6 OTHER CEQA CONSIDERATIONS

Chapter 6, Other CEQA Considerations, discusses mandatory findings of significance regarding cumulative impacts pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15065(a); significant environmental effects which cannot be avoided as identified in the Environmental Impact Report (EIR); significant irreversible environmental changes, including energy and consumption of nonrenewable resources; and growth-inducing impacts pursuant to CEQA Guidelines Section 15126.2, and areas of known controversy and issues to be resolve pursuant to CEQA Guidelines Section 15123.

6.1 Mandatory Findings of Significance

CEQA Guidelines Section 15065(a) requires a finding of significance if a project has the potential to impact the quality of the environment, impact fish or wildlife species, impact historic resources, impact long-term environmental goals, create cumulatively considerable impacts, or create substantial adverse effects on human beings.

6.1.1 Quality of the Environment

CEQA Guidelines Section 15065(a)(1) requires a finding of significance if a project "has the potential to substantially degrade the quality of the environment." In practice, this is the same standard as a significant effect on the environment, which is defined in CEQA Guidelines Section 15382 as "a substantial or potentially substantial adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance."

As described in Chapter 4, Environmental Setting, Impacts, and Mitigation, the proposed project would have no impact or a less-than-significant impact associated with aesthetics, agriculture and forest resources, geology and soils, hazardous and hazardous materials, mineral resources, population and housing, public services, and recreation. Environmental impacts associated with air quality, greenhouse gas emissions, biological resources, cultural resources, hydrology and water quality, land use and planning, noise, and utilities and service systems are considered less than significant or less than significant with mitigation. Certain environmental impacts associated with transportation and circulation are considered significant and unavoidable, as discussed in Section 6.3 below.

6.1.2 Impacts on Species

CEQA Guidelines Section 15065(a)(1) states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to (1) substantially reduce the habitat of a fish or wildlife species; (2) cause a fish or wildlife population to drop below self-sustaining levels; or (3) substantially reduce the number or restrict the range of an endangered, rare, or threatened species. Section 4.3, Biological Resources, of this EIR fully addresses any impacts that might relate to the reduction of the fish or wildlife habitat, the reduction of fish or wildlife

populations, and the reduction or restriction of the range of special-status species as a result of project implementation. The proposed project would have either no impact, a less-than-significant impact, or a less-than-significant impact with mitigation with respect to the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal.

6.1.3 Impacts on Historical Resources

CEQA Guidelines Section 15065(a)(1) states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to eliminate important examples of a major period of California history or prehistory. CEQA Guidelines Section 15065(a)(1) amplifies Public Resources Code Section 21001(c) by requiring preservation of major periods of California history for the benefit of future generations. It also reflects the provisions of Public Resource Code Section 21084.1 in requiring a finding of significance for substantial adverse changes to historical resources. CEQA Guidelines Section 15064.5 establishes standards for determining the significance of impacts to historical resources and archaeological sites that are an historical resource. Section 4.4, Cultural Resources, of this EIR fully addresses impacts related to California history and prehistory, historic resources, archaeological resources, and paleontological resources. The proposed project would have either a less-than-significant impact or a less-than-significant impact with mitigation with respect to the potential to eliminate important examples of the major periods of California history or prehistory.

6.1.4 Long-Term Impacts

CEQA Guidelines Section 15065(a)(2) states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. Section 6.2, Significant Environmental Effects, below, identifies all significant and unavoidable impacts that could occur, thereby creating a long-term impact on the environment. Section 6.3, Significant Irreversible Environmental Changes, below, addresses the short-term and irretrievable commitment of natural resources to ensure that the consumption is justified on a long-term basis. Lastly, Section 6.4, Growth Inducing Impacts, identifies any long-term environmental impacts caused by the proposed project with respect to economic or population growth.

6.1.5 Impacts on Human Beings

CEQA Guidelines Section 15065(a)(4) states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly. As described in Chapter 4, Environmental Setting, Impacts, and Mitigation, the proposed project would have no impact or a less-than-significant impact associated with human beings such as seismic hazards (geology and soils), and hazardous and hazardous materials. Environmental impacts associated with air quality, water quality, noise, and utilities and service systems are considered less than significant or less than significant

with mitigation. Certain environmental impacts associated with transportation and circulation are considered significant and unavoidable, as discussed in Section 6.3 below.

