5 ALTERNATIVES

5.1 Introduction

Chapter 5, Alternatives, evaluates alternatives to the proposed project and examines the potential environmental impacts associated with each alternative. By comparing these alternatives to the proposed project, the relative environmental advantages and disadvantages of each may be analyzed and weighed. California Environmental Quality Act (CEQA) Guidelines section 15126.6(a) states that an environmental impact report (EIR) must describe and evaluate a reasonable range of alternatives to the proposed project which would feasibly attain most of the proposed project's basic objectives but would avoid or substantially lessen any identified significant adverse environmental impacts of the proposed project.

The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those potentially feasible alternatives necessary to foster informed public participation and an informed and reasoned choice by the decision-making body (CEQA Guidelines section 15126.6(f)). Therefore, an EIR does not need to address every conceivable alternative or consider infeasible alternatives. CEQA generally defines "feasible" to mean the ability to be accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, technological, and legal factors (CEQA Guidelines section 15364). The following factors may also be considered: site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and the ability of the proponent to attain site control (CEQA Guidelines section 15126.6(f)(1)). An EIR does not need to consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative (CEQA Guidelines, Section 15126.6(f)(3)).

Two alternatives are evaluated in this chapter:

- Alternative A: No Project Alternative
- Alternative B: Reduced Development Alternative

Under Alternative A: No Project Alternative, the existing land uses and site conditions at the project site would not change, and the project site would not be rezoned to Business Technology Park (BTP) and the floor area ratio (FAR) would remain 0.4 or 1.0 for the various parcels. Alternative B: Reduced Development Alternative would comply with the existing City of South San Francisco (City) zoning code and regulations established for this site. Under this alternative, the project site would remain in a Business Commercial (BC) district on one parcel (Assessor's Parcel Number [APN] 015-102-250), and a Mixed Industrial district on the remaining seven parcels (APNs 015-102-230, 015-102-210, 015-102-220, 015-102-180, 015-102-160, 015-102-240, and 015-102-290).

Table 5.1: Comparison of Characteristics of the Proposed Project to the Alternatives and **Table 5.2: Comparison of Significant Impacts of the Proposed Project to the Alternatives**, shown below on pp. 5.3-5.4, compare the main features and impacts of the proposed project to those of the alternatives. Alternative B would reduce the project-level impact on one intersection but not to a less-than-significant level; this impact would remain significant and unavoidable (see Impact TR-2). Alternative B would reduce the project's contribution to a significant cumulative impact to a less-than-significant level for six intersections and would reduce queue-related traffic impacts (see Impacts C-TR-3, C-TR-5 [Phase 1 only], C-TR-10, C-TR-11, C-TR-12, and C-TR-13), one freeway segment impact (see Impact C-TR-19), and one freeway ramp impact (see Impact CR-20 [Phase 1 only]). Alternative B would also reduce the proposed project's contribution to 12 significant cumulative transportation impacts but not to a less-than-significant level; these impacts would remain significant and unavoidable (see Impacts C-TR-4, C-TR-5 [buildout only], C-TR-6, C-TR-7, C-TR-8, C-TR-9, C-TR-15, C-TR-16, C-TR-17, C-TR-18, C-TR-20 [buildout only], and C-TR-21). This alternative would reduce less-than-significant air quality, greenhouse gas (GHG) emissions, land use, noise and vibration, and utilities impacts of the proposed project, which are analyzed below. This alternative would result in similar less-than-significant impacts on biological resources, cultural resources, hydrology and water quality, and impacts listed in Section 4.11 (aesthetics, agriculture and forest resources, geology and soils, hazards and hazardous materials, mineral resources, and recreation) to those with the proposed project, which are analyzed below. This chapter identifies the Reduced Development Alternative as the environmentally superior alternative (i.e., the alternative that would result in the least adverse effect on the physical environment). This chapter concludes with a discussion of the alternatives that were considered but not analyzed further because they were rejected as infeasible or failed to meet the basic project objectives.

The project sponsor's objectives for the proposed project in furtherance of the City's General Plan and City's policies for developing the East of 101 Area are presented in Chapter 3, Project Description, pp. 3.2-3.3. The ability of each alternative to meet these objectives is presented in **Table 5.3: Ability of Alternatives to Meet Project Objectives**.

As shown in the table, the No Project Alternative (Alternative A) would not meet any of the basic project objectives. The Reduced Development Intensity Alternative (Alternative B) would only attain several of the project sponsor's objectives to a lesser or partial extent. For example, this alternative would provide less office/research and development (R&D) development than the proposed project (459,514 gross square feet [gsf] with the alternative, compared to 677,600 gsf with the proposed project), and would not maximize the opportunity to increase office/R&D uses in an area designated for the promotion of new biotechnology and research and development. Due to the reduced allowable development under Alternative B, it would not result in the degree of positive fiscal impact on the City through the creation of jobs, enhancement of property values, and generation of property tax and other development fees.

Table 5.1: Comparison of Characteristics and Significant Impacts of the Proposed Project to the Alternatives

Parcel Address (APN)	Lot Size (sq. ft.)	Alternative A: No Project Alternative[1]			Proposed Project						Alternative B: Reduced Development Potential Alternative[3]					
		Total Floor Area			Total Floor Area			Gross Square Feet			Total Floor Area			Gross Square Feet[4]		
		Phase 1 Area Existing Development (sq. ft.)	*Phase 2 Area Existing Development (sq. ft.)*	Total Existing Development (sq. ft.)	Phase 1 Development (sq. ft.)	*Phase 2 Development (sq. ft.)*	Project Buildout (sq. ft.)	Phase 1 Development (gsf)	*Phase 2 Development (gsf)*	Project Buildout (gsf)	Phase 1 Development (sq. ft.)	*Phase 2 Development (sq. ft.)*	Project Buildout (sq. ft.)	Phase 1 Development (gsf)	*Phase 2 Development (gsf)*	Project Buildout (gsf)
201 Haskins Way (015-102-230)	280,765	24,075	-	24,075	280,765	-	280,765	311,368	-	311,368	168,459	-	168,459	186,990	-	186,990
400-450 East Jamie Court (015-102-250)	267,000	157,000	-	157,000	25,000	*85,000[1,2]*	110,000[1,2]	25,000	*85,000[1]*	110,000	25,000	*85,000[1,2]*	110,000[1,2]	25,000	*85,000[1]*	110,000
101 Haskins Way (015-102-210)	24,535	-	7,000	7,000	-	*24,535*	24,535	-	*25,762*	25,762	-	14,721	14,721	-	16,340	16,340
151 Haskins Way (015-102-220)	28,602	-	11,599	11,599	-	*28,602*	28,602	-	*30,032*	30,032	-	17,161	17,161	-	19,049	19,049
410 East Grand Avenue (015-102-180)	40,384	-	27,300	27,300	-	*40,384*	40,384	-	*42,403*	42,403	-	24,230	24,230	-	26,895	26,895
430 East Grand Avenue (015-102-160)	72,076	-	37,096	37,096	-	*72,076*	72,076	-	*75,680*	75,680	-	43,246	43,246	-	48,003	48,003
451 East Jamie Court (015-102-240)	62,087	-	75,000	75,000	-	*62,087*	62,087	-	*65,191*	65,191	-	37,252	37,252	-	41,350	41,350
(015-102-290)	16,347	-	-	-	-	*16,347*	16,347	-	*17,164*	17,164	-	9,808	9,808	-	10,887	10,887
Total	**791,796**	**181,075**	**157,995**	**339,070**	**305,765**	*329,031*	**634,796**	***336,368***	*341,232*	**677,600**	**193,459**	***231,418***	***424,877***	**211,990**	**247,524**	**459,514**
Existing Parking Spaces to Remain	-	464 spaces	114 spaces	578 spaces	-	-	-	424 spaces	-	424 spaces	-	-	-	424 spaces	-	424 spaces
New Parking Spaces	-	-	-	-	-	-	-	903 Spaces	603 Spaces	1,506 spaces	-	-	-	605 spaces	707 spaces	1,312 spaces
Total Parking Spaces	-	464 spaces	114 spaces	578 spaces	-	-	-	1,327 Spaces	603 Spaces	1,930 spaces	-	-	-	1,029 spaces	707 spaces	1,736 spaces

Notes:

[1] Existing floor area that would remain under Alternative A is based on the FAR-defined square footage of development for the land use analysis purposes. For Transportation analysis and other quantitative environmental analyses, development impacts are calculated based on gross square feet. Therefore, this table provides both FAR-defined floor area and gross square feet.

