

FINAL ENVIRONMENTAL IMPACT REPORT

INFINITE 131 PROJECT

**CITY OF SOUTH SAN FRANCISCO, CALIFORNIA
STATE CLEARINGHOUSE No. 2023110023**

DRAFT EIR PUBLICATION DATE: JUNE 20, 2024

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WRITTEN COMMENTS SHOULD BE SENT TO:

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San Francisco, South San Francisco, CA.

The purpose of this responses-to-comments (RTC) document is to present comments submitted on the proposed Infinite 131 Project (proposed project), respond in writing to comments on environmental issues, and revise the draft environmental impact report (EIR) as necessary to provide additional clarity. Pursuant to the California Environmental Quality Act (CEQA), Public Resources Code Section 21091(d)(2)(A) and (B), the City of South San Francisco Planning Division (Planning Division) has considered the comments received, evaluated the environmental issues raised, and provides written responses herein that fully address the comments regarding significant environmental issues raised by the commenters. This RTC document also provides, for informational purposes, limited responses to general comments on the draft EIR received during the public review period that were not related to environmental issues. Where appropriate, this RTC document also includes EIR text changes made in response to the comments or initiated by City of South San Francisco (City) staff members.

The draft EIR and this RTC document constitute the final EIR for the proposed project, in fulfillment of CEQA requirements and consistent with CEQA Guidelines Section 15132.

1.1 Environmental Review Process

This EIR has been prepared by the Planning Division, the Lead Agency for the proposed project, in compliance with the provisions of CEQA and the CEQA Guidelines (California Public Resources Code Section 21000 et seq. and California Code of Regulations Title 14, Section 15000 et seq.). The draft EIR was published and posted on the City's website on June 18, 2024. A Notice of Availability was distributed to state and local agencies, neighbors, and other interested parties to solicit public comment. The draft EIR was available for public comment from June 20, 2024, to August 5, 2024. The notices solicited comments on the adequacy and accuracy of the information presented in the draft EIR. Comments were made in written form during the public comment period and as oral testimony at the public hearing on the draft EIR before the Planning Commission held on August 1, 2024. The comments received during the public review period are the subject of this RTC document, which addresses all substantive written and oral comments on the draft EIR. Minutes of the proceedings at the public hearing on the draft EIR and all written comments are included in their entirety in this document.

The final EIR will consist of the draft EIR and this RTC document, which includes comments received during the public review period, responses to the comments on environmental issues, and any revisions to the draft EIR that resulted from staff-initiated text changes or text changes in response to the comments. Information provided in the responses to the comments and in the revisions to the draft EIR clarifies and amplifies the analysis presented in the draft EIR. No significant new information, as defined by CEQA Guidelines Section 15088.5, was added that would trigger recirculation of the draft EIR. Specifically, there is no new significant environmental impact and no substantial increase in the severity of a significant impact. Furthermore, no new alternatives or mitigation measures were identified in the comments or responses that were not already identified in the draft EIR.

The City has distributed this RTC document to the City Council. The City Council will review the final EIR for adequacy and, at its discretion, certify that the EIR has been completed in compliance with CEQA and that it reflects the City's independent judgment pursuant to the requirements of CEQA Guidelines Section 15090. The City will consider certification of the final EIR and then consider the project separately for approval or denial. The City Council will hold a hearing on September 24, 2025, to consider the adequacy of the final EIR. If the City Council finds the EIR to be in compliance with CEQA requirements, it will certify the final EIR. The City decision-makers will consider the certified final EIR, along with other information received during the public process, to determine whether to approve, modify, or disapprove the proposed project and specify the mitigation measures that will be required as conditions of project approval in a Mitigation Monitoring and Reporting Program.

If City decision-makers decide to approve the proposed project, even though the significant environmental impacts identified in the final EIR would not be avoided or reduced to less-than-significant levels, they must indicate that any such unavoidable significant impacts are acceptable due to overriding economic, legal, social, technological, or other considerations, as described in CEQA Guidelines Section 15093. This is known as a Statement of Overriding Considerations, in which the City balances the benefits of a proposed project against its unavoidable environmental risks. If the benefits of a project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable (CEQA Guidelines Section 15093). If an agency adopts a Statement of Overriding Considerations, the statement must be included in the record of project approval.

1.2 Document Organization

This RTC document consists of the following chapters:

- **Chapter 1, Introduction**, discusses the purpose of the RTC document, the environmental review process for the EIR, and the organization of the RTC document.
- **Chapter 2, Comments and Responses**, presents comments from the minutes of the public hearing on August 1, 2024, and written comments to the draft EIR. The comments are organized by agency in the order they were received. Comments from agencies are designated with an "A" and an acronym of the agency's name. A number at the end of the code keys each comment to the order of the comments presented within each written communication or item in the Planning Commission minutes. Thus, each discrete comment has a unique comment code.

Following the Planning Commission minutes and each comment letter are the City's responses. The responses generally clarify the draft EIR text. They may also reference revisions or additions to the draft EIR shown in Chapter 3, *Revisions to the Draft EIR*.

- **Chapter 3, Revisions to the Draft EIR**, presents text changes to the draft EIR made as a result of a response to comments and/or a staff-initiated text changes identified by City staff to update, correct, or clarify the draft EIR text. New text is underlined and deleted text is shown in ~~strikethrough~~.

2.1 Introduction

This chapter contains responses to the comments from the August 1, 2024, City of South San Francisco Planning Commission (Planning Commission) hearing as well as written comments on the draft environmental impact report (EIR) received during the public comment period. In addition to the comments received during the Planning Commission hearing, the City of South San Francisco (City) received one letter commenting on the draft EIR during the comment period.

The Planning Commission hearing comments and the comment letter are organized by agency (A) in order of date received, as follows.

- A-PC: Planning Commission Hearing (August 1, 2024)
- A-Caltrans: Yunsheng Luo, California Department of Transportation (August 2, 2024)

Where revisions to the draft EIR are appropriate to respond to the comments, such changes are noted in the responses and shown in full in Chapter 3, *Revisions to the Draft EIR*. These include changes in response to the comments as well as staff-initiated changes.

2.2 Responses to Specific Comments

This section includes comments on the draft EIR and responses to those comments. Comments from the Planning Commission hearing and comments from the letter that raise environmental issues are bracketed and numbered; each comment is followed by the responses to the comments raised.

Where revisions to the draft EIR are appropriate to respond to comments, such changes are shown in full below and consolidated in Chapter 3, *Revisions to the Draft EIR*. Staff-initiated text changes regarding typographical and other minor errors are also presented in Chapter 3. In other cases, the information provided in the responses is deemed adequate in itself, and modification to the draft EIR text is not necessary.

I131 Project
Planning Commission Draft EIR Comment Hearing
August 1, 2024
Transcript

0:34:32 – Billy Gross (BG) – “The primary purpose of tonight’s meeting is to take public comments on the draft environmental impact report, but I would say for the rest of the project, if you have any design-level comment, or if there are things that you would like us to go into more detail on when we come back for entitlement hearings, if there’s specific things that you’ve seen that you’d like to have more information on, that would also be useful so we make sure that we adequately address that when we’re back before you again at some point in the future.”

0:35:05 – Chair Norm Faria (NF) – “I would now turn over to the commission for questions. Mr. Tzang?”

0:35:10 – Commissioner Alex Tzang (AT) – “Through the chair, so I’m not going comment on whether I really like it or not. But questions; normally I don’t ask this many questions, but I don’t remember any project in front of us with so many S/U, like unavoidable mitigations. And my first question, if we just accept it with a statement of declaration—you know, why we accept it—who is ultimately going to pay for the consequence of accepting these? So, my thinking is our neighborhood, our citizens, not the applicant, not even the city. So, in order—I’m glad that Billy mentioned that this is not approvable right now, because as much as I love how it looks, I do want to know: should we accept who is paying for it? Let’s say if the answer is the citizen, then just because we love the building, it does not grant us the right to just say ‘yeah, I want the job opportunity, I want the income,’ or stuff like that in return for their suffering. For example, traffic and circulation. I know we have a lot of EIRs stating that it is maybe unavoidable but bearable on the heavy developments, like near El Camino/Chestnut area. Using some of my people, saying every time they try to pass that traffic light, in my language, they ‘want to die.’ So there is a discrepancy with what the EIR portrays and what people are experiencing. I get more and more uncomfortable when we just think that things will wing it on the traffic, transportation, congestions, and annoyance to the City. So my question for that in particular: can this project be further phased out—hypothetically phased out—so that the transportation issue can be further mitigated? I know right now there are two big buildings. Let’s say, creatively-speaking, if those two big buildings can be built in halves, kind of like a burrito sliced into half and then eventually built to the complete form of each of those. Even though there is a lot of waste factor, is phasing that out further, can that help transportation issues?”

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And then air quality, that’s my second question. The air quality impact, is it because the nature of this is a lab that the air quality will be impacted a lot more, versus if we pick an 80% office, then the air quality impact would be a lot less: is that how I should comprehend it? The reason why I ask is I’m thinking that if we have to change the proposed use, it might not be possible, which also means that I have to understand this project more correctly. Is it because the amount of R&D proposed is too much for our city to take? If the answer is yes, the R&D part is really the main reason for the air quality problem, then we have to hear that. Because otherwise, like changing it to 80%, if it works, then okay great, do office. But probably that’s not what the applicant is proposing, and we’re talking about different things.

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And, you know what? It’s too heavy; I’ll save my other three for later. Thank you.”

0:39:40 – BG – “Would you like me to start on answering his questions? Okay. I will say that prior to the General Plan Update, for the majority of office R&D projects in the east of 101, for basically every project, we had significant unavoidable transportation impacts because there were often impacts of, for instance, queuing onto the freeway main line, and there are mitigation measures that can be implemented that would mitigate that. But because Caltrans ultimately has to say yes to that project, and we can’t guarantee it, we would always find those significant and unavoidable.