6.2 Cumulative Impacts

An EIR is required to examine cumulative impacts. California Code of Regulations Section 15130(a)(1), defines a cumulative impact as consisting "of an impact which is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts." The analysis of cumulative impacts need not provide the same level of detail as that for project-specific impacts, but it shall "reflect the severity of the impacts and their likelihood of occurrence" (California Code of Regulations Section 15130(b)).

CEQA Guidelines Section 15065 states that a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has potential environmental effects that are individually limited but cumulatively considerable. As defined in CEQA Guidelines Section 15065(a)(3) , cumulatively considerable means "that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects."

The cumulative impacts analysis in an EIR must analyze either a list of past, present, and probable future projects or a summary of projections contained in an adopted general plan or related planning document. A list of reasonably foreseeable future projects and projections used to analyze cumulative impacts is provided in Section 4.A, Approach to Environmental Analysis. Cumulative impacts related to each environmental topic are discussed in Chapter 4, Environmental Setting, Impacts, and Mitigation.

As described in Chapter 4, either there would be no cumulative impacts, cumulative impacts would be less than significant, or the project would have a less than cumulatively considerable contribution (either with or without mitigation) to significant cumulative impacts in the areas of aesthetics, air quality, agriculture and forest resources, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazardous and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise and vibration, population and housing, public services, recreation, and utilities and service systems are considered less than significant. However, Chapter 4 did identify significant and unavoidable cumulative transportation and circulation impacts to which the project's contribution would be cumulatively considerable, as detailed below.

6.3 Significant Environmental Effects that Cannot Be Avoided

In accordance with Section 21067 of CEQA and with Sections 15126(b) and 15126.2(b) of the CEQA Guidelines, the purpose of this section is to identify significant environmental impacts that could not be eliminated or reduced to less-than-significant levels by implementation of mitigation measures included in the proposed project or identified in Chapter 4, Environmental Setting, Impacts, and Mitigation. The

findings of significant impacts are subject to final determination by the City of South San Francisco City Council as part of the certification process for this EIR.

The proposed project would result in significant and unavoidable project-level impacts and cumulatively considerable contributions to significant and unavoidable cumulative impacts related to transportation and circulation. No other environmental topics discussed in Chapter 4 would result in significant and unavoidable environmental effects. As described in detail in Section 4.9, Transportation and Circulation, these significant and unavoidable impacts are listed below.

TR-2 (Allerton/East Grand Avenue): Phase 1 or project buildout would cause the intersection of Allerton Avenue and East Grand Avenue to exceed level of service (LOS) D operations during the PM peak hour and would contribute more than 2 percent of total traffic through the intersection. Mitigation Measure MM-TR-2 would reduce the impact by adding a traffic signal and a southbound right-turn lane. However, the mitigation measure would remove a portion of the Class II bicycle lanes on Allerton Avenue, disrupting an existing bicycle facility and resulting in a significant impact. To avoid the significant impact of this mitigation measure, additional right-of-way would need to be acquired to widen the roadway. Acquisition would require removal of parking spaces associated with adjacent business; these parking spaces could not be replaced in alternative locations, such that the associated buildings would not be able to be occupied. The City of South San Francisco has determined that causing businesses to be non-viable due to lack of parking would reduce the city's tax base, and that funding sources for acquisition of property for additional right-of-way are unknown and may not be available for the additional turn lane; therefore, the mitigation measure is considered infeasible, While the mitigation measure could reduce the traffic impact to a less-than-significant level, the mitigation measure is infeasible, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-3 (Airport Boulevard/Grand Avenue): Project buildout would contribute considerably to the significant cumulative impact at the intersection of Airport Boulevard and Grand Avenue during the AM peak hour. Mitigation Measure MM-C-TR-3 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-3 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore. the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-4 (Dubuque Avenue and Grand Avenue): Project buildout would contribute considerably to the significant cumulative impact at the intersection of Dubuque Avenue and Grand Avenue during the PM peak hour. Mitigation Measure MM-C-TR-4 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-4 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would

reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-5 (East Grand Avenue and Grand Avenue Overcrossing): The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative impact at the intersection of East Grand Avenue and Grand Avenue Overcrossing during the PM peak hour. Mitigation Measure MM-C-TR-5 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-5 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-6 (Gateway Boulevard and East Grand Avenue): The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative impact at the intersection of Gateway Boulevard and East Grand Avenue during the PM peak hour. Mitigation Measure MM-C-TR-6 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-6 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-7 (Harbor Way/Forbes Boulevard and East Grand Avenue): The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative impact at the intersection of Harbor Way/Forbes Boulevard and East Grand Avenue in both the AM and PM peak hours. Mitigation Measure MM-C-TR-7 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-7 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-8 (Littlefield Avenue/East Grand Avenue): Phase 1 or project buildout would contribute considerably to the significant cumulative impact at the intersection of Littlefield Avenue and East Grand Avenue, in the AM peak hour. Mitigation Measure MM-C-TR-8 would improve operations and the

cumulative traffic impact after mitigation would be less than significant. However, the revisions to the lane striping could impact the existing bike lanes on East Grand Avenue. This secondary impact of the mitigation measure would be significant relative to the bicycle and pedestrian impact criteria. Mitigation of the secondary impact would require the acquisition of additional right-of-way from adjacent property owners so that East Grand Avenue could provide a third eastbound through lane and maintain bicycle lanes on each side. The acquisition of property would require removal of parking spaces for properties that do not have alternative locations for replacement parking, such that the associated buildings would not be able to be occupied. Because the City of South San Francisco has determined that acquisition of property for additional right-of-way would economically affect existing businesses that need parking to remain viable, and that funding for the acquisition is not assured, the mitigation measure is considered to be infeasible. While the mitigation measure could reduce the traffic impact to a less-than-significant level, the mitigation is infeasible, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-9 (Allerton Avenue/East Grand Avenue): Phase 1 or project buildout would contribute considerably to the significant cumulative impact at the intersection of Allerton Avenue and East Grand Avenue, in the PM peak hour. Mitigation Measure MM-C-TR-9 would improve operations and the cumulative traffic impact after mitigation would be less than significant. However, the revisions to the lane striping would remove a portion of the Class II bicycle lanes on Allerton Avenue and could impact the existing bike lanes on East Grand Avenue. This secondary impact of the mitigation measure would be significant relative to the bicycle and pedestrian impact criteria. Mitigation of the secondary impact would require the acquisition of additional right-of-way from adjacent property owners so that East Grand Avenue could provide a third eastbound through lane and maintain bicycle lanes on each side, and so that Allerton Avenue could provide an additional southbound lane and maintain bicycle lanes. The acquisition of property would require removal of parking spaces that do not have alternative locations for replacement parking, such that the associated buildings would not be able to be occupied. Because the City of South San Francisco has determined that acquisition of property for additional right-of-way could affect existing businesses, and that funding for the acquisition is not assured, the mitigation measure is considered to be infeasible. While the mitigation measure could reduce the traffic impact to a less-than-significant level, the mitigation is infeasible, and the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-10 (Airport Boulevard/Produce Avenue/San Mateo Avenue): Project buildout would contribute considerably to a significant cumulative impact at the intersection of Airport Boulevard/Produce Avenue/San Mateo Avenue in the PM peak hour. Mitigation Measure MM-C-TR-10 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-10 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-11 (Gateway Boulevard/South Airport Boulevard/Mitchell Avenue): Project buildout would contribute considerably to the significant cumulative impact at the intersection of Gateway Boulevard/South Airport Boulevard/Mitchell Avenue in the PM peak hour. No feasible physical mitigation has been identified. While a Transportation Demand Management (TDM) program would be required to be prepared and implemented pursuant to City ordinance, it cannot be demonstrated that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. The cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-12 (South Airport Boulevard/U.S. 101 Northbound Hook Ramps/Wondercolor Lane): Project buildout would contribute considerably to the significant cumulative impact at the freeway ramp intersection of South Airport Boulevard and U.S. 101 Northbound Hook Ramps/Wondercolor Lane in the AM peak hour. No feasible physical mitigation has been identified. While a TDM program would be required to be prepared and implemented pursuant to City ordinance, it cannot be demonstrated that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-considerable level. The cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-13 (South Airport Boulevard and Utah Avenue): Project buildout would contribute considerably to a significant cumulative impact at the intersection of South Airport Boulevard and Utah Avenue in the AM peak hour. Mitigation Measure MM-C-TR-13 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-13 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-15 (Airport Boulevard/Grand Avenue): Phase 1 or project buildout would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impact on the southbound left turn movement in the AM and PM peak hours and the westbound right-turn movement in the PM peak hour at the intersection of Airport Boulevard and Grand Avenue without the project. Mitigation Measure MM-C-TR-15 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-15 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-16 (East Grand Avenue/Gateway Boulevard): Phase 1 or project buildout would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impact on the eastbound and westbound through movements in the PM peak hour and the westbound left turn movement in the AM and PM peak hours on East Grand Avenue at Gateway Boulevard without the project. MM-C-TR-16 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-16 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-17 (Airport Boulevard/Produce Avenue): Phase 1 or project buildout would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impact on the westbound left turn movement on Airport Boulevard at the intersection of Airport Boulevard/Produce Avenue during the AM and PM peak hours in 2040 without the project. Mitigation Measure MM-C-TR-17 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-17 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-18 (Northbound U.S.101 Off-Ramp/South Airport Boulevard/Wondercolor Lane): Phase 1 or project buildout would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impact on the eastbound left turn movement on the northbound U.S. 101 off-ramp at South Airport Boulevard/Wondercolor Lane during the AM peak hour in 2040 without the project. Mitigation Measure MM-C-TR-18 would compensate for the project's contribution to cumulative traffic. However, the City does not have a mechanism for funding Mitigation Measure MM-C-TR-13 and cannot guarantee that this mitigation measure will be implemented. Implementation of a Transportation Demand Management (TDM) program would be required pursuant South San Francisco Municipal Code Chapter 20.400; however, it cannot be guaranteed that the required TDM program would reduce intersection traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. Therefore, the cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-19 (Freeway Segments): Project Buildout would add more than 1 percent of total traffic to two freeway segments during the PM peak hour which would operate at LOS F under cumulative conditions without the project. While a TDM program would be required to be prepared and implemented pursuant to City ordinance, it cannot be demonstrated that the required TDM program would reduce freeway traffic

