San Francisco Planning

49 South Van Ness Avenue, Suite 1400
San Francisco, CA 94103
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www.sfplanning.org

PUBLIC NOTICE

NOTICE OF AVAILABILITY OF AND INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

PROJECT INFORMATION

Date:	June 19, 2024
Project Title:	***SFPUC City Water Distribution Division Campus Project at 2000 Marin Street***
Project Address:	2000 Marin Street
Case No.:	**2022-000702ENV**
Block/Lot No.:	4346/003, 4347/001, 4346/001, 4346/001A, 4349/011
Zoning District(s):	PDR-2 and M-2 Use Districts 65-J Height and Bulk District
Neighborhood:	Bayview

Project Sponsor:
San Francisco Public Utilities Commission,
Allison Chan
415-554-3186
alchan@sfwater.org
Environmental Case Coordinator:
Timothy Johnston
628.652.7569
timothy.johnston@sfgov.org

The San Francisco Planning Department has studied this project's potential physical environmental effects and welcomes your comments on the adequacy of the preliminary mitigated negative declaration (PMND). Refer to the Project Description and Purpose of Notice sections below for more information.

Project Description

A PMND has been prepared by San Francisco Planning in connection with this project as required by the California Environmental Quality Act (CEQA) to study the project's potential physical environmental effects.

The San Francisco Public Utilities Commission (SFPUC) is proposing construction of a new City Water Distribution Division campus at 2000 Marin Street in the Bayview District of San Francisco. The project would demolish the existing building and parking lot on the project site and construct six buildings, totaling 370,850 square feet, including various uses and facilities such as administrative offices, electrical, landscaping, carpentry, machine, auto and meter shops, a warehouse, a parking garage, and a fueling station. The proposed buildings range from one to six stories and from 20 to 60.5 feet in height.

The document is a PMND, containing information about the possible environmental effects of the proposed project. The PMND documents the determination by the Planning Department that the proposed project could not have a significant adverse effect on the environment. The publication of this environmental document does not indicate a decision by the City to approve or disapprove the proposed project.

Projects on State Hazardous Materials Lists

As required by CEQA Guidelines section 15087(c)(6), the following information is provided because the project site is included on the following list compiled pursuant to California Government Code section 65962.5.

List: Leaking Underground Storage Tank Sites, State Water Resources Control Board
Regulatory Identification Number: T0607500129
Address of Listed Site: 1901 Army (Cesar Chavez) Street, San Francisco, CA 94124
Assessor's Block/Lot: 4346/003
Date of List: January 19, 1996

Purpose of Notice

The PMND is available to view or download from the Planning Department's Negative Declarations and EIRs web page (http://www.sf-planning.org/sfceqadocs). A paper copy is also available at the Planning counter of the San Francisco Permit Center on the second floor of 49 South Van Ness Avenue, San Francisco.

Environmental review focuses on the physical *environmental effects* of the project. Comments regarding your like or dislike of the project or if you think officials should approve or disapprove the project will not be addressed in the environmental review document. Instead, we encourage you to provide these comments to the representative of the project sponsor, Allison Chan (alchan@sfwater.org or 415-554-3186). If you have questions concerning environmental review of the proposed project, contact the Planning Department staff contact listed above.

You are not required to take any action. If you wish to comment on the adequacy of the PMND, within 30 calendar days following publication of the PMND (by 5:00 p.m. on July 19, 2024), any person may:

1. Make recommendations for amending the text of the document. The text of the PMND may be amended to clarify or correct statements and may be expanded to include additional relevant issues or to cover issues in greater depth. This may be done **without** the appeal described below; **OR**

2. Appeal the determination of no significant effect on the environment to the Planning Commission in a letter which specifies the grounds for such appeal, accompanied by a $729 check payable to the San Francisco Planning Department.[1] An appeal requires the Planning Commission to determine whether or not an Environmental Impact Report must be prepared based upon whether or not the proposed project could cause a substantial adverse change in the environment. To file, send the appeal letter to the Planning Department, Attention: Lisa Gibson, 49 South Van Ness Avenue, Suite 1400, San Francisco, CA 94103 or emailed to lisa.gibson@sfgov.org and **must be received by 5:00 p.m. on July 19, 2024.**

In the absence of an appeal, the mitigated negative declaration shall be made final, subject to necessary modifications, after 30 days from the date of publication of the PMND. If the PMND is appealed, the Final Mitigated Negative Declaration (FMND) may be appealed to the Board of Supervisors. The first approval action, as identified in the initial study, would establish the start of the 30-day appeal period for the FMND pursuant to San Francisco Administrative Code Section 31.16(d).

Members of the public are not required to provide personal identifying information when they communicate with the Commission or the Department. All written or oral communications, including submitted personal contact information, may be made available to the public for inspection and copying upon request and may appear on the Department's website or in other public documents.

1 Upon review by the Planning Department, the appeal fee may be reimbursed for neighborhood organizations that have been in existence for a minimum of 24 months.

San Francisco Planning

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San Francisco, CA 94103
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PRELIMINARY MITIGATED NEGATIVE DECLARATION

Date:	June 19, 2024
Case No.:	**2022-000702ENV**
Project Title:	**SFPUC City Water Distribution Division Campus Project at 2000 Marin Street**
Zoning:	PDR-2 and M-2 Use Districts 65-J Height and Bulk District
Block/Lot:	4346/003, 4347/001, 4346/001, 4346/001A, 4349/011
Project Sponsor:	San Francisco Public Utilities Commission, Allison Chan, 415-554-3186, alchan@sfwater.org
Lead Agency:	San Francisco Planning Department
Staff Contact:	Timothy Johnston 628.652.7569 timothy.johnston@sfgov.org

Project Description:

The San Francisco Public Utilities Commission (SFPUC) is proposing construction of a new City Water Distribution Division campus at 2000 Marin Street in the Bayview District of San Francisco. The project would demolish the existing building and parking lot on the project site and construct six buildings, totaling 370,850 square feet, including various uses and facilities such as administrative offices, electrical, landscaping, carpentry, machine, auto and meter shops, a warehouse, a parking garage, and a fueling station. The proposed buildings range from one to six stories and from 20 to 60.5 feet in height. The attached initial study contains a detailed project description.

Finding:

This project could not have a significant effect on the environment. This finding is based upon the criteria of the Guidelines of the State Secretary for Resources, Sections 15064 (Determining Significant Effect), 15065 (Mandatory Findings of Significance), and 15070 (Decision to prepare a Negative Declaration), and the following reasons as documented in the Initial Evaluation (Initial Study) for the project, which is attached.

Mitigation measures are included in this project to avoid potentially significant effects. See pages 70, 99, 137, and 157.

cc: Supervisor Shamann Walton, District 10

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Initial Study

SFPUC City Water Distribution Division Campus Project at 2000 Marin Street

Planning Department Case No. 2022-000702ENV

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A. Project Description

Overview

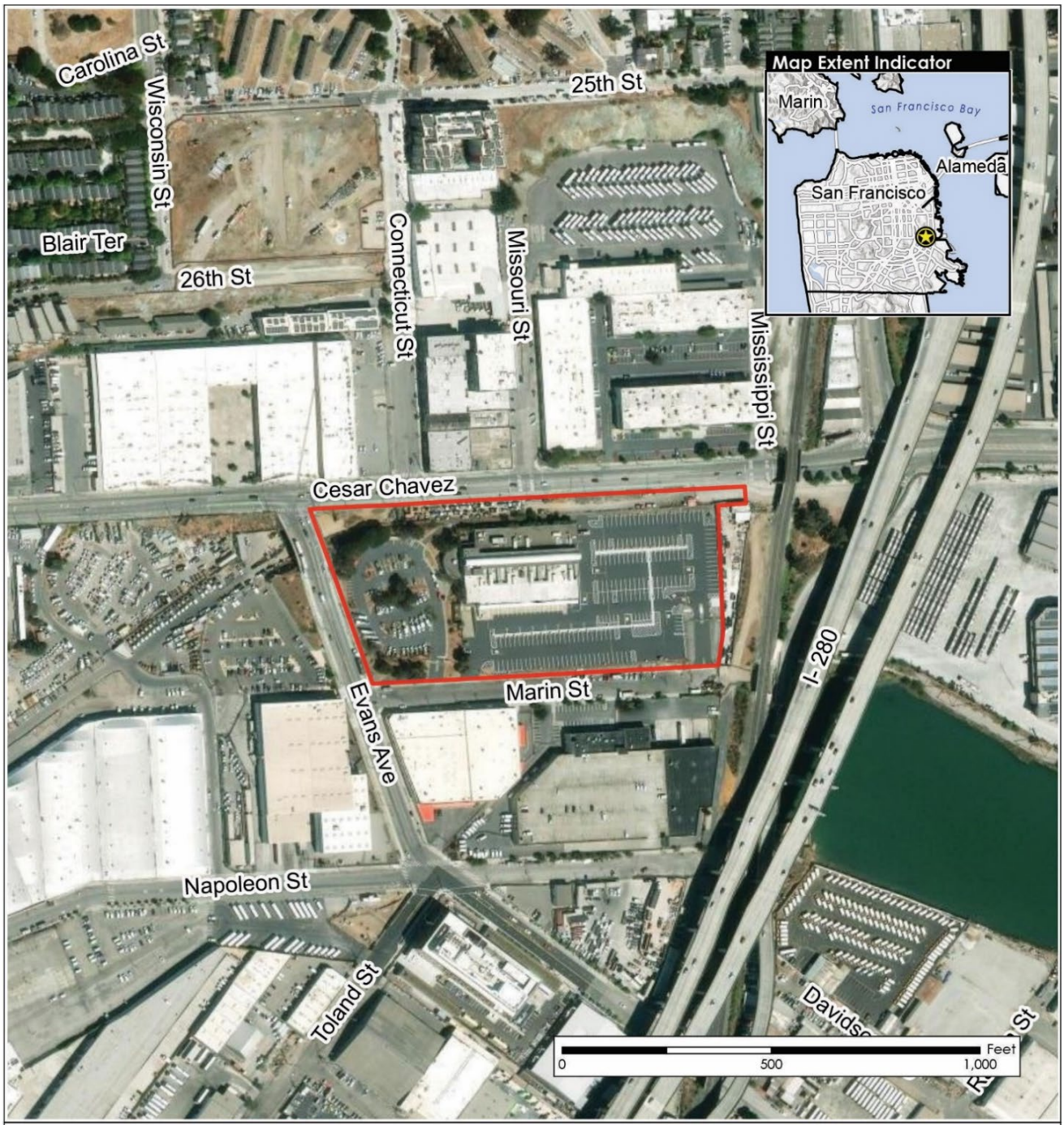
The San Francisco Public Utilities Commission (SFPUC) Water Enterprise's City Distribution Division oversees the water distribution system within San Francisco city limits. The City Water Distribution Division is responsible for the infrastructure of the city's water system, operating and maintaining its reservoirs, pump stations and approximately 1,250 miles of water pipes, maintaining the water meter program, and maintaining the division's facilities, equipment, and vehicles. The City Water Distribution Division Yard at 1990 Newcomb Avenue has been the division's corporate yard and administrative office since 1963. According to the SFPUC, the existing facilities at 1990 Newcomb Avenue have exceeded their useful life, requiring a new campus to address staff overcrowding, code and safety deficiencies, and to eliminate inefficiencies that are present at the current facility.

The SFPUC is proposing construction of a new City Water Distribution Division campus at 2000 Marin Street (the proposed project or project) in the Bayview District of San Francisco (see Figure 1). The project site was initially developed in 1939 as the Federated Fry Metals facility that manufactured and recycled metals, lead, scrap metals, and other materials. The metals facility was demolished, and the San Francisco Chronicle Production Plant building was constructed in 1989. This building is still present; however, it has not been occupied since 2009. The project would demolish the existing building and parking lot on the project site and construct six buildings, totaling 370,850 square feet, including various uses and facilities such as administrative offices, electrical, landscaping, carpentry, machine, auto and meter shops, a warehouse, a parking garage, and a fueling station. The six proposed buildings range from one to six stories and from 20 to 60.5 feet in height. The majority of City Water Distribution Division operations at the 1990 Newcomb Avenue facility would be transferred to the 2000 Marin Street location; however, the 7-acre 1990 Newcomb Avenue Yard would continue to be used for storage.

Project Site Location and Existing Uses

The project site encompasses approximately 9.1 acres and is bounded by Evans Avenue to the west; Cesar Chavez Street to the north; Marin Street to the south; and a salvage yard, railroad tracks, and I-280 to the east. The project site is comprised of five parcels that are owned by the SFPUC: a 7.8-acre parcel (Block/Lot 4346/003) with a one-story, 34-foot-tall building and parking lot is owned by the SFPUC Water Enterprise and four narrow, rectangular parcels (Block/Lot 4347/001, 4346/001, 4346/001A, 4349/011) to the north along Cesar Chavez Street (see Figure 2, p. 7) that are owned by the SFPUC Wastewater Enterprise. The SFPUC Water Enterprise would enter into a Memorandum of Agreement (MOU) with the SFPUC Wastewater Enterprise for the project to use these parcels for circulation and storage. The northern parcel adjacent to Evans Avenue (Block/Lot 4346/001) is leased to San Francisco Public Works (public works), from the SFPUC, for storage. The western portion of this northern parcel extends under the Evans Avenue bridge and includes a small portion of land west of Evans Avenue (see Figure 2, p. 7). The lease would be modified to exclude the area east of Evans Avenue. Three of the northern parcels (Block/Lot 4347/001, 4346/001A, 4349/011) would be used temporarily by the future SFPUC Channel Force Main Intertie Project for construction staging through 2024 (planning case number 2021-006317ENV).

FIGURE 1 PROJECT SITE



SOURCE: City and County of San Francisco, DataSF, accessed March 23, 2022.

The project site contains the former San Francisco Chronicle Production Plant building (75,035 square feet, 34-feet tall, one-story plus basement) and a 295,967 square-foot, approximately 600 space parking lot. The building was constructed in 1989 and has not been used for the last two decades. Existing operations at the project site include SFPUC storage on the eastern half of the property parking lot and public works vehicle and equipment parking on the western half of the property.

The project site is within the 65-J height and bulk district and, as shown in Figure 2, is predominantly zoned Production, Distribution, and Repair (PDR-2), with the northwest corner zoned Heavy Industrial (M-2). Two Special Use Districts cross the project site: the western three quarters of the site is within an Industrial Protection Zone Special Use District and the entire site is within the 2000 Marin Street Special Use District (Figure 3, p. 8). While the Special Use District was established to permit site use as a temporary location for the San Francisco Wholesale Flower Market, the site would not be used for this purpose.

Access to the project site is currently provided via three driveways on Marin Street, and an existing egress to Cesar Chavez Street at the northeast corner of the project site. A retaining wall (supporting the Cesar Chavez Street public right-of-way) separates the project site from Cesar Chavez Street along the northern property boundary. Evans Avenue west of the site has an average 5 percent grade change, sloping upward from south to north. Cesar Chavez Street and Marin Street have a 2.9 percent and 5 percent grade change, respectively, sloping downward from west to east. The buildings in the project vicinity include offices, industrial structures, and warehouses. A public storage facility and FedEx Shipping Center are south of the project site across Marin Street. Public works owns the property northwest of the project site along Cesar Chavez Street. Along the eastern boundary is a salvage yard (1450 Marin Street) that borders the Caltrain railroad tracks. Vegetation along the Marin Street frontage includes small shrubs, grasses, and several trees.

Nearby transit lines include the San Francisco Municipal Railway's (MUNI's) 19-Polk and 48-Quintara/24th Street bus lines, with stops approximately 20 feet west of the project site on Evans Avenue and 1,000 feet north of the project site, at the intersection of 25th Street and Connecticut Street. The K Ingleside-T Third Street (KT) MUNI light rail line is approximately 0.4 mile east of the project site, at the intersection of Third Street and Marin Street. The Caltrain commuter rail line is located approximately 100 feet east of the project site.

Project Characteristics

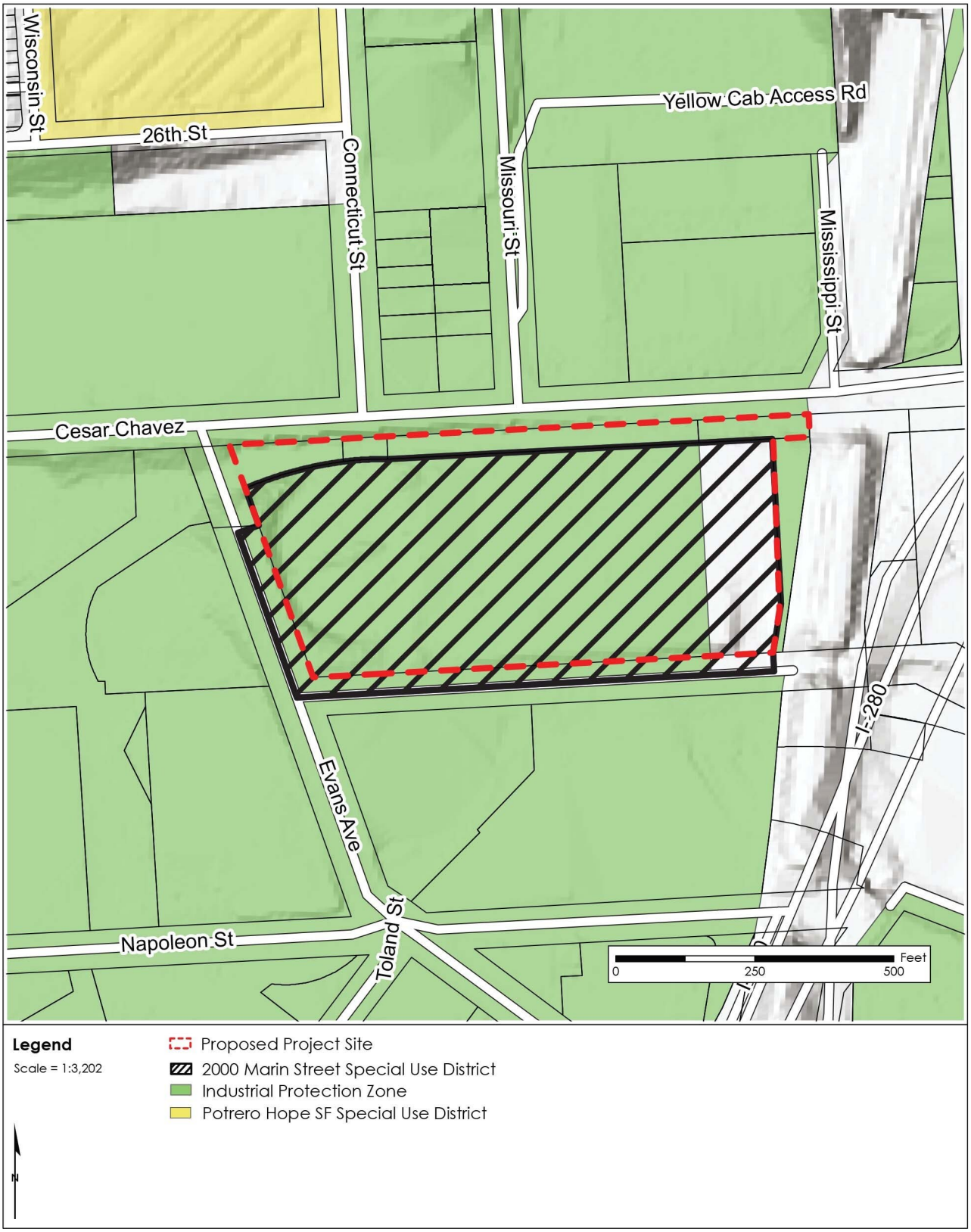
The project would demolish existing structures and construct a new campus at 2000 Marin Street to replace the existing 1990 Newcomb Avenue facility. The proposed facility, which would meet the certification requirements to attain a Leadership in Energy and Environmental Design (LEED) gold rating, would include building space and parking to accommodate the City Water Distribution Division's current and future operational needs. The proposed buildings are described below and shown in Figure 4 (p. 9) and Figure 5 (p. 10). Project characteristics are summarized in Table 1 (p. 12).

- **Administration Building, Community Hub, and Shops**. An approximately 64,050-square-foot, 60-foot tall, four-story building containing the Community Hub, a landscape shop, an electric shop, and an outdoor plaza for staff at 2000 Marin Street. The Community Hub consists of the building lobby, training rooms, a wellness center, lockers, showers, offices, and a morning dispatch room where staff would gather each morning prior to deployment.

FIGURE 2 EXISTING ZONING

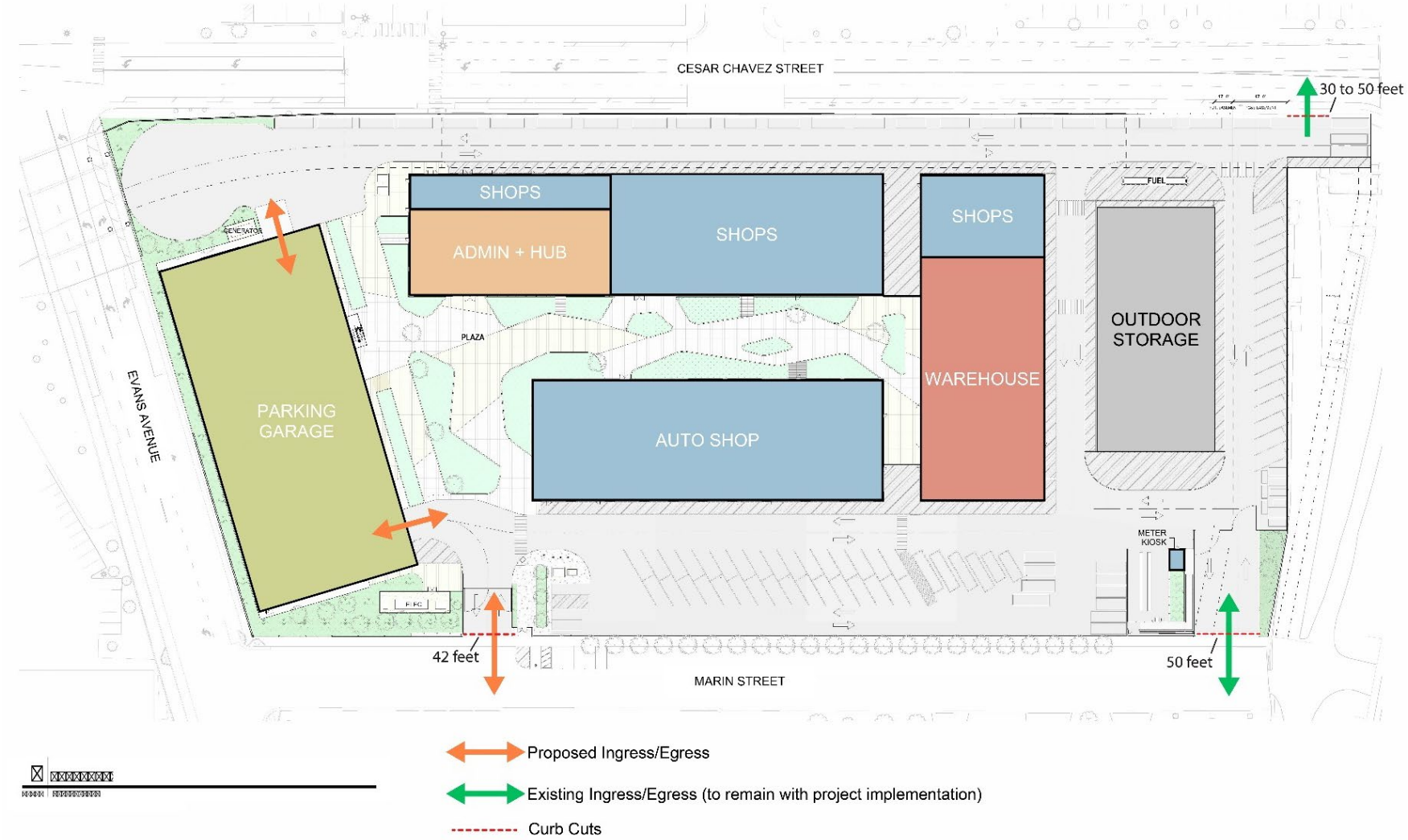
SOURCE: City and County of San Francisco, DataSF, accessed April 4, 2024.