Air quality was also very typically a significant and unavoidable. I will say for this instance the air quality, for instance one of them was related to work receptors. And so, because 101 Terminal is entitled first, they can start construction on that project at any time. If that was constructed, and then you start construction of the 131 Terminal projects, you already have worker receptors there. If they were to come in, for instance, in reverse order, where 131 Terminal was built first and 101 Terminal was built second, you would not have that impact, because the worker receptors would be upwind in that case. So this is a new—we have not had that impact before because worker receptors were not considered sensitive receptors under previous Bay Area Air Quality Management District thresholds. The architectural codings, all of the consumer products, that type of thing, you see that used in every project. One of the other things I wanted to say with the air quality portion is a lot of the overall impacts are also due to other things in the area for Lindenville. For instance, there is the concrete batch plant; a large part of area sources comes from that. So just by being in somewhat close proximity to those projects, you’re already really close to the air quality thresholds, just as a high level for those.

In terms of the—asking about phasing out for transportation issues. One of the requirements is that any of the transportation mitigation measures have to be installed before any occupancy can happen at the 131 Terminal project. So the class four bikeway, the signalization improvement, everything definitely that’s within the city’s jurisdiction; those have to be completed before we would allow them any tenants to occupy the sites. We would then continue to work with—so the portion that’s somewhat within the City of San Bruno’s jurisdiction are any of those improvements to the Sneath, Tanforan intersection, my estimation is that they want all of that to work well in addition to the city. Same thing with Caltrans. Caltrans wants the project impacts to freeway... to not have impacts—And so we’ll work very closely with all of those organizations if we need to make slight modifications to make this work. But ultimately we can’t guarantee that. That’s why they’re still considered significant and unavoidable. But that has typically been the case for these kinds of projects in the east 101. We have less of that now with the General Plan Update EIR, but because this project is an intensification of what we looked at, that’s why we’re having to look at these in more detail. It’s more square footage than we expected.”

0:44:36 – Adena Friedman (AF) – “Thank you Billy. Through the chair, if I could just add one thought. One thing I was thinking when Billy was explaining some of the mitigation measures and thresholds is that the CEQA standards—and I would ask our EIR consultants from ICF to jump in if I’m misstating anything—the CEQA standards and thresholds change over time and have gotten more strict. There’s a higher threshold, there’s a higher bar, which is great, that’s really good and that’s what we want so there’s more emphasis on environmental impacts. And it’s also pushing projects further to do more mitigation and to do higher quality materials, and use all the low-water landscaping and all that, but it’s a little hard to compare. Because of changes over time, it’s hard to compare projects that may have been approved five or six years ago with projects now in terms of the number of significant unavoidable, because there may be new impact areas that we’re studying that didn’t exist. So it’s just something to think about, in terms of it may not be apples to apples to say a project of the same square

footage was designed in a way five years ago; it may have actually had larger effects, but was studied differently. I'm not speaking to this project, I mean Billy obviously knows way more, knows all the details about this one. But just kind of a philosophical thought on how CEQA changes over time.

0:46:30 – BG – “The last thing I wanted to speak to—thanks for letting me think through this a little more—you’d asked how do we balance looking at each of the impacts. Basically, we have to look at each of these—there’s the five significant and unavoidable impacts—we would look at each one separately to say ‘are we okay with the benefits from the projects? Do we believe they outweigh the significant impacts?’ And so for the cultural resources, you look at that, what they’re doing and what the proposed mitigation is to those [unintelligible]. You have to look at each of those separately, and some of these are much more local impacts, some of them you could maybe have a little bit greater, but I think ultimately that’s what we would be looking at: do we agree that the benefits of the project balance any negative impacts? And we’ll look through that and we’ll have that discussion in more detail, but it’s good to know those. It’s ultimately the planning commission providing recommendations, city council having to say yes to that for any other further entitlements to be made for this project.

0:47:50 – Chair NF – “Thank you very much. Commissioner Shihadeh?”

0:47:54 – Commissioner Sam Shihadeh (SS) - “Through the chair. Staff, isn’t SteelWave the developer for the Safeway project as well?”

0:48:01 – BG – “Yes, correct.”

0:48:05 – SS – “So, if they’re not able to develop that project, they’ve already got entitlements, how could they be applying for a new project, which is massive, which is going to cost a lot more? And how could the community accept us engaging such a massive project? We all know that everybody in the community’s been asking about Safeway. We need a supermarket in South City; we don’t even know the status of that project yet. So that’s question number one. I’m being asked to look into a massive project while we have another one on hold.”

0:48:53 – BG – “I’ll start by saying obviously we have lots of different projects entitled. One of the things that we will come back for with the 131 Terminal Project is SteelWave will be asking for a development agreement, and so, uncertain what that timeframe is—that is also typical for a project of this size, that likely could be built in phases; we saw that with the Vantage Project on Forbes, Britannia Cove—and so each entitlement project stands on its own merits; we can’t look at that in relation to other projects. The Safeway and the 180 El Camino Projects don’t have standing related to the application that we’re being asked to review and ultimately approve.

3 **0:49:55 – SS –** “I understand that. I fully understand that. My approach is the community. We’re accountable to the community. One of the main issues that I have with a massive project like this: we’ve seen the development on Airport Boulevard. You know, all the changes; we only have one lane that’s going to the freeway. I can’t imagine the massive tie-up that’s going to be created, and the mitigation measures or CEQA analysis clearly state that there’s going to be a big problem. Circulation, transportation.

4 The other question I have is: we’ve faced a major issue when it rains, that floods. And that’s a major issue that the City has not resolved yet. My understanding is that, is that Caltrans’ responsibility? Is it going to be the developer’s responsibility? Is it going to be the City? But these are real issues that we

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need to address, and I'm sure CEQA is addressing it. Or are they? I'm talking about transportation, all the impact to the community, not only through the development stage, but..."

0:51:23 – BG – "So obviously, CEQA is looking at the environmental impacts, but it has very specific topics that it looks at. I will say for the entitlements that are coming before, one of the things that we'll talk to you about in more detail is the zoning ordinance has a sea-level rise floodplain ordinance, and so the project site will be raised rather significantly to bring it outside of both sea-level rise and floodplain concerns. So we'll be able to talk through those in more detail when we actually get through the entitlement portion. But this is good for us to know the specific items to focus on more when we do come back before you. The one comment related to transportation impacts; the CEQA Draft EIR does indicate that with the implementation of the mitigation measures, the additional traffic that would be created by this project would be able to function. I will note that CEQA no longer looks at Level of Service, that is not something that CEQA considers. But the trips that would be created by the proposed developments would be able to be mitigated adequately with the implementation of the mitigation measures that are included in the Draft EIR."

0:53:13 - CHAIR NF – "Mr. Baker?"

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0:53:14 – Commissioner John Baker (JB) – "Thank you. I remember when we had the 101 project come before us a while back, and I'm really happy to see the quote-unquote 'sister' project here, because it's really helpful for me to think of this as basically one giant campus. And I see that in some of these mitigation measures, notably when 101 came before us, we talked about we're really worried about that on-ramp at Produce Avenue, people speed down it now, and if we're using that as an exit, we'd be seeing potentially a lot of accidents. And even in this EIR on page 216, it notes that those traffic impacts are potentially significant. And you just mentioned while LOS is not considered, VMT is, and I do think we're going to definitely see a lot of additional VMT out of this. But can we confirm that the circulation patterns in this whole campus are taken together as basically one thing, because I'll re-mention a concern I had before with the other project: that if there is an emergency situation—I believe it was Sam who said that's a 'one-lane highway' on the Produce side and the Shaw entrance would just be one lane—do we have enough capacity for a simultaneous evacuation and emergency vehicles going in at the same time. That concern; has that been looked at? I didn't see anything specifically about evacuation or anything in the Draft EIR."

0:55:03 – BG – "I will say we will definitely bring back graphics that will show this in more detail when we come back, but I do know that the fire marshal has looked at that closely, and is comfortable with the access that's being provided. The Shaw Road actually would be able to do two-way for those purposes. One note I will give is yes, the 101 Terminal Project had certain improvements that were intended for the square footage of additional area that it would provide; this then builds on those. So there are certain improvements that will be done to the Terminal Court/Produce/Airport intersection as part of the 101 Project, and then additional improvements would need to happen to accommodate the additional square footage of part of the 131 Terminal.

The entire site was looked at, for this project, as it working together, both of them in collaboration with one another. But I do know from circulation and emergency vehicle, kind of circulation standpoint, that City staff, including police and fire, have reviewed and were comfortable with it. But we'll bring more detail for that when we come back before you."

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0:56:23 – JB – “I have a question that came on the fly that Alex brought up about the preferred environmental alternative being the R&D. Is that because if there are more office options, there would be more people, more cars, et cetera to the site?”

0:56:44 – BG – “When you look at alternative scenarios, one of the requirements is that one of those—you do a minimum of three, some people do more than that—one of those has to be considered the environmentally superior. I would say looking at it as ‘it’s the environmentally superior of those three alternatives.’ It might not be environmentally superior to the proposed project, and that’s ultimately what we look at. And those alternatives are identified trying to, can you reduce one or all of the identified significant and unavoidable impacts. And so the thought was if your laboratory space is one of the areas that is creating air quality impacts, if you reduce that, does that have a noticeable impact or reduction in the air quality impact overall. And it reduced it, but it still exceeded the Bay Area Air Quality Management District’s threshold. So even if that were the project to come in, we would still be coming before you with, this is considered significant and unavoidable because it exceeds the thresholds. One of the results of reducing the laboratory space, you have the office space, you have a lot more people on the site, so all of the transportation impacts ended up becoming more severe, so we would have to create then additional, what other mitigation measures could we do for that. All of this to say that it’s the environmentally superior of the three alternatives that we looked at, does not mean that it’s necessarily environmentally superior over the propose project itself, as part of the ultimate conversation that we have when we entitle.