[2] The 110,000 sq. ft. of available floor area at 400-450 East Jamie Court would be developed through construction of the planned approximately 25,000 sq. ft. building addition to 400-450 East Jamie Court plus the remaining development potential of BTP use under Phase 2. When the total floor area of the Phase 1 building addition is determined, the remaining balance of floor area would be applied to the design of the BTP use under Phase 2 development. It is assumed that the total floor area of the building addition is approximately 25,000 sq. ft of floor area. Therefore, for the purposes of plan-level analysis, it is assumed that Phase 2 development would result in, at minimum, 85,000 sq. ft. total floor area of BTP use.

[2] Section 20.040.008 of the zoning ordinance specifies that floor area includes, but is not limited to, habitable (as defined in the California Building Code) basements and cellars that are below the roof and within the outer surface of the main walls of principal or accessory buildings or the centerlines of party walls separating such buildings or portions thereof or within lines drawn parallel to and two feet within the roof line of any building without walls. In the case of a multi-story building that has covered or enclosed stairways, stairwells or elevator shafts, the horizontal area of such features shall be counted only once at the floor level of their greatest area of horizontal extent. The ordinance specifies that floor area does not include mechanical, electrical, and communication equipment rooms that do not exceed two percent of the building's gross floor area; bay windows or other architectural projections where the vertical distance between the lowest surface of the projection and the finished floor is 30 inches or greater;

Table 5.2: Comparison of Significant Impacts of the Proposed Project to the Alternatives

Impact Statement	Alternative A: No Project Alternative	Proposed Project	Alternative B: Reduced Development Potential Alternative
Summary of Significant Impacts of the No Project, the Proposed Project, and the Reduced Project Alternative Legend: NI = No Impact; LS = Less than Significant; LTSM = Less than Significant with Mitigation; SU = Significant and unavoidable; SUM = Significant and unavoidable impact with mitigation; NA = Not Applicable			
Section 4.9: Transportation and Circulation- Project Impacts			
TR-2: The proposed project (Phase 1 or buildout) would cause the intersection of Allerton Avenue and East Grand Avenue to exceed LOS D operations during the PM peak hour, and the project would contribute more than 2 percent of the total traffic through the intersection.	NI	SU	SU
Section 4.9: Transportation and Circulation - Cumulative Impacts			
C-TR-3: Buildout of the proposed project (Phases 1 & 2) would contribute considerably to the significant impact at the intersection of Airport Boulevard and Grand Avenue during the AM peak hour.	NI	SU	LTS
C-TR-4: Buildout of the proposed project (Phases 1 & 2) would contribute considerably to a significant cumulative at the intersection of Dubuque Avenue and Grand Avenue during the PM peak hour.	NI	SU	SU
C-TR-5: The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative impact the intersection of East Grand Avenue and Grand Avenue Overcrossing during the PM peak hour.	NI	SU	LTS (Phase 1) SU (buildout)
C-TR-6: 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.	NI	SU	SU
C-TR-7: 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.	NI	SU	SU
C-TR-8: The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative at the intersection of Littlefield Avenue and East Grand Avenue in the AM peak hour.	NI	SU	SU
C-TR-9: The proposed project (Phase 1 or buildout) would contribute considerably to a significant cumulative impact at the intersection of Allerton Avenue and East Grand Avenue in the PM peak hour.	NI	SU	SU
C-TR-10: The proposed project at 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.	NI	SU	LTS
C-TR-11: The proposed project at buildout would contribute considerably to a significant cumulative impact at the intersection of Gateway Boulevard/South Airport Boulevard/Mitchell Avenue in the PM peak hour.	NI	SU	LTS
C-TR-12: The proposed project at buildout would contribute considerably to a 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.	NI	SU	LTS
C-TR-13: The proposed project at buildout would contribute considerably to a significant cumulative impact at the intersection of South Airport Boulevard and Utah Avenue in the AM peak hour.	NI	SU	LTS
C-TR-15: The proposed project (Phase 1 or buildout) would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impacts on the southbound left turn movement in the AM peak hour and the westbound right-turn movement in the AM and PM peak hours at the intersection of Airport Boulevard and Grand Avenue where the 95th percentile queues with future cumulative growth in 2040 would exceed the available storage length without the project.	NI	SU	SU
C-TR-16: The proposed project (Phase 1 or buildout) would add more than 1 percent of total traffic and therefore would contribute considerably to the significant cumulative impacts on the eastbound and westbound through movements in the PM peak hour and westbound left turn movement in the AM and PM peak hours on East Grand Avenue at Gateway Boulevard where the 95th percentile queues would exceed the available storage lengths during these peak hours without the proposed project.	NI	SU	SU
C-TR-17: The proposed project (Phase 1 or 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 where the 95th percentile queue would exceed the available storage length during the AM and PM peak hours in 2040 without the proposed project.	NI	SU	SU
C-TR-18: The proposed project (Phase 1 or 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 where the 95th percentile queue would exceed the available storage length during the AM peak hour in 2040 without the proposed project.	NI	SU	SU
C-TR-19: The freeway segments serving the proposed project site would operate at unacceptable LOS F in the future with forecast development in 2040, resulting in a significant cumulative impact. The proposed project at buildout (Phases 1 & 2) \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.	NI	SU	LTS
C-TR-20. The proposed project (Phase 1 or Phases 1 & 2) 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 where the volume would exceed the available capacity during the AM peak hour in 2040 without the proposed project.	NI	SU	LTS (Phase 1) SU (buildout)
C-TR-21. The proposed project (Phase 1 or Phases 1 & 2) 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 on-ramp from Produce Avenue where the volume would not exceed the available capacity during the PM peak hour in 2040 without the proposed project.	NI	SU	SU

Table 5.3. Ability of Alternatives to Meet Project Objectives

Project Objective	Alternative A: No Project Alternative	Alternative B: Reduced Development Alternative
	Would the alternative meet this objective?	
Create state-of-the-art research and development facilities consistent with the General Plan designation of the site, and General Plan goals and policies.	No	Partial: Alternative B does not fully maximize allowable density under the existing General Plan land use designations (CC/MI)
Promote the City's ongoing development of the East of 101 Area into a nationally recognized biotechnology and research and development center that will attract other life science uses.	No	Partial
Further the City's policies of developing the East of 101 Area with new opportunities for continued evolution from manufacturing and warehousing/distribution to biotechnology and research and development.	No	Partial
Redevelop underutilized parcels within the project site at a higher density to take advantage of the opportunities offered in the East of 101 Area to create a vibrant research and development campus.	No	Partial: Alternative B does not fully maximize density[1]
Develop a research and development campus with a high level of design quality as called for in the Design Policies and Guidelines of the East of 101 Area Plan	No	Partial
Build a project that creates quality jobs for the City;	No	Less than the proposed project
Provide sufficient space for tenants to employ key scientific and business personnel in proximity to each other to foster efficient collaboration and productivity;	No	Partial: Alternative B does not fully maximize allowable floor area[1]
Capitalize on the project's proximity to the City's Bay shoreline and San Francisco Bay Trail (Bay Trail) by providing views and access to the waterfront.	No	Yes
Enhance the visual quality of development around the Bay shoreline and take advantage of the attractive setting it provides.	No	Partial
Promote alternatives to automobile transportation to further the City's transportation objectives by emphasizing linkages, TDM, and pedestrian access and ease of movement between buildings.	No	Yes
Enhance vehicular, bicycle, and pedestrian circulation and access in the area surrounding the project site.	No	Yes
Build a project that is viable in the East of 101 Area based upon market conditions and project service requirements for the area.	No	Less than the proposed project
Incorporate flexibility for office and research and development uses to ensure that the project is responsive to tenant demands based on market conditions	No	Less than the proposed project
Provide a positive fiscal impact on the City through the creation of jobs, enhancement of property values, and generation of property tax and other development fees.	No	Less than the proposed project
Retain the flexibility to build the project in phases that respond to market conditions.	No	Yes
Allow for the continued operation of existing manufacturing and warehousing/distribution uses until new development occurs, consistent with City policies.	No	Yes

Note: [1] Alternative B provides 32 percent of the Office/R&D space proposed for the project.

Source: ARE, City of South San Francisco (2018)

5.2 Alternative A: No Project Alternative

CEQA Guidelines section 15126.6(e) requires that a "no project" alternative be evaluated: "The purpose of describing and analyzing a no project alternative is to allow decision makers to compare the impacts of approving the proposed project with the impacts of not approving the proposed project." CEQA Guidelines section 15126.6(e)(2) requires that the no project alternative analysis "discuss the existing conditions…as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and policies and consistent with the available infrastructure and community services." As noted in CEQA Guidelines section 15126.6, an EIR for "a development project on identifiable property" typically analyzes a no project alternative, i.e., "the circumstance under which the project does not proceed. Such a discussion would compare the environmental effects of the property remaining in its existing state against environmental effects that would occur if the project is approved. If disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed."