FIGURE 3 EXISTING SPECIAL USE DISTRICTS



SOURCE: ESRI, HERE, Garmin © OpenStreetMap, "World Light Gray Canvas Base" [base map], accessed January 31, 2023.
City and County of San Francisco, DataSF, accessed January 31, 2023.

FIGURE 4 SITE PLAN



SOURCE: SFPUC, 2024, New City Distribution Division Headquarters at 2000 Marin Street.

FIGURE 5 PROJECT SITE AERIAL VIEW RENDERING

SOURCE: SFPUC, 2024, New City Distribution Division Headquarters at 2000 Marin Street.

- **Parking Garage**. An approximately 219,515-square-foot, 60.5-foot tall, six-story open garage with 556 parking spaces available for City Water Distribution Division fleet vehicle and employee parking.
- **Machine Shop**. An approximately 25,770-square-foot, 40-foot tall, one-story building containing a machine shop.
- **Auto and Carpentry Shop**. An approximately 29,240-square-foot, 40-foot tall, one-story building containing a carpentry shop, vehicle repair shop, and a paint and auto body shop.
- **Warehouse and Meter Shop**. An approximately 30,185-square-foot, 40-foot tall, one-story building containing an open warehouse, offices, and a meter shop.
- **Meter Distribution Kiosk**: An approximately 2,090 square foot, 20-foot tall, one-story building with a public window for pickup and return of water meters to contractors.

An approximately 10,065-square-foot outdoor storage area would be adjacent to the warehouse and meter shop. An approximately 2,160-square-foot fuel station would be constructed on the northeast corner of the project site and would consist of an open structure with a canopy for fleet and equipment fueling. The fuel station would contain two 8,000-gallon aboveground fuel tanks with compartments for diesel and gasoline, four fuel dispensers, and two air and water filling stations. A 1,000-gallon propane tank also would be placed on a concrete pad east of the auto and fabrication shop, across from the project site entryway. A 750-kilowatt back-up diesel generator would be located on the north side of the parking garage adjacent to the vehicle turn-around and would serve the administration building. The back-up generator would be placed on a concrete pad surrounded by a fence enclosure and bollards. In addition to the parking garage, 78 surface parking spaces would be available throughout the project site for large City Water Distribution Division fleet vehicles and equipment, including 30 large vehicle parking spaces and 28 large equipment parking spaces. Electric vehicle charging stations would be available to a minimum of 10 percent of the parking spaces, in accordance with San Francisco Planning Code Section 3102. As a result, the project would provide 113 electric vehicle charging stations and 167 outlets for electric vehicle charging.[1] Each building roof would contain mechanical equipment and solar photovoltaic (PV) panels would be mounted on the rooftops of three of the proposed buildings (shops and warehouse buildings).

Approximately 3 trees on the property would be removed for project construction. However, the project would plant a minimum of 43 trees (a greater than 1:1 replacement). The project would include landscaped areas across the property, including an open gathering space for employees (shown as the plaza on Figure 4, p. 9) that would be paved with permeable unit pavers, several vegetated bioretention planters around the plaza and along the western side of the parking garage, and vegetated planted areas along the east side of the parking lot and between the shop buildings.

The entire project site would be surrounded by an approximately 10-foot-tall security fence. Pedestrian barriers would be installed on the northwest corner of the project site, at the intersection of Cesar Chavez Street and Evans Avenue, and on Cesar Chavez Street at the eastern end of the retaining wall along the northern boundary of the project site. The pedestrian barriers would guide pedestrians to the sidewalk on the north side of Cesar Chavez Street to discourage pedestrians from using the substandard sidewalk along the south side of Cesar Chavez Street. Curb ramps on the southeast, southwest, and northeast corners of the intersection of Evans Avenue and Cesar Chavez Street would be demolished and replaced with Americans

1 This equates to 110 level 2 charging stations, three level 3 charging stations, and 167 level 1 charging outlets.

with Disabilities Act (ADA)-compliant ramps. New curb extensions (i.e., bulb-outs) would also be installed at the Evans Avenue and Cesar Chavez Street intersection. The curb, gutter, and concrete sidewalk on Evans Avenue and Marin Street would be removed and replaced. Along Marin Street, there are currently three curb cuts that are 35 feet, 50 feet, and 55 feet from west to east, respectively. The three curb cuts would be removed during sidewalk replacement, and two new 42-foot and 50-foot curb cuts would be installed. Additionally, the Marin Street sidewalk would be expanded to a width of approximately 13.5 feet, a new curb ramp would be constructed at the northeast corner of Evans Avenue and Marin Street to accommodate the widened sidewalk, two vaults would be raised to grade, and two catch basins would be replaced. Marin Street would also be repaved. A new approximately 110-foot-long and 8-foot-wide sidewalk would be installed along the south side of Cesar Chavez Street, from the eastern edge of the project site to the beginning of the existing retaining wall along Cesar Chavez. The existing egress to Cesar Chavez Street in the northeast corner of the project site would remain and would be used by fleet vehicles only. An electrically operated security gate would be constructed at the Cesar Chavez Street egress for exiting vehicles. The project would prohibit vehicles entering the site from Cesar Chavez Street to increase public safety along the right-of-way. Two electrically operated gates with card readers and communication systems would be constructed along the Marin Street frontage, and a 100-square-foot security guard kiosk would be installed at the east Marin Street entrance security gate.

Table 1 Project Characteristics

Project Characteristics	Existing	Proposed	Net Change
Land Uses (gross square feet)			
Parking	295,967[a,b]	219,515	-76,452
Industrial-PDR Use	71,735	87,285	+15,550
Office Use	3,300	64,050	+60,750
Useable Open Space	0	0	0
Building Characteristics			
Height (feet)	34	20-61	-14-+27
Parking and Loading			
Off-Street Parking (spaces)	600	634	+34
Loading Spaces		2	+2
Accessible Loading (feet)			0
Bicycle Parking (spaces)			
Class I	0	24	+24
Class II	0	8	+8

SOURCE: San Francisco Public Works, 2021 (December), 100% Schematic Design for the New CDD Headquarters at 2000 Marin. SFPUC, 2022, Personal Communication with Shelby Campbell.

NOTES:

[a] The existing off-street parking spaces were estimated based on the existing parking square footage.

[b] The existing parking at the project site is surface parking while the proposed project parking includes the parking structure.

Project Construction

PROJECT CONSTRUCTION OVERVIEW AND SCHEDULE

Project construction is anticipated to begin in September 2024 and last 40 months. The anticipated construction schedule is summarized in Table 2.

Table 2 Construction Schedule

Project Phase	Approximate Start Date	Approximate End Date	Approximate Duration (working days)
Demolition	9/1/2024	1/19/2025	100
Grading and Utilities	1/20/2025	11/15/2025	215
Foundations	7/20/2025	12/9/2026	363
Building Erection	11/16/2025	3/21/2027	350
Architectural Finishes	8/17/2026	7/12/2027	236
Site Work	3/22/2027	1/4/2028	207
Total	**9/1/2024**	**1/4/2028**	**871**

DEMOLITION

Demolition on the project site would include removal of the existing building, parking lot, light poles, signage, asphalt and concrete, and landscaping. The amount of demolition debris is anticipated to be approximately 6,500 total cubic yards and may contain lead and asbestos-containing materials. The basement of the existing building would be removed and backfilled. All underground utilities would be capped and decommissioned, and new utility connections would be installed to serve the project site. In addition to the new utility connections, utility lines would be constructed along the eastern side of the project site from the eastern entrance on Marin Street to Cesar Chavez Street. Excavation for demolition of the existing building on site would be approximately 10 feet below grade.

SOIL EXCAVATION AND GRADING

The depth of excavation would depend on the elevation of the ground surface, soil conditions, and foundation type, which varies across the project site. Project construction would require excavation, grading, and site preparation (cut) of up to approximately 40,900 cubic yards of material. The project would reuse approximately 26,100 cubic yards onsite and would include placement of approximately 3,000 cubic yards of imported soil (fill) to level the site after excavation to remove the belowground portions of the existing building and to raise the general elevation of the project site. Due to known areas of soil contamination (discussed below), the SFPUC estimates that up to approximately 14,800 cubic yards of contaminated excavated soil would be hauled from the project site.[2] A summary of soil excavation is provided in Table 3.

2 Project engineers have assumed that approximately 14,800 cubic yards of contaminated soil would be off hauled. This is a conservative estimate and is subject to change based on testing of soil during excavation and grading activities.

Table 3 Soil Excavation and Building Foundation Summary

Project Component		Foundation Type	Soil Excavation/Disturbance
Parking Garage		Spread footings on bedrock	Maximum excavation depth of 3 to 5 feet for building foundation; minimum 2-foot-deep excavation into bedrock. Approximately 7,279 cubic yards of excavation
Administrative Building, Community Hub, and Shops		Micro-pile foundation[3] for the administrative building and community hub Drilled shaft foundation[4] for the shops	Micro-piles would be a maximum depth of 70 feet Shaft foundation depth would range from 15 to 45 feet
Carpentry and Machine Shop		Micro-pile foundation	Micro-piles would be a maximum depth of 70 feet
Vehicle Repair Shop		Micro-pile foundation	Micro-piles would be a maximum depth of 70 feet
Warehouse and Meter Shop		Micro-pile foundation	Micro-piles would be a maximum depth of 110 feet
Underground Utilities	12-inch-diameter ductile iron emergency firefighting water system	Not applicable	Approximately 425 feet of trenching, approximately 3 feet in width and 7 feet deep. Volume of excavation is approximately 330 cubic yards.
	12-inch-diameter ductile iron low pressure water pipeline		Approximately 425 feet of trenching, approximately 3 feet in width and 5 feet deep. Volume of excavation is approximately 236 cubic yards.
	Electrical duct bank		Approximately 425 feet of trenching, approximately 6 feet in width and 4 feet deep. Volume of excavation is approximately 378 cubic yards.

3 Micro-pile foundations are deep foundations that involve drilling multiple small-diameter piles into the ground subsurface.

4 A shaft foundation is similar to a drilled pier foundation

The greatest foundation depth would be required for the warehouse and meter shop, where the micro-pile foundations would be drilled to a maximum depth of 110 feet. No pile driving would be required. Installation of the fuel tank and generator would require construction of concrete pads, but soil excavation would not be required. The existing rubble mounds associated with the San Francisco Chronicle building landscaping would be removed.

Contaminated soils are known to occur within the project site.[5] Excavation of contaminated soils would be conducted in accordance with the project's Department of Toxic Substances Control-approved soil management plan.[6] Contaminated excavated soil would be hauled to an appropriately licensed disposal facility. Any excavated soil classified as hazardous waste by state and federal standards would be disposed of at a Class I hazardous waste disposal facility, such as the Kettleman Hills Landfill.

CONSTRUCTION STAGING AREAS

Construction vehicle parking and equipment staging would occur on site, and no off-site vehicle parking and equipment staging would occur.

CONSTRUCTION TRAFFIC

The project would generate construction traffic over the approximately 40-month construction period, including worker, delivery, and haul trips. Details on the type and number of trips are provided in Table 4.

CONSTRUCTION EQUIPMENT AND WORKFORCE

Typical construction activities would occur between 7 a.m. and 6 p.m. Monday through Friday. Although not anticipated, construction activities may occasionally extend to 8:00 p.m. Work may occur on Saturdays and Sundays, on an as needed basis. If weekend work is required, work would occur between 7 a.m. and 8 p.m. No nighttime work is proposed or anticipated.

An average of 50 construction workers are expected to be on site daily during weekdays throughout the duration of project construction, with the exception of the building erection phase, during which an average of 90 construction workers are expected to be onsite daily during weekdays and a maximum of 120 construction workers on site at any one time.

Construction would include the use of heavy equipment, including a drill rig, crane, and excavator, as shown in Table 5. Some types of equipment would be needed only for certain phases of construction.

5 ENGEO Incorporated, 2022 (January 12), City Distribution Division (CDD) Headquarters Campus 2000 Marin Street San Francisco, California Soil Management Plan. This document, and all other documents referenced in this MND unless otherwise noted, is available for review at https://tinyurl.com/2000MarinMND.

6 Department of Toxic Substances Control, 2022, Letter to Shelby Campbell at the SFPUC for the proposed City Distribution Division Headquarters Campus Site at 2000 Marin Street.

Table 4 Construction Vehicle and Haul Trips

Phase	One-way Worker Trips per Day	Round-trip Haul Trips per Day (heavy trucks)	Round-trip Delivery Trips per Day (heavy trucks)[a]	Vendor Trips per Day (light/ medium trucks)	Total Round-trip Haul Trips	Total Round-trip Delivery Trips	Total Round-trip Haul and Delivery Trips	Total Vendor Trips
Demolition	80	6	0	0	644	0	644	0
Grading and Utilities	40	8	1	2	1,780	220	2,000	430
Foundation	80	0	2	2	0	586	586	726
Building Erection	240	0	4	4	0	1,354	1,354	1,400
Architectural Finishes	120	0	0	4	0	0	0	944
Site Work	60	0	3	2	0	606	606	414
Total					2,424	2,766	5,190	3,914

NOTES:

The haul and delivery trips assume 10 cubic yards of truck capacity.

[a] Delivery trips include concrete trucks, rebar trucks, structural steel trucks, asphalt trucks, and foundation elements trucks

Table 5 Equipment List

Phase	Equipment Type	Fuel Type	Number of Equipment Per Day	Operating Hours of Equipment Per Day
Demolition	Excavator	Diesel	2	6
	Loader	Diesel	2	6
	Concrete Saw	Diesel	1	6
	Skid Steer	Diesel	3	6
	Sweeper/Scrubber	Diesel	1	6
Grading and Utilities	Excavator	Diesel	2	6
	Skid Steer	Diesel	2	6
	Compactor	Diesel	1	6
	Loader	Diesel	2	6
	Grader	Diesel	2	6
	Sweeper/Scrubber	Diesel	1	6
Foundations	Boom Concrete Pump	Diesel	1	6
	Drill Rig	Diesel	2	6
	Loader	Diesel	2	6

Phase	Equipment Type	Fuel Type	Number of Equipment Per Day	Operating Hours of Equipment Per Day
	Excavator with Hoe Ram	Diesel	2	6
	Forklift	Diesel	2	6
	Crane	Diesel	1	6
	Sweeper/Scrubber	Diesel	1	6
	Boom Concrete Pump	Diesel	1	6
	Concrete Saw/Rock Saw	Diesel	1	6
Building Erection	Boom Concrete Pump	Diesel	2	6
	Crane	Diesel	2	6
	Forklift	Diesel	4	6
	Generator	Diesel	1	6
	Welder	Diesel	2	6
	Boom Lift	Diesel	4	6
	Air Compressors	Diesel	2	6
	Sweeper/Scrubber	Diesel	1	6
Architectural Finishes	Forklift	Diesel	4	6
	Scissor Lift	Electric	15	6
Site Work	Paver	Diesel	1	6
	Skid Steer	Diesel	1	6
	Roller	Diesel	1	6
	Grader	Diesel	1	6
	Compactor	Diesel	1	6
	Mini Excavator	Diesel	1	6
	Forklift	Diesel	2	6
	Sweeper/Scrubber	Diesel	1	6

STANDARD CONSTRUCTION MEASURES

The SFPUC has adopted *Standard Construction Measures* to be implemented during the construction of every SFPUC project and included in all SFPUC construction contracts.[7] The objective of these measures (presented below) is to avoid and reduce construction-related impacts on the environment. Because they apply to all SFPUC projects, including projects located within San Francisco and other urban areas and

7 SFPUC, 2015 (July 1), SFPUC Standard Construction Measures Memorandum.

projects located in rural and natural areas such as SFPUC watershed lands, the measures are necessarily broad. As such, the measures may be tailored to fit specific projects and some measures may not apply in whole or in part to all projects. The applicability of the Standard Construction Measures to the project is considered below under the related resource topics.

1. **Seismic and Geotechnical Studies:** All projects will prepare a characterization of the soil types and potential for liquefaction, subsidence, landslide, fault displacement, and other geological hazards at the project site and will be engineered and designed as necessary to minimize risks to safety and reliability due to such hazards. As necessary, geotechnical investigations will be performed.
2. **Air Quality:** All projects within San Francisco City (the City) limits will comply with the Construction Dust Control Ordinance. All projects outside the City will comply with applicable local and State dust control regulations. All projects within City limits will comply with the Clean Construction Ordinance. Projects outside City limits will comply with San Francisco or other applicable thresholds for health risks. All projects, both within and outside of City limits, will comply with either San Francisco or other applicable thresholds for construction criteria air pollutants.

   To meet air quality thresholds, all projects (as necessary) will implement air quality controls to be tailored to the project, such as using high tier engines, Verified Diesel Emissions Control Strategies (VDECS) such as diesel particulate filters, customized construction schedules and procedures, and low emissions fuel.
3. **Water Quality:** All projects will implement erosion and sedimentation controls to be tailored to the project site such as, fiber rolls and/or gravel bags around stormdrain inlets, installation of silt fences, and other such measures sufficient to prevent discharges of sediment and other pollutants to storm drains and all surface waterways, such as San Francisco Bay, the Pacific Ocean, water supply reservoirs, wetlands, swales, and streams. As required based on project location and size, a Stormwater Control Plan (in most areas of San Francisco) or a Stormwater Pollution Prevention Plan (SWPPP) (outside of San Francisco and in certain areas of San Francisco) will be prepared. If uncontaminated groundwater is encountered during excavation activities, it will be discharged in compliance with applicable water quality standards and discharge permit requirements.
4. **Traffic:** All projects will implement traffic control measures sufficient to maintain traffic and pedestrian circulation on streets affected by construction of the project. Traffic control measures may include, but not be limited to, flaggers and/or construction warning signage of work ahead; scheduling truck trips during non-peak hours to the extent feasible; maintaining access to driveways, private roads, and off-street commercial loading facilities by using steel trench plates or other such method; and coordination with local emergency responders to maintain emergency access. For projects in San Francisco, the measures will also, at a minimum, be consistent with the requirements of San Francisco Municipal Transportation Agency (SFMTA)'s Blue Book. Any temporary rerouting of transit vehicles or relocation of transit facilities would be coordinated with the applicable transit agency, such as SFMTA Muni Operations in San Francisco. All Projects will obtain encroachment permits from the applicable jurisdiction for work in public roadways.
5. **Noise:** All projects will comply with local noise ordinances regulating construction noise. The SFPUC shall undertake measures to minimize noise disruption to nearby neighbors and sensitive receptors during construction. These efforts could include using best available noise control technologies on equipment (i.e., mufflers, ducts, and acoustically attenuating shields), locating stationary noise sources

(i.e., pumps and generators) away from sensitive receptors, erecting temporary noise barriers, and other such measures.

6. **Hazardous Materials:** Where there is reason to believe that site soil or groundwater that will be disturbed may contain hazardous materials, the SFPUC shall undertake an assessment of the site in accordance with any applicable local requirements (e.g., Maher Ordinance) or using reasonable commercial standards (e.g., Phase I and Phase il assessments, as needed). If hazardous materials will be disturbed, the SFPUC shall prepare a plan and implement the plan for treating, containing or removing the hazardous materials in accordance with any applicable local, State and federal regulations so as to avoid any adverse exposure to the material during and after construction. In addition, any unidentified hazardous materials encountered during construction likewise will be characterized and appropriately treated, contained or removed to avoid any adverse exposure. Measures will also be implemented to prevent the release of hazardous materials used during construction, such as storing them pursuant to manufacturer recommendation, maintaining spill kits onsite, and containing any spills that occur to the extent safe and feasible followed by collection and disposal in accordance with applicable laws. SFPUC will report spills of reportable quantity to applicable agencies (e.g., the Governor's Office of Emergency Services).

7. **Biological Resources:** All project sites and the immediately surrounding area will be screened to determine whether biological resources may be affected by construction. A qualified biologist will also carry out a survey of the project site, as appropriate, to note the general resources and identify whether habitat for special-status species and/or migratory birds, are present. In the event further investigation is necessary, the SFPU C will comply with all local, State, and federal requirements for surveys, analysis, and protection of biological resources (e.g., Migratory Bird Treaty Act, federal and State Endangered Species Acts, etc.). If necessary, measures will be implemented to protect biological resources, such as installing wildlife exclusion fencing, establishing work buffer zones, installing bird deterrents, monitoring by a qualified biologist, and other such measures. If tree removal is required, the SFPUC would comply with any applicable tree protection ordinance.