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0:58:43 – JB – “Let’s stay on the natural environment a second. On page 2-22 of the EIR, it notes that riparian impacts are less than significant, yet there is the San Bruno Canal or Slough immediately to the very south of the project, at the edge of the parking lot. Can you assure me that that’s been looked into, what construction and/or new use will have on the slough there?”

0:59:14 – BG – “We definitely have been looking at that. We have worked in conjunction with One Shoreline, which is the San Mateo County flood control and sea level rise management district, to make sure—and BCDC has some jurisdiction because this is tidal—and so yes that is being looked at and all the impacts as the environmental document states, no CEQA-related impacts, and then also looking outside of CEQA at what are One Shoreline and BCDC’s requirements, this has been designed to adequately address all the comments and issues from all of the different agencies.”

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1:00:00 – JB – “Thanks, and while we’re on the slough, I’ll go back to one of the potentially significant identified impacts on page 2-7 about the cultural values. Is there a way you can describe—we’ll actually give a little context on this. As we know when the taller buildings on the side of San Bruno Mountain were built, there were a significant number of shellmounds, et cetera; the Ohlone people basically were fishing and harvesting from the shore there. Part of that was because it came up sloughs of what is now our eastside. So I’m worried that this, having been a marshland environment in the past, we might find some significant impact. Can you tell me what outreach has been made to either the local tribal leaders or what databases have been searched?”

1:00:56 – BG – “As part of the CEQA requirements, every jurisdiction is required to travel outreach. I believe we have six identified tribal contacts that we have sent letters and emails to—for any project that requires CEQA review—that outreach has been done. We have not received any response. I will also note there has been quite a bit of analysis completed in this area related to archaeological/cultural resources. One of the background documents in the past I believe identified a potential resource, and

there's been lots of additional analysis to determine was that done, could someone else find that. I believe that there's been extra borings completed and ultimately was determined that that likely was mistakenly identified. I might ask if Devan or Heidi want to provide any additional background to that. But that is an area where there has been quite a bit of analysis done to determine that there isn't anything there, and we still have mitigation measures that if anything were to be found, that you immediately stop work, you bring professional archaeologists, someone who has the correct credentials to come out and take a look at the site, and try to determine who else could be contacted for that. But at this point we have not received any feedback from any of the tribal contacts.

1:02:57 – JB – “Okay, thank you. That’s all I have for now.”

1:03:06 – Commissioner Aysha Pamukcu (AP) – “Thank you so much for all the work that’s gone into this and the thoughtful presentations. A lot of the questions I had have been asked, but one that I was curious about was how a portion of the mitigation is out of the jurisdiction of South City, because that falls under the City of San Bruno and Caltrans, and so either could be answered here or something looked more into, I’m curious if there is either context for past successful collaborations that we could look to and count on, or even potentially initial agreements or conversations indicating interest in that kind of cross-jurisdiction collaboration.”

1:04:01 – AF – “A great example of this is the Southline Project, which, as the commission probably recalls, is right on the border of San Bruno and had the same condition, where there was a significant and unavoidable impact because intersection improvements would—to bring the impact down to a less-than-significant with mitigation—had to occur within the City of San Bruno. And the applicant for that project was actively working with the City of San Bruno to come up with an agreement to implement those improvements required. However, because we as the City are the agency that has to certify the EIR and could not guarantee—at the last minute, what if fell apart, or what if San Bruno decided we don’t want to make that improvement—we can’t make that guarantee, so we still had to find it significant and unavoidable. But that is a good example where we know, we worked hand-in-hand with this developer and with the City of San Bruno to come up with a plan to solve those issues, and we do know that they will be implemented in the future as that project is built out. I think that’s a good example of that relationship and those improvements being realized. But not being able to, we as the City can’t guarantee; it’s not in our CIP, we don’t control the funding.”

1:05:37 – BG – “And I was going to say, similar with Caltrans, we’re in collaboration with them on many projects. For instance, Utah Avenue Overpass, which had passed environmental design, now we’re moving forward to 35% design, because the overpass itself will go over U.S. 101, but also it touches some of the on-ramps/off-ramps; we’re in contact with Caltrans staff often on that. And so, for instance the San Mateo/Airport/Produce intersection leads in to some of those, so they are looking at those improvements as well. It’s similar. We’re all working to figure out what is that ultimate solution that everyone can agree to, we just can’t guarantee that they’re ultimately going to say yes. But we haven’t had them not say yes, that I’m aware of up to this point.

9 **1:06:44 – AP** – “Thank you, that’s really helpful. I know there is a lot of analysis here too around the existing cultural impacts and what is currently there, specifically the Produce Terminal, and something I’d also be curious about is a future-looking cultural analysis, particularly with Lindenville and some of the aspirations there around an artist-maker cultural hub, how this might square with what is envisioned

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■ around Lindenville and the Specific Plan. And again, that could be something to report back on or speak to a little bit now.”

1:07:38 – **BG** – “I think we would bring that back. I know we’ve had some high-level discussions. The project team was excited about the direction that Lindenville Specific Plan was going, so I think they have some ideas. But that feels like that would be a good one to be part of the next discussion with Planning Commission, unless Heidi wants to speak to that tonight... we’ve move that to the next one.”

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1:08:15 – **AP** – “Just the last thing I think around context for some of the CEQA analysis around transportation and potential impacts is, some of what I was seeing was also not just mitigation, but also improvements to existing infrastructure to be more in line with Complete Streets, and usage not just for cars but for pedestrians and cyclists. So, I would be interested in—again, either now or as a future topic—of seeing how some of the mitigation strategies are also pushing us towards, potentially pushing us towards, other separate policy goals, such as Complete Streets.”

1:09:10 – **BG** – “That will be definitely something we can highlight. This project would be implementing quite a few of our active mobility projects, for instance a north-south bike/pedestrian path to be able to get from, helping to connect from Southline up toward the Caltrain station. So this project’s definitely implementing some of the active [unintelligible] things and we can highlight what those are.”

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1:09:44 – **AP** – “Thank you, and I’m sorry I said last, but now I mean it. Billy did you say that, when you were talking about Alternative B, that that one might not be economically feasible?”

1:09:57 – **BG** – “Any of these projects, if they were developed—for instance if you’re developing at a lower FAR, the entire project might not be financially feasible. I would ultimately think that the applicant team would need to speak to that. Right now, under current conditions, no projects are financially feasible. Nothing is moving forward because it doesn’t make sense from a financial standpoint. But there are always, depending on what your purchase price is for a property and what you can develop on it, certain thresholds of what can and can’t be done. And so the project team could speak more to that, but that was one of the considerations of a reduced floor area alternative, is that it might make it less feasible from a financial standpoint.”

1:11:02 – **Vice-Chairperson Sarah Funes-Ozturk (SF)** – “I really appreciate all the work you guys have done for this. I know you guys work really hard on these presentations and it really does show. And I love all the comments and questions my fellow commissioners have put forward; I agree with all of them.

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For me what I would love to see is a definite intention to really talk about the transportation mitigation efforts that will happen here, because with Commissioner Baker, we always talk about parking. If it’s getting us towards connections with Caltrain and with San Bruno BART, why is there going to be X number of parking? I’d really love for the public to have that information going in; I think that’s going to be really imperative. Thank you.”

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1:11:50 – **Chair NF** – “Pretty much most of the questions have been answered. I do have one thing just for my own education and also for someone who may be watching at home. On the historical site or national historical site, if it is determined one, what are potential impacts—because that would be potential acreage loss where you [unintelligible] from, you could build on—if it is determined a national site, historical site?”

1:12:11 – BG – “It’s been determined that it’s eligible but it’s not actually been submitted, correct.”

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1:12:19 – Chair NF – “And then basically on the transportation part, I don’t want to digress, but the area I’m concerned about—because we know there’s very little access into that site, because of how Shaw Road is, and prior projects we’ve always discussed just the general flow of traffic leaving it without being a job site or a construction site—the one part I’ll be really critical on is, let’s say we—I know we’re at stage one—when we finally get to the phase where we do start, this project does start potentially building, are they going to be doing multiple buildings? One at a time? Are they going to be, you know just the flow of materials in and out? Because sometimes you’ve got to get by 101 where they’re going southbound. I’ve been really asking critical questions on that whole dynamic. I know we have our construction teams to discuss how the flow will be and all that, but it’s certainly to be concerned about because we know automatically no construction site—that corner over there is busy, period. When you start talking about going to Airport Boulevard and out in the freeway, then you put the needs of something of that magnitude, there’ll be a lot of construction sites that need materials, parking for the employees when they’re working there, the construction workers. All of those type of things, staging equipment, I know that this is all part of the project, but these are the questions that I’ll be asking when it does come back to us, that we know that there is a defined plan. Because at 1.7 million square feet, especially when it’s all done concurrent, that’s massive. So I really have a lot of operational questions.

Otherwise, again, the commission did a very good job with all types of questions. I understand we do have some public comments. So is there nothing else from the commission before I close it?”

1:13:58 – AF – “Have you opened the public hearing?”

1:14:01 – Chair NF – “It’s still open.”

1:13:02 – AF – “Okay, great. We have two public comments. The first one is John Medina. For public comments if you could just wait until the timer starts, and then at three minutes your time is up. I will now start the timer now.”

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1:14:26 – John Medina (JM) – “Good evening planning commission members and staff. I’m John Medina, I’m a business agent with Sprinkler Fitters Local 483, also executive board member with the San Mateo Building and Construction Trades Council. I first want to congratulate you guys on probably the best chambers I’ve seen in the Bay Area. Of course this was built by Union labor, and under a project labor agreement or community workforce agreement, which you guys may know.

