

**RESPONSES TO COMMENTS ON THE
DRAFT ENVIRONMENTAL IMPACT REPORT**

751 GATEWAY BOULEVARD PROJECT

**CITY OF SOUTH SAN FRANCISCO, CALIFORNIA
STATE CLEARINGHOUSE No. 2020010281**

DRAFT EIR PUBLICATION DATE: SEPTEMBER 22, 2020

DRAFT EIR PUBLIC HEARING DATE: OCTOBER 15, 2020

DRAFT EIR PUBLIC COMMENT PERIOD: SEPTEMBER 22–NOVEMBER 8, 2020

FINAL EIR CERTIFICATION DATE: JANUARY 21, 2021

January 2021



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Tables

No tables presented.

Figures

No figures presented.

Chapter 1

Introduction

The purpose of this Responses to Comments (RTC) document is to present comments submitted on the draft environmental impact report (draft EIR) for the proposed 751 Gateway Boulevard Project (proposed project), to respond in writing to comments on environmental issues, and to revise the draft 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 Planning Division has considered the comments received, evaluated the environmental issues raised, and herein provides written responses that fully address the comments on significant environmental issues raised by the commenters. This RTC document also provides limited responses to general comments on the draft EIR received during the public review period that were not related to environmental issues for informational purposes. Where appropriate, this RTC document also includes EIR text changes made in response to comments or at the initiation of City of South San Francisco (City) staff.

The draft EIR together with this RTC document constitute the final environmental impact report (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 South San Francisco Planning Division for the City of South San Francisco, 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. [CEQA Guidelines]). The draft EIR was published and posted on the City's website on September 22, 2020. 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 September 22, 2020 to November 8, 2020. The notice solicited comments on the adequacy and accuracy of information presented in the Draft EIR. Comments were made in written form during the public comment period and as oral testimony received at the public hearing on the draft EIR before the Planning Commission held on October 15, 2020. 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. Meeting minutes of proceedings from 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 the comments received during the public review period, responses to the comments on environmental issues, and any revisions to the draft EIR that result from staff-initiated text changes and text changes in responses to comments. Information provided in the responses to 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 are no new significant environmental impacts, no substantial increase in the severity of any significant impact, and no new alternatives or mitigation measures identified in the comments or responses that were not already identified in the draft EIR.

The City has distributed this RTC document to the Planning Commission. The Planning Commission will review the final EIR for adequacy and 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 Planning Commission will hold a hearing on January 21, 2021 to consider the adequacy of the final EIR. If the Planning Commission finds the EIR to comply 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 to specify the mitigation measures that will be required as conditions of project approval in a Mitigation Monitoring and Reporting Program.

If the City decision-makers decide to approve the proposed project even though the significant environmental impacts that are identified in the final EIR are not 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 the comments from the public hearing meeting minutes and written comments. The comments are organized by agency (A) in order by date received.
- **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 staff-initiated text changes identified by City staff to update, correct, or clarify the draft EIR text.

2.1 Introduction

This chapter contains responses to the comments from the October 15, 2020 Planning Commission hearing and to written comments on the draft EIR received during the public comment period. In addition to the comments received during the Planning Commission hearing, the City of South San Francisco received three letters or emails commenting on the draft EIR during the comment period and one letter commenting on the draft EIR after the comment period.

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

- A-PC: Planning Commission Hearing (October 15, 2020)
- A-HPSM: Darren Kattenhorn, Health Plan of San Mateo (October 15, 2020)
- A-DTSC: Eric Chodoroff, Department of Toxic Substances Control, Site Mitigation Program (November 6, 2020)
- A-Caltrans: Mark Leong, California Department of Transportation, District 4 (November 9, 2020)

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 in letters and emails that raise environmental issues are bracketed and numbered; each comment is followed by 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 of the draft EIR text is not necessary.

751 Gateway City of South San Francisco Planning Commission Meeting

Commissioner Wong's Comments:

3:33 – Commissioner Wong accepts proposal to discuss agenda item number 2 (751 Gateway Project) before agenda item number 1 (Genetech 2020 Master Plan). Submits the change in agenda order to the planning commission.

3:44 - *The commission accepts the change in agenda order*

3:54 – Is there anyone in the public that has a comment not related to tonight's agenda?

5:04 – *A comment is made from Hello Housing (Marty Oaks) on the City's housing progress element.*

7:29 – If there are no other comments, why don't we move along to the public hearing. Madam Krik can we have item item number two please.