8. **Visual and Aesthetic Considerations, Project Site:** All project sites will be maintained in a clean and orderly state. Construction staging areas will be sited away from public view where possible. Nighttime lighting will be directed away from residential areas and have shields to prevent light spillover effects. Upon project completion, project sites on SFPUC–owned lands will be returned to their general pre-project condition, including re-grading of the site and re-vegetation or re-paving of disturbed areas to the extent this is consistent with SFPUC' s Integrated Vegetation Management Policy. However, where encroachment has occurred on SFPUC-owned lands, the encroaching features may not be restored if inconsistent with the SFPU C policies applicable to management of its property. Project sites on non-SFPUC land will be restored to their general pre-project condition so that the owner may return them to their prior use, unless otherwise arranged with the property owner.

9. **Cultural Resources:** All projects that will alter a building or structure, produce vibrations, or include soil disturbance will be screened to assess whether cultural resources are or may be present and could be affected, as detailed below.

    Archeological Resources. No archeological review is required for a project that will not entail ground disturbance. Projects involving ground disturbance will undergo screening for archeological sensitivity as described below and implement, as applicable, SFPUC' s Standard Archeological Measures I (Discovery), II (Monitoring) and III (Testing/Data Recovery) per the Cultural Resources Attachments. Standard Construction Measure I will be implemented on all projects involving ground

disturbance and Standard Archeological Measures II and III will be implemented based on the screening process described below for projects assessed as having the potential to encounter archeological sites and/or if an archeological discovery occurs during construction.

Projects involving ground disturbance will initially be screened to identify whether there is demonstrable evidence of prior ground disturbance in the project site to the maximum vertical and horizontal extent of the current project's planned disturbance. For projects where prior complete ground disturbance has occurred throughout areas of planned work, SFPUC will provide evidence of the previous disturbance in the Categorical Exemption application and no further archeological screening will be required. For projects that are on previously undisturbed sites or where the depth/extent of prior ground disturbance cannot be documented, or where the planned project-related ground disturbance will extend beyond the depth/extent of prior ground disturbance, additional screening will be carried out as detailed below and shown on the attached flow chart titled "SFPUC Standard Construction Measure #9 Archeological Assessment Process". The additional screening will be conducted by the SFPUC' s qualified archeologist (defined as meeting the Secretary of the Interior's Professional Qualifications Standards [36 CF R 61]) and, if a consultant, selected in consultation with the San Francisco Planning Department's Environmental Review Officer (ERO) and meeting criteria or specialization required for the resource type as identified by the ERO.

1. The SFPUC qualified archeologist will conduct an archival review for the project site, including review of Environmental Planning's (EP's) archeological GIS data and/or a records search of the California Historical Resources Information System (CHRIS) and other archival sources as appropriate. The qualified archeologist will also conduct an archeological field survey of the project site if, in the archeologist's judgment, this is warranted by site conditions. Based on the results, the archeologist will complete and submit to EP a Preliminary Archeological Checklist (PAC) (version dated 4/2015, to be amended in consultation with the ERO as needed). The PA C will include recommendations for the need for archeological testing, additional research and/or treatment measures consistent with Archeological Measures I, II, and III, to be implemented by the project to protect and/or treat significant archeological resources identified as being present within the site and potentially affected by the project.
2. The EP Archeologist (for projects within the City) or the ERO' s archeological designee (for projects outside the City) will then conduct a Preliminary Archeological Review (PAR) of the PAC and other sources as warranted; concur with the PA C recommendations; and/or amend the PAC in consultation with the SFPUC archeologist or archeological consultant to require additional research, reports, or treatment measures as warranted based on his/her professional opinion.
3. The SFPUC shall implement the PAC/PAR recommendations prior to and/or during project construction consistent with Standard Archeological Measures I, II, and III, and shall consult with the EP Archeologist in selecting an archeological consultant, as needed, to implement these measures.
4. Ground disturbing activities in archeologically sensitive areas, as identified through the above screening, will not begin until required preconstruction archeological measures of the PAC/PAR (e.g., preparation of an Archeological Monitoring Plan, Archeological Treatment Plan, and/or an Archeological Research Design and Data Recovery Plan) have been implemented.

Historic (Built Environment) Resources. For projects within the City that include activities with the potential for direct or indirect effects to historic buildings or structures, initial CEQA screening will include a review, for the project footprint and up to one parcel surrounding the footprint of CCSF' s online planning map, all relevant survey data, preservation address files, and other pertinent sources for previously-identified, historically significant buildings and building and structures more than 45 years old that have not been previously evaluated. For projects outside of the City, initial CEQA screening will include a records search of EP' s CCSF historical resources data, CHRIS, and other pertinent sources for historically significant or potentially significant buildings and structures older than 45 years.

For projects that would modify an existing building or structure that has been determined by EP as being a significant historical resource (i.e., appears eligible to qualify for the CRHR), or that would introduce new aboveground facilities in the vicinity of a significant historical resource, or that would affect previously unevaluated buildings or structures more than 45 years old, the SFPUC will retain a qualified architectural historian (defined as meeting the Secretary of the Interior's Professional Qualification standards and, if a consultant, also selected in consultation with the ERO) to conduct a historical resource evaluation (HRE). SFPUC will submit the project description and the HRE to the CCSF Planning Department Preservation Planner or to the ERO's-designated qualified architectural historian to assess potential effects. Where the potential for the project to have adverse effects on historic buildings or structures is identified, the CCSF Planning Department Preservation Planner or the ERO' s designee will consult with SFPUC to determine if the project can be conducted as planned or if the project design can be revised to avoid the significant impact, and will comply with applicable procedures set forth in Historic Architectural Resource Measure I. If these options are not feasible, the project will need to undergo further review with EP and mitigation may be required. If so, the project would not qualify for a Categorical Exemption from CEQA review.

Where construction will take place in proximity to a building or structure identified as a significant historical resource but would not otherwise directly affect it, the SFPU C will implement protective measures, such as but not limited to, the erection of temporary construction barriers to ensure that inadvertent impacts to such buildings or structures are avoided.

Operations and Maintenance

Most of the existing operations and services at the 1990 Newcomb Avenue facility would be transferred to the new 2000 Marin Street facility, including the shops, warehouses, administration offices, and fleet vehicles. Project operation and maintenance would be similar to that of the existing facility at 1990 Newcomb Avenue, including fueling of fleet vehicles, operation of shop equipment, vehicle and equipment maintenance, staff offices, and worker dispatch.[8] Equipment used for operation of the shops includes grinders, blast cabinets, table saws, welding equipment, dust collectors, forklifts, milling machines, belt sanders, lathes, and overhead cranes. Shop equipment would be used for maintenance of fleet vehicles and equipment and for preparation of materials for operation and maintenance of the city’s water infrastructure.

8 Large diameter pipe storage, soils and spoils storage, temporary storage of hazardous waste, and an auto wash station may remain at the 1990 Newcomb Avenue yard.

Approximately 56 large fleet vehicles and 137 regular fleet vehicles[9] would be parked at the 2000 Marin Street Facility during project operations. The fuel station would dispense approximately 47,000 gallons of diesel fuel and 71,000 gallons of gasoline annually to SFPUC vehicles and equipment.

OPERATING HOURS AND WORKFORCE

Approximately 428 employees would be transferred from the 1990 Newcomb Avenue facility and approximately 35 employees would be transferred from the University Mound facility. Although the total number of employees transferred to the project site would be approximately 463, the project could accommodate up to 490 employees for long-term operational needs. Operating hours for the 2000 Marin Street facility would be 7:00 a.m. to 5:00 p.m. Monday through Friday.

ENERGY USE AND SUPPLY

All proposed buildings would be electrically powered, and the project would incorporate solar PV panels on the roofs of three buildings. Electrical power to the project buildings would be supplemented on-site by the SFPUC. The 750-kilowatt back-up Tier 4 interim generator would provide back-up power to the administration building on an as-needed basis. Individual portable generators would be used, as needed, to provide power for the shops and warehouse buildings in the event of a power failure.

Project Approvals

This initial study is intended to provide the information and environmental analysis necessary to assist the public agency decision-makers in considering the approvals necessary for the planning, development, construction, operations, and maintenance of the project. The permits and approvals anticipated to be required from state, and local agencies are listed below.

In accordance with article VIIIB section 8B.121 of the City of San Francisco Charter, the SFPUC has exclusive charge of the construction, management, supervision, maintenance, extension, expansion, operation, use and control of all water, clean water and energy supplies and utilities of the city. The "exclusive charge" means that the City of San Francisco Board of Supervisors may not adopt ordinances that interfere with the SFPUC's responsibilities, but the SFPUC must still comply with all applicable local ordinances. Therefore, the SFPUC must meet the substantive requirements of city ordinances that apply to other city departments, but SFPUC does not need to obtain the permits normally required by the ordinances.

California Department of Toxic Substances Control

- Approved Soil Management Plan and Health and Safety Plan for excavation activities

Regional Water Quality Control Board, San Francisco Bay Region

- Construction general permit and a stormwater pollution prevention plan for more than 1 acre of ground disturbance

Bay Area Air Quality Management District

9 Large fleet vehicles would consist of medium heavy-duty trucks and heavy heavy-duty trucks and regular fleet vehicles would consist of light-duty autos, light-duty trucks, light heavy-duty trucks, medium-duty vehicles, and medium heavy-duty trucks.

- Approval of an asbestos dust mitigation plan for naturally occurring asbestos
- Authority to construct and permit to operate for stationary equipment

San Francisco Department of Building Inspection

- Plan check review

San Francisco Public Works

- Street improvement review for facilities in the public right-of-way

San Francisco Arts Commission

- Civic design review approval

San Francisco Department of Public Health

- Approved dust control plan for a project over 0.5 acre
- Enrollment in the Maher Program for disturbance of more than 50 cubic yards of soil within the Maher area

San Francisco Public Utilities Commission

- Project approval and adoption of mitigation monitoring and reporting program
- Conditional use authorization for the parking garage and office use

San Francisco Streetscape Design Advisory Team

- Review of streetscape changes

B. Project Setting

Project Site and Surrounding Land Uses

The project site is on the north side of Marin Street, between Evans Street and I-280, in the Bayview District of San Francisco. Marin Street is a two-lane road with no outlet that permits two-way travel, and it ends at the eastern project boundary. The project site has a 2.9 percent grade from west to east along Cesar Chavez Street, and a 5 percent grade change from west to east along Marin Street.

Land uses in the project vicinity primarily include public storage, distribution centers, and light industrial uses. The public storage and the FedEx Shipping Center properties adjacent to and south of the project site are two-story structures. Land uses west of the project site, on the western side of Evans Avenue, include a restaurant supply store, a parking lot, and the public works facility. Along Cesar Chavez Street, north of the project site, are various commercial, office, and retail uses, including a City and County of San Francisco testing center, a liquor store and deli, a dance center, and an electrical supply store. A salvage yard, Caltrain railway, and I-280 are east of the project site. Beyond the Caltrain railway is the Islais Creek Channel, which flows into the San Francisco Bay. The project site is zoned PDR-2 (Production, Distribution, and Repair) and within two Special Use Districts. The entire site is within the 2000 Marin Street Special Use District that permits a potential temporary location for the San Francisco Wholesale Flower Market. However, the site would not be used for this purpose. The western three quarters of the site are within the Industrial Protection Zone Special Use District that preserves production, distribution, and repair land uses. The project site is in close proximity to public transportation. MUNI's 19-Polk bus line operates along Cesar

Chavez Street and Evans Street, and the 48-Quintara/24th Street bus line operates on 25th Street, one block north of the project site.

Cumulative Context

CEQA Guidelines section 15130(b)(1) provides two methods for cumulative impact analysis: the "list-based approach" and the "projections-based approach." The list-based approach uses a list of projects (within approximately a quarter-mile radius of the project site and for which the planning department has a project application on file) producing closely related impacts that could combine with those of a project to evaluate whether the project would contribute to significant cumulative impacts. The projections-based approach uses projections contained in a general plan or related planning document to evaluate the potential for cumulative impacts. This analysis employs both the list-based and projections-based approaches, depending on which approach best suits the resource topic being analyzed.

The cumulative analysis for certain localized impact topics (e.g., cumulative shadow and wind effects) uses the list-based approach. The following is a list of reasonably foreseeable projects within the project vicinity (approximately one-quarter mile) that are included (see Figure 6):

- Case No. 2018-002951ENV: 1111 Pennsylvania Avenue (removal of portable storage containers and demolition of the existing billboard and parking lots and redevelopment of the site with a five-story, 65-foot-tall industrial building)
- Case No. 2010-0515E: Potrero Hope SF (demolish 620 housing units and construct 1,700 new units, 15,000 square feet of commercial uses, 35,000 square feet of Community Center space, and 134,030 of open and recreational space)
- Case No. 2022-001775ENV: 1399 Marin Street (modification of the existing site to modernize the maintenance function and efficiency in the bus maintenance warehouse)
- Case No. 2020-002480ENV: 1801 Evans Avenue (increase recycling operational activities from 25 tons of recycled materials per day to up to 175 tons per day)
- Case No. 2021-006317ENV: Channel Force Main Intertie Project (demolition of 130 feet of existing Channel Force Main and construction of an intertie between the Channel Force Main and the Islais Creek Transport/Storage box)
- Case No. 2023-001209ENV: Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project (replace existing water mains, install new electrical duct bank and vaults, and extend and modernize the existing emergency water system along Evans Avenue, Marin Street, and Cesar Chavez Street)
- Case No. 2022-000112ENV: Islais Creek Bridge Project (replace the existing Islais Creek Bridge on Third Street with a fixed bridge that would meet current structural and seismic standards, and would be resilient to predicted sea level rise)

FIGURE 6 CUMULATIVE PROJECTS

SOURCE: City and County of San Francisco, DataSF, accessed September 22, 2022.

C. Summary of Environmental Effects

The project could potentially result in adverse physical effects on the environmental resources checked below, and where those impacts are significant or potentially significant, the California Environmental Quality Act (CEQA) requires identification of mitigation measures to reduce the severity of the impacts to a less-than-significant level to the extent feasible. This initial study presents a more-detailed checklist and discussion of each environmental resource, unless otherwise noted below.

☐ Land Use and Planning	☐ Greenhouse Gas Emissions	☐ Hydrology and Water Quality
☐ Aesthetics	☐ Wind	☒ Hazards and Hazardous Materials
☐ Population and Housing	☐ Shadow	☐ Mineral Resources
☒ Cultural Resources	☐ Recreation	☐ Energy
☐ Tribal Cultural Resources	☐ Utilities and Service Systems	☐ Agriculture and Forestry Resources
☐ Transportation and Circulation	☐ Public Services	☐ Wildfire
☒ Noise	☐ Biological Resources	☒ Mandatory Findings of Significance
☒ Air Quality	☒ Geology and Soils	

This initial study examines the project to identify potential effects on the environment. For each item on the initial study checklist, the evaluation has considered the impacts of the project both individually and cumulatively. All items on the initial study checklist that have been checked "Less than Significant Impact with Mitigation Incorporated," "Less than Significant Impact," "No Impact," or "Not Applicable" indicate that, upon evaluation, the planning department has determined that the proposed project could not have a significant adverse environmental effect relating to that issue. A discussion is included for those issues checked "Less than Significant Impact with Mitigation Incorporated" and "Less than Significant Impact," and for most items checked with "No Impact" or "Not Applicable." For all of the items checked "No Impact" or "Not Applicable" without discussion, the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the planning department, such as the *Transportation Impact Analysis Guidelines for Environmental Review* or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Wildlife. The items checked above have been determined to be "Less than Significant with Mitigation Incorporated."

NO IMPACT OR NOT APPLICABLE ENVIRONMENTAL TOPICS

The project would have no impact on the following environmental topics and as a result are not discussed further in this initial study: Aesthetics, Agriculture and Forestry Resources, Mineral Resources, and Wildfire. This section briefly describes why these topics would have no impact or are not applicable to the project.

Aesthetics and Parking

In accordance with CEQA section 21099: Modernization of Transportation Analysis for Transit-Oriented Projects, aesthetics and parking shall not be considered in determining if a project has the potential to result in significant environmental effects, provided the project meets all of the following three criteria:

a) The project is in a transit priority area;

b) The project is on an infill site; and

c) The project is residential, mixed-use residential, or an employment center.

The project meets each of the above criteria; therefore, this initial study does not consider aesthetics or parking in determining the significance of project impacts under CEQA.[10]

Automobile Delay and Vehicle Miles Traveled

In addition, CEQA section 21099(b)(1) requires that the Governor's Office of Planning and Research (OPR) develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects that "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." CEQA section 21099(b)(2) states that upon certification of the revised guidelines for determining transportation impacts pursuant to section 21099(b)(1), automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment under CEQA.

In January 2016, the OPR published for public review and comment a Revised Proposal on Updates to the CEQA Guidelines on Evaluating Transportation Impacts in CEQA[11] recommending that transportation impacts for projects be measured using a vehicle-miles traveled (VMT) metric. On March 3, 2016, in anticipation of the future certification of the revised CEQA Guidelines, the San Francisco Planning Commission adopted the OPR's recommendation to use the VMT metric instead of automobile delay to evaluate the transportation impacts of projects (Resolution No. 19579). The VMT metric does not apply to the analysis of project impacts on non-automobile modes of travel such as riding transit, walking, and bicycling.

Agriculture and Forestry Resources

The project site is within an urbanized area in the City and County of San Francisco that does not contain any prime farmland, unique farmland, or farmland of statewide importance; forest land; or land under Williamson Act contract. The area is not zoned for any agricultural uses. Therefore, the project would have no impact, either individually or cumulatively, on agricultural or forest resources.

Mineral Resources

The project site is not located in an area with known mineral resources and would not extract mineral resources. Therefore, the project would have no impact on mineral resources and would not have the potential to contribute to any cumulative mineral resource impact.

Wildfire

The project site is not located in or near state responsibility lands for fire management or lands classified as very high fire hazard severity zones. Therefore, this topic is not applicable to the project.

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10 San Francisco Planning Department, Transportation Study Determination Request, July 27, 2022.

11 Governor's Office of Planning and Research. Available at http://opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf, accessed August 23, 2020.

D. Evaluation of Environmental Effects

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
1. LAND USE AND PLANNING. Would the project:					
a) Physically divide an established community?	☐	☐	☒	☐	☐
b) Cause a significant physical environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☒	☐	☒	☐	☐

Impact LU-1: The proposed project would not physically divide an established community. ***(Less than Significant)***

Land use impacts related to the physical division of an established community typically involve construction of a physical barrier to neighborhood access, such as a new freeway, or removal of an existing means of access, such as a bridge or a roadway. The project would not permanently close any streets and would not construct a physical barrier to neighborhood access or remove an existing means of access, such as a bridge or roadway, that would create an impediment to the passage of persons or vehicles. The project would not require the temporary or permanent closure of any streets or sidewalks during construction and would not impede vehicle or pedestrian traffic. Thus, the project would not physically divide an established community. The impact would be less than significant. No mitigation would be required.

Impact LU-2: The proposed project would not cause a significant physical environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. ***(Less than Significant)***

Land use impacts potentially could be significant if the project would conflict with any plan, policy, or regulation adopted for avoiding or mitigating an environmental impact. Environmental plans and policies are those that directly address environmental issues and/or contain targets or standards that must be met to preserve or improve characteristics of the city's physical environment.

Applicable local land use policies include the general plan, which describes the comprehensive long-term land use policies for the city. The general plan consists of the following 10 elements that set forth goals, policies, and objectives for the physical development of San Francisco: housing, commerce and industry, recreation and open space, transportation, urban design, environmental protection, community facilities, community safety, arts, and air quality. Two objectives, as well as two associated policies from the general plan elements above, apply to the project and are described as follows:

> **Environmental Protection Objective 4:** Assure that the ambient air of San Francisco and the Bay Region is clean, provides maximum visibility, and meets air quality standards.

Policy 4.1: Support and comply with objectives, policies, and air quality standards of the Bay Area Air Quality Management District.

Air Quality Element Objective 5: Minimize particulate matter emissions from road and construction sites.

Policy 5.1: Continue policies to minimize particulate matter emissions during road and building construction and demolition.

The use of construction equipment during project implementation would, if not properly managed, create dust and result in emissions of criteria air pollutants, thereby creating the potential for the project to be inconsistent with these objectives and policies. However, the SFPUC would require the construction contractor to implement site-specific best management practices to control dust and emissions of criteria air pollutants in accordance with the Construction Dust Control Ordinance and SFPUC's Standard Construction Measure 2 (Air Quality). Furthermore, because the project site is located within an Air Pollutant Exposure Zone (as further discussed in Section D.7, Air Quality), the SFPUC would comply with the Clean Construction Ordinance, per SFPUC's Standard Construction Measure 2 (Air Quality), which requires public projects to reduce emissions at construction sites in areas that have been classified as Air Pollutant Exposure Zones. The project's compliance with these ordinances is analyzed in detail in Section D.7 Air Quality, of this initial study. With compliance of the San Francisco Dust Control Ordinance and Clean Construction Ordinance, the project would not conflict with the environmental protection and air quality elements of the general plan, nor would it substantially conflict with any applicable general plan goals, policies, and objectives.

Other relevant examples of plans, policies, and regulations that directly address environmental issues and/or contain targets or standards that must be met include the Bay Area Air Quality Management District's *2017 Clean Air Plan* and the San Francisco Regional Water Quality Control Board's *San Francisco Basin Plan*. As discussed in Section D.7, Air Quality, Section D.8, Greenhouse Gas (GHG) Emissions, Section D.14, Biological Resources, and Section D.17, Hydrology and Water Quality, the project would not conflict with any plan, policy, or regulation adopted for avoiding or mitigating an environmental effect, including the *2017 Clean Air Plan*, San Francisco's *2023 Greenhouse Gas Reduction Strategy Update*, and the San Francisco Urban Forestry Ordinance, respectively. The project would involve the construction and operation of the new SFPUC City Water Distribution Division facility at 2000 Marin Street. Operation would be similar to the operations at the existing 1990 Newcomb Avenue facility. Because the project would be consistent and comply with all applicable environmental regulations, the project would not cause a significant physical environmental impact due to a conflict with any applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect. The impact would be less than significant. No mitigation is required.

Impact C-LU-1: The proposed project, in combination with cumulative development projects, would not result in a significant cumulative impact related to land use and planning. (*No Impact*)

The cumulative context for land use effects typically is localized, within the immediate project vicinity or at the neighborhood level. Cumulative development in the project vicinity (within 0.25 mile of the project site) would include all projects listed in Section B, Project Setting. The cumulative development projects would introduce new infill residential, manufacturing, and industrial uses in the project vicinity.