I’m speaking about the Infinite project tonight, Local 483, and really all of labor is really excited about the opportunities that project this size creates for the local community. We look forward to much needed project like these that SteelWave, and really all the developers in South San Francisco, are presenting to this commission. We hope that these projects will benefit the community, like our Local members, and future people looking for pathways into the middle class working through the building trades: community workforce agreements like the one that built this facility, benefit programs like the Trades Introduction Program, that prioritizes veterans, women, and those from underserved populations here in San Mateo County.

We hope this commission joins us in asking all of the developers that come to you guys what benefits they plan to give the local community as far as construction goes. We hope that they reach out to the

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▲ building trades to ensure the use of local apprentices and area standard wages and benefits. Thank you.”

1:16:03 – AF – “We have a second speaker card for Tom Treyor.”

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1:16:17 – Tom Treyor (TT) – “It’s an honor for me to speak in this building. Like John said, this is built by Local Union labor, and it’s a beautiful, beautiful building. It is definitely one of the finest commission buildings I’ve been in. Local apprenticeships offer local families the opportunity to move into the middle class. I’m second generation sheet metal worker with Local 104, and having a good Union job and the benefits of those paychecks and that healthcare offered my family, allowed my family to live and work on the Peninsula and allows me and my wife to live and work on the Peninsula.

These kinds of projects really offer a great opportunity to help bring up the middle class and help people live and work in this community. Local 104 is really excited to support these kinds of projects when they bring in local families, local hires, local apprentices, and good area standard wages. These jobs can offer healthcare to our local families and can help boost the economy for everybody around. We really like to support projects like this that bring local families this kind of work. Thank you so much.”

1:17:16 – Chair NF – “Do we have anyone else who would like to make a comment on any of the cards?”

1:17:22 – AF – “We do not have any other speaker cards at this time.”

1:17:25 – Chair NF – “Before I close the public hearing, any more questions from the commission? With that I will close the public hearing and turn it back to commissioners with any final statements before we move on from this item. Commissioner Tzang?”

1:17:41 – AT – “Through the chair. I really like how Billy attempted to answer my questions. How you just did is exactly what I would need in the next round when I actually am about to make a vote. It’s like, okay, you’re voting against this even though we’re doing this, this, et cetera, that are unavoidable, that are significant, however our benefit is this. Give me some comparison to the past, reference to current projects; those would help me determine making the exception. You guys probably know me enough that every time I make an exception, I really am nervous. I don’t want to start an exception that’s unprecedented or that will set pathways to future leeway and stuff like that. So, any time with those kinds of ‘even though, but’ will assist me greatly with making an alignment with your recommendation.”

1:18:57 – Chair NF – “Commissioner Shihadeh?”

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1:19:00 – SS – “Thank you. Billy, great presentation, and thanks. I mean the team. I love the design, the concept, the landscaping, it’s great. The issue we’re addressing here is the impact on the community. We all recognize—you know now I live in that neighborhood, and I go to—now it takes us five minutes from the Grand Avenue and Airport intersection. Sometimes it’s five minutes. Never used to take that. We can’t, no red turn on—imagine with the 450 units built on Airport Boulevard, and this massive project, you only have one lane going onto 101. So I would hope you would take these issue real seriously because the community is really impacted and really concerned about. I know that mitigation measures are being taken, but there are great challenges. So I hope you take that in real consideration.

1:20:12 – JB – “I think you heard most of my comments. What I’d like to see in the Final EIR, the only other comment is, I do think it’s a well-designed project, and I think when both projects are finished it’s going to be a really good looking campus if we could get to these last, final nudges. Thanks.”

1:20:38 – AP – “Echoing the appreciation. This is huge and really complex. I’m grateful for the patience and hard work that goes into this. I would say, just what I would like to see—in addition to the excellent information presented here—is, I think we can safely say the community will be impacted. Period. And it’s just a question of will it be a net positive or a net negative, and we’ll make our assessments accordingly. But I think because of the—I don’t know how much leeway you have in your presentation for this, but CEQA necessarily is framed in terms of like ‘this is the bad thing, and this is the mitigation measure.’ And some of the mitigation measures actually bring us closer to important public policy goals. And so I think what I would like to see is, to help understand where this could lean net-positive, is where the place is that this is actually advancing quality of life, and vision, public policy goals in keeping with policies we have on the books—Specific Plan, General Plan—if that makes sense.”

1:21:59 – Chair NF – “Again, thank you. The project itself is beautiful, I mean I have to admit it’s a very impressive project, everyone sees the magnitude of it, it’s going to be great. I think hopefully—first of all for the presenter, thank you very much. I think we’ve given you enough insights that you will know when the devs come back at us, as the commission has said, we will be addressing transportation issues and many phases: construction, during it, the whole bit. So that will be coming back again at you hot and heavy. The traffic issues will be coming again. There were questions about circulation within the actual compounds. So, I think as you can see the areas that’ll be hit upon after all these mitigated items have been determined and stuff, because it’s no fault of anyone in that area when you develop, it’s just the nature of the way the current streets are laid out. You have egress coming out of eastern 101, and that’s just one of the major areas that’s unavoidable, and now we’re throwing more on top of it. So that’s why it’s such a critical area when we bring it to the attention of any going away. It’s no fault of those trying to build, because as we’ve said it’s a beautiful building. So again thank you, and it sounds like we will be seeing you again, so we hope you prep for the kind of things that we will be asking. Thank you.

There’s no other questions? Okay, thank you again.”

Letter A-PC: Planning Commission Hearing (August 1, 2024)

Response to Comment PC-1

The comment expresses concerns about the effects of the project on traffic congestion and questions whether the EIR fully captures the range of transportation impacts; the commenter considers phasing to be a means for addressing transportation issues.

As described in Section 4.6.4.1, *Significance Criteria*, in Section 4.6, *Transportation and Circulation*, of the draft EIR, the analysis of transportation impacts was based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines, including topics such as consistency with plans and policies, vehicle miles traveled (VMT), design hazards, and emergency access. As required by Senate Bill (SB) 743, CEQA Guidelines Section 15064.3 no longer considers automobile delay, as described by level of service (LOS) or similar measures of vehicular capacity or traffic congestion, as an environmental impact for proposed projects. However, an LOS analysis was included for informational purposes as part of the local transportation analysis included in the transportation impact assessment (Appendix H to the draft EIR).

As described in Section 3.6, *Project Construction*, in Chapter 3, *Project Description*, of the draft EIR, the proposed project would be constructed in eight phases over an approximately 5-year period. Construction on the southern portion of the project site would begin in March 2026 and end in October 2028; construction on the northern portion of the project site would begin in November 2028 and end in May 2031. Construction-related impacts, including transportation and circulation, are evaluated for each resource topic throughout the draft EIR. In addition, the draft EIR considers several alternatives that would reduce the proposed project's significant impacts, including those related to transportation and circulation. As detailed in Chapter 5, *Alternatives*, of the draft EIR, although none of the project alternatives evaluated would avoid the significant and unavoidable transportation impacts, Alternative B, the BTP-M Alternative, would result in reduced transportation impacts compared to the proposed project.

Response to Comment PC-2

The comment expresses concern about the proposed project's air quality impacts and asks for the reason(s) behind the air quality impacts. The comment also asks if Alternative C, Increased Office Space, would result in fewer air quality impacts. As discussed in Section 5.7.3.1 of the Draft EIR, emissions from Alternative C would be similar to those of the proposed project and would result in similar impacts related to air quality. The significant and unavoidable air quality impacts of the project would also occur under Alternative C. The project's operational impact related to reactive organic gas (ROG) is because of the many sources of ROG associated with the project, including consumer products, such as cleaning products; architectural coatings (e.g., paint); vehicles; emergency generators; and laboratories. Mitigation Measures MM-AQ-1, 2, and 3 would reduce this impact but not to a less-than-significant level. In addition, the project's impact on worker receptors from the annual concentration of particulate matter with a diameter of 2.5 microns or less (PM_{2.5}) is due mainly to fugitive dust from on-road vehicles and the proximity of receptors downwind of the project site at the adjacent Infinite 101 site. Mitigation Measure MM-AQ-4 would reduce this impact but not to a less-than-significant level. Lastly, the cumulative impact from the annual concentration of PM_{2.5} is due primarily to two existing facilities within 1,000 feet of the

project site; these contribute high levels of PM_{2.5} to the area surrounding the project site. The contribution from the proposed project would be substantially less than the contribution from the existing facilities; however, as discussed above for project-level impacts, the contribution of the project alone would exceed the Bay Area Air Quality Management District's (BAAQMD's) project-level threshold. Mitigation Measure MM-AQ-4 would reduce this impact but not to a less-than-significant level.

Response to Comment PC-3

The comment states that the proposed project would result in transportation and circulation impacts. As noted by the commenter and detailed in Section 4.6, *Transportation and Circulation*, of the draft EIR, the proposed project would result in significant impacts related to transportation and circulation. Specifically, the proposed project would result in significant transportation impacts from conflicts with programs, plans, or policies for addressing issues related to circulation systems and hazards due to a geometric design or incompatible uses. It should be noted that the proposed project would include the transportation improvements outlined in Mitigation Measure MM-TRANS-1 to reduce the proposed project's significant transportation impacts. However, because part of the transportation improvements would be under the jurisdiction of either the California Department of Transportation (Caltrans) or the City of San Bruno, the impact would be significant and unavoidable because the City of South San Francisco cannot ensure full implementation of the mitigation measure.

