21
CEQA Conclusions

Section Guidelines, Section 15126 and 15130 require that, "*all aspects of a project be considered when evaluating its impact on the environment including planning, acquisition, development and operation. The subjects listed below shall be discussed . . . , preferably is separate sections or paragraphs of the EIR. If they are not discussed separately, the EIR shall include a table showing where each of the subjects are discussed:*"

- Significant environmental effects (including cumulative effects) of the Project
- Mitigation measures proposed to minimize significant effects
- Significant environmental effects (including cumulative effects) that cannot be avoided if the Project is implemented
- Growth-inducing effects of the Project
- Alternatives to the Project, and
- Significant irreversible environmental changes that would be involved in the Project should it be implemented

Each of these subjects is discussed in this EIR. The following summary identifies where in this EIR these subjects are addressed, and provides a brief conclusion or summary of those subjects.

Summary of Significant Impacts

Chapter 5 through 19 of this EIR each include a description of the existing (or baseline) physical setting, the thresholds of significance for assessing potentially significant environmental impacts, and an identification of individual significant effects of the Project. Impacts are identified by their levels of significance based on the following categories:

- those effects found to have No Impact (no noticeable adverse effect on the environment)
- Less than Significant Impacts (an environmental effect that would not exceed the threshold of significance),
- impacts that are Less than Significant with Mitigation Measures (impacts that can be reduced to a less than significant level with implementation of recommended mitigation measures), and
- Significant and Unavoidable Impacts (impacts that exceed the threshold of significance and cannot be avoided or reduced through implementation of identified mitigation measures)

Qualitative and location-based environmental effects have been assessed in this EIR for certain topics. These types of environmental effects identify where new development or redevelopment activities pursuant to the Project may adversely affect location-based or site-specific environmental resource (e.g., aesthetics, biological resources, cultural and historic resources, geology and soils, hazards and hydrology). Additionally, the buildout scenario of the Project has been used to generate employment estimates and land use projections for more quantitative analyses. Quantitative impacts have been identified for a number of growth-based environmental topics (e.g., air quality emissions, greenhouse gas emissions, land use and planning, noise sensitivity and noise generation, employment, public services, transportation and utilities).

The Executive Summary (Chapter 2) of this EIR provides a tabular summary of all environmental effect of the Project as analyzed in this EIR.

Cumulative Effects

Chapter 5 through 19 of this EIR each concludes with an analysis of cumulative effects. Depending on the topic, the cumulative context varies with the geography of cumulative implications. For example, cumulative effects related to climate change are global in scale, and cumulative effects related to air quality emissions of criteria air pollutants affect the entire San Francisco Air Basin. Conversely, some cumulative effects are local in nature, such as cumulative water quality effects on those waters that are tributary to the Project Area. The majority of cumulative effects discussed in this EIR (specifically including traffic) are based on anticipated cumulative growth and development within the East of 101 Area of South San Francisco.

Mitigation Measures Proposed to Minimize Significant Effects

Pursuant to CEQA Guidelines Section 15126.4, Chapter 5 through 19 of this EIR each identifies feasible measures that could minimize significant adverse impacts. Each chapter of the EIR distinguishes between those measures that are proposed by Genentech and included in the Project, those measures that are required pursuant to compliance with regulatory permits or other regulatory processes, and additional measures that the City of South San Francisco has determined as necessary to reduce adverse impacts. Accordingly, this EIR identifies a range of feasible mitigation measures that will minimize significant adverse impacts of the Project. Each type of mitigation measure is identified throughout this EIR, and each will be required as a condition of approval of the Project.

The Executive Summary (Chapter 2) of this EIR provides a tabular summary of all mitigation measures required of the Project as identified in this EIR.

Measures Included in the Project

This EIR recognizes the mitigation measures and sustainability initiatives that are proposed by, and will be implemented pursuant to the Project by Genentech as the Project applicant. These measures are included in the Master Plan Update (the Project), will be implemented as part of on-going corporate commitments and include, but are not limited to the following:

- As part of the Master Plan Update, Genentech proposes to minimize traffic generation and maximizing TDM opportunities. The Master Plan establishes a “Trip Cap” that limits the total number of drive-alone vehicle trips at levels that have already been approved pursuant to prior land use entitlements. Genentech (the Project sponsor) commits to ongoing implementation of its gRide TDM program at levels that far exceed the City’s TDM target and fully offset any increase in single-occupant vehicle trips that might otherwise exceed the Trip Cap.
- Genentech’s has numerous ongoing sustainability initiatives that are internally driven by their private, corporate commitments as included in the Genentech Sustainability Strategic Plan. The Sustainability Strategic Plan includes numerous sustainability initiatives that include, but are not limited to reducing water consumption, lowering energy demands and GHG emissions and reducing waste to landfill disposal.
- Genentech has voluntarily joined the California Climate Action Registry (now the Climate Action Reserve), and is a participant in the California Cap-and-Trade Program. Under the Cap-and-Trade Program, enforceable limits are set on the amount of emissions that Genentech can produce (known as a "cap"), and this cap is gradually reduced over time. Genentech receives permits for the emissions allowable under their cap, but if Genentech does not use all their permits they can auction them off to other emitters (via “trade”), and those emitters can use the additional permits to exceed their cap. Conversely, Genentech can trade for increased permits to offset increased GHG emissions

associated with new development. CARB collects revenue from the permit auctions and uses this revenue to invest in offsetting projects that result in reductions in GHG emissions.

Regulatory Requirements

CEQA Guidelines Section 16126.4B specifically provides that, "compliance with a regulatory permit or other similar process may be identified as mitigation if compliance would result in implementation of measures that would be reasonably expected, based on substantial evidence in the record, to reduce the significant impact to the specified performance standards." Accordingly, this EIR itemizes those regulatory requirements that are applicable to the Project, and that would serve to reduce or avoid otherwise potentially significant environmental effects. Examples of these types of measures include, but are not limited to the following:

- All qualifying construction projects pursuant to the Master Plan Update shall comply with Provision C.6 of the Municipal Regional Permit (MRP), including filing a Notice of Intent for permit coverage under the Construction General Permit and preparation of a Stormwater Pollution Prevention Plan (per *Regulatory Requirement Hydro 1A, Construction General Permit and Stormwater Pollution Prevention Plan*), and incorporating post-construction stormwater controls and low-impact development (LID) measures meeting Provision C.3 requirements for reducing long-term impacts of development on stormwater quality (per *Regulatory Requirement Hydro 1B, Provision C.3 Requirements/Stormwater Management Plan*)
- Each new development project pursuant to the Master Plan Update shall have a site-specific geotechnical study prepared by a certified licensed geotechnical engineer, including site-specific geotechnical recommendations demonstrating compliance with all applicable seismic-related geotechnical engineering standards of the City of South San Francisco Municipal Code, the California Building Code and the California Seismic Hazards Mapping Act, with all recommendations to be incorporated into individual development project designs and construction (*per Regulatory Requirement Geology 1, Seismic Hazards*)
- Genentech shall comply with all State, federal and local regulations, and Genentech programs, practices and procedures that ensure that the potential for worker and/or public exposure to hazardous chemicals from improper or unsafe activities or from accidents meets the guidelines of the American Conference of Governmental Industrial Hygienists' Threshold Limit Values and OSHA's Permissible Exposure Levels (per *Regulatory Requirements Hazards 1A, Use of Chemical Materials*)
- The Project Sponsor shall pay South San Francisco's East of 101 Transportation Impact Fees, representing their fair-share contribution toward intersection improvements included in the East of 101 Traffic Impact Fee Program (per *Regulatory Requirement Transportation 1B - East of 101 Transportation Impact Fee Improvements*)

Additional Mitigation Measures

This EIR also identifies those instances where the City of South San Francisco has determined that, in addition to measures proposed pursuant to the Project and measures required pursuant to existing regulations, additional mitigation measures are warranted to reduce or avoid adverse environmental impacts, or to establish performance standards necessary ensure mitigation to less than significant levels. Examples of these types of mitigation measures include, but are not limited to the following:

- Prior to any construction activity near the coastal salt marsh along the southeastern edge of the Campus a protocol-level survey, which involves a series of site visits between mid-January and late March, shall be conducted by a qualified biologist. The survey needs to be approved by the USFWS and CDFW in advance. If breeding rails are determined to be present, construction activities shall not occur within 750 feet of an identified calling center during the breeding season (per *Mitigation Measure Bio 2B, Protocol-Level Surveys and Buffers*)