The nearby cumulative development projects would not physically divide an established community by constructing a physical barrier to neighborhood access or removing a means of access. Like all projects proposed in San Francisco, the nearby cumulative development projects are required to comply with applicable plans, policies, and regulations, including those adopted for avoiding or mitigating an environmental impact, such as the *2017 Clean Air Plan*, San Francisco's GHG Reduction Strategy, and the San Francisco Urban Forestry Ordinance.

Therefore, the proposed project, in combination with cumulative development projects would not result in a significant cumulative impact related to the physical division of an established community or a conflict with a land use plan, policy, or regulation adopted for avoiding or mitigating an environmental impact. No cumulative land-use impact would occur (no impact).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
2. POPULATION AND HOUSING. Would the project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐	☐
b) Displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing?	☐	☐	☐	☒	☐

Impact PH-1: The proposed project would not induce substantial unplanned population growth, either directly or indirectly. ***(Less than Significant)***

In general, a project would be considered growth-inducing if its implementation would result in substantial unplanned population growth or new development that may not otherwise occur without the project. The project would demolish the existing building and parking lot on the project site and construct five buildings, totaling approximately 371,000 square feet. The new buildings would include a warehouse and meter shop, parking garage, fuel station, administrative offices, and electrical, landscaping, carpentry, machine, and auto shops. The project would not involve the development of new housing, which could directly induce population growth.

Construction

Project construction is expected to take approximately 40 months, with an average of 50 construction workers per day on site, and with a maximum number of 120 construction workers per day on site at any one time. According to the California Employment Development Department, the number of individuals that worked in construction jobs in San Francisco and San Mateo counties decreased from 40,700 in February

2023 to 39,600 in February 2024.[12] However, the workforce is projected to grow to approximately 48,300 construction workers by 2030.[13] Because of the relatively large size of the regional construction workforce, construction workers for the project would be expected to be drawn primarily from the local and regional construction workforce. Construction workers who do not live in the project vicinity would be most likely to commute from elsewhere in San Francisco or the Bay Area, rather than relocate from more distant cities or towns. Consequently, project construction would not induce population growth by attracting a substantial number of construction workers from outside the region. Project construction would not create a demand for additional housing or other facilities and services associated with growth. As a result, the project's impact during construction relative to population and housing would be less than significant. No mitigation is required.

Operation

A total of approximately 463 employees of the City Water Distribution Division operations at the 1990 Newcomb Avenue facility and the University Mound facility would be relocated to the new facility at 2000 Marin Street. The 1990 Newcomb Avenue and University Mound facilities are located less than 2 miles from the proposed facility at 2000 Marin. Given the close proximity of the proposed facility to the existing facilities, the project would not be expected to result in any residential relocation of employees. No new housing, which could directly induce population growth, would be developed by project implementation. Furthermore, the project would not indirectly induce substantial population growth in the project vicinity because it would not extend any roads or other infrastructure into areas where roads or other infrastructure currently do not exist. For these reasons, project operations would not result in substantial unplanned population growth. As a result, the project's impact during operations relative to population and housing would be less than significant. No mitigation is required.

Impact PH-2: The proposed project would not displace substantial numbers of existing people or housing units, necessitating the construction of replacement housing outside. ***(No Impact)***

The existing building and parking lot on the project site are vacant, and no housing units are on the project site. Therefore, the project would not involve displacement of any existing people or housing units or necessitate construction of any replacement housing elsewhere that could result in physical environmental effects. No impact would occur. No mitigation is required.

Impact C-PH-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to population and housing. ***(Less than Significant)***

The geographic scope for the population and housing cumulative impact analysis encompasses the Bayview/Hunters Point neighborhood. The identified cumulative project that contains housing components within this geographic scope is Potrero Hope SF. This project would add 1,700 housing units and would

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12 California Employment Development Department, 2024 (March 22), San Francisco – Redwood City- South San Francisco Metropolitan Division Press Release, available at https://labormarketinfo.edd.ca.gov/geography/sanfrancisco-county.html. Accessed on March 26, 2024.

13 California Employment Development Department, (n.d.), 2020-2023 Local Employment Projects Highlights, available at https://labormarketinfo.edd.ca.gov/data/employment-projections.html#Long. Accessed on March 26, 2024.

increase the residential population within the geographic scope of the cumulative project area. However, as discussed under Impact PH-2, the proposed project would not displace any housing or result in the need for replacement housing. In addition, the proposed project would not develop new housing that could directly induce population growth. Therefore, the proposed project would not contribute to a potentially significant cumulative impact related to direct population growth.

Construction

All seven of the cumulative projects identified in Section B, Project Setting, are located within the Bayview/Hunters Point neighborhood. Construction employment generated the identified cumulative projects could overlap, depending on the timing and duration of cumulative project construction. The California Employment Development Department has estimated that San Francisco and San Mateo counties' combined construction workforce will grow to approximately 48,300 construction workers by 2030.[14] The construction labor force available to San Francisco County is therefore expected to accommodate the demand for construction labor, including those related to the identified cumulative projects. Therefore, construction of the cumulative projects would not combine with the proposed project to result in a significant impact related to unplanned population growth or demand for additional housing (less than significant).

Operation

As discussed above, the project would relocate approximately 463 existing employees to the project site from other existing facilities located within 2 miles of the project site. The proposed project would not result in the residential relocation of any employees, nor would the project involve or require the development of new housing that could induce population growth in the project vicinity. Therefore, the proposed project would not contribute to any potential cumulative impact on population growth (no impact).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
3. CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5, including those resources listed in article 10 or article 11 of the San Francisco Planning Code?	☐	☒	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐	☐

14 California Employment Development Department, (n.d.), 2020-2023 Local Employment Projects Highlights, available at https://labormarketinfo.edd.ca.gov/data/employment-projections.html#Long. Accessed on March 26, 2024.

Impact CR-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource. ***(Less than Significant)***

Historical resources are those properties that meet the terms of the definitions in Public Resources section 21084.1 and CEQA Guidelines section 15064.5. Historical resources include properties listed in, or formally determined eligible for listing in, the California Register of Historic Resources (California Register) or listed in an adopted local historic register. The term "local historic register" or "local register of historical resources" refers to a list of resources that officially are designated or recognized as historically significant by a local government pursuant to resolution or ordinance. Historical resources also include resources identified as significant in a historical resource survey, meeting certain criteria as identified in CEQA Guidelines section 15064.5. In addition, a property that is not listed but otherwise is determined to be historically significant based on substantial evidence also would be considered a historical resource. Specifically, a property may be considered a historical resource if it meets any of the California Register criteria related to (1) events, (2) persons, (3) architecture, or (4) information potential that make it eligible for listing in the California Register, or if it is considered a contributor to an existing or potential historic district. The significance of a historical resource is materially impaired when a project "demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance."

There are no built structures of historic significance within the project's *area of potential effect*.[15] The project would involve demolition of the existing San Francisco Chronicle Production Plant building on the project site, which was constructed in 1989. Because the property is an undistinguished concrete building constructed less than 45 years ago, it is not eligible for inclusion on the California Register as an individual resource or as a contributor to a historic district. The nearest potentially historic structure is an age-eligible bridge located on Evans Avenue, just south of the intersection with Cesar Chavez Street, which was built in 1947. As discussed in Section D.6, Noise, project construction has the potential to result in vibration levels that could damage the bridge resulting in a significant impact. However, implementation of **Mitigation Measure M-NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction** would minimize vibration impacts to the historic bridge by requiring preparation of a project-specific, pre-construction survey and vibration management and monitoring plan following the demolition phase of the project, and to be implemented for all phases of construction following the demolition phase of the project. This measure would also require monitoring to ensure that damage effects would not occur or would be repaired appropriately. With implementation of Mitigation Measure M-NO-2 the project would not cause a substantial adverse change in the significance of a historical resource such that it would no longer be eligible for listing as an historic resource. As a result, the impact on historical structures would be less than significant with mitigation incorporated.

Impact CR-2: The proposed project would not cause a substantial adverse change in the significance of an archaeological resource. ***(Less than Significant)***

Archaeological resources are defined as those that: 1) are significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California;

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15 For the purposes of this analysis, the "area of potential effect" is defined as the project site boundaries.

2) meet the criteria for listing in the California Register; or 3) are defined as a unique archaeological resource.[16] Determining the potential for encountering archaeological resources is based on relevant factors that include the location, depth, and amount of excavation proposed as well as any recorded information on known resources in the area.

Construction of the project would require excavation to a depth of 10 feet and the excavation and grading of approximately 40,900 cubic yards of material, as well as drilling of micro-piles for the administrative building, carpentry and machine shop, vehicle repair shop, and warehouse and meter shop to a subsurface depth of between 70 and 110 feet. A preliminary archaeological review was performed by a planning department staff archaeologist to determine the potential for encountering archaeological resources during project construction.[17] The review included a literature review of previous archaeological research results in the project vicinity, including results of a 2018 archaeological records search of the California Historical Resources Information System, Northwest Information Center; and review of Native American archaeological sensitivity modeling for the project area. The preliminary archaeological review did not identify any known archaeological sites within 0.25 mile of the project site. The preliminary archaeological review indicates the eastern and southern portion of the project site were within the marshland at the mouth of Islais Creek and the western portion of the project site was above the tideline during the mid-19th century. The project site was identified as having very high to high Native American archaeological surface sensitivity. The portion of the project site that was historically within the marshland has moderate sensitivity for buried Native American archaeological resources and very high to high sensitivity for submerged Native American archaeological resources, while the western portion of the site has little to no sensitivity for buried and submerged Native American archaeological resources. The preliminary archaeological review suggested possible sensitivity for historic-era resources at the project site. Therefore, the project has the potential to disturb significant archaeological resources.

SFPUC's Standard Archaeological III (Archaeological Testing) was identified to be required as part of project implementation (pursuant to the SFPUC's Standard Construction Measures) based on the planning department's archaeological review. Specifically, SFPUC Standard Archaeological Measure III addresses the potential for discovery and treatment of significant archaeological resources if encountered during construction-related soil-disturbing activities. This measure requires training construction crews about the archaeological sensitivity of the project site, protocols for appropriate treatment and protection of resources, and requires the development of an archaeological testing program. The archaeological testing program would include both geoarchaeological coring, undertaken by a qualified geoarchaeologist, and trenching within archaeologically sensitive soils that would be impacted by project activities to test for the presence of Native American and 19th century archaeological resources. The archaeological testing plan will also include proposed treatment methods including recommendations for monitoring and data recovery procedures for identified archaeological resources and soils that may contain paleoenvironmental data. Upon discovery of any Native American archaeological resources, Native American monitors will be engaged, and treatment of all archaeological resources will be done in consultation with Native American

16 A unique archaeological resource is one for which "without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria: 1) contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information; 2) has a special and particular quality such as being the oldest of its type or the best example of its type; or 3) is directly associated with a scientifically recognized important prehistoric or historic event or person." (CEQA section 21083.2 [g]).

17 San Francisco Planning Department, 2022 (December 7), Environmental Planning Preliminary Archaeological Review for the SFPUC City Distribution Division Campus Project at 2000 Marin Street.

representatives. As identified in the Standard Construction Measure III, the archaeological testing plan will also identify public interpretation requirements, which will include consultation with Native American representatives, if Native American resources are recovered, and requirements for the curation of significant archaeological resources. The recovery, documentation, public interpretation, and curation of archaeological resources that may be encountered within the project site would enhance knowledge of prehistory and history. This information would be available to support future archaeological studies, contributing to the collective body of scientific and historic knowledge. With implementation of SFPUC's Standard Archaeological Measure III, the project would not cause a substantial adverse change in the significance of an archaeological resource should one be discovered within the project site. As a result, the impact on archaeological resources would be less than significant. No mitigation is required.

Impact CR-3: The proposed project could disturb any human remains, including those interred outside of formal cemeteries. ***(Less than Significant)***

There are no known human burials or archaeological resources that contain human remains in the area of potential effect; however, the possibility of encountering human remains, either within the context of a buried prehistoric deposit or in isolation in pre-Bay sediments, cannot be entirely discounted. In the unlikely event that human remains are encountered during construction, any inadvertent damage to human remains would be considered a significant impact. Earth-moving activities associated with construction of the project could result in direct impacts on previously undiscovered human remains. The project is subject to the provisions of California Health and Safety Code, section 7050.5, with respect to the discovery of human remains. The Public Resources Code, section 5097.98, regulates the treatment and disposition of human remains encountered during construction. Furthermore, SFPUC Standard Archaeological Measure I (Archaeological Discovery) outlines halt-work and agency notification protocols in the event human remains or other funerary objects are encountered during construction and requires the development of a treatment plan. Compliance with state regulatory requirements and implementation of SFPUC Archaeological Measure I would require that any human remains that might be uncovered during construction are promptly identified and appropriately protected and treated, and therefore would minimize the potential for significant impacts to human remains or other funerary objects. As a result, the impact on human remains, including those interred outside of formal cemeteries, would be less than significant. No mitigation is required.

Impact C-CR-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to cultural resources. ***(Less than Significant with Mitigation)***

The geographic scope for cumulative cultural resource impacts encompasses areas within or immediately adjacent to the proposed project site. While built historic resources, archaeological resources, and human remains are often site-specific, two projects that are adjacent to each other can impact the same built historic resource or potential archaeological resource, particularly in regard to Native American archaeological resources when two adjacent project areas are both modeled as having high or very high Native American archaeological sensitivity. The closest cumulative project is the Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project, approximately 30 feet from the project site.

The Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project would include use of heavy construction equipment adjacent to the historic bridge on Evans Avenue, which could result in in vibration levels that could affect the historic bridge, similar to the proposed project. As described below

under Impact C-NO-1, because peak particle velocity vibration levels do not combine, the worst-case peak particle velocity vibration level experienced at nearby structures would generally be equal to the worst-case peak particle velocity vibration level from the most vibration-intensive equipment associated with either the proposed project or the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, individually. In addition, as discussed above, the proposed project would require implementation of **Mitigation Measure M-NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction,** which would minimize vibration-related impacts to the historic bridge to a less-than-significant level. Therefore, because the proposed project would have a less than significant vibration impact on nearby structures (with mitigation) and because peak particle velocity vibration levels from cumulative projects would not combine, a significant cumulative impact on historic resources resulting from vibration would not occur (less than significant with mitigation).

The SFPUC Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project was identified by planning department archaeological staff as having the potential to impact archaeological resources. Therefore, ground-disturbing activities associated with the proposed project and the Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project could result in a significant cumulative impact on archaeological resources or human remains, if present. However, because the Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project is an SFPUC project, it would be required to implement SFPUC Standard Construction Measure 9, Archaeological Measure I (Archaeological Discovery) and SFPUC Standard Construction Measure II (Archaeological Monitoring). These measures require training crew about the potential for archaeological sensitivity, archaeological monitoring, and preparation of an Archaeological Monitoring Plan for sensitive areas to minimize the potential for impacts to archaeological resources during construction. Therefore, the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would not result in a significant impact related to archaeological resources or human remains and would not combine with the proposed project to result in a significant cumulative impact (less than significant).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
4. TRIBAL CULTURAL RESOURCES. Would the project:					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐	☐

Impact TCR-1: The proposed project could result in a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code section 21074. ***(Less than Significant)***

Pursuant to CEQA section 21074, tribal cultural resources are defined as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that also are either (a) included or determined to be eligible for inclusion in the California Register or (b) included in a local register of historical resources, as defined in CEQA section 5020.1(k).

Pursuant to CEQA section 21080.3.1(d), on December 7, 2022, the planning department contacted Native American individuals and organizations in the San Francisco area, providing a description of the project and requesting comments on the identification, presence, and significance of tribal cultural resources in the project vicinity.[18] During the 30-day comment period, no Native American tribal representatives responded to the planning department's request for consultation.

Based on Native American consultation undertaken since 2015, with the passage of AB 52 and the addition of Tribal Cultural Resources to CEQA review, all Native American archaeological resources are determined to be tribal cultural resources. Additionally, based on Native American consultation undertaken for the Housing

18 San Francisco Planning Department, Tribal Notification Regarding Tribal Cultural Resources and CEQA, December 7, 2022.

Element 2022 Update EIR[19], the following locations are identified as culturally important to local Ohlone and, therefore, determined to be potential tribal cultural resources:

- Locations modeled as having high sensitivity for Native American archaeological resources, confirming the previous Native American consultation.
- The shoreline and marsh zone associated with natural environmental change over the period between about 8,000 years ago and 170 years ago, including areas modeled as having high sensitivity for archaeological resources that were submerged by the rising bay.
- Known historical locations of creek channels, ponds, marshes, and other wetlands.
- The modern San Francisco Bay and ocean shoreline as well as the shores of remnant creek channels, lakes, and ponds that are characterized by above-ground water today.

Based on the above consultation, the project site is within an area identified as a potential tribal cultural resource as it was mapped as historical marsh zone associated with Islais Creek as identified in Figure 4.3-1 of Housing Element 2022 Update EIR. Based on consultation undertaken for the Housing Element 2022 Update EIR and other projects, Native American representatives primarily asked that potential paleoenvironmental data from stratigraphic layers determined to be associated with historical waterways and their shorelines be collected if encountered during project activities in order to add to the overall understanding of San Francisco's historical ecology. Additionally, that historical ecology information would be highlighted in any public interpretation programing that was undertaken for the project. Both of these requests would be covered in requirements and scoping of SFPUC Standard Construction Measure III (Archaeological Testing), as described in Impact CR-2 of Section D.3, Cultural Resources, above.

The potential to encounter unknown Native American archaeological resources that are also tribal cultural resources during project excavation activities exists. In the event that project activities were to disturb unknown archaeological sites that are considered to be tribal cultural resources, any inadvertent damage would be a potentially significant impact. As discussed in Section D.3 Cultural Resources, SFPUC's Standard Archaeological Measure III (Archaeological Testing) would be implemented. In accordance with SFPUC's Standard Archaeological Measure III, if significant Native American resources are discovered, at a minimum, SFPUC would coordinate with Native American representatives on any data recovery, monitoring would be conducted by a Native American monitor, paleoenvironmental data would be collected and analyzed, and public interpretation of the resources would be undertaken in coordination with the Native American community. The impact would be less than significant. No mitigation is required.

Impact C-TCR-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on tribal cultural resources. ***(Less than Significant)***

The geographic scope for cumulative tribal cultural resource impacts encompasses areas within or immediately adjacent to the proposed project site. While tribal cultural resources are often site-specific, two projects that are adjacent to each other can impact the same potential tribal cultural resource, particularly when two adjacent project areas are both modeled as having high or very high Native American

19 San Francisco Planning Department, 2022 (November 17), San Francisco Housing Element 2022 Update.

archaeological sensitivity. As discussed under Impact C-CR-1 of Section D.3, Cultural Resources, the closest cumulative project is the Bay Corridor Transmission and Distribution Phase 4 Improvements Project, approximately 30 feet from the project site, which was identified by planning department archaeological staff as having the potential to impact archaeological resources. Therefore, ground-disturbing activities associated with the proposed project and the Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project could have a significant cumulative impact on Native American archaeological resources, if present.

As discussed above, the proposed project would have a less-than-significant impact on tribal cultural resources with compliance with state regulatory requirements and implementation of SFPUC Standard Construction Measure III (Archaeological Testing), as required. Therefore, the proposed project's contribution to a potential cumulative impact on Native American archaeological resources or human remains would be less than cumulatively considerable (less than significant).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
5. TRANSPORTATION AND CIRCULATION. Would the project:					
a) Involve construction that would require a substantially extended duration or intensive activity, and the effects would create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit?	☐	☐	☒	☐	☐
b) Create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations?	☐	☐	☒	☐	☐
c) Interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access?	☐	☐	☒	☐	☐
d) Substantially delay public transit?	☐	☐	☒	☐	☐
e) Cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas (i.e., by adding new mixed-flow travel lanes) or by adding new roadways to the network?	☐	☐	☒	☐	☐
f) Result in a loading deficit, and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or substantially delay public transit?	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
g) Result in a substantial vehicular parking deficit, and the secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; or interfere with accessibility for people walking or bicycling or inadequate access for emergency vehicles; or substantially delay public transit?	☐	☐	☒	☐	☐

The transportation analysis was prepared in accordance with the planning department's 2019 Transportation Impact Analysis Guidelines for Environmental Review (SF Guidelines)[20] and examines the transportation-related impacts of the project's construction and operational activities on hazardous conditions, accessibility, public transit, vehicle miles traveled (VMT), and loading.

The project would satisfy the eligibility criteria for a "transit-oriented infill project" under section 21099(d)(1) of CEQA because it would consist of employment-center uses and the project area would be on an infill site and within a transit priority area.[21] Therefore, the project's vehicular parking impacts would not be potentially significant under CEQA. Furthermore, the project would not result in a substantial parking deficit because it would meet the map-based screening criterion for VMT impacts, as discussed further in this section. Because a substantial parking deficit would not occur, the project would not require a parking analysis to determine whether any secondary effects would create potentially hazardous conditions for people walking, bicycling, or driving; interfere with accessibility for people walking or bicycling or create inadequate access for emergency vehicles; or substantially delay public transit. Therefore, impacts related to topic D.5(g) would be less than significant, and the topic is not discussed further in this initial study.

TRANSPORTATION SETTING

The project site is bounded by Marin Street to the south, Evans Avenue to the west, Cesar Chavez Street to the north, and an adjacent parcel and Caltrain tracks to the east. Vehicular access to the project site is via two driveways on Marin Street and an egress on Cesar Chavez Street. I-280 is east of the project site and is an elevated freeway that overlies the Caltrain tracks. Transit, pedestrian, and bicycle access is available from existing bus transit services, sidewalks, streets, and crosswalks near the site.

Roadways. Marin Street is a discontinuous, two-lane road with no outlet that permits two-way travel in the east-west direction to the east of Evans Avenue. Evans Avenue is a four-lane road that runs in a north-south direction and is west of the project site. Cesar Chavez Street, a designated truck route, is a four-lane street that runs in an east-west direction and is north of the project site. I-280 is a six-lane freeway that connects to the Bay Bridge and is west of the project site.

20 San Francisco Planning, 2019, Transportation Impact Analysis Guidelines for Environmental Review, available: https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines.

21 San Francisco Planning Department, 2022, Eligibility Checklist: CEQA Section 21099, Modernization of Transportation Analysis.