Response to Comment PC-4

The comment expresses concern regarding flooding. Portions of the project site are within a Federal Emergency Management Agency (FEMA) 100-year flood zone, although the remaining portions of the project site are outside of the 100-year flood zone. Areas of the project site are also subject to inundation from a moderate flood event (i.e., flooding with a 0.2 percent annual chance). The applicant is required to comply with stormwater and flood risk requirements including Provision C.3 and LID requirements of the municipal regional permit, to ensure that implementation of the proposed project would not result in flooding. Flooding impacts were evaluated in the draft EIR Section 6.4.9, Hydrology and Water Quality, as well as Section 3.10, Hydrology and Water Quality, of the Initial Study (Appendix B to the draft EIR). To comply with FEMA requirements and combat future sea-level rise and flooding, the site would be raised to at least 13 feet; structures would be designed with first-floor elevations of 14 feet. Fill would be placed to raise existing grades and allow structures to meet the natural grade; as a result, structures would be outside of the floodplain. A flood-proofing certificate would be submitted to the City.

Under the proposed project, the project site would have nine drainage management areas to collect, treat, store, and discharge stormwater runoff. Project runoff would flow into the city storm drain system. For the majority of the project site, flows from storm drains would flow into the adjacent slough. Oversized underground pipes would control flows prior to discharge to the slough. Storage pipes would connect to existing outfalls and ultimately discharge to the slough. On the lower portions of the site, smaller areas would drain to the City's municipal separate storm sewer system within Terminal Court. Furthermore, the proposed project would increase the amount of pervious surface on the largely paved project site. Landscaped and vegetated areas would provide stormwater treatment and manage stormwater runoff. Overall, the amount of

stormwater that would be discharged with implementation of the project would decrease compared to existing conditions. On-site storm drain improvements would include the installation of bioretention ponds, flow-through planters, and Silva Cell units to provide treatment on the project site and convey water to storage pipes. Water would be released at the designed flow rate.

Response to Comment PC-5

The comment expresses concerns regarding the project's effects on safety, VMT, and emergency vehicle access. These topics are addressed in Section 4.6.4.3, *Impact Evaluation*, in Section 4.6, *Transportation and Circulation*, of the draft EIR.

The project would increase hazards by increasing the number of vehicle trips on several streets and freeway ramps with unsignalized intersections adjacent to the project site. Mitigation Measure MM-TRANS-1 identifies new traffic signals and street design changes to address this impact, thereby reducing the potential for conflicts as well as queueing at affected intersections. However, some of these rights-of-ways are under the jurisdiction of Caltrans and the jurisdiction of the City of San Bruno; therefore, the City of South San Francisco cannot guarantee their enforcement. The impact due to design hazards would be significant and unavoidable.

The project's impact on VMT would be less than significant. As shown in Table 4.6-4 on page 4.6-19 of the draft EIR, without a transportation demand management (TDM) program, home-based work (HBW) VMT per employee under existing conditions is expected to be 17.5, which is greater than the City's significance threshold of 12.7 for HBW VMT. However, implementation of a TDM program would reduce VMT to 12.3, which is below the City's threshold of significance of 12.7 for HBW VMT per employee. Therefore, the project's impact would be less than significant.

The project would not include features that would alter emergency vehicle access routes or roadway facilities; fire and police vehicles would continue to have access to all facilities around the entire city. Emergency vehicles would have full access to the project site from all driveways connecting to adjacent streets; each driveway would be equipped to handle all types of emergency vehicles. Therefore, the project would provide adequate emergency access, and the project's impacts on emergency access would be less than significant.

Response to Comment PC-6

The comment asks for clarification about the environmentally superior alternative and related air quality impacts. As detailed in Chapter 5, *Alternatives*, of the draft EIR, the environmentally superior alternative is Alternative B, BTP-M Alternative, because it would reduce, but not avoid, all of the project's significant and unavoidable impacts. Specifically, Alternative B would not result in a cumulatively considerable net increase in any criteria air pollutant for which the San Francisco Bay Area Air Basin is designated as a nonattainment area with respect to federal or state ambient air quality standards due to the reduction in overall building square footage, number of employees, and number of emergency generators. With these reductions under Alternative B, daily operational ROG emissions would very likely be reduced enough to be below BAAQMD's thresholds of significance, along with other pollutants. As such, Mitigation Measures MM-AQ-1 through MM-AQ-3 would not be required under Alternative B, and the impact would be less than that of the proposed project. However, as detailed in Section 5.6.2, *Ability to Meet Project Objectives*, of the draft EIR, Alternative B would meet some, but not all, of the project objectives.

Response to Comment PC-7

The comment asks if impacts on the navigable slough and riparian habitat were evaluated in the draft EIR. Impacts on the navigable slough south of the project site along with the associated habitat were evaluated in the draft EIR, as summarized in Chapter 6, *Other CEQA Considerations*, and the Initial Study (Appendix B). As detailed in Section 3.4, *Biological Resources*, of the Initial Study, no riparian habitat or other sensitive natural community is present on the project site. In addition, the proposed project would incorporate an approximately 15-foot buffer between construction work areas on the southern portion of the project site and the top of the bank of the navigable slough. Furthermore, as detailed in Section 3.10, *Hydrology and Water Quality*, of the Initial Study, the project storm drain system would use LID areas to treat and control flows prior to discharge to the adjacent slough. The proposed project would also be required to comply with the NPDES regional permit requirements and would not result in adverse water quality impacts to the navigable slough. Impacts would be less than significant.

Response to Comment PC-8

The commenter asks what outreach and databases were used to inform the archaeological resources analysis. As detailed on pages 4.3-30 and 4.30-31 in Section 4.3, *Cultural Resources*, of the draft EIR, a records search at the Northwest Information Center (NWIC), a Sacred Land File search through the Native American Heritage Commission, and tribal consultation with eight Native American tribes took place to inform the archaeological resources analysis. The records search concluded that there may be one known cultural resource within the project site, P-41-000051 (CA-SMA-47), that was identified during a survey in the early 1900s. However, no evidence of the resource was identified at the location during subsequent archaeological surveys conducted in 1998 or 1995, nor was evidence identified during a geoprobe in 2016.

Response to Comment PC-9

The commenter asks for clarification regarding the proposed project's impacts on the Golden Gate Produce Terminal and its consistency with the artist-maker cultural hub goals and policies envisioned in the Lindenville Specific Plan. As detailed on pages 4.3-32 to 4.3-35 in Section 4.3, *Cultural Resources*, of the draft EIR, the proposed project would result in significant and unavoidable impacts on historical resources because it would demolish the Golden Gate Produce Terminal, which is recommended as eligible for listing in the California Register of Historical Resources (CRHR) and the National Register of Historic Places (NRHP) and therefore considered to be a historical resource for CEQA compliance. However, to reduce the adverse impact to the greatest extent possible, the proposed project would implement Mitigation Measure MM-CULT-1, Prepare Documentation in the Likeness of the Historic American Building Survey (HABS) in Consultation with Interested Parties, and Mitigation Measure MM-CULT-2, Initiate Interpretive Signage Plan or Public Interpretation Program. The mitigation measures would ensure that documentation and recordation of the Golden Gate Produce Terminal would reduce the loss by preserving the history of the resource and its role within the region's historical context for the public's benefit and understanding. The measures would also provide signage or an interpretative program, creating opportunities for the public to learn about South San Francisco's industrial heritage and the history of land uses within the project site. Furthermore, the proposed project's consistency with City plans, such as the Specific Plan, are discussed and evaluated throughout the draft EIR and Initial Study (Appendix B to the draft EIR). Specifically, Section 3.11, *Land Use and Planning*, of the Initial Study discusses the proposed project's consistency with the City's goals and policies, including Specific Plan goals and policies; the proposed project was found to be consistent, resulting in a less-than-significant impact.

Response to Comment PC-10

The comment expresses an interest in aligning the transportation mitigation measures with the City's policy goals regarding complete streets and pedestrian and bicycle improvements. Consistency with plans and policies is analyzed under Impact TRANS-1 in Section 4.6.4.3, *Impact Evaluation*, in Section 4.6, *Transportation and Circulation*, of the draft EIR. Mitigation Measure MM-TRANS-1 calls for implementation of the transportation improvements identified in the General Plan, Lindenville Specific Plan, and Active South City Plan, including new bikeways, traffic signals, pedestrian crossings, and intersection and ramp reconfiguration.

Response to Comment PC-11

The comment asks for clarification of the economic feasibility of Alternative B, which was identified as the environmentally superior alternative. 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 (per CEQA Guidelines Section 15126.6[f]). An EIR does not need to address every conceivable alternative or consider infeasible alternatives. CEQA Guidelines Section 15364 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. The identification of Alternative B was based on the existing zoning on the project site. Specific financial details such as net profit and loss have not been evaluated, nor is such an evaluation required under CEQA. However, it is reasonable to assume that Alternative B would be less profitable than the project, given its reduced size.

Response to Comment PC-12

The comment seeks clarification regarding the consistency of the project's proposed parking supply with City requirements. The project proposes 2,434 parking spaces for office/research-and-development uses, consistent with the City's maximum rate of 1.5 spaces per 1,000 square feet; it also proposes 534 dedicated spaces for amenity uses. The project would not exceed the City's adopted parking maximums; therefore, its approach to parking would not present a significant impact related to VMT or consistency with plans and policies.

Response to Comment PC-13

The comment asks for clarification regarding the historical status of the Golden Gate Produce Terminal. As detailed on page 4.3-16 in Section 4.3, *Cultural Resources*, of the draft EIR, the Golden Gate Produce Terminal was determined to be eligible for listing in the NRHP and CRHR for its association with the development of the South San Francisco Industrial Park and the produce industry in the San Francisco Bay Area. As such, the Golden Gate Produce Terminal is considered a historical resource under CEQA. The proposed project would result in significant and unavoidable impacts on historical resources because it would demolish the Golden Gate Produce Terminal. However, as detailed in Section 4.3, *Cultural Resources*, of the draft EIR, to reduce the adverse historical resource impact to the greatest extent possible, the proposed project would implement Mitigation Measure MM-CULT-1, Prepare Documentation in the Likeness of the Historic American Building Survey (HABS) in Consultation with Interested

Parties, and Mitigation Measure MM-CULT-2, Initiate Interpretive Signage Plan or Public Interpretation Program, which would ensure proper documentation of the historical resource and minimization of project construction impacts.