7: 31 – Madam Kirk “Report regarding a public hearing for the 45 day comment period from September 22nd 2020 to November 8th 2020, for the draft environmental impact report for the proposed 751 development project, for a new 7-story research and development and office building in the gateway specific plan district.”

8:01 – I'll open it up to the public hearing and ask for a staff report please.

8:10 – Adena Freedman, senior planner, gave staff report on proposed development and EIR.

13:13 – Adena Freedman opens the hearing to questions and public comments from the commission and community attendees. Introduces Toon Jordan from Alexandria, Jessica Viramontes from ICF, and Mike Hawkins from Fehr & Peers.

13:28 – Toon Jordan introduces herself

14:10 – Thank you so much. Is their anyone in the audience who would like to make a comment on this item? Again if you do then click the raise hands button in the participant tab in the bottom right. Shelby do you see anyone who would like to make a comment on this item?

14:53 – Alright, I see none. I will go ahead and turn this over to the commissioners..

15:03 – Michelle “I do have a comment to read into the record. I'm sorry I thought I unmuted myself. It says, Hello Adina, it was a pleasure speaking with you today. Here are my concerns:

- 1 ■— 1) bus traffic,
- 2 ■— 2) air quality, will they be burning any waste from their labs,
- 3 ■— 3) car and pedestrian traffic influx,
- 4 ■— 4) impact of construction and debris, and cleanup of HPSM property,
- 5 ■— 5) air quality at 801 gateway during and after construction,
- 6 ■— 6) new road signage during and after construction,
- 7 ■— 7) impact of sewer and water supply pipes.

Thanks for your time. Darren Katenhorn, Chief Engineer from Health Plan of San Mateo.”

15:48 – Thank you Michelle. Why don't we turn it over to commissioners now, and why don't we start with commissioner Zang.

16:05 – Commissioner Zang does not have any specific questions yet.

16:08 – Ok. Commissioner Bernardo?

16:11 – Commissioner Bernardo does not have any questions right now.

16:14 – Ok. Commissioner Murphy?

16:18- Commissioner Murphy does not have any questions or comments on the project at the moment.

16:20 – Ok. Commissioner Shahid?

16:25 - Commissioner Shahid does not have questions or comments either at the moment.

16:31 – Ok. Commissioner Keria.

16:34 – Commissioner Keria does not have any questions or comments either at the moment but would like to be informed if there are any issues on mitigated items if they do not get resolved.

16:45 – Ok. Vice Chair Evans?

16:48 – Vice Chair Evans has no questions.

8 ■ **16:50 – Nothing, ok. Adena I won't let you get away that easy. I'll just ask you just ask one quick question. So the new VMT rules that were instituted in December, I see that those were listed underneath at least one of the bullet points for significant and unavoidable impacts. Would that not have been an issue prior to the new rule changes instituted this past summer?** ■

17:15: Adena Freedman "That's correct. Traffic would have been analyzed differently, so for this project, traffic would have been analyzed using level of service impacts. So it still would have been analyzed and potentially would have been an issue, this is just a different way to analyze it and there will be different mitigation measures required. I do have Mike Hawkins from Fehr & Peers available and I would just like to ask Mike if you would like to provide any additional technical detail to anything Ive said. Please do or let us know if you think that is significant from a transportation standpoint."

18:00 – Mike Hawkins "Sure Adena. I think you did a really good job covering it in that the transportation analysis would have just been done a little differently under CEQA before the VMT rules came into play. But I'll just add that if we were looking at Level of Service, the potential mitigation measures would have likely been more along the lines of increasing intersection capacity and things that are more related to vehicles. Were as with VMT we are focusing more on transportation demand management, improving the pedestrian and bicycle environment, and creating a safer space for transportation, is kind of the key difference."

18:44 – Claire, do we need to take action on this or do we just mention that we accept, or open the comment period?

18:50- Claire "Yeah the commission just accepts the staff report and closes the public hearing and concludes the item if there is no additional comments."

19:00 – Do we need to motion for that? To accept the recommendation or not?

19:10 – Clarie "There is not a recommendation for the commission..."

19:13 – Ok. Then I'll go ahead and close the public comment and note that we received this public hearing for this EIR.