Bicycle Facilities. Bicycle facilities near the project site include class IV facilities on Cesar Chavez Street[22] and class III[23] facilities on Evans Avenue. Evans Avenue is on the Vision Zero High Injury Network.[24]

Pedestrian Facilities. Marin Street, Cesar Chavez Street, and Evans Avenue have sidewalks on both sides of the street. Along the northern border of the site, a substandard sidewalk is at grade near the northeastern corner of the site. Westward along Cesar Chavez Street, the sidewalk is separated by a railing, cyclone fence, and a gradual elevation change that increases to up to 15 feet above the project site at the northwest corner. The sidewalk is uneven with cracks and vegetation. On the southern side of the site, a sidewalk is present for approximately 270 feet of the 830-foot-long site frontage on Marin Street before Marin Street terminates in a dead end. Pedestrian crosswalks are provided at the signalized intersections at Cesar Chavez Street and Evans Avenue. Access curb ramps (consistent with the Americans with Disabilities Act) are at the intersections of Cesar Chavez Street and Evans Avenue, and Evans Avenue and Marin Street.

Transit. Primary public transit to the project site is provided by Muni bus services. Muni operates three bus routes (19-Polk and 48-Quintara/24th Street) in the project vicinity. The 19-Polk and 48-Quintara/24th Street bus routes run every 15 to 20 minutes. A Muni stop for the 19-Polk route is on the west side of Evans Avenue, approximately 20 feet west of the project site. Muni stops for the 48-Quintara/24th Street route are on the north and south sides of 25th Street, at the intersection of 25th Street and Connecticut Street, approximately 1,000 feet north of the project site.

PROJECT TRAVEL DEMAND

The project would generate an estimated 1,312 person trips in the form of 815 auto trips, 46 walking trips, 9 bike trips, 37 transit trips, 386 fleet vehicle trips, and 19 trips made by other modes (e.g., taxi/Transportation Network Company [TNC]), as shown in Table 6. The project would result in approximately 1,220 daily vehicle trips, as shown in Table 7. The project is estimated to generate 212 p.m. peak hour person trips, in the form of 187 auto trips, 8 transit trips, two bike trips, 11 walking trips, and 4 trips made by other modes. Because the project includes transferring employees from the existing 1990 Newcomb Avenue and University Mound facilities to the 2000 Marin Street project site, the project person trips identified are not new trips, but rather the numbers of trips being moved from the existing 1990 Newcomb Avenue and University Mound facilities to the 2000 Marin Street project site, which is located less than 2 miles from these existing facilities.

22 Class IV facilities consist of protected bikeways where bicycle facilities are separated from traffic by parked cars, safe-hit posts, transit islands, or other physical barriers.

23 Class III facilities consist of designated and signed bicycle routes where bicyclists share the roadway with vehicles. They may or may not be marked with arrows and usually are signed.

24 San Francisco Department of Public Health, 2017, Vision Zero High Injury Network: 2017 Map, available: https://sfgov.maps.arcgis.com/apps/webappviewer/index.html?id=fa37f1274b4446f1bdddd7bdf9e708ff.

Table 6 Project Person Trip Demand

Mode	Daily Person Trips	P.M. Peak Hour Person Trips[a]		
		Inbound	Outbound	Total
Auto	815	11	176	187
TNC/Taxi	19	0	4	4
Transit	37	1	7	8
Bike	9	0	2	2
Walk	46	1	10	11
Fleet Vehicles[b,c]	386	NA	NA	NA
Total	**1,312**	**13**	**199**	**212**

SOURCE: San Francisco Planning Department, 2019, Transportation Impact Analysis Guidelines, Appendix F, Travel Demand

NOTES:

NA = Not Available

[a] p.m. peak hour is calculated based on the building square footage and does not include the parking garage.

[b] Fleet vehicles remain at the project site and are not used by employees traveling to and from the site for employment. Fleet vehicles would remain on-site and may be used by employees after they have already traveled to the project site. For this reason, fleet vehicles were not included in the total daily person trips for the purposes of determining the model people travel. Fleet vehicles would also not be expected to have P.M. peak hour person trips.

[c] Fleet vehicles would not be used for employees traveling to work at the project site and therefore would not contribute to p.m. peak hour person trips.

Table 7 Project Vehicle Trip Demand

Vehicle Mode	Daily Vehicle Trips	P.M. Peak Hour Vehicle Trips		
		Inbound	Outbound	Total
Auto	815	11	176	187
TNC/Taxi	19	0	4	4
Fleet Vehicles[bc]	386	NA	NA	NA
Total Vehicle Trips	1,220	11	180	212

SOURCE: San Francisco Planning Department, 2022, SF Travel Demand Tool, available at https://sftraveldemand.sfcta.org/, accessed on 09/21/2022.

NOTES:

NA = Not Available

[a] p.m. peak hour is calculated based on the building square footage and does not include the parking garage.

[b] Fleet vehicles remain at the project site and are not used by employees traveling to and from the site for employment. Fleet vehicles would remain on-site and may be used by employees after they have already traveled to the project site. For this reason, fleet vehicles were not included in the total daily person trips for the purposes of determining the model people travel. Fleet vehicles would also not be expected to have P.M. peak hour person trips.

[c] Fleet vehicles would not be used for employees traveling to work at the project site and therefore would not contribute to p.m. peak hour person trips.

Impact TR-1: The proposed project would involve construction that would require a substantially extended duration or intensive activity, but the secondary effects would not create potentially hazardous conditions for people walking, bicycling, or driving, or public transit operations; or interfere with emergency access or accessibility for people walking or bicycling; or substantially delay public transit. ***(Less than Significant)***

General construction activities result in temporary conditions, and usually do not result in permanent changes to the environment, in particular, changes to the transportation circulation network. Compliance with city codes and regulations typically ensure that construction activities do not result in potentially hazardous conditions to people walking, bicycling, riding transit and/or transit conditions. The SF Guidelines Construction Analysis Screening Criteria Checklist[25] sets forth screening criteria for determining whether or not further analysis is needed relating to potential construction impacts. The screening criteria is a two-step approach that first considers project context. If the project context is such that there is relatively little travel activity that could be disrupted by construction activities, then detailed construction analysis is not needed. If, however, the project site context includes travel activity that could be substantially disrupted by project construction activities, then consideration of the duration and magnitude of construction activities is needed to determine if further evaluation is warranted. These screening criteria include the following:[26]

1. **Project Site Context**. The level of travel activity in the project site study area (site context) including volumes of people walking, bicycling, riding transit, and driving, as well as the presence of transit facilities (routes and/or stops) and emergency service operator facilities are such that further construction analysis would not be needed. The following are examples of project site context such that further construction analysis would not be needed:
    a. The site surrounding is not well-served by multiple other ways of travel and may be characterized by a lack of or substandard sidewalks, bicycle facilities, or transit routes or transit stops in the study area such that there would be little interference with modes of travel due to project construction activities; and
    b. The amount of excavation is less than two levels below ground surface; and/or
    c. The amount of demolition would result in less than 20,000 cubic yards of material removed from the site.
2. **Construction Duration and Magnitude**. The level of intensity of project construction activities as well as anticipated duration for project construction is a circumstance such that further construction analysis would not be needed. The following are examples under which the construction magnitude and duration would be such that further construction analysis would not be needed:
    d. Construction is anticipated to be completed in 30 months or less.
    e. Construction of a project is not multi-phased.

The project site context is an industrial area characterized by storage facilities, warehouses, a freeway, and other industrial uses. Given the industrial nature of the project area and presence of substandard sidewalks

25 San Francisco Transportation Impact Analysis Guidelines, Appendix N Construction, October 2019, available at: https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update#impact-analysis-guidelines

26 Ibid.

(e.g., south side of Cesar Chavez Street and north side of Marin Street), bicycle and pedestrian activity is low. In May 2022, there were approximately 51 a.m. peak hour and 30 p.m. peak hour bicycle crossings and approximately 21 weekday A.M. peak hour and 15 P.M. peak hour pedestrian crossings at the Evans Avenue and Cesar Chavez Street intersection.[27] San Francisco Muni Route 19 serves the project area on Evans Street.

The project would excavate and grade approximately 40,900 cubic yards of material at the site, and result in approximately 26,100 cubic yards of soil reuse on site, 14,800 cubic yards of soil export, and 3,000 cubic yards of soil import. Project construction is anticipated to last approximately 40 months and would require approximately 5,190 roundtrip haul and delivery truck trips and 3,914 roundtrip vendor truck trips. The number of construction trucks traveling to and from the project site would vary, depending on the type of construction activity. Depending on the construction phase, anticipated daily construction truck trips would include between two and nine delivery and haul truck trips and between two and four vendor truck trips. An average of 50 construction workers are expected to be on the site daily, with the exception of the building erection phase during which an average of 90 workers would be onsite daily. Construction workers primarily would be working on site between 7:00 a.m. and 6:00 p.m., with most workers arriving at the project site before the morning-commute peak hour and departing during the afternoon commute peak hour. Due to the size of the project site, construction activities and staging areas would occur within the project site. Project construction would require temporary closure of the sidewalks and parking lanes along Marin Street and the bike lane and sidewalks along Evans Avenue during curb, gutter, and sidewalk construction. The project would not require the closure of any public roadways or traffic lanes, nor require changes to transit facilities, including transit stops.

Project construction would comply with the San Francisco Municipal Transportation Agency's (SFMTA) San Francisco Regulations for Working in San Francisco Streets (known as the Blue Book), which sets the rules and guidance for work in San Francisco's public rights-of-way so that construction work can be done safely and with the least possible interference with pedestrian, bicycle, transit, and vehicular traffic. In accordance with the Blue Book, SFPUC would ensure that that pedestrians are notified of alternative pedestrian access routes and detours by posting adequate signage. Furthermore, in accordance with Blue Book requirements, the SFPUC would coordinate with SFMTA and the public works department for temporary closure of the sidewalks along Marin Street and Evans Avenue.

In addition, the SFPUC's Standard Construction Measure 4 (Traffic) requires that traffic control measures be implemented as a part of the project to minimize potential impacts from truck traffic on circulation and public transit operations and reduce potential safety hazards associated with proposed construction activities. These traffic control measures may include scheduling truck trips during non-peak hours to the extent feasible; deployment of flaggers where workers or equipment would temporarily block a travel lane for access into and out of the project site; use of flaggers, illuminated signs, a temporary stop sign, or a combination of these methods to slow approaching traffic where construction trucks are making wide turns; and storage of all equipment and materials in designated on-site staging areas to minimize obstruction of traffic, and measures to maintain safe pedestrian circulation on sidewalks affected by construction of the project.

Given the site location in an industrial area with low pedestrian and bicycle activity, on-site staging and construction activities, and the relatively low number of average daily truck and worker trips, as well as

27 Islais Creek Bridge Project Draft Environmental Impact Report (Case No. 2022-000112ENV), November 2023

implementation of SFPUC's Standard Construction Measure 4 (Traffic), the extended duration of project construction or intense activity would not result in interference to people walking, bicycling, or driving, including transit, the project would not create potentially hazardous conditions or substantially interfere with accessibly during construction of the project. No mitigation is required.

Project construction would not require the closure of any public roadways or travel lanes or changes to the roadway network that could restrict emergency access. Although the project construction may temporarily generate additional truck and vehicle trips, construction-related trips would not increase to a level such that emergency vehicles in the project vicinity would be hindered, especially given the project's required implementation of Standard Construction 4 (Traffic), as explained above. Additionally, there are no emergency response facilities in the immediate vicinity of the project site. Emergency access would be maintained to the project site via Marin Street throughout the duration of construction. As a result, the project would result in a less than significant impact relative to the creation of inadequate emergency access. No mitigation is required.

Impact TR-2: The proposed project would not create potentially hazardous conditions for people walking, bicycling, or driving or public transit operations. ***(Less than Significant)***

Driving and Transit Operations

Operation of the project would not result in any changes to public rights-of-way that would result in hazards for people driving. The primary point of vehicular ingress and egress to the project site would be provided via Marin Street. Marin Street is a two-way thoroughfare with one lane in either direction with no outlet at the eastern terminus of the roadway. Along Marin Street, the three curb cuts would be removed during sidewalk replacement, and two new curb cuts would be installed—one that is 42 feet and another that is 50 feet. An additional 30- to 50-foot-long curb cut would be installed along Cesar Chavez Street to upgrade the existing ingress/egress, which currently measures 80 feet, and which would be changed to egress-only under the project in increase safety.

As shown in Table 7 (p. 42), operation of the project would generate a total of approximately 191 p.m. peak hour vehicle trips leaving the project site. However, because the project involves the relocation of operations at other existing facilities, primarily the existing operations at 1990 Newcomb Avenue approximately one mile from the project site, the project's trip generation would not represent substantial numbers of new vehicle trips within the local grid network. Vehicle trips would also be distributed across the surrounding grid network. Vehicle trips would start and end at the project site within the project site parking areas. This number of trips accessing the project site driveways and crossing the sidewalk is not substantial because the project site is closed to the public and because Marin Street dead ends at the eastern end of the project site; meaning, few conflicts with pedestrians or other vehicles would likely result on Marin Steet during project operations. Vehicle ingress/egress locations from the project site would be similar to the existing project site, except that ingress to the site from Cesar Chavez Street would be removed. Improvements to the existing egress on Cesar Chavez Street may result in an increase in vehicles exiting the project site at this location, compared to existing conditions. However, traffic signage (e.g., stop sign, yield sign) would be installed at the Cesar Chavez Street egress to reduce conflicts with vehicles and bicycles traveling east on Cesar Chavez Street.

Project implementation would not alter the established street grid or result in any other changes that could adversely affect traffic circulation or public transit operations adjacent to or near the project site. Vehicles exiting the project site would not be near an adjacent transit stop. Therefore, operation of the project would not create potentially hazardous conditions for driving or public transit operations. As a result, the impact on traffic circulation would be less than significant. No mitigation is required.

Walking

During operations, the project would generate approximately 191 p.m. peak hour vehicle trips. The project would not add a substantial number of vehicle trips to the surrounding street network, compared to existing conditions, such that it would result in hazardous conditions for pedestrians, due to the reasons that follow. The project's pedestrian access points would be along Marin Street. Walking person trips generated by the project would be primarily along Marin Street and Evans Avenue. As stated above, the project site is currently closed to the public and would remain closed to the public. Furthermore, Marin Street terminates at the eastern end of the project site with no through-access; therefore, public pedestrians would not use Marin Street as a thoroughfare, consistent with the existing condition at this location. Although project site conditions (such as the lack of an outlet along Marin Street) and the industrial nature of the project site and surrounding area would result in a low number of pedestrian daily trips, the project was conservatively projected to generate approximately 46 pedestrian daily walking trips. The project's generation of vehicle trips has the potential to conflict with pedestrian trips, which could create hazardous conditions for pedestrians. However, the project would demolish and replace the existing gutters, curbs, and sidewalks along Marin Street and Evans Avenue. The project also would construct ADA-compliant curb ramps at the southeast, southwest, and northeast corners of the intersection of Evans Avenue and Cesar Chavez Street. At the same intersection and on Cesar Chavez Street at the eastern end of the retaining wall along the northern boundary of the project site, pedestrian barriers would be placed to safely guide pedestrians to the north side of Cesar Chavez Street because Cesar Chavez Street does not have adequate sidewalks for pedestrians along the south side of the roadway. The proposed pedestrian barriers, sidewalks, and ADA-compliant curb ramps would improve safety for pedestrians and would not alter the existing pedestrian network such that it would create potentially hazardous conditions for people walking. As a result, the impact on pedestrian circulation would be less than significant. No mitigation is required.

Bicycling

Designated bicycle routes are located along Cesar Chavez Street and Evans Avenue. The addition of 191 operational vehicle trips during the p.m. peak hour at the project location would not represent substantial numbers of new vehicle trips within the local grid network (as discussed above). Vehicle ingress/egress locations from the project site would be similar to the existing project site, except that ingress to the site from Cesar Chavez Street would be removed. As discussed above, improvements to the existing egress on Cesar Chavez Street may result in an increase in vehicles exiting the project site at this location. However, the proposed traffic signage (e.g., stop sign, yield sign) to be installed at the Cesar Chavez Street egress would reduce conflicts with bicyclists traveling east on Cesar Chavez Street. Additionally, use of the egress on Cesar Chavez Street would be limited to fleet vehicles; employee vehicles would exit on Marin Street. As a result, the project's potential to result in conflicts with bicyclists along Cesar Chavez Street, Evans Avenue, or other surrounding streets would be minimized and the project would not create new, potentially hazardous conditions for people bicycling. Furthermore, the project would not alter the existing street grid, reconfigure the intersections near the project site, or introduce other physical features that would create potentially

hazardous conditions for bicyclists. Therefore, the impact on bicycle circulation would be less than significant. No mitigation is required.

Impact TR-3: The proposed project would not interfere with accessibility of people walking or bicycling to and from the project site, and adjoining areas, or result in inadequate emergency access. ***(Less than Significant)***

Pedestrian and Bicycle Access

As discussed above, the project would not alter the established street grid, permanently close any streets or sidewalks, or eliminate or reconfigure any existing bicycle routes. The project's pedestrian access points would be along Marin Street. Walking person trips generated by the project would be primarily along Marin Street and Evans Avenue The project would replace sidewalks along Marin Street and Evans Avenue, establish three ADA-compliant curb ramps at the intersection of Evans Avenue and Cesar Chavez Street, and install pedestrian barriers at the intersection of Evans Street and Cesar Chavez Street and on Cesar Chavez Street at the eastern end of the retaining wall along the northern boundary of the project site. These improvements would improve pedestrian accessibility to and from the project site. The project would not remove or change any of the existing bicycle facilities or otherwise interfere with bicycling accessibility to and from the project site. The project would generate approximately 11 p.m. peak-hour walking trips and two p.m. peak-hour bicycle trips. Given the project's low generation of pedestrian and bicycle trips, the project would not create overcrowding or otherwise interfere with accessibility for people walking or bicycling. Therefore, the project would not interfere with accessibility for people walking or bicycling to and from the project site. As a result, the impact on pedestrian and bicycle access would be less than significant. No mitigation is required.

Emergency Access

As previously discussed, the project would not result in the closure of any streets or any alterations to the roadway network that could restrict emergency access to the project site. Therefore, emergency access to the project site would remain substantially similar to existing conditions. As discussed under Section D.13, Public Services, the project site receives police and fire emergency services from the San Francisco Police Department Bayview Station and the San Francisco Fire Department Battalion 10 within 1.3 miles and 0.4 mile of the project site, respectively. The project would continue to accommodate emergency access to the project site via Marin Street. Although the project would relocate existing vehicle trips in the vicinity to the project site, the relocated vehicle trips would not be sufficient to impede or hinder the movement of emergency vehicles in the project area, given that similar number of trips are currently generated by the facility at 1990 Newcomb Avenue, which would be replaced by the project. Furthermore, the project would not introduce any new design features that could impede or hinder the movement of emergency vehicles in the project area. As a result, the impact on emergency access would be less than significant. No mitigation is required.

Impact TR-4: The proposed project would not substantially delay public transit. ***(Less than Significant)***

The project would relocate 191 vehicle trips during the p.m. peak-hour. This level of p.m. peak hour vehicle trips is below the planning department's transit delay screening criterion of 300 p.m. peak-hour vehicle trips,

which is the amount of traffic with the potential to substantially delay public transit vehicles operating on routes adjacent to a project site. Additionally, the driveways to access the project site are located along Marin Street and the driveway for vehicle egress is located along Cesar Chavez Street, which are not along Muni routes or adjacent to Muni stop locations. The project would not include any changes on street frontages with existing bus facilities and would not alter or move any existing transit facilities. Thus, the project would not substantially delay public transit. As a result, the impact on public transit would be less than significant. No mitigation is required.

Impact TR-5: The proposed project would not cause substantial additional vehicle miles traveled or substantially induce additional automobile travel by increasing physical roadway capacity in congested areas or by adding new roadways to the network. ***(Less than Significant)***

A project would have a significant transportation impact on the environment if it would cause substantial additional VMT or substantially induce automobile travel. VMT per person (or per capita) is a measurement of the amount and distance that a resident, an employee, or a visitor drives, accounting for the number of passengers in a vehicle. In general, higher VMT areas are associated with more air pollution, including GHG emissions and energy use, than lower VMT areas. Many interdependent factors affect the amount and distance a person may drive. In particular, the built environment affects how many places a person can access within a given distance, time, and cost, using different modes of travel (e.g., private vehicle, public transit, bicycling, walking). Typically, low-density development at great distances from other land uses and in areas with few options for modes of travel provides less access than locations with high-density, mixed land uses and numerous modes of travel. Therefore, low-density development typically generates more VMT compared to a similarly sized development in urban areas, such as the project site.

Based on these travel behavior factors, on average, people living or working in San Francisco contribute to lower VMT per person than people living or working elsewhere in the nine-county San Francisco Bay Area. In addition, on average, people living or working in some areas of San Francisco result in lower VMT per person than people living or working elsewhere in San Francisco.

San Francisco displays different amounts of VMT per capita geographically through transportation analysis zones (TAZs). TAZs are used in transportation planning models for transportation analysis and other planning purposes. The San Francisco County Transportation Authority uses the San Francisco Chained Activity Modeling Process to estimate VMT by private automobiles and for-hire vehicles for different TAZs.[28]

To help determine whether a project would result in substantial VMT, the planning department uses a map-based screening tool that depicts existing VMT levels in San Francisco for residential, office, and retail land uses. Other land uses may use the residential, office, and retail as a proxy for determining VMT per capita or per employee, per the SF Guidelines. The planning department uses these maps and associated data to determine whether a project is in an area of the city that is below the VMT threshold. If a project is located within a transportation analysis zone that exhibits low levels of VMT, then it is presumed that VMT impacts would be less than significant and a detailed VMT analysis is not required.

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28 San Francisco Planning Department, 2019, Transportation Impact Analysis Guidelines, Appendix L Vehicle Miles Traveled/Induced Automobile Travel.

The project site is in TAZ 487. Office-type projects are used as a proxy for Production, Distribution, and Repair uses in calculating VMT.[29] The SF Guidelines identify substantial additional VMT as exceeding the regional VMT per employee minus 15 percent. The nine-county San Francisco Bay Area average daily regional VMT per employee for office-type projects is 19.1. Thus, the threshold of significance is 16.2. Table 8 shows the existing average daily VMT per employee for office uses in TAZ 487, which is approximately 27 percent lower than the regional Bay Area average.