Response to Comment PC-14

The comment asks for clarification regarding the proposed project's construction information and expresses concerns regarding construction impacts on the local transportation network. As detailed in Section 3.6, *Project Construction*, of Chapter 3, *Project Description*, of the draft EIR, the proposed project would be constructed over an approximately 5-year construction period, with construction on the southern portion of the project site beginning in March 2026 and ending in October 2028 and construction on the northern portion of the project site beginning in November 2028 and ending in May 2031. With respect to impacts on the local transportation network during project construction, the haul route for demolition materials would be U.S. 101, with trucks traveling from the project site either northbound or southbound. Trucks using the northbound haul route would exit the project site, travel from Produce Avenue to Mitchell Avenue, then continue to South Airport Boulevard and the on-ramp located off the boulevard. Trucks using the southbound haul route would exit the project site, then make a right turn from Terminal Court to the Produce Avenue on-ramp. The haul route for deliveries or trucks returning to the project site would be in the opposite direction. In addition, other construction-related impacts are evaluated for each resource topic throughout the draft EIR, including construction-related air quality impacts (Section 4.2, *Air Quality*, pages 4.2-31 through 4.2-41), construction-related greenhouse gas emissions impacts (Section 4.4, *Greenhouse Gas Emissions*, pages 4.4-18 through 4.4-40), and construction-related noise impacts (Section 4.5, *Noise and Vibration*, pages 4.5-27 through 4.5-54).

Response to Comment PC-15

The comment expresses support for the proposed project. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. No substantive response or revisions to the draft EIR are required.

Response to Comment PC-16

The comment expresses support for the proposed project. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. No substantive response or revisions to the draft EIR are required.

Response to Comment PC-17

The comment expresses concern regarding the proposed project's cumulative transportation impacts. See Response to Comment PC-1 regarding traffic congestion, which is outside the scope of CEQA. CEQA does, however, require an evaluation of transportation impacts in the context of circulation and safety, along with VMT. As detailed on pages 4.1-4 through 4.1-9 of the draft EIR, the cumulative land use assumptions for the proposed project include the citywide 2040 projections used in the Shape SSF 2040 General Plan Update Environmental Impact Report and the Lindenville Specific Plan Addendum, with refinements to reflect development projects that are under construction, approved, or pending within the city as well as additional reasonably foreseeable large development projects that are near the project site but outside the jurisdiction

of the City. These projects considered in the draft EIR are depicted in Figure 4.1-1, *Cumulative Project Locations*, and include projects for which the City of South San Francisco, as well as the City of San Bruno, had an application on file or projects that have been entitled but not yet constructed at the time the EIR analysis was initiated (i.e., November 2023). Cumulative impacts are evaluated within each topical section of the draft EIR. As summarized in the draft EIR, the proposed project in combination with the cumulative projects identified would have significant and unavoidable transportation and circulation impacts with mitigation. The analysis presented within the draft EIR appropriately and adequately describes the potential for cumulative transportation and circulation impacts.

Response to Comment PC-18

The comment asks for information regarding how the project would be advancing the goals or policies in the City's General Plan or Specific Plan. The proposed project's consistency with City plans, such as the General Plan and Specific Plan, is discussed and evaluated throughout the draft EIR and Initial Study (Appendix B to the draft EIR). Specifically, Section 3.11, *Land Use and Planning*, of the Initial Study discusses the proposed project's consistency with City General Plan goals and policies, Specific Plan goals and policies, the Active South City Plan, the San Francisco International Airport (SFO) Airport Land Use Compatibility Plan (ALUCP), and the San Francisco Bay Plan. The proposed project would not conflict with any of the aforementioned plans and policies, and impacts would be less than significant.

California Department of Transportation

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Billy Gross, Principal Planner
City of South San Francisco
315 Maple Street
South San Francisco, CA 94080

Re: Infinite 131 Project – Draft Environmental Impact Report (DEIR)

Dear Billy Gross:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Infinite 131 Project. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities. The following comments are based on our review of the June 2024 DEIR.

1

Please note this correspondence does not indicate an official position by Caltrans on this project and is for informational purposes only.

Project Understanding

The proposed project would demolish approximately 126,750 square feet (sq. ft.) of industrial and operational uses along with 116,572 sq. ft. of open-air structures to construct approximately 1.7 million sq. ft. of research and development (R&D) uses and amenities within seven buildings, along with two parking garages and additional surface parking. The project site is in the vicinity of U.S. Route 101 (U.S. 101).

2

Travel Demand Analysis

The project's Vehicle-miles Traveled (VMT) analysis and significance determination are undertaken in a manner consistent with the City/County Association of Governments of San Mateo County (C/CAG) VMT analysis guidelines. Per the DEIR, this project is found to have a less than significant VMT impact with implementation of the Transportation Demand Management (TDM) Program. Caltrans commends the Lead Agency in developing the TDM Program to reduce employee and guest, therefore working towards meeting the State's goal of a 15-percent reduction. The proposed

2
cont'd ↑ measures identified in the TDM program should be documented with annual monitoring reports to demonstrate effectiveness.

■ **Pedestrian and Bicycle**

The proposed project may affect pedestrian and bicycle transportation near the U.S. 101 on- and off-ramps at Produce Ave. Mitigation Measure TRANS-1 (MM TRANS-1) of the proposed project includes improvements to the pedestrian and bicycle facilities at the following intersections:

- U.S. 101 off-ramp/Produce Ave
- U.S. 101 on-ramp/Produce Ave/Terminal Ct
- Produce Ave/San Mateo Ave/ Airport Blvd

3 MM TRANS-1 also includes construction of a Class IV separated Bikeway from Baden Ave to Terminal Ct via Airport Blvd and Produce Ave. Please incorporate higher visibility striping for any pedestrian crosswalks planned within the project limit and consider providing both short-term bike parking and long-term secure bike parking for the users of the facilities in the new development. Please also consider "YIELD TO PEDS" signs within the project limit when necessary.

■ **Construction-Related Impacts**

4 Project work that requires movement of oversized or excessive load vehicles on State roadways requires a transportation permit that is issued by Caltrans. To apply, please visit Caltrans Transportation Permits ([link](#)).

Prior to construction, coordination may be required with Caltrans to develop a Transportation Management Plan (TMP) to reduce construction traffic impacts to the State Transportation Network (STN).

5 The proposed project may overlap with Caltrans Project 04-4H360 to incorporate safety enhancements and improve traffic operations at Produce Ave and the U.S. 101, such as installation of new signals at the Produce Ave/San Mateo Ave/Airport Blvd intersection. For future project coordination, please contact Rommel Pardo, Senior Project Manager of Program Project Management for San Mateo County at Rommel.Pardo@dot.ca.gov.

■ **Lead Agency**

6 As the Lead Agency, the City of South San Francisco is responsible for all project mitigation, including any needed improvements to the STN. The project's fair share contribution, financing, scheduling, implementation responsibilities and lead agency monitoring should be fully discussed for all proposed mitigation measures.

The DEIR has identified that Impact TRANS-1 would be significant and unavoidable. To address the project impact, the DEIR proposes Mitigation Measure TRANS-1 that

↓ "Provide a safe and reliable transportation network that serves all people and respects the environment."

6 cont'd ↑ includes several transportation improvement projects within Caltrans' Right-of-Way (ROW). Please contact Caltrans for the potential coordination opportunities.

■ **Hydrology**

Please ensure that any increase in storm water runoff to State Drainage Systems or Facilities be treated, contained on project site, and metered to preconstruction levels. Any floodplain impacts must be documented and mitigated.

7 The Office of Hydraulics would like to ensure that the discharge from the new development will not impact the existing draining system at U.S. 101 during the raining season and that no surface flow will get into the roadside ditch between the development and southbound U.S. 101. For future design phase review, please submit plan views, profiles, cross-sections, details of all draining facilities, and hydrologic calculations showing conditions before and after development at this location.

■ **Archaeology**

8 The Cultural Resources studies and mitigation measures in the Cultural Resources Section of the DEIR satisfy environmental legal compliance for cultural resources within Caltrans' ROW. Should construction activities within Caltrans' ROW take place in relation to this project, these mitigation measures shall be implemented if there is an archaeological discovery. If there is an inadvertent archaeological or burial discovery within Caltrans' ROW, please immediately contact the Caltrans Office of Cultural Resource Studies at (510) 847-1977. A staff archaeologist will evaluate the finds within one business day after contact. Caltrans requires review of any potential data recovery plans within Caltrans' ROW.

■ **Aeronautics**

The project site is located within one mile of the San Francisco International Airport. One of the goals of the Caltrans Aeronautics Program, is to assist cities, counties, and Airport Land Use Commissions or their equivalent (ALUC), to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq.

9 The proposed Project is in the Airport Influence Area B (AIA) of the San Francisco International Airport, established by the San Mateo County ALUC pursuant to Section 21675(c). Therefore, the proposed project shall adhere to the safety and land use criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) formed by the ALUC pursuant to the PUC, Section 21674 and Section 21676 and is subject to review authority by the ALUC.