by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. The cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-20 (Freeway Ramps): Phase 1 or project buildout would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impact on the northbound U.S. 101 off-ramp at South Airport Boulevard/Wondercolor Lane during the AM peak hour in 2040 without the project. While a TDM program would be required to be prepared and implemented pursuant to City ordinance, it cannot be demonstrated that the required TDM program would reduce freeway ramp traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than- cumulatively considerable level. The cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

C-TR-21 (Freeway Ramps): Phase 1 or project buildout would add traffic volumes which would cause total traffic to exceed capacity and therefore would contribute considerably to the significant cumulative impact on the southbound U.S. 101 off-ramp from Produce Avenue during the AM peak hour in 2040 without the project. While a TDM program would be required to be prepared and implemented pursuant to City ordinance, it cannot be demonstrated that the required TDM program would reduce freeway ramp traffic by the amount necessary to reduce the project's contribution to a significant cumulative impact to a less-than-cumulatively considerable level. The cumulative impact would remain significant and the project's contribution would remain cumulatively considerable.

6.4 Significant Irreversible Environmental Changes

In accordance with Section 21100(b)(2)(B) of CEQA, and Section 15126.2(c) of the CEQA Guidelines, an EIR must identify any significant irreversible environmental changes that could result from implementation of the proposed project. The EIR is required to consider whether "uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or non-use thereafter unlikely" (CEQA Guidelines Section 15126.2(c)). "Nonrenewable resource" refers to the physical features of the natural environment, such as land, waterways, etc. This may include current or future uses of non-renewable resources and secondary or growth-inducing impacts that commit future generations to similar uses. According to the CEQA Guidelines, irretrievable commitments of resources should be evaluated to ensure that such current consumption is justified.