5.2.1 Description

Under Alternative A: No Project, the existing land uses and site conditions at the project site would not change. The existing seven buildings on the project site would remain, as would the existing ingress and egress points, and the surface parking which accommodates 578 vehicles, 20 semi-tractors, and 35 trailers. Under the No Project Alternative, the project site would not be rezoned to BTP and the FAR would remain 0.4 or 1.0 for the various parcels. The No Project Alternative would not preclude potential future development of the project site with a range of land uses that are permitted at the project site.

5.2.2 Impacts

This environmental analysis assumes that the existing structures and uses on the project site would not change and that the existing physical conditions, as described in detail for each environmental topic in Chapter 4, Environmental Setting, Impacts, and Mitigation, would remain the same. If the No Project Alternative were implemented, none of the impacts associated with the proposed project, as described in Chapter 4, would occur. However, development and growth would continue within the vicinity of the project site as reasonably foreseeable future projects are approved, constructed, and occupied. These projects could contribute to cumulative impacts in the vicinity, but under the No Project Alternative, land use activity on the project site would not contribute to these cumulative impacts beyond existing levels.

AIR QUALITY

Under Alternative A there would be no demolition or construction activities and no new operational sources of air pollutants on the project site. Existing stationary sources of air pollution near the project site and major roadways contributing to air pollution in the project vicinity would remain in existing conditions. Compared to the proposed project, which would result in less-than-significant project-level air quality impacts with mitigation and a less than cumulatively considerable contribution to significant cumulative air quality impacts with mitigation, the No Project Alternative would have no impact related to air quality. Because potential air quality impacts that would occur under the proposed project would

not occur under this alternative, implementing air quality mitigation measures MM-AQ-1a through MM-AQ-1b would not be necessary.

BIOLOGICAL RESOURCES

Under Alternative A there would be no demolition of buildings or removal of any trees or vegetation. Compared to the proposed project, which would result in a less-than-significant project-level biological resources impacts with mitigation and a less than cumulatively considerable contribution to significant cumulative biological impacts with mitigation, the No Project Alternative would have no impact related to biological resources. Because potential biological resources impacts that would occur under the proposed project would not occur under this alternative, implementing mitigation measures MM-BI-1a through MM-BI-1d would not be necessary.

CULTURAL RESOURCES

Under Alternative A no excavation and demolition of buildings would occur on the site. The site would remain in its current condition. Compared to the proposed project, which would result in a less-than-significant project-level cultural resources impacts with mitigation and a contribution to significant cumulative cultural impacts that is less than cumulatively considerable with mitigation, the No Project Alternative would have no impact related to cultural resources. Because potential cultural resources impacts that would occur under the proposed project would not occur under this alternative, implementing mitigation measures MM-CR-2a through MM-CR-2c, and MM-CR-3, would not be necessary.

GREENHOUSE GAS EMISSIONS

Alternative A would not result in new GHG emissions. No demolition or new construction activities would occur. There would be no new development to adhere to Leadership in Energy and Environmental Design (LEED) requirements. Sources of GHG emissions would continue under existing conditions but there would be no cumulatively considerable contribution to significant GHG impacts.

HYDROLOGY AND WATER QUALITY

Under Alternative A, there would be no demolition or construction of new buildings, and no changes to existing impervious surfaced, hardscape, or landscaped and vegetated areas on the project site. The No Project Alternative would not alter the site drainage pattern or substantially deplete groundwater supplies, or interfere substantially with groundwater recharge. Compared to the proposed project, which would result in a less-than-significant project-level hydrology and water quality impact and a less-than-cumulatively considerable contribution to significant cumulative hydrology and water quality impacts, the No Project Alternative would have no impact related to hydrology and water quality.

LAND USE AND PLANNING

The No Project Alternative would not involve a rezoning of the parcels on the project site. The project site would remain zoned as Business Commercial on one parcel (APN 015-102-250), and as Mixed Industrial on the remaining seven parcels (APNs 015-102-230, 015-102-210, 015-102-220, 015-102-180,

015-102-160, 015-102-240, and 015-102-290). Under the No Project Alternative, land use would remain as under existing conditions. Compared to the proposed project, which would result in a less-than-significant project-level land use and planning impact and a less-than-significant cumulatively considerable contribution to significant cumulative land use and planning impact, the No Project Alternative would have no impact related to land use and planning.

NOISE

Under the No Project Alternative, there would be no demolition or construction activities and no new temporary or operational noise or vibration impacts in the project vicinity or within the project site. Noise conditions in the area would remain as in existing conditions. Compared to the proposed project, which would result in less-than-significant project-level noise impacts with mitigation and a less than cumulatively considerable contribution to cumulative noise impacts with mitigation, the No Project Alternative would have no impact related to noise. Because potential noise impacts that would occur under the proposed project would not occur under this alternative, implementing noise mitigation measures MM-NO-2 and MM-NO-3 would not be necessary.

TRANSPORTATION AND CIRCULATION

Unlike the proposed project, under the No Project Alternative there would be no changes to traffic and circulation. The existing commercial and industrial buildings on the project site would continue to operate in their current condition and traffic conditions under existing conditions would remain. Compared to the proposed project, which would result in a significant and unavoidable project-level transportation and circulation impact and a cumulatively considerable contribution to significant unavoidable cumulative transportation and circulation impacts, the No Project Alternative would have no impact related to transportation and circulation. Because the impacts that would occur under the proposed project would not occur under this alternative, mitigation measures would not be applicable.

UTILITIES AND SERVICE SYSTEMS

The No Project Alternative would not involve any new construction or new land uses on the project site. This alternative would not alter the existing stormwater conveyances and would not exceed the capacity of the wastewater treatment provider serving the project site. This alternative would also not require the construction of new, or expansion of existing, wastewater treatment facilities. The No Project Alternative would not require the construction of new, or expansion of existing, stormwater drainage facilities, the construction of which could cause significant environmental effects. Compared to the proposed project, which would result in a less-than-significant project-level utilities and service systems impact and a less-than-cumulatively considerable contribution to significant cumulative utilities and service systems impact, the No Project Alternative would have no impact related to utilities and services systems.

OTHER TOPICS

The Draft EIR concludes that the proposed project would have no impact or less-than-significant impacts in the following analysis areas:

- Agriculture and Forest Resources (all topics)
- Aesthetics (all topics)
- Geology and Soils (all topics)
- Hazards and Hazardous Materials (all topics)
- Mineral and Energy Resources (all topics)
- Population and Housing (all topics)
- Public Services (all topics)
- Biological Resources (all topics)
- Recreation (all topics)

The No Project Alternative would result in no impact related to any of the above-listed environmental topics, because this alternative would result in no changes to existing site conditions.

5.3 Alternative B: Reduced Development Alternative

5.3.1 Description

Unlike the proposed project, Alternative B: Reduced Development Alternative, would comply with the existing City zoning code and regulations established for this site. Under this alternative, the project site would remain zoned as Business Commercial on one parcel (APN 015-102-250), and as Mixed Industrial on the remaining seven parcels (APNs 015-102-230, 015-102-210, 015-102-220, 015-102-180, 015-102-160, 015-102-240, and 015-102-290). Under existing zoning, parcels would provide new office/R&D development potential of up to 1.0 FAR for the Business Commercial District, similar to the proposed BTP use under the proposed project. Under existing zoning, the Mixed Industrial district provides a new office/R&D development potential of 0.4 FAR, or up to 0.6 FAR with development and implementation of a Transportation Demand Management (TDM) Plan and design and green building standards, subject to approval of a Conditional Use Permit (CUP). As a result, Alternative B would include approximately 459,514 gsf of office/R&D development, 218,086 gsf less than under the proposed project overall, as shown in Table 5.1, on p. 5.3.

Similar to the proposed project, Alternative B would involve the removal of existing light industrial uses and associated parking on seven parcels (101, 151, and 201 Haskins Way; 410 and 430 East Grand Avenue; 451 East Jamie Court; and one parcel with no address [APN 015-102-290]), the construction of new office/R&D use on those seven parcels, and the expansion of existing office/R&D use on one parcel (400-450 East Jamie Court), as shown on **Figure 5.1: Alternative B - Reduced Development Alternative – Conceptual Site Plan**. Like the proposed project, this alternative would be constructed using at least two development phases. For the purposes of analysis under CEQA, the EIR considers a Phase 1 site plan and conceptual Phase 2 site plan. Alternative B would result in the construction of approximately 193,459 square feet of office/R&D use during Phase 1 development, and approximately 231,418 square feet during Phase 2 development.