Per the California Public Utilities Code Section 21001 et seq. relating to the State Aeronautics Act, Section 21676(b) prior to the amendment of a general plan, within the planning boundary established by the ALUC pursuant to Section 21675, the local

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- agency shall first refer the proposed action to the ALUC. If the ALUC determines that the proposed action is inconsistent with the ALUC's plan, the referring agency shall be notified. Any proposed development in the defined safety zones or AIA, therefore, must adhere to the safety criteria and restrictions defined in the (ALUCP) adopted by the ALUC pursuant to the PUC, Section 21674.
- 10
- The proposed project site is partially located in the Community Noise Equivalent Level (CNEL) 65 decibel (dB) noise contour. While the proposed land uses of the project include commercial, office, and/or research and development land use and are considered compatible per the ALUCP, the proposed daycare associated with these uses should be considered for noise compatibility. It is recommended that the day care site be located in the portion of the Project site outside of the 65 dB noise contour or be made conditionally compatible per the ALUCP. Caltrans Aeronautics also strongly recommends an onsite noise review to determine if additional noise attenuation is necessary to maintain interior noise levels below 45 CNEL, or lower. Interior CNEL calculations should assume windows are closed.
- 11
- The proposed project should also be reviewed to comply with 14 Code of Federal Regulations (CFR) Part 77 Conical Surface standards, United States Standard for Terminal Instrument Procedures (TERPS) Approach, and One Engine Inoperative (OEI) Departure Surfaces in applicable areas.
- 12
- Equitable Access**
If any Caltrans facilities are impacted by the project, those facilities must meet American Disabilities Act (ADA) Standards after project completion. As well, the project must maintain bicycle and pedestrian access during construction. These access considerations support Caltrans' equity mission to provide a safe, sustainable, and equitable transportation network for all users.
- 13
- Encroachment Permit**
Please be advised that any permanent work or temporary traffic control that encroaches onto Caltrans' ROW requires a Caltrans-issued encroachment permit. As part of the encroachment permit submittal process, you may be asked by the Office of Encroachment Permits to submit a completed encroachment permit application package, digital set of plans clearly delineating Caltrans' ROW, digital copy of signed, dated and stamped (include stamp expiration date) traffic control plans, this comment letter, your response to the comment letter, and where applicable, the following items: new or amended Maintenance Agreement (MA), approved Design Standard Decision Document (DSDD), approved encroachment exception request, and/or airspace lease agreement.
- The Office of Encroachment Permit requires 100% complete design plans and supporting documents to review and circulate the permit application package. To

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obtain more information and download the permit application, please visit Caltrans Encroachment Permits ([link](#)). Please note that the checklist TR-0416 is used to determine the appropriate Caltrans review process for encroachment projects. Your application package may be emailed to D4Permits@dot.ca.gov.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Luana Chen, Transportation Planner, via LDR-D4@dot.ca.gov.

For future early coordination opportunities or project referrals, please visit the Caltrans LDR website ([link](#)) or contact LDR-D4@dot.ca.gov.

Sincerely,



YUNSHENG LUO
Branch Chief, Local Development Review
Office of Regional and Community Planning

c: State Clearinghouse

Letter A-California Department of Transportation (Caltrans): Yunsheng Luo, Caltrans (August 2, 2024)

Response to Comment A-Caltrans-1

The comment expresses appreciation from Caltrans for the opportunity to comment on the Draft EIR and provides a summary of the description of the proposed project. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. No substantive response or revisions to the draft EIR are required.

Response to Comment A-Caltrans-2

The comment acknowledges that the proposed project's analysis of VMT and travel demand is consistent with the City/County Association of Governments of San Mateo County VMT analysis guidelines and that the proposed project would have a less-than-significant impact with respect to VMT. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. No substantive response or revisions to the draft EIR are required.

Response to Comment A-Caltrans-3

The comment requests that specific design requirements be incorporated as part of the Class IV separated bikeway from Baden Avenue to Terminal Court proposed as part of the transportation improvements provided in Mitigation Measure MM-TRANS-1. This includes incorporating high-visibility striping for pedestrian crosswalks, short-term and long-term bicycle parking, and "Yield to Pedestrians" signs within the project site when necessary. As detailed in Chapter 3, *Project Description*, of the draft EIR, the proposed project would include a total of 176 bicycle parking spaces throughout the project site, including 149 long-term bicycle parking spaces and 27 short-term bicycle parking spaces. The short-term bicycle parking spaces would be located near the lobby entrances to the proposed buildings. The long-term bicycle parking spaces, as well as showers, would be provided on the ground floor of the I131N and I131S buildings and within a bicycle storage room in the parking garage. Mitigation Measure MM-TRANS-1 has been revised to include other design requirements, as requested by Caltrans and shown in Chapter 3, *Revisions to the Draft EIR*. The revisions requested by Caltrans would further reduce hazard impacts, and do not alter the findings in the draft EIR.

Response to Comment A-Caltrans-4

The comment states that, if project work requires the movement of oversized or excessive-load vehicles on state roadways, it may require a transportation permit from Caltrans as well as a transportation management plan. Comment noted. Project construction would involve the routine transport, use, and disposal of hazardous materials and would be required to be comply with applicable requirements and regulations set forth by Caltrans as well as the California Highway Patrol, U.S. Department of Transportation, and BAAQMD. The project would acquire permits from Caltrans as well as a transportation management plan if deemed necessary during the permitting and entitlement process.

Response to Comment A-Caltrans-5

The comment states that the proposed project could overlap with the U.S. Highway 101/Produce Avenue Interchange Project (Caltrans Project 04-4H360), which would incorporate safety enhancements and improve traffic operations at Produce Avenue and U.S. 101; the commenter provides a contact for future project coordination. Comment noted. As detailed on page 4.1-8 of the draft EIR, the U.S. Highway 101/Produce Avenue Interchange Project was included as part of the proposed project's cumulative analysis. The project applicant would coordinate with Caltrans as described in the comment.

Response to Comment A-Caltrans-6

The comment reiterates that the City is responsible for advancing project mitigation on the state transportation network, including Mitigation Measure MM-TRANS-1. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. No substantive response or revisions to the draft EIR are required.

Response to Comment A-Caltrans-7

The comment asks if increases in stormwater runoff would be treated and managed, particularly where the project is in proximity to U.S. 101. As detailed in Section 3.10, *Hydrology and Water Quality*, of the Initial Study (Appendix B to the draft EIR), construction of the proposed project would not substantially alter the existing drainage pattern of the area in a manner that would substantially increase the rate or amount of runoff or result in flooding on- or off-site. For the majority of the project site, storm drain lines would outfall into the adjacent slough. Oversized underground pipes would control flows prior to discharge to the slough. On the lower portions of the site, smaller areas would drain to the City's municipal separate storm sewer system within Terminal Court. On-site storm drain improvements would include the installation of bioretention ponds, flow-through planters, and Silva Cell units to provide treatment on the project site and convey water to storage pipes. Stormwater treatment controls would be in compliance with the requirements of Provision C.3 of the Municipal Regional Permit. Water would be released at the designed flow rate. Through compliance with state and local regulations, as well as implementation of best management practices, the project would not contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems, including systems maintained by Caltrans.

The comment requests that, for future design-phase review, plan views, profiles, cross-sections, details of all drainage facilities, and hydrologic calculations showing conditions before and after development at the U.S. 101 location be submitted. The project is required to comply with Caltrans' drainage facility requirements. When the project applicant submits plans to Caltrans for review, the project design materials and runoff calculations requested by Caltrans will be provided.

The comment expresses concern regarding floodplain impacts, which are addressed in Section 3.10, *Hydrology and Water Quality*, of the Initial Study (Appendix B to the draft EIR). To comply with FEMA requirements and combat future sea-level rise and flooding, the site would be raised to at least 13 feet; structures would be designed with first-floor elevations of 14 feet. Fill would be placed to raise existing grades and allow structures to meet the natural grade; as a result, structures would be outside of the floodplain. A flood-proofing certificate would be submitted to the City. The site would file for the LOMR-F and would not be required to pay for flood insurance.

Response to Comment A-Caltrans-8

The comment states that the cultural resources analysis and mitigation measures provided in the draft EIR satisfies environmental compliance requirements for potential cultural resources found within the Caltrans right-of-way and provides a contact should inadvertent archaeological or burial discoveries occur within the Caltrans right-of-way during project construction. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. No substantive response or revisions to the draft EIR are required.

Response to Comment A-Caltrans-9

The comment states that the proposed project is within SFO's Airport Influence Area and that it is required to be consistent with the ALUCP. As detailed in Section 3.9, *Hazards and Hazardous Materials*, and Section 3.11, *Land Use and Planning*, of the Initial Study (Appendix B to the draft EIR), the project site is within Airport Influence Area B of the SFO ALUCP and required to comply with policies and actions concerning interior noise levels and maximum building heights, as included in the General Plan, Specific Plan, and City Municipal Code and Zoning Ordinance. In addition, because the proposed project is within Area B, consultation with the City/County Association of Governments of San Mateo County and the Federal Aviation Administration (FAA) would be required prior to project construction. This would include determining the need to file form 7460-I, Notice of Proposed Construction or Alteration, with the FAA, which applies to any project that would exceed FAA notification heights, as shown on ALUCP Exhibit IV-10, and complying with the FAA aeronautical study findings. With the 7460-I filing, the FAA then undertakes an aeronautical study for the project and issues a "determination of no hazard" or a "determination of hazard." A determination of hazard is made when a project would cause an obstruction to air navigation, resulting in a substantial aeronautical impact. The project would, therefore, require a consistency determination with the ALUCP to comply with FAA regulations regarding height. The project applicant would be required to receive a determination of no hazard to air navigation as a condition of approval for a building permit for the proposed project.

Response to Comment A-Caltrans-10

The commenter is correct that the project site is partially located within the 65-decibel (dB) Community Noise Equivalent Level (CNEL) contour for SFO. The commenter recommends that the day-care site be located on the portion of the project site outside the 65 dB CNEL contour or be made conditionally compatible per the SFO ALUCP. The day care associated with the proposed project is on the northern portion of the project site and outside the 65 dB CNEL contour for SFO, per Exhibit IV-6 – Noise Compatibility Zones – Detail from the SFO ALUCP (City/County Association of Governments of San Mateo County 2012). According to Table IV-1, Noise/Lane Use Compatibility Criteria, of the ALUCP, public and private schools are considered compatible with aircraft noise levels below 65 dB CNEL. Therefore, the day care associated with the project would be considered compatible with the ALUCP for SFO.