Chapter 4, Environmental Setting, Impacts, and Mitigation, discusses topics that could potentially be affected by irreversible environmental impacts, such as agriculture and forestry, biological resources, cultural resources, hydrology, and population and housing. None of these environmental topics were found to have significant impacts as a result of the proposed project.

No significant irreversible environmental damage related to hazardous materials is anticipated to occur with implementation of the proposed project. Compliance with federal, state, and local regulations related to office/research and development (R&D) uses identified in Section 4.10.5, Hazards and Hazardous

Materials, would ensure that the possibility that hazardous substances from the demolition, construction, and operation of proposed project would not cause significant and unavoidable environmental damage.

The proposed project would involve excavation of soils for grading and soil remediation. Grading would be required for general site preparation and design of on-site stormwater flows, but the proposed project would not substantially raise or lower the existing grade. However, grading would not be excessive or greater than what is necessary to achieve stormwater goals.

Construction and implementation of the proposed project would not result in a large commitment of natural resources, require highway improvements to previously inaccessible areas; or irreversible damage due to environmental accidents. No other irreversible permanent changes such as those that might result from construction of a large-scale mining project, hydroelectric dam, or other industrial project would result from development of the proposed project.

6.4.1 Energy and Consumption of Nonrenewable Resources

Section 21100(b)(3) of CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing any inefficient, wasteful, and unnecessary consumption of energy. Implementation of the proposed project would commit future generations to an irreversible commitment of energy resources in the form of usage of nonrenewable fossil fuels due to vehicle and equipment use during demolition, construction, and operation of the proposed project.

ENERGY AND NATURAL GAS AND LOCAL ENERGY SUPPLY

The estimated annual electricity demand associated with occupancy and operation of Phase 1 is approximately 4.22 million kilowatt hours per year (MM kWh/yr) and 4.28 MM kWh/yr for project buildout .Estimated natural gas demand associated with operation occupancy of Phase 1 is 6.26 billion British thermal units (BBTU/yr) (62,598 therms) and 6.35 BBTU/yr (63,503 therms) for project buildout. Electrical and natural gas service to the project site would be adequately provided by Pacific Gas and Electric Company (PG&E).[1]

The proposed project would comply with CALGreen requirements for energy efficiency in new buildings and would also be designed to meet Leadership in Energy and Environmental Design (LEED) v4 standards. For both electricity and natural gas, compared to the mix of other existing development in South San Francisco and the region, compliance with the latest CALGreen and other requirements would ensure that the proposed project would be more efficient than all but recent buildings built to the same requirements, or buildings for which owners decided to exceed efficiency requirements.

[1] Pacific Gas and Electric Company, 2018. 201 Haskins Way Will-Serve Letter from Tosin Ladeinde, Industrial Power Engineer, September 5, 2018.

TRANSPORTATION FUEL DEMAND

Comparison of transportation fuel use and efficiency between the proposed project and the mix of other existing development in the region is speculative; however, the proposed project includes a TDM plan to discourage single-occupancy vehicle trips and encourage transit and other modes of transportation.

Table 6.1, Approximate Transportation Fuel Demand for Phase 1 and Project Buildout provides estimated transportation-related gasoline and diesel demand for the proposed project.[2]

Table 6.1: Approximate Transportation Fuel Demand for Phase 1 and Project Buildout

	Estimated Gasoline Demand (gallons / year)	Estimated Diesel Demand (gallons / year)
Phase 1		
Phase 1 Total	36,488	6,420
Project Buildout		
Project Buildout Total	37,207	6,794

Notes: CalEEMod estimates vehicle miles traveled (VMT) based on building square footage by type of use. Vehicle fuel efficiency figures (gasoline, electric hybrid, electric only, and diesel) are rough approximations based on the EMFAC2014 model run.