Source: City of South San Francisco, SWCA (2018)

201 HASKINS WAY PROJECT

FIGURE 5.1: ALTERNATIVE B - REDUCED DEVELOPMENT ALTERNATIVE - CONCEPTUAL SITE PLAN

Like the proposed project, this alternative would involve construction of two primary office/R&D buildings: the 201 Haskins Way Building under Phase 1 development, and the conceptual East Grand Building under Phase 2 development at project buildout. However, the density of the development would be reduced and each building would be constructed to a maximum height of three stories, as compared to five stories under the proposed project. In addition, the conceptual East Grand Building in the Phase 2 area would have a slightly smaller development footprint. Similarly, the proposed parking garage would also be reduced to three stories under Alternative B, as compared to five stories under the proposed project. See **Figure 5.2: Alternative B – Reduced Development Alternative 201 Haskins Way Building Elevations** and **Figure 5.3: Alternative B – Reduced Development Alternative Conceptual East Grand Avenue Building Elevations**.

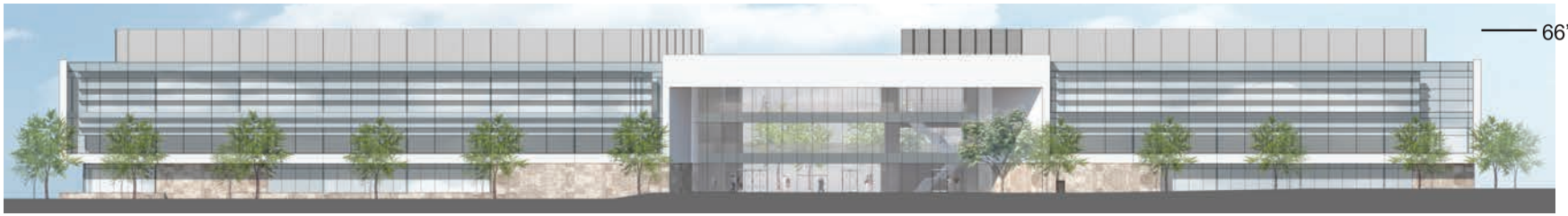
Under existing Business Commercial zoning, the 400-450 East Jamie Court parcel would have the development potential of 1.0 FAR, the same as for the proposed project. Accordingly, Alternative B would also involve construction of a 25,000 gsf building addition on the 400-450 East Jamie Court parcel during Phase 1. As with the proposed project, Phase 2 development on the 400-450 East Jamie Court parcel is conceptual. Because detailed information about Phase 2 development is not known at this time, the EIR considers the maximum potential development that could occur under existing zoning. Phase 2 development would require subsequent project-level site design review. For illustrative purposes, the EIR includes a conceptual Phase 2 development plan. As with the proposed project, the Phase 2 development plan would include future office/R&D development capacity of up to approximately 85,000 square feet of floor area on the 400-450 East Jamie Court parcel (APN 015-102-250).

As with the proposed project, the existing driveways would be removed and four new driveways would be constructed: two new driveways on Haskins Way, one new driveway on East Jamie Court, and one new driveway on East Grand Avenue, as shown on Figure 5.1, p. 5.10. At project buildout, Alternative B would provide 1,312 off-street parking spaces in surface parking lots and a three-story parking garage on the site, reduced from 1,930 spaces with a five-story parking garage under the proposed project. See **Figure 5.4: Alternative B – Reduced Development Alternative Conceptual Parking Structure Elevations at Project Buildout**. The surface parking lot constructed in the Phase 2 area would be slightly larger than under the proposed project to account for a smaller conceptual East Grand Building footprint.

Similar to the proposed project, Alternative B would include the same overall pedestrian and landscape improvements to the site. New sidewalks with street trees and landscaping buffers would be constructed along East Jamie Court, Haskins Way, and East Grand Avenue. Like the proposed project, this alternative would include at least 15 percent of lot coverage for landscaping and a similar number of new street trees would be planted to the site. Both of the proposed office/R&D buildings (the 201 Haskins Way Building and the conceptual East Grand Building) would include showers and clothes locker facilities, and short-term and long-term bicycle parking spaces in accordance with the State's Title 24 Green Building Standards (CALGreen) Section 5.106.4.1.2, and would meet LEED Version 4 bicycle parking standards.

North Elevation

South Elevation

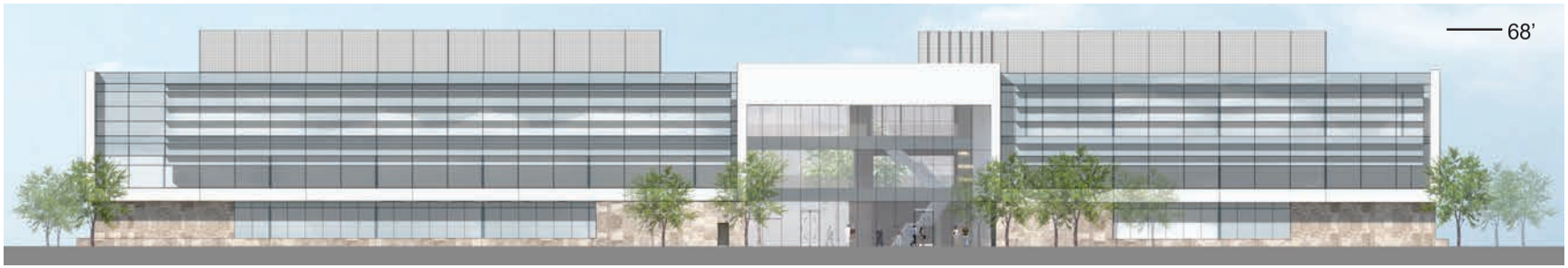


Source: WRNS (2018)

201 HASKINS WAY PROJECT

FIGURE 5.2: ALTERNATIVE B - REDUCED DEVELOPMENT ALTERNATIVE
201 HASKINS WAY BUILDING ELEVATIONS

North Elevation



South Elevation

Source: WRNS (2017)

201 HASKINS WAY PROJECT

FIGURE 5.3: ALTERNATIVE B - REDUCED DEVELOPMENT ALTERNATIVE CONCEPTUAL EAST GRAND BUILDING ELEVATIONS

South Elevation

North Elevation

Source: WRNS (2018)

201 HASKINS WAY PROJECT

FIGURE 5.4: ALTERNATIVE B - REDUCED DEVELOPMENT ALTERNATIVE CONCEPTUAL PARKING STRUCTURE ELEVATIONS AT PROJECT BUILDOUT

Infrastructure activities associated with Alternative B would be similar to those described for the proposed project. The project site is serviced by existing potable water, stormwater, sanitary sewer, natural gas, electric, and trash and recycling services. New on-site facilities would be connected to existing services along East Grand Avenue, Haskins Way, and East Jamie Court. No expansion or increased capacity of off-site infrastructure would be necessary.

Construction activities associated Alternative B would be similar to those described for the proposed project. Build-out of this alternative would be similar to the proposed project, and is assumed to occur over two phases and approximately 4 years after project entitlements, if executed from start to finish. Construction would not commence until the existing uses within each phase area have vacated. As with the proposed project, Phase 1 development under Alternative B is anticipated to take approximately 18 months after project entitlements. The preliminary construction schedule assumes 2019 as the start of construction and 2021 as the end of construction.

Under existing zoning, Alternative B would allow the existing uses in the Phase 2 area to continue. At this time, no specific Phase 2 development is proposed, and it is uncertain when or if such development would occur. As with the proposed project, it is assumed for purposes of this EIR that Phase 2 construction would commence in 2021 (immediately after completion of Phase 1 construction) and would occur over an 18-month period. Construction would not commence until the existing uses have vacated.

As for discretionary approvals, unlike the proposed project Alternative B would not involve zoning map amendments. However, this alternative would still require a CUP, TDM Plan approval, design review, and subdivision maps. Alternative B would also require standard City engineering, building, and fire permits, along with other agency approvals (Bay Area Regional Water Quality Control Board, Bay Area Air Quality Management District (BAAQMD), San Mateo County Department of Environmental Health, Federal Aviation Administration, and the San Francisco Bay Conservation and Development Commission). Because this alternative would not involve rezoning, the proposed project would not require referral to the Airport Land Use Commission.

5.3.2 Impacts

The impact analysis below focuses on those impacts that were determined to be potentially significant under the proposed project. Less than significant impacts are generally discussed only if implementation of the alternative would substantially increase the impact.