Measured noise levels at the project site resulting from other sources (e.g., traffic along U.S. 101 rather than aircraft noise) are such that additional design features may be required to ensure interior noise levels are adequate for the proposed day-care use. Compliance with applicable General Plan Actions, however, would ensure that the project would be designed such that interior noise levels would be appropriate for the day-care use. Specifically, General Plan Actions NOI-1.1.1,

Enforce Exterior and Interior Noise Limits, and 1.1.2, Incorporate Noise Compatibility Conditions of Approval, pertain to the enforcement of appropriate interior noise limits throughout the city and include mechanisms by which appropriate interior noise levels can be ensured (e.g., through development review processes and conditions of approval).

Response to Comment A-Caltrans-11

The comment states that the proposed project would be required to comply with 14 Code of Federal Regulations Part 77, Conical Surface Standards; United States Standards for Terminal Instrument Procedures Approach; and One Engine Inoperative Departure Standards. Refer to response to comment A-Caltrans-9, above.

Response to Comment A-Caltrans-12

The comment states that Caltrans facilities affected by the proposed project must be designed to meet Americans with Disabilities Act (ADA) standards and that bicycle and pedestrian access must be maintained during project construction.

As discussed in draft EIR Chapter 3, *Project Description*, the need for Caltrans review of the proposed project as a responsible agency is identified in Table 3-2, Required Permits and Approvals for the Proposed Project. As noted under Impact TRANS-1 on pages 4.6-19 through 4.6-22 of the draft EIR, implementation of the transportation improvements identified under Mitigation Measure MM-TRANS-1 would be partially under the jurisdiction of Caltrans and would require right-of-way acquisitions, encroachment permits, and/or review and approval by Caltrans.

Where Caltrans' facilities and intersections would be affected as a result of the proposed project, improvements would be designed to meet ADA standards. In addition, project-related construction activities occurring within the Caltrans' right-of-way would require an encroachment permit and be required to meet temporary traffic control and detour requirements in accordance with the permit to maintain bicyclist and pedestrian access during construction. In addition, as stated on page 4.6-19 of the draft EIR, the proposed project would be consistent with General Plan and Specific Plan goals and policies, as well as the Active South City Plan, related to pedestrian and bicyclist circulation, including policies to improve bicycle and pedestrian access through the city. No revisions to the draft EIR are required.

Response to Comment A-Caltrans-13

The comment states that any project-related permanent or temporary traffic control that encroaches onto a Caltrans right-of-way would require an encroachment permit. Furthermore, required items, including 100 percent design plans, must be provided in order to issue the encroachment permit. Comment noted. The comment does not contain questions or concerns regarding the adequacy of the draft EIR analysis. The encroachment permit process will be completed separate from the CEQA or environmental review process. No substantive response or revisions to the draft EIR are required.

Chapter 3

Revisions to the Draft EIR

This section lists revisions that have been made to the draft environmental impact report (EIR) following the 45-day public comment period. Revisions were made either in response to the comments received on the draft EIR or as a result of staff-initiated changes to correct typographical errors. Staff-initiated text changes are indicated by an asterisk (*).

The changes and minor errata items do not result in significant new information with respect to the proposed project, including the level of significance of project impacts or any new significant impacts. Therefore, recirculation of the draft EIR pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15088.5 is not required.

Chapter 2, Executive Summary

The following correction has been made to Table 2-1, *Summary of Project Impacts, Mitigation Measures, and Improvements Measures*, on EIR p. 2-17, under Impact TRANS-1 (new text is italicized):¹

Potential Environmental Impact	Level of Significance before Mitigation	Recommended Mitigation Measure	Level of Significance after Mitigation
<p>Impact TRANS-1: The project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicyclist, and pedestrian facilities.</p>	<p>PS</p>	<p>Mitigation Measure TRANS-1: Advanced Implementation of Transportation Improvements Identified in General Plan, Lindenville Specific Plan, and Active South City Plan</p> <p>The project sponsor shall and/or fund, as indicated below, the following improvements identified in the General Plan, Lindenville Specific Plan, and Active South City Plan:</p> <ol style="list-style-type: none"> <u>Signalization of the U.S. 101 Off-ramp/Produce Avenue and U.S. 101 On-ramp/Produce Avenue/Terminal Court Intersections:</u> The project shall implement two new traffic signals along Produce Avenue to improve traffic operations, safety, and bicycle and pedestrian access to the project site. The traffic signals shall be located at the intersections of the U.S. 101 off-ramp/Produce Avenue and U.S. 101 on-ramp/Produce Avenue/Terminal Court. 	<p>SUM</p>

¹ For purposes of this specific revision to the draft EIR, the new text was italicized instead of underlined for clarity.

Potential Environmental Impact	Level of Significance before Mitigation	Recommended Mitigation Measure	Level of Significance after Mitigation
		<p>The traffic signals shall be accompanied by changes to lane configurations, sidewalks, crosswalks, and bicycle facilities identified by the City to achieve consistency with adopted plans and policies.</p> <p>2. <u>Redesign of the Produce Avenue/San Mateo Avenue/Airport Boulevard Intersection</u>: The project shall implement a redesign of the Produce Avenue/San Mateo Avenue/Airport Boulevard intersection to improve traffic operations, safety, and bicycle, pedestrian, and transit access to the project site. A partial redesign of this intersection is already funded by the 100 Produce, 124 Airport, and 40 Airport projects, which will include removal of slip lanes on the northeast, northwest, and southwest corners. The project’s redesign shall include the reconfiguration of turning lanes, improvements to pedestrian and bicycle facilities, and the addition of bus stops and shelters for SamTrans Route 292, as identified by the City.</p> <p>3. <u>Construction of a Class IV Separated Bikeway from Baden Avenue to Terminal Court via Airport Boulevard and Produce Avenue</u>: The project shall implement a Class IV separated bikeway on Produce Avenue and Airport Boulevard from Baden Avenue to Terminal Court, connecting the Caltrain station to the project site. This bikeway would close existing gaps between the project site, Caltrain station, and downtown South San Francisco, enabling continuous bicycle travel separated from auto and truck traffic. Improvements would include construction of a two-way facility along the west</p>	

Potential Environmental Impact	Level of Significance before Mitigation	Recommended Mitigation Measure	Level of Significance after Mitigation
		side of Produce Avenue from Terminal Court to Airport Boulevard/San Mateo Avenue, transitioning to a pair of one-way facilities through the Caltrain crossing to Baden Avenue. <i>High-visibility striping for pedestrian crosswalks and "YIELD TO PEDS" signs would be incorporated where necessary and within project limits.</i>	

Section 4.6, Transportation and Circulation

The following correction has been made to the third paragraph of Mitigation Measure TRANS-1 on EIR p. 4.6-21 (new text is underlined):

Mitigation Measure TRANS-1: Advanced Implementation of Transportation Improvements Identified in General Plan, Lindenville Specific Plan, and Active South City Plan

The project shall implement and/or fund, as indicated below, the following improvements identified in the General Plan, Lindenville Specific Plan, and Active South City Plan:

1. Signalization of the U.S. 101 Off-ramp/Produce Avenue and U.S. 101 On-ramp/Produce Avenue/Terminal Court Intersections. The project shall implement two new traffic signals along Produce Avenue to improve traffic operations, safety, and bicycle and pedestrian access to the project site. The traffic signals shall be located at the intersections of the U.S. 101 off-ramp/Produce Avenue and U.S. 101 on-ramp/Produce Avenue/Terminal Court. The traffic signals shall be accompanied by changes to lane configurations, sidewalks, crosswalks, and bicycle facilities identified by the City to achieve consistency with adopted plans and policies.
2. Redesign of the Produce Avenue/San Mateo Avenue/Airport Boulevard Intersection The project shall implement a redesign of the Produce Avenue/San Mateo Avenue/Airport Boulevard intersection to improve traffic operations, safety, and bicycle, pedestrian, and transit access to the project site. A partial redesign of this intersection is already funded by the 100 Produce, 124 Airport, and 40 Airport projects, which will include removal of slip lanes on the northeast, northwest, and southwest corners. The project’s redesign shall include the reconfiguration of turning lanes, improvements to pedestrian and bicycle facilities, and the addition of bus stops and shelters for SamTrans Route 292, as identified by the City.

3. Construction of a Class IV Separated Bikeway from Baden Avenue to Terminal Court via Airport Boulevard and Produce Avenue The project shall implement a Class IV separated bikeway on Produce Avenue and Airport Boulevard from Baden Avenue to Terminal Court, connecting the Caltrain Station to the project site. This bikeway would close existing gaps between the project site, Caltrain Station, and downtown South San Francisco, enabling continuous bicycle travel separated from auto and truck traffic. Improvements would include construction of a two-way facility along the west side of Produce Avenue from Terminal Court to Airport Boulevard/San Mateo Avenue, transitioning to a pair of one-way facilities through the Caltrain crossing to Baden Avenue. High-visibility striping for pedestrian crosswalks and "YIELD TO PEDS" signs would be incorporated where necessary and within project limits.

Appendix B, Initial Study

The following correction has been made to the last paragraph in Section 3.10.2.3, *Drainage and Flooding*, of the Initial Study (Appendix B to the EIR) on p. 3-49 (deleted text has ~~striketrough~~):*

Fill would be placed to raise existing grades and allow structures to meet the natural grade; as a result, structures would be outside of the floodplain. A flood-proofing certificate would be submitted to the City. ~~The site would file for a Letter of Map Revision Based on Fill (LOMR-F) and would not be required to pay flood insurance.~~⁶⁶