- For any construction activity that is within 50 feet of an adjacent off-site property and where construction noise may exceed the 90dBA limit of the SSF Municipal Code, the Project applicant shall be required, by contract specifications, to implement BMPs for construction activity to reduce construction noise levels (per *Mitigation Measure Noise 1A, Construction Period BMPs*)
- The Project Sponsor shall pay its fair-share toward those intersection improvements not currently included in the East of 101 Traffic Impact Fee Program by either; 1) fully funding improvements subject to fee credits if the improvement is subsequently included in the City's CIP update; or 2) paying the City's Transportation Impact Fees if the City does subsequently include these improvements in its CIP (per *Mitigation Measure Transportation 1: Additions to East of 101 Transportation Impact Fee Program*)

Significant and Unavoidable Impacts

Based on the analysis presented in this EIR, the Project would result in the following environmental impacts that would be considered significant and unavoidable:

Air Quality

Operational Criteria Pollutants

Chapter 6 of this EIR concludes that during operations, the Project would result in a cumulatively considerable net increase of criteria pollutants for which the region is non-attainment, including emissions that exceed quantitative thresholds for ozone precursors. Specifically, the Project's average daily operational emissions are projected to exceed 54 pound per day of reactive organic gas (ROG) and nitrogen oxides. Regulatory Requirement AQ 4 - New Source Review Offset requires Genentech to purchase offset credits pursuant to BAAQMD Regulation 2-2: New Source Review, Section 302 Offset Requirements for each new permitted stationary source of NOx and/or ROG emissions, and for any modifications to existing stationary emission sources that result in increased NOx and/or ROG emissions. Although TDM, energy efficiency features and regulatory requirements are incorporated into the Project, total emissions of criteria pollutants from mobile sources and other sources not requiring separate permits from BAAQMD would exceed the thresholds of significance. The health impacts associated with criteria pollutant emissions from the Project are conservatively estimated and the analysis indicates that anticipated health impacts are vanishingly small and that the actual health impacts may be zero.

Noise

Construction Noise

Chapter 14 of this EIR concludes that construction activities pursuant to the Project could generate noise levels that exceed the noise standards established in SSFMC Section 8.32.030. Construction projects pursuant to the Project will be required to implement construction Period BMPs for construction that is within 50 feet of an adjacent off-site property, and to route heavily loaded trucks away from noise-sensitive and vibration-sensitive uses. With implementation of Genentech Noise Attenuation and Logistics Plans, construction-period noise effects on Genentech's own on-Campus buildings would meet applicable OSHA requirements for safe workspaces and other private Genentech-based noise standards for healthy workplaces. Construction noise is temporary and episodic in nature, and construction noise is typically not considered significant if its duration is for a period of less than one year. However, the details of individual construction activities cannot be known in advance, and achieving the noise standards established in SSF Municipal Code is not certain. Mitigation measures presented in this EIR include all reasonable and feasible methods to reduce construction noise effects, but this impact is conservatively considered significant and unavoidable.

Transportation

Chapter 17 of this EIR concludes that under Existing plus Project and/or under Cumulative plus Project scenarios, the Project would make significant contributions to traffic levels that would conflict with applicable plans, ordinances or policies that establish measures for effective levels of service. These impacts are more fully described below.

Local Intersection Level of Service – Existing plus Project

The Project would contribute traffic to intersections in the Project vicinity that would result in conflicts with applicable plans, ordinances or policies that establish measures of effectiveness for intersection levels of service (LOS) or queuing at twenty (20) of the 27 traffic study intersections. Regulatory requirements and/or mitigation measures have been identified that are capable of reducing these impacts at 13 of the 20 affected intersections, but no feasible or certain improvements have been identified as capable of reducing impacts to a less than significant level at 7 affected study intersections.

Payment of fair-share contributions toward signal timing improvements and intersection improvements as included in the City's current East of 101 Transportation Impact Fee Program (Regulatory Requirements Transp 1A and Transp 1B) would reduce Project impacts at 9 intersections. Either fully funding certain improvements subject to fee credits, or paying City Transportation Impact Fees if the City's then-current CIP includes improvements at the time of issuance of building permits (pursuant to Mitigation Measure Transp-1), the Project's impacts would be reduced to less than significant at 4 intersections. However, either there are no feasible improvements capable of reducing the Project's impacts, or implementation of mitigation improvements are within the jurisdiction of a separate agency (Caltrans) at seven (7) intersections, and impacts would remain significant and unavoidable at the following locations:

- 101 NB/Oyster Pt. Boulevard off Ramp (Caltrans jurisdiction)
- 101 SB/Gateway Boulevard/Oyster Pt. Boulevard Off Ramp (Caltrans jurisdiction)
- Gull Drive/Forbes Boulevard (limited right-of-way)
- Airport Boulevard/Miller Avenue/ US-101 SB Off-Ramp (Caltrans jurisdiction)
- Airport Boulevard/Grand Avenue (unavailable capacity for southbound left turn queue)
- South Airport Boulevard/US-101 On- and Off-Ramps/ Wondercolor Drive (constrained right-of-way)
- South Airport Boulevard / I-380 Westbound ramp (constrained right-of-way and downstream queuing on the I-380 westbound ramp)

Freeway Segments – Existing plus Project

The Project would generate more than 100 peak hour trips onto the Congestion Management Program roadway network, resulting in conflicts with applicable plans, ordinances or policies that establish measures for effective levels of service along two freeway segments – southbound US-101 north of Oyster Point Boulevard and northbound US-101 south of Produce Avenue during the morning peak hour. Consistent with C/CAG guidelines, the Project will implement a TDM program that is consistent with and exceeds City requirements. That TDM program will serve to reduce its otherwise greater contribution of trips on the CMP network, including increased traffic on US-101 freeway segments. However, there are no feasible mitigation measures for these impacts to freeway segments due to constrained right-of-way and a corresponding inability to add traffic capacity or reduce vehicular delays, and these impacts remain significant and unavoidable.

Local Intersection Level of Service – Cumulative

The Project would contribute to cumulative traffic levels that would result in conflicts with applicable plans, ordinances or policies that establish measures of effectiveness for intersection levels of service (LOS) at 22 intersections. Regulatory requirements and mitigation measures identified under Existing plus Project conditions (Mitigation Measure Transportation 6A) would reduce Cumulative plus Project impacts to less than significant levels at 3 intersections. Improvements identified in Mitigation Measure Transportation-6B could effectively reduce impacts at 4 of intersections, but these improvements are not currently included under the City's East of 101 Transportation Impact Fee Program or in the City's Capital Improvement Program (CIP), and there is no fair-share funding mechanism is established by the City to provide for fair-share payments toward the improvements. Even with improvements identified in MM Transportation-6B, there are 15 intersections that would be adversely affected by Cumulative plus Project-generated traffic for which there are no feasible improvements capable of reducing cumulative impacts to below threshold levels, and these impacts would remain significant and unavoidable at the following locations:

- Airport Boulevard/Sister Cities Boulevard/Oyster Point Boulevard (constrained roadway right-of-way)
- Dubuque Avenue/Oyster Point Boulevard (no space available to add additional queuing)
- Oyster Point Boulevard/Gateway Boulevard (constrained roadway right-of-way)
- Oyster Point Boulevard/Veterans Boulevard (constrained street right-of-way)
- Oyster Point Boulevard/Eccles Avenue (constrained street right-of-way)
- Gull Drive/Forbes Boulevard (constrained street right-of-way)
- Airport Boulevard/Grand Avenue (adding vehicle capacity would be inconsistent with the Pedestrian Priority Zone identified in the South San Francisco Station Area Specific Plan)
- East Grand Avenue/Gateway Boulevard (roadway widening would conflict with the City of South San Francisco's Complete Streets Policy)
- East Grand Avenue/Harbor Way/Forbes Boulevard (constrained roadway right-of-way)
- Produce Avenue/Airport Boulevard/San Mateo Avenue (constrained roadway right-of-way)
- South Airport Boulevard/Gateway Boulevard (constrained roadway right-of-way)
- South Airport Boulevard/US-101 On- and Off-Ramps (constrained roadway right-of-way)
- South Airport Boulevard/Utah Avenue (no feasible mitigations at this intersection)
- I-380 Westbound Ramp/South Airport Boulevard (unavailable capacity for queue lengths on the southbound right turn movement)

Freeway Ramps - Cumulative

The Project would generate more than 100 peak hour trips onto the Congestion Management Program roadway network, contributing to cumulative traffic levels that would conflict with applicable plans, ordinances or policies that establish measures for effective levels of service at two nearby freeway interchanges under Cumulative plus Project conditions. These freeway ramps include US-101/Oyster Point Boulevard interchange in the PM peak hour and US-101/Produce Avenue interchange in the AM peak hour. Consistent with C/CAG guidelines, the Project will implement a TDM program that is consistent with and exceeds City requirements. That TDM program will serve to reduce its otherwise greater contribution of trips on the CMP network, including its contributions of traffic to freeway ramps, but impacts will remain significant and unavoidable.