Table 8 Existing Average Daily Vehicle Miles Traveled in TAZ 487

Land Use	Bay Area Regional Average	Bay Area Regional Average Minus 15 Percent (Significance Threshold)	TAZ 487
Office	19.1	16.2	13.95

SOURCE: San Francisco Planning Department, 2022, SF Travel Demand Tool, available at https://sftraveldemand.sfcta.org/, accessed on April 5, 2024.

The project would have a VMT of more than 15 percent below existing regional averages and would not contribute to any substantial cumulative increase in VMT. For the reasons described above, the project would not cause substantial additional VMT or substantially induce additional automobile travel. As a result, the impact relative to VMT would be less than significant. No mitigation is required.

Impact TR-6: The proposed project would not result in a loading deficit. *(Less than Significant)*

Freight Loading

There is no designated on-street freight loading in the project vicinity. The project area is comprised primarily of land uses that accommodate all loading operations on site, and no commercial loading operations currently occur on-street. Off-street freight loading facilities are present at the existing project site and all freight loading for the project would continue to occur on site. The project's onsite freight-loading facilities would be able to meet its own freight loading demand during average and peak-hour periods due to the amount of available space onsite. Thus, the project would not result in a freight loading demand that could cause a loading deficit. As a result, impacts relative to freight loading demand would be less than significant. No mitigation is required.

Passenger Loading

There are no designated on-street passenger loading zones or facilities at the existing project site along Marin Street, Evans Avenue, or Cesar Chavez Street and none are proposed as part of the project. All passenger loading for the project would be accommodated on site such that passenger loading for the project would be able to meet passenger loading demand during average and peak-hour periods. Thus, the project would not result in a passenger loading demand that could cause a loading deficit. As a result, the impact relative to passenger loading would be less than significant. No mitigation is required.

29 San Francisco Planning Department, 2019, Transportation Impact Analysis Guidelines, Appendix L Vehicle Miles Traveled/Induced Automobile Travel.

Impact C-TR-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on transportation and circulation. ***(Less than Significant)***

The geographic scope for potential cumulative impacts would include roadways where the cumulative development projects would have the potential for overlapping effects with the project (i.e., use of same roadways). The cumulative transportation impact assessment includes the following nearby cumulative development projects: Channel Force Main Intertie Project, Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, Islais Creek Bridge Project, 1111 Pennsylvania Avenue, Potrero Hope SF, 1399 Marin Street, and 1801 Evans Avenue. The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, Channel Force Main Intertie Project, 1801 Evans Avenue, and 1399 Marin Street projects did not require transportation studies because they would not contribute substantial net new operational vehicle trips to the area. After construction of the Islais Creek Bridge Project is complete, transportation and circulation across Third Street would be restored to existing conditions. The Islais Creek Bridge Project would not result in new operational vehicle trips to the area.

Construction

The construction cumulative analysis considered project construction-phase traffic and cumulative development projects where construction schedules would overlap. Construction of the project could overlap with construction of the following cumulative projects: Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, Channel Force Main Intertie Project, 1111 Pennsylvania Avenue, Potrero Hope SF, 1399 Marin Street, 1801 Evans Avenue, and the Islais Creek Bridge Project. Construction of the project and cumulative projects could result in a significant cumulative transportation impact if combined construction activities would result in potentially hazardous conditions or interfere with access for pedestrians, bicyclists, motorists, transit operations, and emergency vehicles.

None of the cumulative projects were determined to result in a significant construction impact related to transportation with the exception of the Islais Creek Bridge Project. The Islais Creek Bridge Project would close the existing Islais Creek Bridge during construction activities. Vehicles, pedestrians, and bicyclists would be diverted from the Islais Creek Bridge to surrounding roadways, including the adjacent Illinois Street Bridge and Cargo Way. Closure of the Islais Creek Bridge is unlikely to disrupt construction activities for the proposed project and the other cumulative projects, because construction traffic to and from the proposed project and cumulative project sites would likely use the on- and off- ramps to U.S. 101 or I-280 at Cesar Chavez Street, San Bruno Avenue, or Bayshore Boulevard, which are not the roadways that would be used to divert traffic from Islais Creek Bridge. The Islais Creek Bridge Project would also affect the operation of Muni's T-Third Street light rail line, 15-Bayview-Hunters Point Express, 91-Third Street/19th Avenue Owl and Third Street bus routes during construction of the bridge and would have a significant and unavoidable effect on public transit with mitigation. Therefore, this analysis conservatively presumes that a significant cumulative traffic impact could result.

As discussed under Impact TR-1, construction of the project would not require the closure or modification of any public roadways, bicycle lanes, or transit facilities. The sidewalk along Marin Street and Evans Avenue would be closed temporarily during construction, but safe pedestrian circulation would be maintained through the area with implementation of SFPUC's Standard Construction Measure 4 (Traffic) and compliance with SFMTA blue book and the San Francisco Public Works Code requirements. Furthermore, implementation of traffic control measures in accordance with SFPUC's Standard Construction Measure 4 (Traffic) (e.g., scheduling truck trips during non-peak hours to the extent feasible; use of flaggers, illuminated

signs, and/or a temporary stop sign to slow approaching traffic where construction trucks are making wide turns; storage of all equipment and materials in designated on-site staging areas to minimize obstruction of traffic) would reduce the project's potential to create hazardous conditions. Therefore, the project would not result in a cumulatively considerable contribution to a significant cumulative impact related to potentially hazardous conditions or interfere with access for pedestrians, bicyclists, motorists, transit operations, and emergency vehicles (less than significant).

Operations

Hazardous Conditions and Accessibility

As stated above, the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, Channel Force Main Intertie Project, 1801 Evans Avenue, and 1399 Marin Street projects would not contribute substantial net new vehicle trips to the area. The 1111 Pennsylvania Avenue project and Potrero Hope SF project would increase the level of vehicle trips in the project vicinity; however, trips generated by these cumulative projects would be geographically dispersed across the roadway network in the Bayview District and neither are located along the project frontages along Marin Street, Evans Street, or Cesar Chavez Street. As such, the project, in combination with the identified cumulative projects, would not result in substantial changes to traffic circulation that could lead to potentially hazardous conditions for people walking, bicycling, driving, or transit operations.

Similarly, the identified cumulative projects would not result in substantial changes to pedestrian or bicycle facilities along the project frontages on Marin Street, Evans Avenue, or Cesar Chavez Street that could interfere with or hinder pedestrian, bicycle, or emergency access to and from the cumulative project sites and adjoining areas. Additionally, the 1111 Pennsylvania Avenue and Potrero Hope SF cumulative projects would improve accessibility for people walking bicycling, and driving by including streetscape improvements, sidewalks, on-site bicycle facilities and parking, and off-site bicycle parking. The identified cumulative projects and the project would be required to comply with the city policies' design standards, including the Better Streets Plan.

Thus, no significant cumulative impacts related to potentially hazardous conditions or accessibility for people walking or bicycling, or relative to inadequate access for emergency vehicles would occur (less than significant).

Public Transit

As discussed under Impact TR-4, the SF Guidelines set forth a screening criterion for projects that typically would not result in significant public transit delay effects. The project would generate 191 vehicle trips during the p.m. peak-hour, which would be less than the screening criterion of 300 peak-hour vehicle trips. Under cumulative conditions, the cumulative development projects could result in substantial increases in vehicle traffic to surrounding roadways on which public transit would operate. The 1111 Pennsylvania Avenue project would generate 82 p.m. peak-hour vehicle trips, which would be below the planning department's transit delay screening criterion of 300 peak-hour vehicle trips under cumulative conditions.

The Potrero Hope SF project would generate 1,069 p.m. peak-hour vehicle trips, which would exceed the planning department's screening criteria. The Potrero Hope SF project would have a significant and unavoidable impact on the Muni 10-Townsend line and would implement mitigation to provide a fair-share

contribution to improve capacity for the 10-Townsend line.[30] While the project would relocate 191 p.m. vehicle trips on local roadways, project vehicle trips existing in the vicinity would continue to be distributed across the surrounding road network and would therefore not make a cumulatively considerable contribution to a significant cumulative impact on operation of the Muni 10-Townsend line. The 1801 Evans Avenue project would increase operation activities, and the 1399 Marin Street project would modify the SFMTA bus maintenance warehouse to modernize the maintenance function and efficiency. However, neither of these projects would substantially affect vehicular circulation or increase peak-hour vehicle or transit trips in the project vicinity that would cause substantial transit delay. The Channel Force Main Intertie Project would construct an intertie between the Channel Force Main and the Islais Creek Transport/Storage Box, and the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would replace existing water mains. Both projects are subsurface and would not permanently nor substantially affect vehicular circulation or transit trips in the project vicinity that would cause substantial transit delay. Once operational, the Islais Creek Bridge Project would restore existing access to Third Street and would not impact transit operations or facilities. Therefore, these identified cumulative projects also would not result in a significant cumulative impact relative to substantial public transit delay (less than significant).

Vehicle Miles Traveled

VMT generally is a cumulative impact. The number and distance of vehicular trips associated with cumulative projects may contribute to the secondary physical environmental impacts associated with VMT. No single project by itself would likely be sufficient in size to prevent the region or state to meet a VMT reduction goal. Instead, a project's individual VMT would contribute to cumulative VMT impacts. As described under Impact TR-5, the project would meet the project-level screening criteria, and therefore would not result in significant VMT impacts. As shown in Table 9, the future (2040) average daily VMT per employee for office uses in TAZ 487 would be approximately 28.6 percent lower than the future (2040) Bay Area regional average and, therefore, would not contribute considerably to any substantial cumulative increase in VMT.

Table 9 Cumulative 2040 Average Daily Vehicle Miles Traveled in TAZ 487

Land Use	Bay Area Regional Average	Bay Area Regional Average Minus 15 percent (Significance Threshold)	TAZ 487
Office	17.1	14.5	12.21

SOURCE: San Francisco Planning Department, 2022, SF Travel Demand Tool, available at https://sftraveldemand.sfcta.org/, accessed on April 5, 2024. Loading

Loading

The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, Channel Force Main Intertie Project, and Islais Creek Bridge Project would not generate any loading demand as these projects are infrastructure projects that would not result in new operational vehicle trips. As stated above, 1801 Evans Avenue and 1399 Marin Street projects would not contribute substantial net new vehicle trips to the area and impacts related to loading would not occur.

The 1111 Pennsylvania Avenue Project would generate an estimated peak-hour demand for two freight loading spaces, which would be accommodated by two on-site freight loading spaces proposed by this

30 San Francisco Planning Department, 2016 (June), *Potrero Hope SF Master Plan Final EIR/EIS*.

cumulative project. The 1111 Pennsylvania Avenue Project is estimated to generate demand for one passenger loading space in a given minute during the p.m. peak hour, which would be accommodated by three on-street passenger loading spaces proposed along the project frontage on 25th Street and the cumulative project site. The Potrero Hope SF Project would generate a demand of three freight loading spaces during the average hour and four freight spaces during the peak hour of loading demand. The Potrero Hope SF Project includes a minimum of 18 on-street loading spaces throughout the project site, which would meet this loading demand. The same on-street loading spaces that could be provided for freight loading would also be used for passenger pick-up/drop-off activities within the project site. Therefore, these identified cumulative projects also would not result in a significant cumulative impact relative to loading deficit and would not combine with the proposed project to result in a significant cumulative impact related to loading (less than significant).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
6. NOISE. Would the project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan area or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒

The project site is not in the vicinity of a private airstrip or an airport land use plan area or in an area within 2 miles of a public airport or public use airport. Therefore, Topic D.6.c is not applicable to the project and is not discussed further.

Existing Noise Sources and Levels

The project site is in an industrial area with noise sources characteristic of an urban setting. Dominant noise sources include noise from highway and vehicular traffic along I-280, Cesar Chavez Street, and Evans Avenue, with Caltrain rail operations (which includes train tracks located approximately70 feet east of the project site) and aircraft overflights also contributing to the ambient noise levels in the project vicinity.

Long-term noise measurements were conducted by Charles Salter Associates at the project site to characterize existing ambient noise levels.[31] Noise measurements were taken between October 18 and 23, 2023, and again between October 27 and 31, 2023. The results of the measurements are shown in Table 10. The locations of the noise measurements are shown on Figure 7, p. 56.

Noise-Sensitive Receptors

Noise-sensitive receptors generally include hospitals, skilled nursing/convalescent care facilities, schools, daycares, churches, libraries, and residences. The nearest noise sensitive receptor is the residential complex at 1250 Missouri Street, which is approximately 300 feet north of the nearest proposed project building site and approximately 260 feet north of the nearest project construction area (i.e., the northern boundary of the project site). The nearest education facility is the Arise Educational Center, approximately 415 feet north of the nearest proposed project building site and approximately 370 feet north of the nearest project construction area. No noise sensitive land uses are south, west, or east of the project site, because land uses in those areas are limited to parking lots, industrial uses, and transportation infrastructure.

Existing Vibration Sources

The Caltrain railroad tracks, approximately 70 feet west of the project site, are an existing source of vibration.[32] No other major sources of vibration are in the project vicinity.

Vibration-Sensitive Receptors

Receptors that are sensitive to vibration include structures (especially older masonry structures), older utilities, people (especially residents, the elderly, and the sick), and equipment (e.g., magnetic resonance imaging equipment and high-resolution lithographic, optical, and electron microscopes).[33] The primary vibration-sensitive receptors in the project area are structures that could be susceptible to damage, and people, who could be susceptible to vibration-related annoyance, particularly during nighttime hours. Project construction areas would be at least 70 feet from the nearest offsite structures, which are commercial buildings north of Cesar Chavez Street. The nearest vibration sensitive receptor is the residential complex at 1250 Missouri Street, approximately 260 feet north of the project site.

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31 Charles Salter Associates, 2023, Ambient Noise Measurement Data for SFPUC CDD Headquarters. Accessed on April 3, 2024.

32 Vibration is the physical manifestation of energy carried through the earth and structures. Groundborne vibration consists of rapidly fluctuating motions or waves. It has the potential to annoy people and damage buildings. The most common descriptor used to quantify construction vibration amplitude in relation to impacts on structures is the peak particle velocity (PPV), defined as the maximum instantaneous peak of the vibration signal in inches per second (in/sec).

33 Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment*. FTA Report No. 0123. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed January 30, 2024.

Table 10 Long-term Noise Measurement Results

Measurement	Measurement Location	Lowest Daytime Weekday L_{90}[b]	Lowest 24-Hour L_{eq}[c]/L_{90}	Weekday Average dBA L_{dn}[d]/CNEL	Daytime Average L_{eq}/L_{90} (7 a.m. to 10 p.m.)	Lowest One Hour Weekday Noise Level dBA L_{eq} (7 a.m. to 6 p.m.)[a]	Construction Hours Average L_{eq} (7 a.m. to 6 p.m.)	Nighttime Average L_{eq}/L_{90} (10 p.m. to 7 a.m.)
LT-1	Approximately 70 feet south of the intersection of Cesar Chavez Street and Connecticut Street	54	55/48	67/67	62/56	61	63	59/54
LT-1	Northeast corner of the project site, approximately 215 feet west of the Caltrain tracks	57	60/47	73/73	69/63	68	70	65/57
LT-1	Approximately 100 feet north of Marin Street and 220 feet east of Evans Avenue	56	52/48	69/69	63/61	59	63	61/60

SOURCE: Charles Salter Associates, 2023

NOTES:

LT = long-term noise measurement.

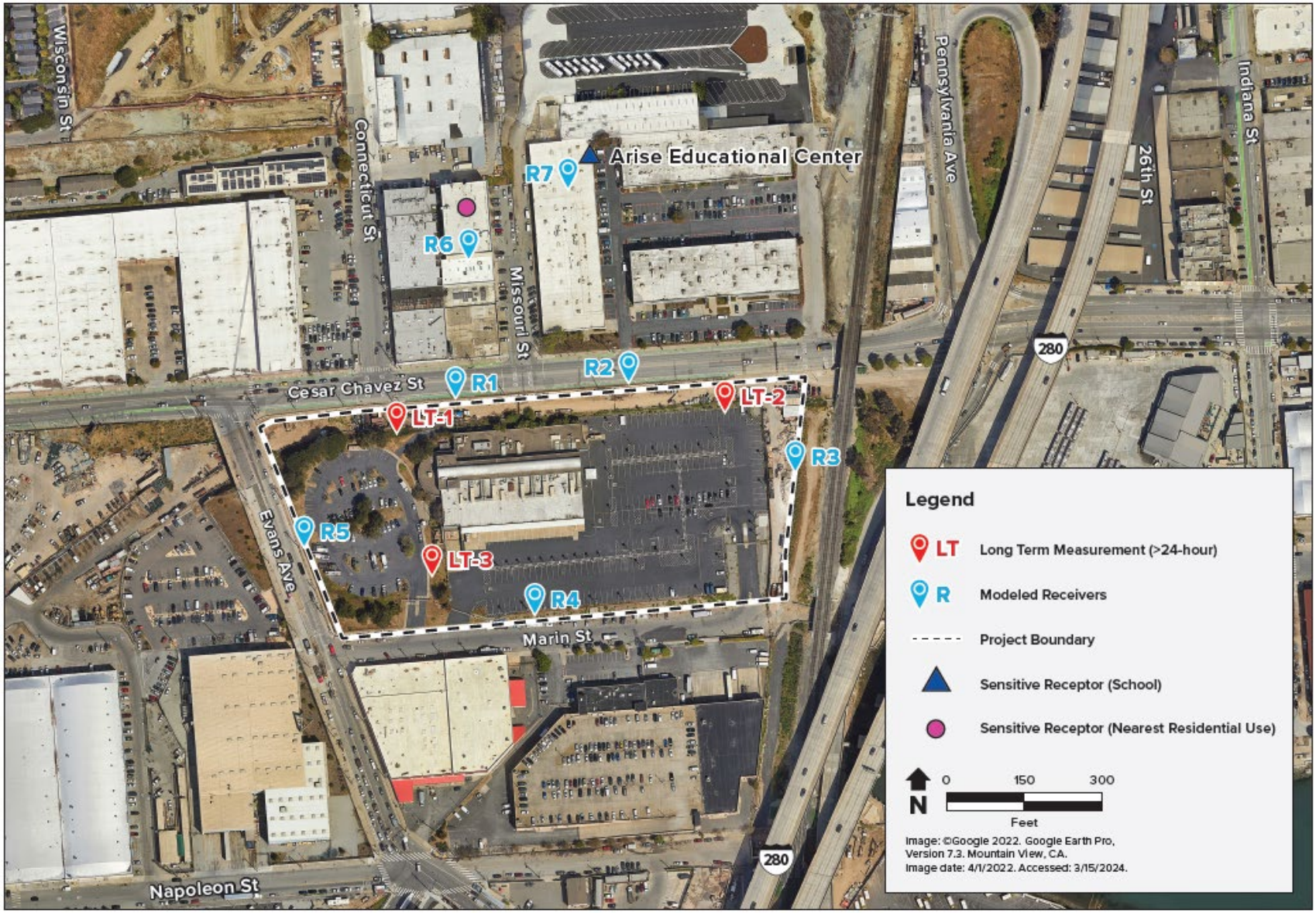
[a] Typical hours from project construction would be weekdays from 7 a.m. to 6 p.m.

[b] L_{90} is the level of noise exceeded 90 percent of the time and is a conservative representation of ambient conditions.

[c] L_{eq} is the equivalent steady-state sound level containing the same total acoustical energy as a time-varying signal over a given sample period. L_{eq} is typically computed over 1-, 8-, and 24-hour sample periods. The 1-hour A-weighted equivalent sound level (1-hour LA_{eq}) is the energy average of A-weighted sound levels occurring during a 1-hour period.

[d] L_{dn} is the energy average of the A-weighted sound levels occurring during a 24-hour period, with a 10-decibel penalty added to sound levels between 10 p.m. and 7 a.m.

FIGURE 7 NOISE MEASUREMENT LOCATIONS AND MODELED RECEIVERS



SOURCE: ICF, 2024 (June), Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California Case No. 2022-000702ENV.

Applicable Noise Regulations and Guidance Documents

Federal Transit Administration Guidance

The planning department uses the Federal Transit Administration's general assessment construction impact guidelines, in part, to analyze potential daytime construction noise impacts. Federal Transit Administration guidance evaluates construction noise by modeling the combined noise levels from the two loudest pieces of equipment operating concurrently and compared modeled noise levels to the Federal Transit Administration daytime noise limit of 90 dBA at nearby noise sensitive uses.[34]

City and County of San Francisco

Article 29 of the police code (the noise ordinance) regulates noise in the city, and prohibits unnecessary, excessive, and offensive noises. The noise ordinance regulating construction and operational noise is codified in police code sections 2907 through 2909, discussed in further detail below.

Construction Noise

Sections 2907 and 2908 of the noise ordinance regulate construction noise and construction work at night, respectively. Section 2907(a) limits noise from a single piece of construction equipment to 80 dBA when measured at a distance of 100 feet from such equipment or an equivalent sound level at some other convenient distance (such as 86 dBA at a distance of 50 feet). Section 2907(b) provides exemptions to the section 2907(a) limit for impact tools and other equipment (e.g., jack hammer, hoe rams, pile drivers), provided they are fitted with intake and exhaust mufflers and the acoustically attenuating shields or shrouds recommended by their manufacturers and approved by the director of public works or the director of building inspection for maximum attenuation.

Police Code section 2908 prohibits nighttime construction (between 8 p.m. and 7 a.m.) that generates noise exceeding the ambient noise level by 5 dBA at the nearest property line unless a special permit has been issued by the city. On public properties, sections 2907 and 2908 are enforced by Public Works. No nighttime work is proposed for project construction.

Operational Noise

Section 2909 of the noise ordinance provides limits on stationary source noise from any machine, device, entertainment, or combination of such sources. Police code section 2909(b) prohibits fixed mechanical equipment noise from exceeding 8 dB above the local ambient noise level as measured at any point outside the property plane. Section 2909(d) establishes a noise level limit from fixed noise sources (e.g., mechanical equipment) of 55 dBA during daytime hours and 45 dBA during the nighttime hours inside any sleeping or living room in any dwelling unit on residential property to prevent sleep disturbance with windows open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. Section 2901 of the noise ordinance defines ambient as "the lowest sound level repeating itself

34 Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment*. FTA Report No. 0123. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed January 30, 2024.

during a minimum ten-minute period as measured with a type 1 precision sound level meter, using slow response and 'A' weighting.

Approach to Analysis

Construction Noise

In addition to the construction noise regulations promulgated in Police Code sections 2907 and 2908, the planning department uses a criterion of 10 dB above the ambient noise level to assess substantial temporary ambient noise level increases from construction. A 10 dB increase in ambient noise levels corresponds to a perceived doubling of loudness. This criterion applies at the property lines of the nearest sensitive receivers.