00748.17

Letter A-PC: Planning Commission Hearing (October 15, 2020)

Response to Comment PC-1

The comment expresses concern regarding bus traffic as a result of the proposed project. Existing transit facilities are described in Sections 4.9.2.2 and 4.9.2.3 on pp. 4.9-3 and 4.9-5 of the draft EIR. Impacts associated with local and regional transit are described in detail under Impact TR-4. The project is not expected to increase the number of San Mateo County Transit District (SamTrans) buses near the project site. As part of the project's Transportation Demand Management (TDM) plan and as required as part of Mitigation Measure TR-1, the project is required to participate in first-/last-mile shuttle program to connect the project site to regional transit hubs. Public shuttles are required to use on-street shuttle stops to minimize additional travel time for shuttles. As described in the project's TDM plan, transit and shuttle use would decrease the demand for single occupancy auto trips, which would ultimately help to lower total vehicle trips to and from the project site and congestion on the roadway network.

Response to Comment PC-2

The comment requests information regarding whether the proposed project would involve waste burning. According to the project applicant, the proposed project would not involve waste burning at the project site. Solid waste generated by building tenants would be collected by a municipal solid waste collection service, similar to all commercial buildings in the area. Thus, no air pollutants would be emitted from waste burning.

From a hazardous materials perspective, the proper handling and disposal of hazardous materials and hazardous waste as a result of project operations is discussed under Impact HAZ-1 on p. 4.10-15 of the draft EIR. The use and disposal of these materials would comply with all applicable state and local regulations and under consultation with the San Mateo County Environmental Health Department (SMCEHD) (and as part of the SMCEHD Hazardous Materials Business Plan Program). The proposed project would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials during operation and this impact would be less than significant.

Response to Comment PC-3

The comment requests information on increases in the volumes of cars and pedestrians as a result of the proposed project. As shown in Table 4.9-3 on p. 4.9-19 of the draft EIR, the project is expected to generate 1,784 net new daily vehicle trips. Impacts related to vehicle miles traveled are described under Impact TR-1 on p. 4.9-23 of the draft EIR. Information related to vehicle level of service is included in the *Transportation Impact Analysis* provided in Appendix D of the draft EIR. As stated in Section 3.3.2.4 in Chapter 3, *Project Description*, of the draft EIR, the proposed project would result in approximately 731 net new employees at the project site, which are anticipated to increase the number of pedestrians at the site. The project includes some pedestrian improvements to enhance on-site pedestrian circulation and safety (e.g., a pedestrian walkway constructed along Gateway Boulevard that would connect pedestrians from the northern portion of the project site to the proposed building). In addition, Mitigation Measure TR-1 requires contributions towards additional off-site pedestrian improvements, such as upgrading the Poletti Way sidewalk, adding directional curb ramps and high visibility crosswalks at the Gateway Boulevard/Gateway Business Park

driveway/Project driveway intersection, and adding high-visibility crosswalks at the Oyster Point Boulevard/Gateway Boulevard intersection.

Response to Comment PC-4

The comment expresses concern regarding the impact of construction and debris and clean-up on the Health Plan of San Mateo (HPSM) property, an office building at 801 Gateway Boulevard. In accordance with City requirements, the applicant would be required to have construction management plans to address dust and debris. If there is dust or debris on neighboring properties, the applicant would be required to take appropriate measures to control dust. The applicant would also be required to put up signage during construction with a contact number on it, to allow neighboring properties to call and report any problems that may arise.

From a hazardous materials perspective, the use of hazardous materials during construction of the proposed project is discussed under Impact HAZ-1 on p. 4.10-15 of the draft EIR. The transport, use, and disposal of these materials would comply with applicable regulations. The demolition involved with the project would not produce hazardous building materials during construction. The proposed project would not create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials during construction and this impact would be less than significant.

Response to Comment PC-5

The comment requests information on the air quality impacts at the HPSM property, an office building at 801 Gateway Boulevard, during and after project construction. Section 4.2, *Air Quality*, of the draft EIR analyzes both regional and localized air quality impacts from implementation of the project. Regional air quality impacts (i.e., those impacts in the San Francisco Bay Area Air Basin) from project construction and operation would not be significant because emissions would not exceed the applicable thresholds established by the Bay Area Air Quality Management District (BAAQMD) (with construction mitigation), as shown in Table 4.2-6 and 4.2-7 on pp. 4.2-27 and 4.2-29, respectively, of the draft EIR. As such, the project would not contribute to a cumulatively considerable net increase in any pollutant for which the project region is classified as nonattainment under an applicable federal or state ambient air quality standard. Regional air quality would not be significantly worsened from construction or operations.