Sources: Vehicle Miles Traveled from SWCA, CalEEMod model run (split is 88.9% gasoline and hybrid gasoline-electric, 6.4% electric-only, and 4.6% diesel); (2) Composite MPG from ESA, EMFAC2014 (v1.0.7) Emissions Inventory, San Francisco County, Calendar Year 2030 (annual), EMFAC2011 Vehicle Classification Categories.

Under the proposed project, the project applicant would develop and implement a TDM Plan and pedestrian- and bicycle-serving features to achieve a 35 percent minimum alternative mode use as required by the Zoning Ordinance. These design features would include secure covered bicycle parking proportional to development as required by City bicycle parking standards. The TDM Plan would include a parking reduction from the required parking standard of 1 space per 350 square feet of office use as provided by the zoning ordinance for a Business Technology Park District, and would also include electric vehicle parking spaces and charging stations. The proposed project would also provide designated carpool and vanpool parking. The project sponsor would coordinate with the City and other private landowners to continue and expand the Commute.org shuttle bus program to serve employees of the new research and development office uses. TDM Plan measures and design features would be subject to review and approval by the City Council. The proposed project TDM Plan would be subject to an annual survey and triennial report to monitor and enforce alternative mode use goals. For these reasons, the proposed project would have a less-than-significant impact on the use of transportation fuel energy and would not result in the use of large amounts or in the wasteful use of energy as a result of operational transportation.

[2] Diesel fuel would also be used for periodic testing and infrequent running of emergency generators. Testing is generally limited to 50 hours or less per year for each generator under BAAQMD air permits. It is difficult to forecast emergency use, as the events are typically rare.

OTHER NONRENEWABLE RESOURCES

Consumption of nonrenewable resources includes increased energy consumption, conversion of agricultural lands to urban uses, and loss of access to mineral reserves. No agricultural lands would be converted and no access to mining reserves would be lost with construction of the proposed project.

Resources consumed during demolition, construction, and operation would include lumber, concrete, gravel, asphalt, masonry, metals, and water. Similar to the existing uses on the project site, the proposed project would irreversibly use water and solid waste landfill resources. However, the proposed project would not involve a large commitment of resources relative to existing conditions and also relative to supply, nor would it consume any of those resources wastefully.

The proposed project would introduce new office/R&D uses to the project site to serve existing and projected demand for such uses as described in Section 3.1.1, Project Objectives, pp. 3.2-3.3, Section 4.7, Land Use, pp. 4.7.4-4.7.6, and Section 4.11.6, Population and Housing, pp. 4.11.42-4.11.45. The project site is fully served by existing utilities and construction of new utility infrastructure would not be necessary. The proposed project would not involve new or expanded water supply resources or entitlements. Section 4.10, Utilities and Service Systems, describes the water supply and demand aspects of the proposed project. The proposed project would include required water conservation practices to reduce the amount of water used. Water-efficient plumbing fixtures would be installed throughout the new and renovated buildings, pursuant to CALGreen and building code requirements. Landscaping and street trees would be water efficient. Therefore, the proposed project would include the application of required water conservation measures and would be in conformance with policies addressing water efficiency. Compared to the mix of other existing development in South San Francisco and the region, compliance with the latest CALGreen and other requirements would ensure that the proposed project would be more water efficient than all but recent buildings built to the same requirements, or buildings for which owners decided to exceed efficiency requirements. For these reasons, the proposed project would not result in the wasteful use of water.

6.5 Growth-Inducing Impacts

As required by Section 15126.2(d) of the CEQA Guidelines, an EIR must consider the ways in which the proposed project could directly or indirectly foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Growth-inducing impacts can result from the elimination of obstacles to growth; through increased stimulation of economic activity that would, in turn, generate increased employment or demand for housing and public services; or from the implementation of policies or measures that do not effectively minimize premature or unplanned growth.

Growth-inducing impacts such as those associated with job increases that might affect housing and retail demand in other areas over an extended time period are difficult to assess with precision, since future economic and population trends may be influenced by unforeseeable events and business development cycles. Moreover, long-term changes in economic and population growth are often regional in scope; they

are not influenced solely by changes in policies or specific development projects. Business trends are influenced by economic conditions throughout the state and country as well as around the world.