In addition, the planning department supplements the construction noise analysis with guidance provided in the Construction Noise Assessment of the Federal Transit Administration Transit Noise and Vibration Assessment Manual.[35] Specifically, the planning department uses the general assessment daytime residential noise limit of 90 dBA at residential receptors as developed by the Federal Transit Administration. This assessment results in a reasonable worst-case scenario because it is based on the assumption that the two noisiest pieces of equipment would operate simultaneously.

If any of the above criteria are exceeded (10 dB increase in ambient noise levels or 90 dBA at noise-sensitive receptors), the planning department would evaluate the temporal frequency, duration, and intensity of the exceedance when determining whether construction noise could result in a substantial temporary increase in ambient noise levels.

Traffic Noise

Traffic noise typically produces a 3 dB increase when the existing traffic volume on a roadway doubles. An increase of less than 3 dB generally is not perceptible outside controlled laboratory conditions,[36] while a 5 dB increase is generally more readily noticeable. For vehicular traffic noise, the following planning department thresholds are applied to determine whether a project would result in significant vehicle-generated noise effects:[37]

- An increase of more than 5 dBA is considered a significant vehicular traffic noise increase in areas where the existing and resulting noise environment is considered "acceptable"; and
- In places where the existing noise environment already is degraded any noise increase greater than 3 dBA is considered a significant vehicular traffic noise increase.

35 U.S. Department of Transportation, Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, Report No. 0123, September 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, accessed April 16, 2021.

36 California Department of Transportation. 2013 (September). *Technical Noise Supplement to the Traffic Noise Analysis Protocol*.

37 San Francisco Planning Department. n.d. *Noise Impact Analysis Guidelines*.

Impact NO-1: The project would not generate a substantial temporary or permanent increase in ambient noise levels in the project vicinity in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. ***(Less than Significant)***

CONSTRUCTION

The noise ordinance limits noise from individual pieces of powered construction equipment to a level of 80 dBA Lmax at a distance of 100 feet, except for impact equipment. As shown in Table 11, no individual piece of construction equipment, including impact equipment such as a hoe ram, would exceed 80 dBA[38] when measured at a distance of 100 feet from the source. Therefore, the project would comply with police code section 2907(a).

Section 2908 of the police code prohibits construction noise between 8 p.m. and 7 a.m. if noise exceeds the ambient noise level by 5 dBA at the nearest property line unless the city has issued a special permit. Project construction typically would occur between 7 a.m. and 6 p.m., Monday through Friday, and would not involve construction at night. The project would comply with section 2908 of the police code.

The analysis of construction noise considers whether the project has the potential for the equipment to generate noise levels in excess of standards established in local noise ordinances. Reference noise levels in the Federal Highway Administration's Roadway Construction Noise Model User's Guide were used to assess noise from construction equipment. [39] Noise levels associated with the construction equipment anticipated to be used during project construction are listed in Table 11.

Daytime Construction Noise Evaluation

As discussed in the Approach to Analysis section, above, the daytime construction noise analysis evaluates noise from the two loudest pieces of equipment at sensitive receptor locations to determine if construction noise would exceed 90 dBA or be 10 dBA above the ambient noise level.[40] If so, the evaluation considers the duration and severity of noise levels in determining whether the project would result in a significant noise impact. Table 12 shows the worst-case noise levels for each major phase of construction for the proposed project. As indicated above, the worst-case noise levels assume that the two loudest pieces of equipment from each construction phase are operating simultaneously.

38 The decibel scale is used to quantify sound intensity. When addressing the effects of noise on people, the frequency response of the human ear or those frequencies that people hear the best must be considered. The frequency weighting most often used to evaluate environmental noise is "A weighting" because it best reflects how humans perceive noise. Measurements from instruments using this system and associated noise levels are reported in dBA.

39 Federal Highway Administration. 2006 (January). *Roadway Construction Noise Model User's Guide.,* Washington, DC. Available: http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf.

40 The lowest 1-hour daytime L_{eq} noise level recorded during the proposed construction period of 7 a.m. to 8 p.m. was used to represent the ambient noise level.

Table 11 Typical Noise Levels from Proposed Project Construction Equipment

Construction Equipment	Noise Level (dBA, L_{eq} at 100 feet)
Drill Rig[a]	71
Compactor (ground)	70
Air Compressor	68
Boom Concrete Pump[b]	68
Concrete Saw	77
Crane	67
Excavator	71
Hoe Ram	77
Forklift[c]	69
Front-end Loader	69
Generator	72
Grader	75
Boom Lift/Scissor Lift[e]	62
Paver	68
Roller	67
Skid Steer[b]	68
Sweeper/Scrubber	66
Welder	64

SOURCE: Federal Highway Administration, 2006, Roadway Construction Noise Model User's Guide, available: http://www.fhwa.dot.gov/environment/noise/construction_noise/rcnm/rcnm.pdf, accessed July 26, 2022.

NOTES: dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

[a] Based on auger drill rig

[b] Based on concrete pump truck

[c] Based on front-end loader

[d] Based on man lift

[e] Based on backhoe

For the purposes of this analysis, the nearest sensitive receptors are the multi-family residential structure at 1250 Missouri Street approximately 260 feet from the nearest project construction area and the Arise Educational Center approximately 370 feet from the nearest project construction area. In accordance with Federal Transit Administration guidance, noise levels from the two loudest pieces of equipment expected to operate simultaneously were combined and assumed to operate at approximately the same location. Project construction activities would consist of demolition, grading and utilities, foundations, building erection, architectural finishes, and site work for approximately 40-months.

Although noise levels at nearby receptors during project construction would vary depending on the equipment being used and the distance to the nearest noise-sensitive land use, the foundation phase of construction, during which a concrete saw and how ram would be used simultaneously, would result in the highest noise levels compared to the other construction phases, including overlapping phases. However, construction activities for this phase would take place only within the footprint of proposed project buildings, as close as 300 feet from the nearest residential use and 415 feet from the Arise Educational Center. The demolition phase would result in the second highest noise level of any subphase of construction but would occur closer to the nearest offsite receptors. For this reason, estimated noise levels for both the foundation phase and the demolition phase were included in this analysis. As presented in Table 12, which shows the estimated noise levels from the demolition and foundation phases at the nearest sensitive receptors, noise from the two loudest pieces of equipment operated simultaneously would not exceed the Federal Transit Administration 90 dBA threshold during project construction.[41]

To assess whether the project would result in a 10-dBA increase over the existing ambient noise level at the nearest sensitive receptors, modeled noise levels were compared to the measured ambient noise levels.[42] As discussed above, ambient noise measurements were collected at three locations within close proximity to the project site. The measurement locations are reasonably representative of sensitive land uses in the project vicinity because the distances between noise generating features (i.e., Cesar Chavez Street and I-280) were similar.[43]

Table 12 shows the potential worst-case construction noise increase over ambient noise levels at the nearest sensitive receptors. The project would result in an approximately 8-dBA increase in noise levels over ambient levels at 1250 Missouri Street and an approximately 6-dBA increase in noise levels over ambient levels at the Arise Educational Center. Therefore, noise from construction activities would not result in a 10 dBA or more increase in ambient noise levels at the nearest sensitive receptors.

Because construction noise would not exceed the 90 dBA L_{eq} noise threshold or result in a 10 dBA increase in ambient noise levels at the nearest sensitive sources, the project would comply with Federal Transit Administration guidance and the planning department's ambient noise level increase standards.

41 ICF, 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

42 Ibid.

43 Ibid.

Table 12 Reasonable Worse-Case Construction Noise (Demolition and Foundation Phases[a]) at Sensitive Receptors

Sensitive Receptor	Location	Phase	Closest Distance to Receptor (feet)	Modeled Construction Noise at Receptor (dBA L_{eq})[b, c]	Estimated Construction Noise at Receptor (dBA L_{eq})[d, e]	Exceeds FTA 90 dBA Criterion?	Receiver Representative of Sensitive Receptor[f]	Estimated Ambient Noise Level (dBA L_{eq})[g]	Potential Increase over Ambient (dBA)
Residential structure at 1250 Missouri Street	North of the project site along Missouri Street	Foundation	300	70	67	No	LT-3b	59	8
		Demolition	260	70	67	No			8
The Arise Educational Center	North of Cesar Chavez Street in the Potrero Business Center	Foundation	416	68	65	No	LT-3	59	6
		Demolition	370	67	64	No			5

SOURCE: ICF, 2024 (June), Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California Case No. 2022-000702ENV.

NOTES:

dBA = A-weighted decibels; L_{eq} = equivalent continuous sound level

[a] Although the foundation phase involves louder equipment, the demolition phase would take place closer to sensitive uses. Estimated foundation phase noise levels were modeled for a hoe ram and concrete saw. Estimated demolition noise levels were modeled for an excavator and concrete saw.

[b] Geometric attenuation is based on 6 dBA per doubling of distance.

[c] Modeled noise levels do not include the effects, if any, of local shielding from walls, topography, or other barriers, which may reduce the sound levels further.

[d] The northern portion of the project site is approximately 11 feet below Cesar Chavez Street. Intervening structures (i.e., commercial buildings north of Cesar Chavez Street) are between the project site and the nearest sensitive receptors. Therefore, views of the project site from the 1250 Missouri Street residential complex and the Arise Educational Center would be obscured. Because of the topography of the project site and the presence of intervening structures, noise levels would attenuate. The residences at 1250 Missouri Street and the Arise Educational Center would have a view of less than half of the project site. Therefore, a 3 dBA reduction was conservatively applied to the construction noise model at these sensitive receptors.

[e] Assumes 3 dB of reduction from intervening topography and shielding from structures.

[f] The noise monitoring location with the lowest measured ambient noise level (LT-3) was used to represent the existing ambient noise level at nearby sensitive uses (refer to the Noise Report for the for the noise monitoring locations and additional information regarding measured noise levels).

[g] The ambient noise level used in the analysis of construction noise is the lowest 1-hour L_{eq} during the typical construction hours of 7 a.m. to 6 p.m. on weekdays.

Implementation of the SFPUC's Standard Construction Measure 5 (Noise), which would require SFPUC to implement measures to minimize noise disruption to nearby sensitive receptors during construction, would further reduce construction equipment noise. These measures would include using best available noise control technologies on equipment (e.g., mufflers, ducts, and acoustically attenuating shields), locating stationary noise sources (e.g., pumps and generators) away from sensitive receptors, and erecting temporary noise barriers. As a result, project-related construction activities would not expose individuals to temporary increases in noise levels that would be in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. As a result, the noise impact would be less than significant. No mitigation is required.

Construction Traffic

Construction vendor and haul trips would have the potential to increase noise levels on local roads in the project area, including Cesar Chavez Street and Evans Avenue. The construction traffic analysis conservatively assumes a maximum of approximately 40 one-way vendor and haul truck trips to or from the project site would occur daily during the most intensive overlapping construction phases. Project construction is expected to take approximately 40 months. Although construction truck activity can result in noise in the vicinity of haul routes, truck noise would be temporary. Construction trucks would use the primary thoroughfare of Cesar Chavez Street to access nearby U.S. 101 or I-280, which borders primarily industrial uses. The trucks would not be traveling on the quieter local streets to access the nearby freeways. Finally, although a maximum of 40 one-way truck trips per day to or from the site may occur on a peak day, the total number of construction trips would usually be lower than this number. For the reasons described above, and because project construction would be temporary and would use haul routes that border primarily industrial uses, haul truck noise impacts would not be considered substantial. The impact would be less than significant. No mitigation is required.

Operations

Traffic

Project implementation would relocate vehicle trips from the existing SFPUC facilities to the project site. These relocated vehicle trips could potentially increase the ambient noise levels at noise-sensitive uses in proximity to the project area. As discussed in Section D.5, Transportation and Circulation, project operations would relocate an estimated 1,108 daily auto vehicle trips (i.e., trips by employees and small fleet vehicles) and 112 daily truck trips (i.e., trips by large fleet vehicles) to the project site. However, this analysis conservatively assumes that all employees would drive to and from the project site, resulting in an estimated 1,312 daily auto vehicle trips (1,200 daily auto trips and 112 daily truck trips).

The operational traffic noise evaluation focused on roadway segments where noise-sensitive receptors are located.[44] Cesar Chavez Street is the only roadway in the project vicinity that would provide access to the project site that also has noise-sensitive uses – the Arise Educational Center at 1760 Cesar Chavez Street. The multi-family residential structure at 1250 Missouri Street is also located in close proximity to Cesar Chavez Street. Project-related traffic noise was modeled based on data from the Federal Highway Administration

44 ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

Traffic Noise Model.[45] The measured ambient noise levels were used to represent existing conditions in the operational traffic noise assessment because the dominant noise source in the project vicinity is traffic.[46] Modeled project-only traffic noise levels were added to the existing measured traffic noise levels to estimate an existing-plus project traffic noise level for Cesar Chavez Street.[47] Table 13 shows the increase in traffic noise that would be generated by project operation. The project would result in an estimated 0.3-dB increase in traffic noise along Cesar Chavez Street. The project would therefore not result in traffic noise impacts that would exceed the planning department's 3-dBA and 5-dBA traffic noise increase thresholds. As a result, the noise impact would be less than significant. No mitigation is required.

Table 13 Operational Traffic Noise

Roadway	Roadway Segment	Existing Measured Noise (dBA L_{dn})	Project-Only Modeled[a] Traffic Noise (dBA L_{dn})	Existing Measured Noise plus Modeled Project Traffic Noise (dBA L_{dn})	Project-Related Traffic Noise Increase (dBA L_{dn})
Cesar Chavez Street	Between U.S. 101 and I-280	69b	57.4	69.3	0.3

SOURCE: ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.
NOTES:
[a] The noise levels are estimated at a distance of 50 feet from the roadway centerline.
[b] LT-3 was selected to represent existing traffic noise at the nearest residential receptor because it is approximately the same distance to the centerline of Cesar Chavez Street as the nearest residential receptor (1250 Missouri Street).

Fixed Mechanical Equipment

The project would install stationary mechanical building equipment (e.g., heating, ventilation, and air conditioning systems) as well as other noise-generating devices associated with manufacturing uses, such as drills, lathes, grinders, and sand blasters. Most of the onsite noise sources would be entirely enclosed within the project buildings. However, some mechanical noise sources would be installed on the building exterior, including rooftop mechanical equipment (e.g., air handlers, boilers, condensing units, exhaust fans, heat pumps), and some interior mechanical equipment (e.g., air handlers, exhaust fans) would be ducted through openings in the building façades. Combined noise levels were calculated for exterior mechanical equipment and interior mechanical equipment that would be ducted through building façade openings. The operational noise analysis conservatively assumes that all exterior noise sources would operate simultaneously 24 hours a day and that up to 556 vehicles (the capacity of the parking garage) would access the garage during a worst case hour.[48] Using FTA methods,[49] the noise level generated by 556 vehicles per hour would be approximately 54 dBA L_{eq} at a distance of 50 feet, which equates to a sound power level of 85.5 dBA. This parking garage noise level was incorporated into the overall operational equipment noise levels presented below.

45 Federal Highway Administration. 2008. FHWA Roadway Construction Noise Model (RCNM), Software Version 1.1. December 8. Prepared by, U.S. Department of Transportation, Research and Innovative Technology Administration, John A. Volpe National Transportation Systems Center, Environmental Measurement and Modeling Division.

46 ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

47 Ibid.

48 Ibid.

49 $L_{eq(1hr)} = SEL_{ref} + C_N - 35.6$, where $L_{eq(1hr)}$ is the resulting L_{eq} noise level in dBA, SEL_{ref} is a reference noise level of 92 dBA, and C_N is a correction for 556 vehicles relative to the standard assumption of 1,000 vehicles, calculated as $10 \times \log(556/1000)$.

Interior noise sources at the project site were not included in the analysis because they are anticipated to be negligible compared to the exterior noise sources as they would be enclosed in buildings with the doors closed and would be used intermittently during daytime operational hours.[50] Therefore, the interior noise contribution to long-term average noise levels would be reduced compared to the conservative assumption of continuous operation for the analyzed exterior sources.

As discussed above, section 2909 of the noise ordinance provides limits on stationary source noise. Section 2909(b) prohibits increases of no more than 8 dBA above the local ambient noise level, as measured at any point outside the property plane for commercial and industrial properties. Table 14 shows the anticipated noise levels at the property plane receivers (see Figure 7, p. 56) and compares the noise levels to the section 2909(b) noise limit of 8 dBA over ambient noise levels. As shown in Table 14, onsite operational equipment noise levels at the property plane would increase by up to 4 dBA over ambient noise levels for 24-hour ambient noise levels, would be less than daytime ambient noise levels at each receiver, and would not exceed the section 2909(b) 8-dBA noise limit. Onsite operational equipment noise levels at the property plane would be less than daytime ambient noise levels at each receiver and would not exceed the section 2909(b) 8 dBA noise limit.

Section 2909(d) of the noise ordinance also prohibits any fixed noise source that may cause the noise level measured inside any sleeping or living room in any dwelling unit on residential property to exceed 45 dBA between the 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. with windows open, except where building ventilation is achieved through mechanical systems that allow windows to remain closed. Table 15 (p. 67) shows the anticipated onsite operational equipment noise levels at the nearest sensitive receptors compared to the section 2909(d) daytime and nighttime interior noise limits. The modeled exterior noise levels at 1250 Missouri Street and the Arise Educational Center would be 44 dBA and 41 dBA, respectively.[51] Interior noise levels modeled at 1250 Missouri Street and the Arise Educational Center would be 19 dBA and 16 dBA, respectively.[52] Therefore, the operational noise levels generated by the project would not exceed the daytime or nighttime interior noise limits of 45 dBA between 10 p.m. and 7 a.m. or 55 dBA between 7 a.m. and 10 p.m. As a result, the noise impact would be less than significant. No mitigation is required.

Generator Noise

The project would install one 750-kilowatt emergency generator on the northwestern portion of the project site, north of the parking garage. The generator would be tested approximately once a month for 30 minutes during daytime hours. In addition, one 3-hour test would occur annually. Noise from generator testing is not regulated by the police code. However, all testing would be conducted during daytime hours when people generally are less sensitive to noise. Additionally, noise from the generator testing would be attenuated by the presence of the approximately 20-foot-tall retaining wall located approximately 40 feet north of the proposed generator, along the northern boundary of the project site. This topographic barrier would reduce noise experienced by sensitive receptors north of the project site. Because of the short-term and infrequent generator use and presence of noise-attenuating topographic features on site, the noise impact from project emergency generator testing would be less than significant. No mitigation is required.

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50 ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

51 Ibid.

52 Ibid.

Table 14 On-site Operational Equipment Noise Levels at Property Plane Receivers

Property Plane Receiver	Location	Predicted Noise Level with Operational Equipment[a] (1-hour L_{eq}, dBA)	Assessment Relative to 24-Hour Ambient Noise Levels			Assessment Relative to Daytime Ambient Noise Levels		
			Ambient Noise (Lowest Measured 24-hour L_{90}, dBA)[e]	Noise Limit (8 dB above ambient), dBA	Predicted Noise Level Exceeds Limit?	Ambient Noise (Lowest Measured Daytime L90, dBA)	Noise Limit (8 dB above ambient), dBA	Predicted Noise Level Exceeds Limit?
R1	North property plane adjacent to the proposed administration building and machine shop	52	48[b]	56	No	54[b]	62	No
R2	North property plane adjacent to the proposed warehouse	47	47[c]	55	No	61[c]	69	No
R3	East property plane, adjacent to the proposed warehouse	44	47[c]	55	No	61[c]	69	No
R4	South property plane, adjacent to the proposed auto shop	48	48[d]	56	No	56[d]	64	No
R5	West property plane, adjacent to the proposed parking garage	51	48[d]	56	No	56[d]	64	No

SOURCE: ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

NOTES:

[a] Includes onsite project mechanical equipment and parking garage noise.

[b] Based on ambient noise levels measured at LT-1

[c] Based on ambient noise levels measured at LT-2.

[d] Based on ambient noise levels measured at LT-3.

[e] The noise analysis for operational noise conservatively compares the predicted noise levels to the lowest hourly L_{90} measured during daytime hours when the project would typically be operational as well as the lowest hourly L_{90} measured over a 24-hour period. Under most conditions, the level of noise exceeded 90 percent of the time (L_{90}) is a conservative representation of ambient conditions.

Table 15 On-site Operational Equipment Noise Levels at Nearest Noise Sensitive Receivers

Sensitive Receptor	Location	Predicted Exterior Noise Level with Operational Equipment[a], 1-hour L_{eq}, dBA	Estimated Interior Noise Level, 1-hour L_{eq}, dBA[b]	Assessment Relative to Daytime[c] Interior Noise Limits		Assessment Relative to Nighttime[d] Interior Noise Limits	
				Daytime Interior Noise Limit, dBA	Predicted Noise Level Exceeds Limit?	Nighttime Interior Noise Limit, dBA	Predicted Noise Level Exceeds Limit?
Residential structure at 1250 Missouri Street	Multi-family residences north of project site at 1250 Missouri Street	44	19	55	No	45	No
The Arise Educational Center	Arise Educational Center, educational facility north of project site at 1760 Cesar Chavez Street	41	16	55	No	45	No

SOURCE: ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

NOTES:

[a] Includes onsite project mechanical equipment and parking garage noise.

[b] Assumes 25 dB exterior-to-interior noise reduction with windows closed.

[c] Daytime = 7 a.m. to 10 p.m.

[d] Nighttime = 10 p.m. to 7 a.m.

Impact NO-2: The project would not generate excessive groundborne vibration or groundborne noise levels. ***(Less than Significant with Mitigation)***

Vibration Levels

The primary vibration-sensitive receptors in the project area would be existing structures, which could be susceptible to damage, and people, who could be susceptible to vibration-related annoyance, particularly during nighttime hours. As discussed in Section A, Project Description, project construction would require the use of various types of heavy construction equipment such as vibratory rollers, hoe rams, augur drills, bulldozers, and loaded trucks, all of which would generate varying levels of groundborne vibration. Groundborne vibration decreases in intensity quickly with increased distance from the source. Typical vibration levels at various distances for relevant heavy construction equipment were calculated using the Federal Transit Administration's guidance on vibration and are shown in Table 16.