To assess localized air quality impacts, the draft EIR focuses on those impacts from emissions of toxic air contaminants (TAC). As noted on p. 4.2-32 of the draft EIR, the primary TAC of concern associated with the proposed project is diesel particulate matter (DPM). DPM is a carcinogen emitted by diesel internal combustion engines. Construction activities would generate DPM that could expose adjacent receptors to significant health risks. The draft EIR evaluates the localized impacts from DPM and focuses on the impacts that would be experienced by sensitive receptors.

Sensitive receptors are located at land uses where human populations, especially children, seniors, or sick persons are located and where there is reasonable expectation of continuous human exposure according to the averaging period for the air quality standards (i.e., 24 hours, 8 hours). Typical sensitive receptors are residences, hospitals, schools, child care facilities, and parks. BAAQMD notes that a *sensitive land use* is where “sensitive individuals are likely to spend a significant amount of time. *Sensitive individuals* refer to those segments of the population most susceptible to poor air quality: children, the elderly, and those with pre-existing serious health

problems affected by air quality.” Based on this guidance from the expert air quality agency with jurisdiction over the project site, the property at 801 Gateway is not considered to be a sensitive receptor location. As such, the localized health effects at this property were not modeled.

Nonetheless, impacts from construction of the proposed project could affect people at 801 Gateway, but there are several indications that the impacts would be minimized by the location of 801 Gateway and the duration of proposed project construction. For example, most of the floor space at 801 Gateway would be at least 500 feet from the areas of construction at the project site. BAAQMD, in its CEQA Guidelines, notes the following.

Due to the variable nature of construction activity, the generation of toxic air contaminant emissions in most cases would be temporary, especially considering the short amount of time such equipment is typically within an influential distance that would result in the exposure of sensitive receptors to substantial concentrations. Concentrations of mobile-source diesel particulate matter emissions are typically reduced by 70 percent at a distance of approximately 500 feet....^[1]

Health risk methodologies are typically associated with longer-term exposure periods (9, 40, and 70 years), while construction at the project site would occur for only 18 months. Consequently, relative to typical health risk assessments, the impacts on people at 801 Gateway would be comparably less because of the 500 foot buffer (where concentrations are reduced by 70 percent) and the relatively short construction period (18 months vs. 9, 40, or 70 years).

During project operations, there would be no substantial sources of TACs at the project site because the project would not substantially affect diesel-fueled vehicle traffic. The use of an emergency diesel generator would be a source of diesel particulate matter during operations. However, as noted on page 4.2-33 of the draft EIR, the generator is a source of pollution that requires a permit from the BAAQMD, and BAAQMD will not issue a permit for a new source that results in a cancer risk greater than their established threshold (10.0 cases per million). At the nearest sensitive receptor, the Gateway Child Development Center, modeling results confirm that impacts from the generator would be well below the BAAQMD’s applicable thresholds, (refer to Table 4.2-9 in the draft EIR). The generator would be located approximately 600 feet from the building at 801 Gateway, and thus diesel particulate matter emissions would be reduced in that distance between the generator and 801 Gateway. Regardless, the generator would require a permit from BAAQMD demonstrating that health risks are not in exceedance of the thresholds at land uses in the project vicinity. Therefore, the generator cannot operate until the permit conditions for it show that cancer risks would be below the BAAQMD’s threshold.

Response to Comment PC-6

The comment requests information on new road signage to be used during and after project construction. As discussed in Section 4.9.4.3, *Impact Evaluation*, under Impact TR-3 in Section 4.9, *Transportation and Circulation*, of the draft EIR, construction activities have the potential to interfere with existing and proposed bicycle/pedestrian facilities, but the impact is expected to be less than significant. Construction activities would be temporary in nature and will be planned pursuant to a construction management plan that would be approved by City staff. Additional

¹ Bay Area Air Quality Management District. 2017. *California Environmental Quality Act, Air Quality Guidelines*. May Available: http://www.baaqmd.gov/~media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.pdf?la=en. Accessed: January 6, 2020.

roadway signage associated with new bicycle facilities would be installed according to the City's standards and would be approved by City staff prior to construction.