Another consideration is that the creation of growth-inducing potential does not automatically lead to growth. Growth occurs through capital investment in new economic opportunities by the private and/or public sector. Investment patterns reflect, in turn, the desires of investors to mobilize and allocate their resources to development in particular localities and regions. A combination of these and other pressures serve to fashion policy. The regulatory authority of local governments serves to mediate the growth-inducing potential or pressure created by a project or plan. Despite these limitations on the analysis, it is still possible to qualitatively assess the general potential growth-inducing impacts of the proposed project.

6.5.1 Projected Growth

Section 4.10.7, Population and Housing, discussed population and employment growth as a result of the proposed project and made the following findings. The proposed project does not include any new housing units in either Phase 1 or project buildout and would not directly induce population growth. The proposed project would construct new office/R&D uses on an existing infill site in an urbanized area.

Development of infrastructure could remove obstacles to population growth if it would allow for development in an area that was not previously considered feasible for development because of infrastructure limitations. The proposed project would not include the extension of area roadways or expansion of infrastructure to areas lacking existing development. No indirect impacts related to population growth as a result of expansion of infrastructure would occur.

The displacement of existing light industrial uses and employees, and the new employees introduced as a result of new Business Technology Park land uses would, on the whole, increase the number of employees in the City and the East of 101 Area. The existing light industrial uses support a total of approximately 191 employees who would vacate the project site and be displaced or relocated. The 400-450 East Jamie Court site hosts an existing business and technology park use that would remain under both Phase 1 development and project buildout. The estimated number of jobs provided by the proposed project is summarized in Table 4.11.1: Proposed Project Employment, on p. 4.11.44. The new 748 employees introduced in the City during Phase 1 and 1,506 during project buildout could result in an increase in demand for housing. The City is primarily built out and any housing constructed within the City limits would most likely be infill housing. South San Francisco is a job center that, overall, imports employees and exports housing demand. Implementation of Phase 1 development or project buildout would result in an increased unfavorable jobs/housing ratio in the City. The *City of South San Francisco* General Plan (General Plan) Land Use Element, as amended in 2011, projects an employment of 80,600 jobs in the City by 2035 at buildout of the General Plan.[3] The proposed project employees introduced during Phase 1 and project buildout would represent 2.5 percent and 5.2 percent of the total job growth in the City at General Plan buildout. The proposed project's new employees would not result in substantial unplanned employment growth.

[3] General Plan, Chapter 2, Table 2.4-4, p. 2-35.

The proposed project would create the need for up to 519 new units of housing in Phase 1 and 1,046 new units of housing at project buildout. Although it is likely that some of the new employees on the project site would be existing residents in the City or in the region, the employment increase would result in indirect growth that may not be accommodated by existing or projected housing developments for the City. However, the City recognizes that much of its land area, including the East of 101 Area, is not well suited for housing development due to existing land use conflicts, including proximity to the San Francisco International Airport and the historic and existing industrial uses of the East of 101 Area, as well as the emerging office/R&D uses in the area. In that light, the City relies upon the greater San Francisco Bay Area's regional jobs-housing balance.

If the project application is not deemed complete by January 1, 2019, the proposed project would require payment of the commercial linkage fee under Chapter 8.69 of the Municipal Code which would contribute to the development of affordable housing to serve the indirect demand generated by commercial development. Although affordable housing could eventually be developed through this fee, the resulting number of residential units would be small in relation to the total number of households in the City. Therefore, any indirect population growth impacts would be less than significant, as described in Section 4.11, Less-Than-Significant Impacts, in Section 4.11.6, Population and Housing.

Overall, the proposed project would be an appropriate land use for the project site's limitations, and the job growth that would occur under the proposed project would be within the projected employment growth of the City. The proposed project would not induce direct or indirect population growth.

6.6 Areas of Known Controversy and Issues To Be Resolved

The Planning Division published a Notice of Preparation of an EIR (NOP) on April 18, 2018, announcing its intent to prepare and distribute an EIR (the NOP is included in this EIR as Appendix A).The public review period began on April 18, 2018, and ended on May 18, 2018. During the NOP public review period, four comment letters were submitted to the Planning Division by public agencies and other interested parties. On May 3, 2018, a public scoping meeting was held and no speakers contributed comments at this meeting.