Freeway Segments – Cumulative

The Project would generate more than 100 peak hour trips onto the Congestion Management Program roadway network, contributing to cumulative traffic levels that would conflict with applicable plans, ordinances or policies that establish measures for effective levels of service on the following freeway segments:

- Northbound US-101 north of Oyster Point Boulevard (the Project would contribute 1.2 and 3 percent of the cumulative traffic on this freeway segment during both peak hours, respectively)
- Southbound US-101 north of Oyster Point Boulevard (the Project would contribute 5 percent of the cumulative traffic on this freeway segment during the AM peak hour)
- Northbound US-101 between Oyster Point Boulevard and Grand Avenue (the Project would contribute 2 percent of the cumulative traffic on this freeway segment during the PM peak hour)
- Southbound US-101 between Oyster Point Boulevard and Grand Avenue (the Project would contribute 1.1 percent of the cumulative traffic on this freeway segment during the PM peak hour)
- Northbound US-101 between Grand Avenue and Produce Avenue (the Project would contribute 5 percent of the cumulative traffic on this freeway segment during the AM peak hour)
- Southbound US-101 between Grand Avenue and Produce Avenue (the Project would contribute 4 percent of the cumulative traffic on this freeway segment during the PM peak hour)
- Northbound US-101 south of Produce Avenue (the Project would contribute 5 percent of the cumulative traffic on this freeway segment during the AM peak hour)

Consistent with C/CAG guidelines, the Project will implement a TDM program that is consistent with and exceeds City requirements. That TDM program will serve to reduce its otherwise greater contribution of trips on the CMP network, including increased traffic on US-101 freeway segments. There are no feasible mitigation measures for these impacts due to constrained right of way on US-101 and these cumulative impacts remain significant and unavoidable.

Growth-Inducing Effects

As described in Chapter 15 of this EIR, Genentech's presence as the largest employer in the City and founder of one of the largest biotechnology campuses in the world has, and will likely continue to draw a number of support businesses and industries to the area. According to City publications, the East of 101 Area is one of the largest and fastest-growing biotechnology cluster in the world, estimated to have more than 200 biotechnology firms employing over 20,000 people. This growth is primarily a function of non-CEQA factors such as business decisions to be proximate to this growing industry, the availability of a specialty-skilled workforce, and forward-thinking planning efforts by the City. These factors are not typical growth inducement concerns of CEQA, such as the extension of roadways or expansion of infrastructure capacity that would otherwise preclude new development or that would induce growth beyond what is otherwise planned. The Project will not include any physical improvement that would induce growth in CEQA-based concerns beyond that needed to support its own needs, or that would be in addition to City growth plans for the area.

As also described in greater detail in Chapter 15 of this EIR, the Project is estimated to accommodate an increase of approximately 12,550 new jobs, conservative estimated to result in a demand for approximately 9,160 new households. However, Genentech estimates that approximately 75% of its new labor force since 2010 were existing Bay Area residents choosing to change their employment to Genentech, and that only approximately 25% of its new labor force is derived from new residents from outside the Bay Area. Assuming a similar trend that 25% of new Project-generated jobs would be taken by new Bay Area residents, the

Project may more realistically result in a demand for approximately 2,290 new households. An increase of 9,160 new households (or even 2,290 new households assuming 75% of new jobs would be taken by existing Bay Area residents) would exceed the projection of new housing potential in the City of South San Francisco pursuant to its Housing Element. However, Genentech is a regional employer, drawing its employees from across the entire Bay Area region. ABAG's Plan Bay Area 2040 provides a regional forecast for growth, indicating that between 2010 and 2040, the Bay Area is projected to grow from 3.4 to 4.7 million jobs and the population is projected to grow from 7.2 to 9.5 million people. This population will live in approximately 3.43 million households or an increase of approximately 817,000 households over 2010 levels. The Project's potential indirect housing demand represents a small share (between 0.2% and 1.1%) of projected household growth within the Bay Area region. On a regional basis, the Project's demand for new housing is not a significant share of the total projected regional household growth.