Response to Comment PC-7

The comment requests information on the proposed project's impact on sewer and water supply pipes. As discussed in Section 4.10.10.4, *Impact Evaluation*, under Impact UT-1 in Section 4.10, *Less-than-Significant Impacts*, of the draft EIR, the proposed project would have less-than-significant impacts on water and wastewater infrastructure. Specifically, the proposed project would incorporate new potable water utilities around the perimeter of and throughout the project site. A new 6-inch lateral would connect to the existing 12-inch lateral on the project site, and two new 8-inch laterals for fire needs would be constructed as part of the project. In addition, one 8-inch lateral would connect to the existing 12-inch lateral on the project site, and the other 8-inch lateral would connect to the 12-inch water main in Gateway Boulevard.

For the sanitary sewer system at the project site, the 12-inch gravity pipe outfall in Gateway Boulevard may need to be upsized as part of the proposed project. A new 8-inch lateral would be constructed on the project site to serve the proposed building. Furthermore, the existing 8-inch lateral that serves the 701 Gateway Boulevard building would need to be replaced with a 10-inch lateral.

Impacts related to the construction of new utility facilities for the proposed project are addressed as part of the analysis of construction impacts for the proposed project as a whole. The installation or expansion of any utility facilities for the project would not result in additional significant impacts that are not otherwise disclosed elsewhere in the draft EIR. If required, the costs of capital improvements would be captured through payment of the City's Sewer System Capacity Study and Improvement Fee (the "Sewer Capacity Fee"), based on the square footage of proposed project new uses, pursuant to the City's Master Fee Schedule and Title 14 "Water and Sewage" of the Municipal Code. The draft EIR concludes that the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage facilities, the construction or relocation of which could cause significant environmental effects and this impact would be less than significant.

As discussed in Section 4.10.10.4, *Impact Evaluation*, under Impact UT-2 in Section 4.10, *Less-than-Significant Impacts*, of the draft EIR, the project would increase water demand compared to existing conditions. However, the project would not increase demand beyond that anticipated in the Urban Water Management Plan. The water demand generated by the proposed project would not exceed the supply or capacity of the water utility; this would be a less than significant impact. As discussed under Impact UT-3, the increase in wastewater flow from the proposed project would be minimal compared to the overall flow through the existing system. Sufficient wastewater treatment capacity is available to serve the project during operation and this impact would be less than significant.

Response to Comment PC-8

The comment asks about the significant and unavoidable impacts related to vehicle miles traveled (VMT), and whether or not this would have been a project impact prior to the implementation of California Senate Bill (SB) 743. As discussed during the Planning Commission hearing, transportation impacts identified in the draft EIR related to VMT are based on SB 743 and CEQA Guidelines Section 15064.3 which state that vehicle level of service (LOS) shall no longer be used for determining transportation impacts. Instead, transportation impacts shall be based on VMT, as described in Section

4.9.3.1 and Section 4.9.4.2 in Section 4.9, *Transportation and Circulation*, of the draft EIR. Prior to SB 743 implementation, project impacts would have been based on LOS. LOS analysis is included for informational purposes in the *Transportation Impact Analysis* provided in Appendix D of the draft EIR.

Subject: RE: SSF Environmental Meeting - 7pm

From: Darren Kattenhorn <Darren.Kattenhorn@hpsm.org>
Date: October 15, 2020 at 12:14:52 PM PDT
To: "Friedman, Adena" <Adena.Friedman@ssf.net>
Cc: Robert Fleming <Robert.Fleming@hpsm.org>, Adela Escobar <Adela.Escobar@hpsm.org>, Trent Ehrgood <Trent.Ehrgood@hpsm.org>
Subject: SSF Environmental Meeting - 7pm

Hello Adena, it was a pleasure speaking with you today.

Here are my concerns:

- 1 ■— 1. Bus traffic
- 2 ■— 2. Air quality – will they be burning any waste from their labs?
- 3 ■— 3. Car and Pedestrian traffic influx
- 4 ■— 4. Impact of construction and debris and clean-up of HPSM property
- 5 ■— 5. Air quality at 801 Gateway during and after construction
- 6 ■— 6. New road signage during and after construction
- 7 ■— 7. Impact of sewer and water supply pipes

Thanks for your time.

Darren Kattenhorn
Chief Engineer
Health Plan of San Mateo
801 Gateway, SSF
(650) 922-0620

Darren Kattenhorn

Chief Engineer
Health Plan of San Mateo
801 Gateway Boulevard, Suite 100
South San Francisco, CA 94080

650.616.5095 direct
650.616.0050 main
650.616.0060 fax

Darren.Kattenhorn@hpsm.org

www.hpsm.org

[cid:image610247.jpg@740ADEDE.9DD97A31]<<http://www.hpsm.org/>>

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<<https://cmo.smcgov.org/census-2020-san-mateo-county/>>

Letter A-HPSM: Health Plan of San Mateo, Darren Kattenhorn (October 15, 2020)²

Response to Comment HPSM-1

The comment expresses concern regarding bus traffic as a result of the proposed project. Please refer to response PC-1 above.