Reducing the allowable office/R&D development to the amount currently allowed under existing zoning (i.e., a reduction of 218,086 gsf) would primarily reduce impacts related to vehicle trips and, to some degree, construction-period impacts, such as air pollutant emissions, traffic, and noise. Alternative B would also avoid considerable contribution to significant and unavoidable impacts due to the reduced number of vehicle trips for Impacts C-TR-3, Impact C-TR-5 (Phase 1 only), Impact C-TR-10 (buildout), Impact C-TR-11 (buildout), Impact C-TR-12 (buildout), Impact C-TR-13 (buildout), Impact C-TR-19 (buildout), and Impact C-TR-20 (Phase 1 only). However, Alternative B would not, as discussed below, result in the avoidance or lessening of any other significant and unavoidable impacts to a less-than-

significant level (Impacts TR-2, C-TR-4, C-TR-5 [buildout only], C-TR-6, C-TR-7, C-TR-8, C-TR-9, C-TR-15, C-TR-16, C-TR-17, C-TR-18, C-TR-20 [buildout only], and C-TR-21).

AIR QUALITY

Because this alternative would involve a reduction of 218,086 gsf compared to the proposed project, Alternative B would result in fewer vehicle trips to the site than the proposed project as well as less building space that would require water and energy use. This alternative would marginally reduce the already less-than-significant air quality impacts identified under the proposed project.

Less building space under Alternative B would equate to marginally lower construction-period emissions, though BAAQMD fugitive dust and emissions reduction measures would be required to reduce the impact to less than significant, as under the proposed project.

As with the proposed project, impacts that can be brought to a less-than-significant level through mitigation would also be marginally reduced. Mitigation Measures AQ-1a and AQ-1b, would continue to apply to Alternative B and would reduce project-level air quality impacts and the less than cumulatively considerable contribution to significant air quality impacts to less-than-significant levels.

BIOLOGICAL RESOURCES

Because Alternative B would involve a similar development footprint, demolition, and excavation program as the proposed project, impacts on biological resources during the construction period would remain largely the same. Removal of existing light industrial buildings and on-site landscaping would be expected to have the same impacts on wildlife species such as migratory birds and roosting bats. Mitigation Measure MM-BI-1a: Pre-Construction Nesting Bird Surveys and Buffer Areas, MM BI-1b: Lighting Measures to Reduce Impacts to Birds, MM-BI-1c: Building Design Measures to Minimize Bird Strike Risk would continue to apply to Alternative B and would reduce impacts to a less-than significant-level. Mitigation Measure BI-1d: Pre-construction Bat Survey for Roosting Bats and Roosting Habitat Abatement (Phase 2), would continue to apply to Alternative B during Phase 2 development for project buildout and would reduce project-level impacts to a less-than significant-level. Mitigation Measure BI-1d would also reduce Alternative B's cumulatively considerable contribution to significant biological resources impacts to less-than-significant levels. Removal of any protected trees as defined under the City's Tree Preservation Ordinance would be required to comply with the Tree Preservation Ordinance under Alternative B and impacts would continue to be less than significant. As with the proposed project, impacts that can be brought to a less-than-significant level through mitigation would also be marginally reduced. Mitigation Measures MM-BI-1a, MMBi-1b, MM-BI-1c, and MM-BI-1d continue to apply to Alternative B and would reduce project-level impacts and reduce the less than cumulatively considerable contribution to cumulative impacts.

CULTURAL RESOURCES

Alternative B would involve a similar excavation program as the proposed project, and impacts on cultural resources during the construction period would remain largely the same. Excavation activities could encounter archeological resources such as shell mounds, as identified in Impact CR-2, or other

previously unrecorded archaeological resources. Mitigation Measures MM-CR-2a: Cultural Resources Worker Environmental Awareness Program (WEAP), MM-CR-2b: Cultural Resources Monitoring During Ground Disturbing Activities, and MM-CR-2c: Halt Construction Activity, Evaluate Find and Implement Mitigation would continue to apply to Alternative B and would reduce impacts on archaeological resources to a less-than-significant level. Application of the same mitigation measures would also ensure that impacts associated with tribal cultural resources would be reduced to a less-than-significant level under Alternative B. Application of MM-CR-3: Halt Construction Activity, Evaluate Remains and Take Appropriate Action in Coordination with Native American Heritage Commission would continue to apply to Alternative B and would reduce impacts associated with the potential inadvertent discovery of human remains to a less-than-significant level. As with the proposed project, Mitigation Measures MM-CR-2a, MM-CR-2b, MM-CR-2c, and MM-CR-3 would continue to apply to Alternative B and would reduce project-level impacts and reduce the less than cumulatively considerable contribution to cumulative impacts.

GREENHOUSE GAS EMISSIONS

Because this alternative would involve a reduction of 218,086 gsf compared to the proposed project, Alternative B would result in fewer vehicle trips to the site than the proposed project as well as less building space that would require water and energy use. This alternative would marginally reduce the already less-than-significant GHG emissions impacts identified under the proposed project. BAAQMD-recommended construction GHG reduction measures would continue to apply to Alternative B and would be implemented to further reduce impacts. As with the proposed project, Alternative B would not contribute considerably to significant cumulative GHG emissions impacts.

HYDROLOGY AND WATER QUALITY

Because Alternative B would involve a similar development footprint and excavation program as the proposed project, impacts on hydrology and water quality during the construction period would remain largely the same. Water quality effects of construction activities and groundwater dewatering would remain less-than-significant under Alternative B through compliance with applicable regulatory requirements including the Construction General Stormwater Permit.

As with the proposed project, Alternative B would not place structures within a future 100-year flood zone that would impede or redirect flood flows, and would not expose people or structures to a significant risk or loss, injury, or death involving flooding or inundation by seiche, tsunami or mudflow, and these impacts would remain less than significant. As with the proposed project, Alternative B would not alter drainage in a manner which would result in substantial erosion or flooding, runoff water would not exceed the capacity of existing stormwater drainage systems, and no additional sources of polluted runoff would be created; these impacts would remain less than significant. As with the proposed project, the Alternative B site plan would include low-impact development infrastructure that would ensure that peak post-development operational stormwater flows would not exceed the pre-development peak stormwater flow. As with the proposed project, cumulative development would not cause significant cumulative hydrology and water quality impacts.

LAND USE AND PLANNING

Unlike the proposed project, Alternative B would not involve a rezoning of the parcels on the project site. Instead, the project site would remain zoned as Business Commercial on one parcel (APN 015-102-250), and as Mixed Industrial on the remaining seven parcels (APNs 015-102-230, 015-102-210, 015-102-220, 015-102-180, 015-102-160, 015-102-240, and 015-102-290). Under existing zoning, parcels would provide new office/R&D development potential of up to 1.0 FAR for the Business Commercial District, similar to the proposed BTP use under the proposed project. Under the existing zoning, the Mixed Industrial district provides a new office/R&D development potential of 0.4 FAR, or up to 0.6 FAR with development and implementation of a TDM Plan and design and green building standards, subject to approval of a CUP. As a result, Alternative B would include approximately 424,877 square feet of floor area, or 459,514 gsf of office/R&D development (see Table 5.1, Comparison of Characteristics of the Proposed Project to the Alternatives).

Alternative B, the Reduced Development Alterative, would reduce overall office/R&D development compared to the proposed project (about 218,086 gsf less than the proposed project overall) in compliance with existing zoning, but it is assumed for purposes of this analysis that the general site plan and proposed land uses would be the same as the proposed project.

Because this alternative would not involve rezoning, the proposed project would not require referral to the Airport Land Use Commission. However, all other City and agency approvals, including a CUP and TDM Plan approval, would continue to apply. As with the proposed project, under Alterative B, the project sponsor would be required to comply with Federal Aviation Administration height and airspace compatibility notification requirements, San Francisco Bay Conservation and Development Commission consultation, and Climate Action Plan measure review and selection. Alternative B would not conflict with any applicable land use plan, policy or regulation with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, and this impact would remain less than significant. As with the proposed project, cumulative development would not cause significant cumulative land use and planning impacts.

NOISE

Because construction of Alternative B would still require demolition of existing light industrial uses and construction of new office/R&D buildings, impacts would remain largely similar to those identified for the proposed project. Because the square-footage of office/R&D uses would be reduced by 218,086 gsf under Alternative B, it is expected that construction phases would be the same length and activities as the proposed project, thereby resulting in the same construction-related noise impacts as those described for the proposed project. These noise impacts would remain less than significant and, to further reduce impacts, Improvement Measure IM-NO-1, Construction Noise Minimization and Notification, would continue to apply to Alternative B. Mitigation Measure MM-NO-2, Groundborne Vibration Minimization and Avoidance would continue to apply to Alternative B and would reduce impacts associated with groundborne vibration during construction to a less-than-significant level.