Comments on the NOP raised the following issues:

Transportation and Circulation

- Compliance with the San Mateo County Congestion Management Program (CMP) Traffic Impact Analysis (TIA) Policy and Land Use Guidelines as provided by the City/County Association of Governments (C/CAG), including preparation of a forecast and discussion of the expected impacts of the project on the Congestion Management Program roadway network, the immediate project area, and other areas.
- Project-related traffic generation and mitigation measures should the project generate a net of 100 or more peak-hour trips on the CMP roadway network. Inclusion of potential mitigation strategies documented in the C/CAG Land Use Guidelines policy such as reducing project scope, building

roadway and/or transit improvements, collecting traffic mitigation fees, and requiring project sponsors to implement TDM programs.

- C/CAG consultation regarding the scope and parameters of the analysis, and C/CAG review and comment on the TIA, EIR, and TDM plan.
- Project-related construction traffic impacts on the existing 451 East Jamie Court uses, and mitigation measures to minimize construction traffic during construction of the 201 Haskins Way Building and parking garage.
- Traffic and circulation impacts on Haskins Way, East Grand Avenue, Littlefield Avenue, and the northbound U.S. 101 on-ramp from East Grand Avenue during PM peak hours as a result of operation of the project, and mitigation measures to improve traffic and circulation.
- Analysis of implementing a TDM program as mitigation for VMT impacts, including design features, programs, and monitoring.
- Cumulative regional transportation impacts and mitigation through fair share contributions toward multi-modal and regional transit improvements.
- Project-related impacts on transit, pedestrians, bicycles, and disabled travelers, including analysis of mitigation for increased VMT, and design features that encourage the use of alternative transportation modes including transit and shuttles, such as improvements to shelters or benches, as well as pedestrian and bicycle design features.

Project Description

- Confirmation of where the project would occur within the San Francisco Bay (Bay) or the San Francisco Bay Conservation and Development Commission (BCDC) 100-foot shoreline jurisdictional band.
- Confirmation of the proposed public access to the Bay Trail and Bay shoreline per existing BCDC permits on-site and BCDC public access requirements.

Greenhouse Gas Emissions

- Analysis of implementing a TDM program as mitigation for greenhouse gas emission impacts, including design features, programs, and monitoring.

Noise

- Project-related construction noise impacts on the existing 451 East Jamie Court uses and mitigation measures to minimize construction noise during construction of the 201 Haskins Way Building and parking garage.

Land Use

- Project-related impacts on the continuation of existing business operations of parcels within the project site, including future property and building maintenance under the proposed rezoning.
- Project-related impacts on the potential for future development of parcels in the Phase 2 area as separate and individual parcels in compliance with the proposed rezoning, and the implications of development alternatives for each parcel not currently owned by the developer.

Recreation

- Project-related impacts on shoreline access due to an increased on-site worker population, and whether the proposed public access areas would be adequate to accommodate these additional users, in recognition of existing BCDC permits and BCDC public access requirements.

Aesthetics

- Project-related impacts on scenic views of the Bay in consideration of the height of the proposed buildings and parking structure.
- Project-related shadow on the existing 451 East Jamie Court Building and existing and planned roof solar photovoltaic systems.
- Project-related impacts on existing wind hazards and whether the project includes mitigation measures to reduce project-related wind impacts.

Hydrology and Water Quality

- Whether project impacts related to sea level rise would occur on transportation facilities in the project area due to higher water levels, including increased erosion, changing environmental characteristics that affect material durability, increased groundwater levels, change in sediment movement along shorelines, and soil pore pressure at dikes and levees on which transportation facilities are constructed.

6.6.1 Issues to be Resolved under Design Review

The City does not have codified standards or thresholds regarding wind and shadow impacts and these issues are not treated as environmental impacts for the purposes of CEQA. However, a discussion of these issues in relation to the design review standards set forth under the City Municipal Code is provided in response to the NOP comment and pursuant to CEQA Guidelines Section 15128 in Section 4.11, Less-than-Significant Impacts, under "Aesthetics."