Response to Comment HPSM-2

The comment requests information regarding if the proposed project would involve waste burning. Please refer to response PC-2 above.

Response to Comment HPSM-3

The comment requests information on car and pedestrian influx as a result of the proposed project. Please refer to response PC-3 above.

Response to Comment HPSM-4

The comment expresses concern regarding the impact of construction and debris, and clean-up of the HPSM Property. Please refer to response PC-4 above.

Response to Comment HPSM-5

The comment requests information on the air quality impacts at 801 Gateway Boulevard during and after project construction. Please refer to response PC-5 above.

Response to Comment HPSM-6

The comment requests information on new road signage to be used during and after project construction. Please refer to response PC-6 above.

Response to Comment HPSM-7

The comment requests information on the proposed project's impact on sewer and water supply pipes. Please refer to response PC-7 above.

² This comment letter was read into the record during the Planning Commission hearing. Thus, responses to the comments in this letter are included in Letter A-PC: Planning Commission Hearing, October 15, 2020.

Subject: RE: EIR Comments: 751 Gateway Project

From: "Chodoroff, Eric@DTSC" <Eric.Chodoroff@dtsc.ca.gov>
Date: November 6, 2020 at 4:33:17 PM PST
To: "Friedman, Adena" <Adena.Friedman@ssf.net>
Cc: "Prowell, Cheryl@DTSC" <Cheryl.Prowell@dtsc.ca.gov>
Subject: EIR Comments: 751 Gateway Project

Hello,

I represent California Department of Toxic Substances Control (DTSC), a responsible agency reviewing the Draft Environmental Impact Report (DEIR) for the 751 Gateway Project.

The DEIR lists a "Less Than Significant" finding for Impact HAZ-2 "The proposed project would not create a significant hazard for the public or the

environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment." The Project overlaps with DTSC's Homart Development Corp Site, which has a Land Use Covenant (LUC) for metals-impacted soils. The Project may overlap area that is restricted by the LUC, and mitigation measures may be required to prevent disturbance and removal of impacted soil, or to ensure proper disposal of impacted soils. LUC:

https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/2773023307/SMBR_DEED_41330007.pdf

EnviroStor website for the Homart Development Corp site:

https://www.envirostor.dtsc.ca.gov/public/profile_report.asp?global_id=41330007

We have the following recommendations:

1) The EIR should evaluate whether the Project overlaps with restricted areas of the Homart Development Corp Site;

2) If the Project overlaps with the restricted areas of the Homart Development Corp Site, a soil management plan will be required to comply with the LUC. The LUC states that "Soils shall not be removed from the Property without testing to determine whether they are subject to Hazardous Waste Control Law provisions for offsite transportation, reuse and disposal." The soil management plan will need to be reviewed and approved by DTSC.

Thank you,

Eric Chodoroff
Project Manager
Site Mitigation Program, Department of Toxic Substances Control
700 Heinz Ave, #200
Berkeley, CA 94710
510-540-3777
248-320-7990 (cell)

Letter A-DTSC: Department of Toxic Substances Control, Eric Chodoroff (November 6, 2020)

Response to Comment DTSC -1

The comment requests information on the proposed project's impact to the Homart Development Corporation site. The Homart Development is the controlled recognized environmental condition (REC) discussed on p. 4.10-20 in Section 4.10, *Hazards and Hazardous Materials*, of the draft EIR:

No RECs other than the controlled REC have been identified within the project site. As part of the regulatory controls for the controlled REC, the contaminated area was capped. No construction activity would occur in the portion of the project site impacted by the controlled REC other than landscaping installation. This work would not penetrate the cap. The contractor would conduct verification boring before starting construction to confirm the depth where REC is capped.