Because of the reduced intensity of development including fewer vehicle trips and less traffic, operational increases in noise at and in the vicinity of the project site would be marginally less under Alternative B than under the proposed project. Mitigation Measure MM-NO-3, Mechanical Equipment Noise Reductions, would continue to apply to Alternative B, and would reduce project-level impacts associated with operational mechanical equipment noise to a less-than-significant level. As with the proposed project, MM-NO-3 would reduce the less than cumulatively considerable contribution to significant cumulative noise impacts.

TRANSPORTATION AND CIRCULATION

Similar to the proposed project, Alternative B would remove existing industrial uses from the site. Since these industrial uses were active and generating traffic that is included in the base traffic counts from 2016 and 2017, their trips are subtracted from the total project trip generation to determine the net added vehicle trips for each project phase. Similar to the proposed project, Alternative B would result in new vehicle trips in the project vicinity, with a reduction of approximately 40 percent of net new vehicle trips compared to the proposed project.

As shown in **Table 5.4: Vehicle Trip Generation – Alternative B**, the Phase 1 project under Alternative B would generate 1,551 net daily vehicle trips, with 157 in the AM peak hour and 182 in the PM peak hour (as compared to 2,533 net daily vehicle trips, with 258 in the AM peak hour and 298 in the PM peak hour under the proposed project). Phase 2 of Alternative B would generate an additional 1,176 net daily vehicle trips, with 102 in the AM peak hour and 132 in the PM peak hour (as compared to 1,913 net daily vehicle trips, with 178 in the AM peak hour and 219 in the PM peak hour under the proposed project). Phases 1 and 2 combined at project buildout would add 2,727 net daily vehicle trips, with 259 in the AM peak hour and 314 in the PM peak hour (as compared to 4,777 net daily vehicle trips, with 436 in the AM peak hour and 517 in the PM peak hour under the proposed project).

The trip distribution percentages and choices of routes to and from the project site for Alternative B were assumed to be consistent with the assumptions used for the analysis of the proposed project as shown in Table 4.9.8: Project Vehicle Trip Distribution, p. 4.9.34. These assumptions are from the City of South San Francisco traffic model as updated in July 2018. The vehicle trips generated by Alternative B result in some reduced transportation impacts as compared to the proposed project as detailed in **Table 5.5: Summary of Transportation Impacts for the Proposed Project and Alternative B.**

Table 5.4: Vehicle Trip Generation – Alternative B

Land Use	Land Use	Size (Sq.Ft.)	Vehicle Trip Generation Rates per KSF AM (PM)	Vehicle Trips		
				Daily	AM Peak Hour	PM Peak Hour
PHASE 1 (Est Complete 2021)						
Existing Land Use (To Be Removed)						
Existing Mixed Industrial (MI)	Industrial	-24,075	0.62 (0.62)	-118	-15	-15
Proposed Land Use						
New Office/R&D under Existing MI District with incentive-based FAR density bonus.	Office	211,990	0.81 (0.93)	1,669	172	197
Net New Trips (Phase 1)				*1,551*	*157*	*182*
PHASE 2 (Est Complete 2023)						
Existing Land Use (To Be Removed)						
Existing Mixed Industrial (MI)	Industrial	-157,995	0.62 (0.62)	-772	-98	-98
Proposed Land Use						
New Office/R&D under Existing MI District incentive-based FAR density bonus	Office	247,524	0.81 (0.93)	1,948	200	230
Net New Trips (Phase 2)				*1,176*	*102*	*132*
Net New Trips (Phases 1 & 2)				**2,727**	**259**	**314**
Proposed Project Net New Trips				4,777	436	517
Alternative B Compared to Proposed Project				**57%**	**59%**	**61%**

Notes: Trip generation rates from City of South San Francisco Traffic Forecast Model

KSF = thousand square feet

Daily vehicle trips estimated by using the ratio between Daily and PM peak hour trips from ITE Trip Generation Manual, 10th Edition

Source: Kittelson & Associates, Inc. (2018)

Table 5.5: Summary of Transportation Impacts for the Proposed Project and Alternative B

Impact	Threshold	Project Phase 1		Project Buildout		Alternative B Phase 1		Alternative B Buildout	
		Impact	CEQA Determination	Impact	CEQA Determination	Impact	CEQA Determination	Impact	CEQA Determination
EXISTING PLUS PROJECT									
Intersection LOS									
TR-1: Littlefield/E. Grand	LOS D +2%	AM: **LOS E +10.9%***	LTS with Mit	AM: **LOS F +18.5%***	LTS with Mit	AM: **LOS E +6.5%***	LTS with Mit	AM: **LOS E +11.1%***	LTS with Mit
TR-2: Allerton/E. Grand	LOS D +2%	PM: **+16.0%***	SU	PM: **+27.9%***	SU	PM: **+9.6%***	SU	PM: **+16.7%***	SU
TR-3: Gateway/S. Airport	LOS D +2%	PM: **+3.2%***	LTS with Mit	**PM: +5.7%***	LTS with Mit	PM: **+1.9%**	LTS	PM: **+3.4%***	LTS with Mit
Intersection Queues									
TR-4: Gateway/Oyster Pt.	+1%	AM: **+<1%**	LTS	AM: **+<1%**	LTS	AM: **+<1%**	LTS	AM: **+<1%**	LTS
TR-5: Gateway/E. Grand	+1%	AM: **+6.1%*** PM: **+17.5%***	LTS with Mit	AM: **+8.8%*** PM: **+31.7%***	LTS with Mit	AM: **+3.7%*** PM: **+10.5%***	LTS with Mit	AM: **+5.3%*** PM: **+19.0%***	LTS with Mit
TR-6: Airport/Produce	+1%	PM: **+8.8%***	LTS with Mit	PM: **+15.9%***	LTS with Mit	PM: **+5.3%***	LTS with Mit	PM: **+9.5%***	LTS with Mit
TR-7: Airport/Grand	+1%	AM: **+15.3%***	LTS with Mit	PM: **+21.2%***	LTS with Mit	PM: **+9.2%***	LTS with Mit	PM: **+12.7%***	LTS with Mit
Freeway Ramps									
TR-8: Freeway Ramps	Capacity +1%	<1%	LTS	<1%	LTS	<1%	LTS	<1%	LTS
Trip Generation									
TR-9: Trip Generation	>100 Trips	**>100***	LTS with Mit.	**>100***	LTS with Mit.	**>100***	LTS with Mit.	**>100***	LTS with Mit.
Freeway Segments									
TR-10: Freeway Segments	LOS E +1%	LOS E	LTS	LOS E	LTS	LOS E	LTS	LOS E	LTS

Impact	Threshold	Project Phase 1		Project Buildout		Alternative B Phase 1		Alternative B Buildout	
		Impact	CEQA Determination	Impact	CEQA Determination	Impact	CEQA Determination	Impact	CEQA Determination
Other									
TR-11: Safety			LTS		LTS		LTS		LTS
TR-12: Emergency Access			LTS		LTS		LTS		LTS
TR-13: Transit Capacity		**Adds passengers***	LTS with Mit.	**Adds passengers***	LTS with Mit.	**Adds passengers***	LTS with Mit.	**Adds passengers***	LTS with Mit.
TR-14: Transit Amenities		**Adds passengers***	LTS with Mit.	**Adds passengers***	LTS with Mit.	**Adds passengers***	LTS with Mit.	**Adds passengers***	LTS with Mit.
TR-15: Bicycle/Pedestrian			LTS		LTS		LTS		LTS
TR-16: Vehicle-Miles of Travel			LTS		LTS		LTS		LTS
CUMULATIVE									
Intersection LOS									
C-TR-1: Gateway/Oyster Pt.	LOS D +1%	**LOS F <1%**	LTS	**LOS F <1%**	LTS	**LOS F <1%**	LTS	**LOS F <1%**	LTS
C-TR-2: Airport/Grand	LOS D +2%	**LOS F <2%**	LTS		LTS	**LOS F <2%**	LTS		LTS
C-TR-3: Airport/Grand	LOS D +2%			AM: **LOS F +3.2%***	SU			AM: **LOS F +1.9%**	LTS
C-TR-4: Dubuque/Grand OC	LOS D +2%	PM: LOS D	LTS	PM: **LOS E +4.3%***	SU	PM: LOS D	LTS	PM: **LOS E +2.6%***	SU
C-TR-5: E. Grand/Grand OC	LOS D +2%	PM: **LOS E +2.7%***	SU	PM: **LOS F +4.6%***	SU	PM: **LOS E +1.6%**	LTS	PM: **LOS E +2.8%***	SU
C-TR-6: Gateway/E. Grand	LOS D +2%	PM: **LOS F +3.4%***	SU	PM: **LOS F +5.9%***	SU	PM: **LOS F +2.0%***	SU	PM: **LOS F +3.5%***	SU