Alternatives to the Project

Three alternatives are presented and analyzed in Chapter 20 of this EIR. These alternatives are intended to meet the CEQA requirements for the EIR to describe the no project alternative as well as a range of reasonable alternatives to the Project that would feasibly attain most of the basic objectives of the Project, but would avoid or substantially lessen significant effects. Specifically, these alternatives include:

- Alternative #1: No Project - defined as the current 2007 Master Plan and the existing Genentech Master Plan Zoning District remaining in place, and with new development within the Campus remaining limited to a maximum buildout of up to 6 million square feet of building space, plus the 821,000 square feet added as the South Campus.
- Alternative 2: Reduced Project - establishes an overall growth limit within the Campus boundaries of up to 7.9 million square feet, or the mid-point between the 6.8 million square-foot buildout of the currently effective 2007 Master Plan and the 9 million square-foot buildout potential of the proposed Project.
- Alternative 3: Alternative Mix of Land Uses – representing buildout of 9 million square feet (like the Project) but with a mix of land uses that have a substantially different shift from the higher trip-generating office land use to the lower trip-generating lab and manufacturing space uses. One of the purposes of this Alternative is to demonstrate the flexibility of the Master Plan Update and its proposed Trip Cap to respond to potentially changing building space demands at the Campus over time.

None of the alternatives is fully capable of changing a significant impact of the Project to less than significant impact, or is capable of fully avoiding an environmental effect of the Project. Rather, the differences between the Project and the alternatives are measured in relative magnitude. Generally, the lower development potential of Alternative #1 (the No Project) would generate less severe impacts as compared to the Project. CEQA requires this EIR to identify an alternative, other than the No Project Alternative, that would be considered environmentally superior. The lower development potential of Alternative #2 would generate less severe overall impacts as compared to the Project, and Alternative #2 is environmentally superior in terms of relative magnitude of impacts. However, Alternative #2 does not substantially lessen or avoid any significant environmental effects of the Project that cannot otherwise be substantially lessened or avoided under the Project with implementation of all feasible mitigation measures identified in this EIR.

Two other alternatives were considered in preparation of this EIR, but rejected. A "No New Development Alternative" was rejected because a "no project" alternative would reject the Project, but would continue the existing 2007 Master Plan and existing zoning regulations into the future. This EIR does not analyze nor does it foresee any "no build" scenario under which there is no new development beyond what exists at the Campus under the baseline condition. An alternative site location was also considered but rejected. Genentech does have other facilities in Vacaville and Oceanside, California, in Hillsboro, Oregon and in

Singapore. While it is possible that Genentech could consider an alternative of developing at one of these other locations, such an alternative would not enable Genentech to achieve its basic Project objectives. Furthermore, there is no information to suggest that development of up to approximately 4.3 million square feet of Genentech operational facilities at any of these other locations would avoid or substantially lessen any significant effects of the Project, but instead would likely transfer those effects from one place to another.

Significant Irreversible Environmental Change

Section 15126.2(d) of the CEQA Guidelines states that significant irreversible environmental changes associated with a proposed project shall be discussed. These irreversible changes include long-term commitments of natural resources and land, use of non-renewable resources during the initial and continued phases of a project, impacts that commit future generations to similar uses (such as highway improvement that provide access to a previously inaccessible area), and irreversible damages that could result from environmental accidents associated with a project.

The Project would increase the intensity of use on the approximately 207-acre Genentech Campus, but the Campus already exists with approximately 4.7 million square feet of industrial, office and R&D land uses. As indicated in Chapter 8 of this EIR, much of the East of 101 Area, including the Project site, has been in industrial or commercial uses since the late 1800s and early 1900s. Thus, the Project would occur on a site that has already been committed to long-term use for similar purposes.

Project construction would result in an irretrievable commitment of non-renewable resources including lumber, steel and other metals, sand and gravel, petrochemicals and water. On-going operations would result in an irretrievable commitment of resources necessary to generate fuel and electricity, as well as resources needed to manufacture products used during operations. However, as indicated in Chapter 18 of this EIR, the use of these materials would not be wasteful, inefficient or unnecessary.

As disclosed in Chapter 14 of this EIR, the routine use, transport and disposal of hazardous materials associated with the Project could potentially result in accidental spills, leaks, toxic releases, fire or explosion. The consequences of an accident or spill involving hazardous materials depend on the specific hazards associated with the material, the facility design and the availability of emergency response equipment. Within the Project, hazardous materials will be stored in laboratories and in designated secured areas designed to prevent accidental release to the environment. In the unlikely event of an accidental release, these small storage volumes limit potential consequences to the individual laboratory in which they are stored. For those employees that work with hazardous materials, the amount of hazardous materials that are handled at any one time is relatively small, reducing the potential consequences of an accident during handling. Major hazardous materials accidents are extremely infrequent. With implementation of fall regulatory requirements related to the use, transport and disposal of hazardous materials, the Project would not create a significant hazard to the public or a significant irreversible environmental change through reasonably foreseeable upset and accident conditions.