revisions to the project. All mitigation measures identified in the TIS are likely to still be necessary and required by the revised project.

The revised project is expected to generate VMT at similar levels to other land uses in the East of 101 area, which is approximately 13 percent higher than the Bay Area regional average, which is above the 16.8 percent below the regional average threshold. The revised project is expected to generate a total weekday daily HBW VMT of 3,780 and project VMT represents an increase of less than one percent within the East of 101 area. The project applicant may consider implementing additional measures to help reduce VMT such as contributing towards physical improvements to connect pedestrian and bicycle access to the Caltrain station.

# Sewer Demand Estimates

# Attachment E

to the

328 Roebling Road Project
1st Addendum to the Recirculated IS/MND

Subject: Sewer Demand Assumptions

**ASSUMPTIONS**

References:

1. "East of Highway 101 Sewer System master Plan Update" by the City of South San Francisco, dated January 2012.
2. "Water Supply Assessment of the Genentrech Research and Development Overlay District" by EIP Associates, dated August 2006.

**BUILDING SQUARE FOOTAGE ESTIMATES**

2020 Proposed Development (1.0 FAR)

| Phase | Land Use | No. | Unit |
|---|---|---|---|
| Bldg A | Office/R&D | 129,919 | GSF |
| | Amenity | NA | GSF |
| Parking Structure | | 0 | GSF |
| | | | |

2012 Approved Entitlements (0.8123 FAR)

| Phase | Land Use | No. | Unit |
|---|---|---|---|
| Bldg A | Office/R&D | 52,769 | GSF |
| | Amenity | NA | GSF |
| Bldg B | Office/R&D | 52,769 | GSF |
| | Amenity | NA | GSF |

Subject: Sewer Demand Assumptions

**WATER USAGE RATES**

- cross checked water usage rates against EIR and Genentech study
- sewer rate given as 90% of water usage rate

| | Water | Sewer | | |
|---|---|---|---|---|
| Office | 59* | 53 | gpd/1000 sf | *(ref. 1)* |
| R&D (ORD) | 223* | 201 | gpd/1000 sf | *(ref. 1)* |
| 50% Office/ 50% R&D** | - | 127 | gpd/1000 sf | |
| 30% Office/ 70% R&D*** | - | 157 | gpd/1000 sf | |

*gpd= gallons per day*

**water usage rate provided by ROMA Design Group, 2009*
***buildings proposed in 2020 with combination of office and R&D space use sewer rate consisting of 50% office and 50% R&D*
****buildngs entitled in 2012 with combination of office and R&D space use sewer rate consisting of 30% office and 70% R&D*

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Engineering, Surveying & Planning

Job No.: 796-018
Author: SAW

Sheet 1 of 1
Date: 4/1/2020

Subject: Sewer Demand Estimate

**255 E. GRAND AVE & 328 ROEBLING DEVELOPMENT - SANITARY SEWER DEMAND ESTIMATE**

**2020 Proposed Development (1.0 FAR)**

| Building | Land Use | Unit Type | # Units | Flow rate | Unit | Avg. Flow | Unit |
|---|---|---|---|---|---|---|---|
| Bldg A | Office/R&D | gross sf | 129,919 | 127 | gpd/1000 sf | 16,500 | gpd |
| | Amenity | gross sf | NA | NA | gpd/1000 sf | 0 | gpd |
| Parking Structure | | gross sf | 0 | 0 | gpd/1000 sf | 0 | gpd |
| | | | | | **Σ=** | **16,500** | **gpd** |

| | | |
|---|---|---|
| **AVERAGE DAILY FLOW (AD** | **16,500** | **gpd** |
| | **0.01650** | **mgd** |

**2012 Entitled Development (0.8123 FAR)**

| Building | Land Use | Unit Type | # Units | Flow rate | Unit | Avg. Flow |
|---|---|---|---|---|---|---|
| Bldg A | Office/R&D | gross sf | 52,769 | 157 | gpd/1000 sf | 8,285 |
| | Amenity | gross sf | NA | NA | gpd/1000 sf | 0 |
| Bldg B | Office/R&D | gross sf | 52,769 | 157 | gpd/1000 sf | 8,285 |
| | Amenity | gross sf | NA | NA | gpd/1000 sf | 0 |
| | | | | | **Σ=** | **16,570** | **gpd** |

| | | |
|---|---|---|
| **AVERAGE DAILY FLOW (AD** | **16,570** | **gpd** |
| | **0.01657** | **mgd** |

***Therefore, the 2020 proposed development's ADF is 70 gpd less than 2012 entitled development's ADF.***