Impact	Threshold	Project Phase 1		Project Buildout		Alternative B Phase 1		Alternative B Buildout	
		Impact	**CEQA Determination**	**Impact**	**CEQA Determination**	**Impact**	**CEQA Determination**	**Impact**	**CEQA Determination**
C-TR-7: Harbor/E. Grand	LOS D +2%	AM: **LOS E +4.0%*** PM: **LOS F +5.1%***	SU	AM: **LOS F +6.8%*** PM: **LOS F +8.8%***	SU	AM: **LOS E +2.4%*** PM: **LOS F +3.1%***	SU	AM: **LOS E +4.1%*** PM: **LOS F +5.3%***	SU
C-TR-8: Littlefield/E. Grand	LOS D +2%	AM: **LOS E +7.5%***	SU	AM: **LOS F +12.8%***	SU	AM: **LOS E +4.5%***	SU	AM: **LOS E +7.7%***	SU
C-TR-9: Allerton/E. Grand	LOS D +2%	PM: **LOS F +9.0%***	SU	PM: **LOS F +15.6%**	SU	PM: **LOS F +5.4%***	SU	PM: **LOS F +9.4%**	SU
C-TR-10: Airport/Produce	LOS D +2%	PM: **LOS F +1.3%**	LTS	PM: **LOS F +2.4%***	SU	PM: **LOS F +0.8%**	LTS	PM: **LOS F +1.4%**	LTS
C-TR-11: Gateway/S. Airport	LOS D +2%	PM: **LOS F +1.7%**	LTS	PM: **LOS F +2.9%***	SU	PM: **LOS F +1.0%**	LTS	PM: **LOS F +1.7%**	LTS
C-TR-12: S. Airport/US 101 Ramps	LOS D +1%	AM: **LOS F +0.9%**	LTS	AM: **LOS F +1.6%***	SU	AM: **LOS F +0.5%**	LTS	AM: **LOS F +1.0%**	LTS
C-TR-13: S. Airport/Utah	LOS D +2%	AM: **LOS F +1.3%**	LTS	AM: **LOS F +2.3%***	SU	AM: **LOS F +0.8%**	LTS	AM: **LOS F +1.4%**	LTS
Intersection Queues									
C-TR-14: Gateway/Oyster Pt.	+1%	AM: **+<1%**	LTS	AM: **+<1%**	LTS	AM: **+<1%**	LTS	AM: **+<1%**	LTS
C-TR-15: Airport/Grand	+1%	AM: **+4.5%*** PM: **+2.8%***	SU	AM: **+7.8%*** PM: **+3.9%***	SU	AM: **+2.7%*** PM: **+1.7%***	SU	AM: **+4.7%*** PM: **+2.3%***	SU
C-TR-16: Gateway/E. Grand	+1%	AM: +**2.6%*** PM: +**6.9%***	SU	AM: +**3.7%*** PM: +**12.5%***	SU	AM: +**1.6%*** PM: +**4.1%***	SU	AM: +**2.2%*** PM: +**7.5%***	SU
C-TR-17: Airport/Produce	+1%	AM: +**1.0%*** PM: +**3.6%***	SU	AM: +**1.5%*** PM: +**6.6%***	SU	AM: +**0.6%** PM: +**2.2%***	SU	AM: +**0.9%** PM: +**4.0%***	SU
C-TR-18: S. Airport/US 101 Ramps	+1%	AM: +**1.7%***	SU	AM: +**2.8%***	SU	AM: +**1.0%***	SU	AM: +**1.7%***	SU

Impact	Threshold	Project Phase 1		Project Buildout		Alternative B Phase 1		Alternative B Buildout	
		Impact	**CEQA Determination**	**Impact**	**CEQA Determination**	**Impact**	**CEQA Determination**	**Impact**	**CEQA Determination**
Freeway Segments									
C-TR-19: US 101 N. of Oyster Pt. NB	LOS E +1%	PM: **LOS F** **+0.6%**	LTS	PM: **LOS F** **+1.0%***	SU	PM: **LOS F** **+0.4%**	LTS	PM: **LOS F** **+0.6%**	LTS
US 101 N. of I-380 SB		PM: **LOS F** **+0.6%**		PM: **LOS F** **+1.1%***		PM: **LOS F** **+0.4%**		PM: **LOS F** **+0.7%**	
Freeway Ramps									
C-TR-20: NB Off-Ramp to S. Airport	Capacity +1%	AM: **+1.3%***	SU	AM: **+2.3%***	SU	AM: **+0.8%**	LTS	AM: **+1.4%***	SU
C-TR-21: SB On-Ramp from Produce	Capacity +1%	PM: **+2.1%***	SU	PM: **+3.9%***	SU	PM: **+1.3%***	SU	PM: **+2.3%***	SU

Bolded results = exceeds threshold *** significant impact**

Source: Kittelson & Associates, Inc. (2018)

Existing Plus Project Conditions – Alternative B

The reduction in trips for Alternative B compared to the proposed project would reduce impacts, but would not eliminate significant impacts on intersection operations and queues under existing plus project conditions. Therefore, Mitigation Measures MM-TR-1: Add a Northbound Right-Turn Lane at the Intersection of Littlefield Avenue and East Grand Avenue; MM-TR-3: Widen and Restripe the Southbound, Eastbound and Westbound Approaches at the Intersection of Gateway Boulevard/South Airport Boulevard/Mitchell Avenue; MM-TR-5: Adjust Signal Timing at Gateway Boulevard and East Grand Avenue; MM-TR-6: Adjust Signal Timing at the intersection of Airport Boulevard/San Mateo Avenue/Produce Avenue; MM-TR-7: Adjust Signal Timing at Airport Boulevard and Grand Avenue; MM-TR-9: Implement Transportation Demand Management measures listed in San Mateo County Congestion Management Program Appendix I; MM-TR-13: Expand local shuttle services; and MM-TR-14: Provide shuttle stop amenities at Phase 2, as described in Section 4.9 of this EIR, would continue to apply to Alternative B and would reduce impacts to a less-than-significant level.

The reduction in vehicle trips for Alternative B compared to the proposed project would reduce impacts to operation of the Allerton Avenue and East Grand Avenue intersection. Mitigation Measure TR-2: Add a Traffic Signal and a Southbound Right-Turn Lane at the Intersection of Allerton Avenue and East Grand Avenue would continue to apply to Alternative B, but as described in Section 4.9 of this EIR, 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, Similar to the proposed project, while the mitigation measure could reduce the traffic impact to a less-than-significant level, the mitigation measure under Alternative B remains infeasible. The cumulative impact would remain significant and Alternative B's contribution would remain cumulatively considerable.

CUMULATIVE CONDITIONS – ALTERNATIVE B

Unlike the proposed project, Alternative B's contribution to Intersection Impacts C-TR-3 for the intersection of Airport Boulevard and Grand Avenue; C-TR-5 for the intersection of East Grand Avenue/Grand Avenue Overcrossing (Phase 1 only); C-TR-10 for the intersection of Airport Boulevard/Produce Avenue/San Mateo Avenue; C-TR-11 for the intersection of Gateway Boulevard/South Airport Boulevard/Mitchell Avenue; C-TR-12 for the freeway ramp intersection of South Airport Boulevard and U.S. 101 Northbound Hook Ramps/Wondercolor Lane; and C-TR-13 for the intersection of South Airport Boulevard and Utah Avenue, as described in Section 4.9 of this EIR, would not be cumulatively considerable, as the traffic generated by Alternative B (Phase 1 or buildout) would add less than the threshold of 2 percent of total traffic at the intersections during peak hours when the

intersections would operate at LOS E or F without the project (or the 1 percent threshold at a freeway ramp intersection for C-TR-12). Therefore, under Alternative B, no mitigation would be necessary for these intersections. However, Alternative B's contribution to significant cumulative impacts for C-TR-5 at project buildout would continue to be cumulatively considerable, as further discussed below.