The northern portion of the existing 701 Gateway building overlaps with a small portion of the Heavy Slag Area of Parcel 4, as noted on Figure 1 of the Annual Inspection Report Homart Development Company Site South San Francisco, San Mateo County dated February 11, 2019.³ As stated, only activities associated with the future campus esplanade connection and future campus tree corridor on the north side of the 701 Gateway building would be within the footprint. These features are considered surficial and not expected to penetrate the existing cap. As discussed in the phase I environmental site assessment prepared for the project site, “[a]s stated in the 2000 Deed Restriction, the impacted soil encapsulated beneath the subject property does not present a significant existing or potential hazard to public health or safety provided the encapsulated area remain undisturbed.”⁴ The phase I environmental site assessment states that the site owner is responsible for ensuring that the asphalt is maintained.

³ This report is available at:
https://www.envirostor.dtsc.ca.gov/public/deliverable_documents/6740832269/Final%20Homart%20Cap%20Inspection%20Report%202.11.19.pdf.

⁴ Ramboll Environ US Corporation. 2017. *Phase I Environmental Site Assessment 701 Gateway Boulevard*. Final. 1690006158. South San Francisco, CA. Prepared for: Alexandria Real Estate Equities, Inc.

DEPARTMENT OF TRANSPORTATION

DISTRICT 4

OFFICE OF TRANSIT AND COMMUNITY PLANNING

P.O. BOX 23660, MS-10D

OAKLAND, CA 94623-0660

PHONE (510) 286-5528

TTY 711

www.dot.ca.gov

A-Caltrans*Making Conservation
a California Way of Life.*

November 9, 2020

SCH # 2020010281

GTS # 04-SM-2020-00333

GTS ID: 18486

SM/ 101/ 22.6

Adena Friedman, Senior Planner
City of South San Francisco
315 Maple Avenue
South San Francisco, CA 94083

751 Gateway Boulevard Project Draft Environmental Impact Report (DEIR)

Dear Adena Friedman:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the 751 Gateway Boulevard Project. We are committed to ensuring that impacts to the State's multimodal transportation system and to our natural environment are identified and mitigated to support a safe, sustainable, integrated and efficient transportation system. The following comments are based on our review of the September 2020 DEIR.

Project Understanding

The proposed project would construct a new 148-foot-tall, 7-story building with approximately 208,800 square feet of lab and office uses on the existing surface parking lot. The proposed project would improve pedestrian connections between the nearby Gateway Campus buildings at 701, 901, 951 and 801 Gateway Boulevard by creating a pedestrian hub. The proposed project would also include surface parking lots with a total of 418 parking spaces (including 46 parking spaces in a lot north of the proposed building) that would be used by other buildings within the Gateway Campus. The project is accessible directly from State Route (SR)-101 on Oyster Point Boulevard.

Highway Operations

Table 4.9-5 presents existing volumes. Please clarify if these are flow (count) volumes or demand volumes. All project-generated trips should be added to the existing traffic-demand volumes and the future forecasted scenario traffic-demand volumes.

1

2

With the opening of the SM-101 Express lanes, more vehicles may be able to arrive downstream earlier during the peak period, thereby possibly increasing the queue length at these off-ramps during peak hours. Please clarify whether the analysis includes this factor. Ramp storage should be able to accommodate the demand volumes on these off-ramps.

3

If the existing volumes presented in Table 4.9-5 are not demand volumes, the demand volumes need to be presented along with a corrected "Impact TR-2" section to determine the project's impact significance to State facilities. The Transportation Demand Management Plan should include appropriate mitigations to reduce these calculated impacts to State facilities.

Thank you again for including Caltrans in the environmental review process. Should you have any questions regarding this letter, please contact Laurel Sears at laurel.sears@dot.ca.gov. Additionally, for future notifications and requests for review of new projects, please contact LDIGR-D4@dot.ca.gov.

Sincerely,



Mark Leong
District Branch Chief
Local Development - Intergovernmental Review

cc: State Clearinghouse

Letter A-Caltrans: Department of Transportation, Mark Leong (November 9, 2020)

Response to Comment Caltrans-1

The comment requests clarification on existing volumes presented in Table 4.9-5 of the draft EIR, and if these are flow (count) volumes or demand volumes. The comment states that all project-generated trips should be added to the existing traffic-demand volumes and the future forecasted scenario traffic-demand volumes. Table 4.9-5 on p. 4.9-27 of the draft EIR presents count volumes consistent with standard CEQA practice of analyzing observed existing conditions and adding project volumes to existing conditions. Table 4.9-6 on p. 4.9-28 of the draft EIR shows cumulative demand volumes under no project and project conditions.

Response to Comment Caltrans-2

The comment requests clarification on if the project analysis includes increasing queue lengths at off-ramps due to the opening of the US-101 Express Lanes project. The US-101 Express Lanes project is included in the cumulative analysis. It was not included in the existing analysis because the project has not been completed and is not expected to be finished until the end of 2022 (after the anticipated certification of this EIR). In addition, increasing queue lengths at off-ramps would not inherently result in a new significant impact related to hazardous conditions. A significant impact related to queuing would only be identified if the queue would result in a hazardous condition, per the significance criteria described in Section 4.9.4.1 in Section 4.9, *Transportation and Circulation*, of the draft EIR. The number of project-related vehicles added to cumulative off-ramp queues, including the US-101 Express Lanes project and other cumulative projects, is expected to be minimal and, thus, would not create any new or exacerbate any existing hazards. The proposed project's contribution to cumulative impacts related to off-ramp queues would be less than cumulatively considerable.

Response to Comment Caltrans-3

The comment asks if existing volumes presented in Table 4.9-5 are demand volumes and states that demand volumes need to be presented to determine the project's impact on state facilities. An analysis of demand volumes with the US-101 Express Lanes project is included under cumulative conditions (see Table 4.9-6 on p. 4.9-28 of the draft EIR). There is no impact under cumulative conditions based on demand volumes or under existing conditions based on traffic counts; thus, no impact would be expected under a near-term 2022 scenario with demand volumes and the completion of the US-101 Express Lanes project.

Chapter 3

Revisions to the Draft EIR

This section lists revisions that have been made to the draft EIR following the 45-day public comment period. All of the draft EIR revisions are staff-initiated text changes intended to correct minor typographical errors. No revisions to the draft EIR were necessary in response to comments made on the draft EIR.

These changes and minor errata 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 CEQA Guidelines Section 15088.5 is not required.

The following correction has been made to Table 2.1: *Summary of Project Impacts, Mitigation Measures, and Improvements Measures*, on EIR p. 2-16, under Impact GHG-1b (new text is underlined and deleted text is ~~striketrough~~):

Potential Environmental Impact	Level of Significance before Mitigation	Recommended Mitigation Measure	Level of Significance after Mitigation
Impact GHG-1b: The proposed project would generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment during operation.	S	Implement Mitigation Measure TR-1 , below. Mitigation Measure GHG-2: Operational GHG Reduction Measures The project sponsor shall: <ul style="list-style-type: none"> Plant 44 additional trees on existing surface parking lots <u>the project site</u>; and Install 28 more electric vehicle (EV) charging spots than required by the 2019 Building Code. 	SUM

The following correction has been made to the third sentence of the second paragraph under “Conclusion” on EIR p. 4.7-24 (deleted text is ~~striketrough~~):

Implementation of Mitigation GHG-2, Operational GHG Reduction Measures, would plant 44 additional trees on the project site’s ~~existing parking lots~~.

The following correction has been made to the first bullet point of the mitigation measure at the top of the page on EIR p. 4.7-25 (new text is underlined and deleted text is ~~striketrough~~):

Mitigation Measure GHG-2: Operational GHG Reduction Measures

The project sponsor shall:

- Plant 44 additional trees on ~~existing surface parking lots~~ the project site; and
- Install 28 more electric vehicle (EV) charging spots than required by the 2019 Building Code.

The following corrections have been made to the first paragraph under the sub-header “VMT Threshold” on EIR p. 4.9-15 (new text is underlined and deleted text is ~~striketrough~~):

As a part of the *Shape SSF 2040 General Plan*, the City is updating its transportation impact thresholds. On June 10th, ~~2002~~ 2020, the City adopted a VMT threshold in accordance with OPR’s guidance for implementing SB 743 requirements, which ~~has become~~ became effective on July 1, 2020.

The following correction has been made to the third sentence of the first bullet point “Impact GHG-1b...” under the sub-header “5.1.2 Significant Impacts of the Project” on EIR p. 5-2 (new text is underlined and deleted text is ~~striketrough~~):

Implementation of Mitigation Measure GHG-2 would plant additional trees on ~~existing surface parking lots~~ the project site, but would still result in a net loss of trees.

The following correction has been made to the third sentence of the first bullet point “Impact GHG-1b...” under the header “6.3 Significant Environmental Effects that Cannot Be Avoided” on EIR p. 6-4 (new text is underlined and deleted text is ~~striketrough~~):

Implementation of Mitigation Measure GHG-2 would plant additional trees on ~~existing surface parking lots~~ the project site, but would still result in a net loss of trees.