As with the proposed project, Alternative B's contribution to Impact C-TR-4, Impact C-TR-5 (buildout only), Impact C-TR-6, Impact C-TR-7, Impact C-TR-10, Impact C-TR-13, Impact C-TR-15, Impact C-TR-16, Impact C-TR-17, and Impact C-TR-18 on the intersection of East Grand Avenue and Grand Avenue would continue to be cumulatively considerable. Unlike the proposed project, Alternative B's contribution to Impact C-TR-5 would not be significant under Phase 1. Mitigation Measure MM-C-TR-5: Add a Second Northbound Left-Turn Lane would no longer apply to Alternative B under Phase 1. As discussed in Section 4.9, the City is in the process of updating its East of 101 Area Traffic Impact Fee (TIF) and Capital Improvement Program (CIP). The City is considering including the improvements contemplated under Mitigation Measures MM-C-TR-4, MM-C-TR-5, MM-C-TR-6, MM-C-TR-7, MM-C-TR-10, MM-C-TR-13, MM-C-TR-14, MM-C-TR-15, MM-C-TR-16, MM-C-TR-17, and MM-C-TR-18 in the updated TIF and CIP. The Phase 1 and Phase 2 project sponsors would pay the applicable TIF in effect at the time building permits are issued. Until TIF and CIP updates are complete, however, the City does not have a mechanism for funding these mitigation measures. At this time, the City, therefore, cannot guarantee that these mitigation measures will be implemented. Thus, while the proposed mitigation measures could reduce the traffic impact to a less-than-significant level, the City has not yet completed the TIF and CIP updates to include or fund these mitigation measures, so the overall impact would remain significant. A TDM program would be required to be prepared and implemented 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. The impacts would be significant and unavoidable.

Intersection Impact C-TR-8 for the intersection of Littlefield Avenue and East Grand Avenue and C-TR-9 for the intersection of Allerton Avenue and East Grand Avenue as described in Section 4.9 of this EIR, would be reduced under Alternative B compared to the proposed project, but Alternative B's contribution to these impacts would remain cumulatively considerable. Mitigation Measure C-TR-8: Add an Eastbound Through Lane to the Intersection of Littlefield Avenue/East Grand Avenue and C-TR-9: Add a Westbound Through Lane and a Southbound Right-Turn Lane at the intersection of Allerton Avenue/East Grand Avenue would continue to apply to Alternative B. Implementation of these mitigation measures would provide LOS D or better operations; however, the revisions could impact existing bike lanes. This secondary impact of these mitigation measures 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. 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 the additional right-of-way to widen East Grand Avenue would economically affect existing businesses that need parking to remain viable, and that funding for the acquisition is not

assured, these mitigation measures are considered to be infeasible. As with the proposed project, Impacts C-TR-8 and C-TR-9 would remain significant and unavoidable with mitigation under Alternative B.

Under Alternative B, the degree of trip reduction would be sufficient to reduce traffic levels and reduce Alternative B's contribution to significant and unavoidable cumulative impacts to two freeway segments of U.S. 101 in the PM peak hour, northbound north of Oyster Point Boulevard and southbound north of I-380 as described under Impact C-TR-19. Under Alternative B, these freeway segments would still operate at unacceptable LOS F in the future, but project vehicle trips under this alternative would add less than 1 percent of total traffic to the segments during the PM peak hour. Therefore, Alternative B's contribution to Impact C-TR-19 as described in Section 4.9 of this EIR would not be cumulatively considerable under Alternative B.

Alternative B's contribution at buildout to Freeway Ramp Impact C-TR-20 for the northbound off-ramp to South Airport would continue to be a cumulatively considerable but unlike the proposed project, Alternative B's contribution to Impact C-TR-20 would not be cumulatively considerable under Phase 1. Freeway Ramp Impacts C-TR-20 for the northbound off-ramp to South Airport (at buildout) and C-TR-21 for the Southbound on-ramp from Produce Avenue (at Phase 1 and buildout), as described in Section 4.9 of this EIR, would be reduced under Alternative B compared to the proposed project, but Alternative B's contribution to these significant cumulative impacts would remain cumulatively considerable. No feasible mitigation is available under the proposed project or Alternative B. Alternative B's contribution to these significant cumulative impacts would remain significant and unavoidable.

UTILITIES AND SERVICE SYSTEMS

Because Alternative B would result in development of 218,086 gsf less office/R&D land use and less occupied building space than the proposed project, Alternative B's use of potable water supplies and production of wastewater and solid waste would be less than that identified under the proposed project. This alternative would marginally reduce the already less-than-significant water supply, wastewater, and solid waste impacts that had been identified under the proposed project. Alternative B would continue to involve contribution to the City's Sewer System Capacity Study and Improvement Fee; stormwater design regulations provided by the City and the Regional Water Quality Control Board; and implementation of water consumption and solid waste reduction measures provided by the City Climate Action Plan and CALGreen requirements.

As with the proposed project, the Alternative B site plan would include low-impact development infrastructure that would ensure that peak post-development operational stormwater flows would not exceed the pre-development peak stormwater flow and impacts to stormwater systems would remain less than significant. As with the proposed project, cumulative development would not cause significant cumulative utilities and service systems impacts.

LESS-THAN-SIGNIFICANT IMPACTS

Section 4.11, Less-than-Significant Impacts, concluded that the proposed project would have no impacts or less-than-significant impacts in the following analysis areas:

- Aesthetics (all topics)
- Agriculture and Forest Resources (all topics)
- Geology and Soils (all topics)
- Hazards and Hazardous Materials (all topics)
- Mineral Resources (all topics)
- Population and Housing (all topics)
- Public Services (all topics)
- Recreation (all topics)

Alternative B would occupy the same project site footprint as the proposed project and would have a similar, though less intensive development program overall (459,514 gsf of development under this alternative compared to 677,600 gsf under the proposed project). As a result, the construction and operational impacts of Alternative B, the Reduced Development Alternative, for each of the environmental topics noted above in Section 4.11, Less Than Significant Impacts would be similar to, but reduced from, those of the proposed project.

5.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires identification of an environmentally superior alternative (the alternative that has the fewest significant environmental impacts) from among the other alternatives evaluated if the proposed project has significant impacts that cannot be mitigated to a less-than-significant level. If the No Project Alternative is found to be the environmentally superior alternative, the EIR must identify an environmentally superior alternative among the other alternatives.

The No Project Alternative would not result in any change to existing environmental conditions. Alternative B, the Reduced Development Alternative, would result in an overall reduction of impacts identified for the proposed project. Alternative B would have less square footage (by 218,086 square feet, or 32 percent less) of office/R&D land use than the proposed project. As such, it would result in lower trip generation than the proposed project and reduced impacts related to transportation and circulation. The one project-level impact under the proposed project would remain significant and unavoidable under Alternative B. The proposed project's contribution to 12 significant cumulative traffic impacts would remain cumulatively considerable under Alternative B and these impacts would remain significant and unavoidable. However, due to the reduced number of vehicle trips, Alternative B's contribution to eight significant cumulative impacts, which would be cumulatively considerable under the proposed project, would be less than cumulatively considerable under Alternative B. A detailed discussion of the traffic impact analysis and applicable mitigation measures for Alternative B, the Reduced Development Alternative, is provided in Section 5.3 under "Transportation and Circulation".

5.5 Alternatives Considered but Rejected

Section 15126.6(c) of the CEQA Guidelines provides that an EIR should "identify any alternatives that were considered by the lead agency but rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination." The screening process for identifying viable EIR alternatives included consideration of the following criteria: ability to meet the project objectives; potential ability to substantially lessen or avoid environmental effects associated with the proposed project; and potential feasibility. The discussion below describes alternatives that were considered in the preparation and scoping of the EIR, and provides the reasons for eliminating these alternatives from detailed consideration in the EIR.

5.5.1 Off-Site Alternative

An off-site alternative was eliminated from consideration as an alternative to the proposed project. Due to the limited primary road network of the East of 101 Area, construction of any similarly sized new office/R&D uses on land located elsewhere in the East of 101 Area would result in similar project-level impacts and cumulatively considerable contributions to significant cumulative transportation and traffic impacts. An off-site alternative in other areas in South San Francisco would not further the City's policies of developing the East of 101 Area with new opportunities for biotechnology and office/R&D uses and would not achieve the City's goals in the East of 101 Area. Therefore, an off-site alternative was considered and rejected.

5.5.2 Revised Design Alternative

An alternative design option was considered and rejected because configuration or changes to the site plan or architectural design would not reduce transportation and traffic impacts. Therefore, a revised design alternative was considered and rejected.

5.5.3 Further Reduced Density Alternative

A further reduced density alternative was considered for the purposes of eliminating additional significant and unavoidable impacts as compared to Alternative B. Reducing the scale of the development to a level that would eliminate project-level impacts and cumulatively considerable contributions to significant cumulative traffic impacts would not result in a feasible project. Reducing the amount of development below allowable FAR would effectively downzone the property and would not be practical. Therefore, a further reduced density alternative was considered and rejected.

5.5.4 Alternative Land Use

An alternative land use, such as residential or retail, that may result in fewer significant and unavoidable transportation impacts was also considered and rejected. An alternative land use of industrial would, in effect, be equivalent to Alternative A, the No Project Alternative. Other alternative land uses (such as residential or retail) would not be permitted under current City General Plan policies for the East of 101 Area, nor would they be consistent with existing land uses in the vicinity of the project site. Therefore, an alternative land use development was considered and rejected.

This page intentionally left blank.