Table 16 Vibration Source Levels for Construction Equipment

Equipment	PPV (Vdb) at 1 foot[a]	PPV (Vdb) at 23 feet	PPV (VdB) at 25 feet	PPV (VdB) at 70 feet[b]	PPV (VdB) at 260 feet[c]	PPV (VdB) at 300 feet
Vibratory roller	26.250 (136)	0.238 (95)	0.210 (94)	0.045 (81)	0.006 (63)	0.005 (62)
Auger drill	11.125 (129)	0.101 (88)	0.089 (87)	0.019 (74)	0.003 (56)	0.002 (55)
Hoe ram	11.125 (129)	0.101 (88)	0.089 (87)	0.016 (74)	0.003 (56)	0.002 (55)
Large bulldozer	11.125 (129)	0.101 (88)	0.089 (87)	0.016 (74)	0.003 (56)	0.002 (55)
Loaded trucks	9.500 (128)	0.086 (87)	0.076 (86)	0.016 (73)	0.002 (55)	0.002 (54)
Small bulldozer	0.375 (100)	0.003 (59)	0.003 (58)	0.001 (45)	0.000 (27)	0.000 (26)

SOURCE: Federal Transit Administration. 2018. *Transit Noise and Vibration Impact Assessment*. FTA Report No. 0123. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed January 31, 2024.

NOTES:

PPV = peak particle velocity

VdB = vibration decibel(s)

[a] The nearest structure is the potentially historic bridge (Evans Avenue) is approximately 1 foot west of the project site.

[b] The nearest buildings are approximately 70 feet north of the project site at 1810 and 1850 Cesar Chavez Street.

[c] The nearest sensitive receptors (residences) are located approximately 260 feet north of the project site at 1250 Missouri Street.

Applicable Vibration Standards

The City and County of San Francisco regulations do not address vibration effects or provide numerical thresholds for determining when groundborne vibration impacts are considered significant. Therefore, the analysis uses peak-particle velocity thresholds from the California Department of Transportation (Caltrans)

to determine whether project construction would result in vibration impacts.[53] Construction vibrations that are equal to or exceed the vibration thresholds could result in potential damage to structures. The Caltrans vibration thresholds to prevent damage to buildings are shown in Table 17.

Table 17 Vibration Thresholds for Structural Impacts—Damage

Structure and Conditions	Maximum Peak Particle Velocity (inches/second)	
	Transient Sources	Continuous or Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

SOURCE: California Department of Transportation. 2020 (April). *Transportation and Construction Vibration Guidance Manual*.

NOTES: Transient sources would create a single, isolated vibration event (e.g., blasting or drop balls). Continuous/frequent intermittent sources include would impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

Construction

Structure Damage

The most vibration-intensive type of construction equipment would be the vibratory roller, which could generate substantial groundborne vibration. An auger drill, a hoe ram, and an excavator or large bulldozer also would be used during construction activities; however, these types of equipment generate lower levels of vibration compared with the vibratory roller. The project site is surrounded by industrial and manufacturing land uses. The nearest off-site structures are approximately 70 feet from the project site on the north side of Cesar Chavez Street and are over 45 years old. Construction could also occur within approximately 1 foot of the potentially historic bridge at Evans Avenue, near the northwest corner of the project site. This analysis conservatively assumed that the vibratory roller and other vibration-generating construction equipment could operate within 70 feet from the nearest off-site structure and that all construction equipment could operate within approximately 1 foot of the piers for the potentially historic bridge.[54] Because the vibratory roller is the most vibration-intensive piece of equipment proposed for use, the vibration modeling is based on a vibratory roller operating within 1 foot of the bridge's piers. Because of the age of the offsite structures and the potentially historic nature of the bridge, the "historic and some old buildings" Caltrans vibration criterion is used.

The vibratory roller would generate a peak particle velocity of 0.045 inches per second (in/sec) at a distance of 70 feet, which is below the Caltrans damage criteria for "historic and some old buildings" (peak particle velocity of 0.25 in/sec).[55] In addition, project construction equipment would be operating predominantly at a

53 The maximum rate or velocity of particle movement is the commonly accepted descriptor of the vibration "strength." This is referred to as the peak particle velocity and typically is measured in inches per second.

54 ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

55 Ibid.

distance beyond 70 feet from the nearest offsite structures because of the size of the project site, which would result in lower vibration levels experienced at off-site locations. The vibratory roller would generate a peak particle velocity of approximately 26 in/sec at a distance of 1 foot (i.e., the distance to the piers of the potentially historic bridge), which would exceed the 0.25 peak particle velocity in/sec Caltrans damage criteria for historic structures. Construction with a vibratory roller occurring closer than 23 feet from this bridge could result in vibration levels in excess of the applicable criterion (as shown in Table 16), and vibration levels for other heavy equipment types (e.g., large bulldozer, auger drill, hoe ram) could exceed the applicable criterion at distances of less than 13 feet, which could result in a significant vibration impact on the bridge.

However, implementation of **Mitigation Measure M-NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction** would minimize vibration-related damage impacts from construction at the potentially historic bridge by requiring preparation of a project-specific pre-construction survey and vibration management and monitoring plan following the demolition phase of the project, and to be implemented for all phases of construction following the demolition phase of the project.[56] The measure would also require monitoring to ensure that damage effects would not occur or would be repaired appropriately. As a result, impacts related to construction vibration would be less than significant with mitigation incorporated.

Mitigation Measure M NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction

After completion of the demolition phase of the project and prior to the start of the grading and utilities construction phase, the project sponsor shall submit a project-specific Pre-construction Survey and Vibration Management and Monitoring Plan for approval to the Environmental Review Officer (ERO) or the ERO's designee for the Evans Avenue Bridge. The plan shall identify all feasible means to avoid damage to the potentially affected structure. The project sponsor shall ensure that the requirements of the Pre-construction Survey and Vibration Management and Monitoring Plan are included in contract specifications, as necessary.

- *Maximum Vibration Level.* Based on the anticipated construction and condition of the affected adjacent structure, a qualified acoustical/vibration consultant, in coordination with a structural engineer (or professional with similar qualifications) and, in the case of a potentially affected historic structure, a qualified historic preservation professional, shall establish a maximum vibration level that shall not be exceeded at the adjacent structure, based on existing conditions, character-defining features, soil conditions, and anticipated construction practices (common standards are a peak particle velocity a PPV of 0.5 inch per second for new residential structures and modern industrial/commercial buildings, or 0.12 for sensitive structures).

  Note that baseline vibration (to be determined via measurements) can be taken into consideration when evaluating the potential for project construction to affect the bridge, and when determining the appropriate maximum vibration level that shall be applied to the bridge. If existing vibration levels (from vehicles traveling on the bridge) already exceed the

56 The demolition phase of the project would occur approximately 300 feet from the Evans Street Bridge and would not result in vibration-related impacts to the bridge.

threshold applied to the structure, then a less stringent threshold may be considered for project-related construction vibration. Depending on the threshold selected and the vibration levels estimated to result from project construction, project vibration levels may not result in vibration levels greater than existing conditions. In this instance, the Pre-construction Survey and Vibration Management and Monitoring Plan may not be required. This determination would be made by a structural engineer in consultation with a qualified acoustical/vibration consultant, and would be approved by the Environmental Review Officer (ERO) or the ERO's designee.

- *Pre-construction Survey.* Prior to the start of any ground-disturbing activity, the project sponsor shall engage a consultant to undertake a pre-construction survey of the potentially affected structure. If the potentially affected structure is not potentially historic, a structural engineer or other professional with similar qualifications shall document and photograph the existing conditions of the potentially affected structure. The project sponsor shall submit the survey for review and approval prior to the start of vibration-generating construction activity.

  If the nearby affected structure is a known historic resource or potentially identified as a historic resource, unless there is evidence in the record that the structure is not a historic resource (as determined a planning department preservation planner) or would not be particularly sensitive to construction vibration, the project sponsor shall engage a qualified historic preservation professional and a structural engineer or other professional with similar qualifications to undertake a pre-construction survey of the potentially affected historic structure. The pre-construction survey shall include descriptions and photographs of the identified historic structure, including all details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features. The report shall also include pre-construction drawings that record the pre-construction condition of the structure and identify cracks and other features to be monitored during construction. The qualified historic preservation professional shall be the lead author of the pre-construction survey if the historic structure could be affected by the project. The pre-construction survey shall be submitted to the ERO for review and approval prior to the start of vibration-generating construction activity for the grading and utilities construction phase, and all subsequent construction phases.

- *Vibration-Generating Equipment*. The plan shall identify all vibration-generating equipment to be used during construction phases, including, but not limited to, excavation, shoring, foundation installation, and building construction (excluding demolition).

- *Alternative Construction Equipment and Techniques.* The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard (e.g., drilled shafts [caissons] could be substituted for driven piles, if feasible, based on soil conditions, or smaller, lighter equipment could be used in some cases).

- *Buffer Distances*. The plan shall identify buffer distances to be maintained, based on vibration levels, the applied vibration-related damage criterion, and site constraints

between vibration-generating construction equipment and the potentially affected structure to avoid damage to the extent possible.

- *Vibration Monitoring*. The plan shall identify the method and equipment for vibration monitoring to ensure that construction vibration levels do not exceed the established standards identified in the plan.

    - Should construction vibration levels be observed in excess of the standards established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible.

    - The qualified historic preservation professional (for effects on a historic structure) and/or structural engineer (for effects on both historic and non-historic structures) shall inspect the affected structure in the event the construction activities exceed the vibration levels identified in the plan.

    - The structural engineer and/or historic preservation professional shall submit monthly reports to the ERO during vibration-inducing activity periods that identify and summarize any vibration level exceedances and describe the actions taken to reduce vibration.

    - If vibration has damaged a nearby structure that is not historic, the structural engineer shall immediately notify the ERO and prepare a damage report documenting the features of the structure that have been damaged.

    - If vibration has damaged a nearby structure that is historic, the historic preservation consultant shall immediately notify the ERO and prepare a damage report documenting the features of the structure that have been damaged.

    - Following incorporation of the alternative construction techniques and/or planning department review of the damage report, vibration monitoring shall recommence to ensure that the allowable vibration level at the nearby historic structure (Evans Avenue Bridge) is not exceeded.

- *Periodic Inspections.* The plan shall identify the intervals and parties responsible for periodic inspections. The qualified historic preservation professional (for effects on a historic structure) and/or structural engineer (for effects on a structure that is either historic and non-historic) shall conduct regular periodic inspections of the affected adjacent structure during vibration-generating construction activity that occurs within 50 feet of the bridge. The plan will specify how often inspections shall occur.

- *Repair Damage.* The plan shall also identify provisions to be followed should damage to the nearby structure occur due to construction-related vibration. The structure shall be remediated to its pre-construction condition (at the conclusion of vibration-generating activity on the site). For historic resources, should damage occur at the adjacent structure, the structure shall be restored to its pre-construction condition in consultation with the qualified historic preservation professional and planning department preservation staff.

- *Vibration Monitoring Results Report.* After construction is complete, the project sponsor shall submit a final report from the qualified historic preservation professional (for effects on a historic structure). The report shall include, at a minimum, collected monitoring records, building and/or structure condition summaries, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore damage to the structure. The ERO shall review and approve the Vibration Monitoring Results Report.

Sleep Disturbance and Vibration-Sensitive Equipment

The nearest residential land uses to the project site are the residences that are approximately 260 feet to the north at 1250 Missouri Street, as shown in Table 16. Construction activities would occur during daytime hours between 7 a.m. and 6 p.m. As nighttime construction work is not proposed, vibration annoyance impacts on people in residential buildings related to nighttime construction would not occur. Furthermore, no facilities that may contain vibration-sensitive equipment, such as hospitals or medical research facilities, are in the project vicinity. Thus, the project would not result in adverse effects on vibration-sensitive equipment. Therefore, impacts related to human annoyance from vibration and impacts on vibration-sensitive equipment are not applicable to the project and are not discussed further.

Operation

The proposed project would not include new sources of vibration during operation. Therefore, no operational vibration assessment is required. Project operation would not generate excessive groundborne vibration or noise levels. No impact would occur.

Impact C-NO-1. The project, in combination with cumulative projects, would not result in a significant cumulative impact on noise and vibration. ***(Less than Significant with Mitigation)***

Construction Noise

The geographic extent for the cumulative impact analysis for noise would be limited to cumulative projects within 1,000 feet of the project site, because noise levels attenuate rapidly with distance. The nearest reasonably foreseeable projects to the project site are the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project (directly adjacent to the project site), the Potrero HOPE SF Project (more than 610 feet north of the project site), the Channel Force Main Intertie Project (750 feet east of the project site), the 1111 Pennsylvania Avenue Project (more than 850 feet northeast of the project site), and the 1399 Marin Street Project (approximately 970 feet east of the project site). All the cumulative projects are more than 1,000 feet from the nearest sensitive receptor at 1250 Missouri Street, except for the Potrero Hope SF project, which is 580 feet away. The 1111 Pennsylvania Avenue and Potrero Hope SF cumulative projects are within 1,000 feet of the Arise Educational Center sensitive receptor.

The Potrero Hope SF Project includes several parcels north and south of 25th Street. The nearest parcel to 1250 Missouri Street is southwest of the intersection of Connecticut Street and 25th Street. Construction of this parcel already has begun, and most of the loudest construction activities (i.e., demolition, grading, site preparation) have been completed. The remainder of the construction activities on this parcel are anticipated to be completed before the start of construction of 2000 Marin Street project construction. Therefore, noise from construction activities on this parcel for the Potrero Hope SF Project would not combine with proposed

project construction noise, and therefore would not result in a significant cumulative construction noise impact.

Construction on the Potrero Hope SF Project parcels north of 25th Street has not begun. The closest construction area for the Potrero Hope SF project is approximately 580 feet from the 1250 Missouri Street sensitive receptor. However, the residential unit at 1250 Missouri Street that would be most affected by project construction (i.e., the southern portion of the residential structure) is more than 700 feet from the northern Potrero Hope SF parcels. The residential unit that would be most affected by proposed project construction would experience substantial shielding from the residential units to the north and other commercial structures between the Potrero Hope SF site and that particular residential unit. In addition, most of the Potrero Hope SF construction north of 25th Street would occur at even greater distances from 1250 Missouri Street. As construction moves north within the Potrero Hope SF site, topographical shielding would provide additional noise reduction. Finally, the Potrero HOPE SF Project is required to implement mitigation measures M-NO-1a, Submit a Construction Noise Plan to Reduce Construction Noise, and M-NO-1b, Implement a Construction Noise Plan to Reduce Construction Noise, which would further reduce construction noise generated by the Potrero Hope SF Project.

The southernmost residential unit at 1250 Missouri Street would predominantly experience noise from proposed project construction activities. Although construction noise from the Potrero Hope SF Project periodically could combine with proposed project construction noise, resulting in greater overall noise levels at some sensitive uses, the duration of such increases would be limited. This is because contributions to noise increases would need to occur at the same time, with large pieces of equipment (i.e., equipment used for demolition or grading) being used simultaneously at the project site and the Potrero Hope SF Project site, both with a line of sight to the same receptors. This would occur infrequently and only for short durations, if at all. Furthermore, because the project construction noise analysis presented the worst-case noise levels at the closest distance during the loudest construction phase (i.e., demolition at a distance of 260 feet), project construction activities typically would result in even lower noise levels than presented for the proposed project. The Potrero Hope SF Project would be required to comply with construction noise mitigation, including submittal and implementation of a construction noise plan.

The 1111 Pennsylvania Avenue and Potrero Hope SF cumulative projects sites are approximately 800 feet and 700 feet from the Arise Educational Center sensitive receptor, respectively. Existing topography blocks almost the entire line of sight between the Potrero Hope SF Project parcels and the Arise Educational Center. Furthermore, the line of sight between the Arise Educational Center and the 1111 Pennsylvania Avenue project site is obstructed by existing structures and topography, which would act as noise barriers, thereby decreasing noise levels at the receptor. Therefore, construction noise from the cumulative projects would not combine with project construction noise at this receptor to result in a significant cumulative construction noise impact.

Therefore, the identified cumulative projects would not combine with the proposed project to result in a significant cumulative impact related to construction noise (less than significant).

Operational Noise

Traffic

The existing and cumulative traffic volumes scenario from the transportation study for the Potrero Hope SF Project were reviewed and used for the cumulative traffic noise impact evaluation. Specifically, the traffic

volumes for the existing scenario for the Potrero Hope SF Project were used to represent current traffic volumes, and the traffic volumes for the cumulative traffic volumes scenario were used to represent cumulative traffic volumes for this analysis. Traffic volumes generated by the proposed project were added to the Potrero Hope SF cumulative traffic volumes to estimate volumes for a cumulative-plus-project scenario. The cumulative traffic analysis was conducted for Cesar Chavez Street near the proposed project because this would be the most utilized roadway segment for project-related traffic. Table 18 provides the existing traffic noise, cumulative traffic noise, and cumulative plus project traffic noise along Cezar Chavez Street.[57]

Table 18 Cumulative Operational Traffic Noise

Roadway	Roadway Segment	Traffic Noise Levels				
		Modeled Existing Traffic Noise (Potrero HOPE)[a]	Modeled Cumulative Traffic Noise (Potrero HOPE)[a]	Modeled Cumulative-plus-Project Noise[a]	Existing to Cumulative-plus-Project Change	Project-Related Traffic Noise Increase (dBA Ldn)
Cesar Chavez Street	East of Connecticut	64.7	67.5	67.7	3.0	0.2

SOURCE: ICF. 2024 (June). *Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California*.

NOTES:

[a] The noise levels are estimated at a distance of 50 feet from the roadway centerline.

The modeled noise level along Cesar Chavez Street from the cumulative-plus-project scenario would result in a potential 3-dB increase from existing conditions. A noise increase of this magnitude above existing conditions would not be considered a significant vehicular traffic noise increase. As infrastructure-related projects, the 1399 Marin Street Project, the Channel Force Main Intertie Project, and the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would not increase operational vehicle trips. The 1801 Evans Avenue Project did not require a transportation study because it would not contribute substantial net new vehicle trips to the area. For these reasons, cumulative traffic noise increases along Cesar Chavez Street would not be substantial. Therefore, the identified cumulative projects would not combine with the proposed project to result in a significant cumulative impact related to operational traffic noise (less than significant).

Fixed Mechanical Equipment

Noise from onsite operations at cumulative projects near the project site could combine and result in a cumulative noise impact on a receptor between the two project sites. The nearest cumulative projects that are anticipated to include new operational stationary noise sources (i.e., mechanical equipment) are the Potrero Hope SF Project site, approximately 610 feet north of the proposed project site, and the 1111 Pennsylvania Avenue Project site, approximately 850 feet northeast of the proposed project site. The sensitive receptors at 1250 Missouri Street and the Arise Educational Center could be exposed to new stationary sources of noise from both cumulative projects and the proposed project during operations.

57 The existing and cumulative traffic volumes from the transportation study prepared for the Potrero HOPE SF Environmental Impact Report/Environmental Impact Statement were used to represent current traffic volumes and cumulative traffic volumes for this analysis

Based on noise modeling that was conducted for the proposed project, operational equipment noise levels would be 44 dBA at the 1250 Missouri Street receptor and 41 dBA at the nearby Arise Educational Center. Based on an assumed 25-dBA noise reduction from exterior to interior noise levels with windows closed, these modeled noise levels equate to interior noise levels of approximately 19 dBA and 16 dBA at the 1250 Missouri Street and Arise Educational Center, respectively, which is well below both the daytime and nighttime interior noise limits of 55 dBA and 45 dBA, respectively.[58] The 1111 Pennsylvania Avenue and Potrero Hope SF cumulative projects would be required to comply with the noise limits in article 29 of the police code. Because the cumulative projects would be required to demonstrate compliance with the local noise ordinance, and because project-specific noise levels at the nearest sensitive use would be well below the allowable limits, the identified cumulative projects would not combine with the proposed project to result in a significant cumulative impact related to operational equipment noise (less than significant).

Vibration

As described above, the potential for a vibration-related damage impact to occur is based on peak particle velocity. Because peak particle velocity is a measure of the instantaneous vibration level rather than an average, such as the vibration velocity level, or VdB, worst-case ground-borne vibration levels from construction are generally determined by whichever individual piece of equipment generates the highest vibration levels at the affected building(s). Vibration from multiple construction sites, even if they are close to one another, would not be expected to combine to raise the maximum peak particle velocity. Most of the identified cumulative projects would involve construction that would be more than 600 feet from the project site, with the exception of the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, which would be approximately 30 feet from the project site. Construction of the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project could temporarily occur in proximity to the project site and at a distance to nearby offsite structures, including the Evans Street Bridge, similar to that of project construction. Because peak particle velocity vibration levels do not combine, the worst-case peak particle velocity vibration level experienced at nearby structures would generally be equal to the worst-case peak particle velocity vibration level from the most vibration-intensive equipment associated with either the proposed project or the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, individually. As discussed under Impact NO-2, the proposed project has the potential to result in significant vibration impacts on the Evans Street Bridge. However, this impact would be less than significant with implementation of **Mitigation Measure M-NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction.** Therefore, because the project would have a less-than-significant vibration impact on nearby structures with mitigation and because peak particle velocity vibration levels from cumulative projects would not combine, a significant cumulative vibration impact related to building damage would not result (less than significant with mitigation).

58 ICF, 2024 (June), Environmental Noise and Vibration Assessment for the 2000 Marin Street Project in San Francisco, California.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
7. AIR QUALITY. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard?	☐	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐	☐

SETTING

AIR BASINS

SAN FRANCISCO BAY AREA AIR BASIN

The project site is in the city and county of San Francisco. The Bay Area Air Quality Management District (or Bay Area air district) is the regional agency with jurisdiction over the nine-county San Francisco Bay Area Air Basin (Bay Area air basin), which includes San Francisco, Alameda, Contra Costa, Marin, San Mateo, Santa Clara, and Napa counties and portions of Sonoma and Solano counties. The Bay Area air district is responsible for attaining and maintaining air quality in the Bay Area air basin within federal and state air quality standards, as established by the federal Clean Air Act and the California Clean Air Act, respectively. Specifically, the Bay Area air district has the responsibility to monitor ambient air pollutant levels throughout the Bay Area air basin and to develop and implement strategies to attain the applicable federal and state standards. The federal and state clean air acts require plans to be developed for areas that do not meet air quality standards, generally.

The most recent air quality plan, the 2017 clean air plan, was adopted by the Bay Area air district on April 19, 2017.[59] The clean air plan updates the most recent Bay Area ozone plan, the 2010 clean air plan, in accordance with the requirements of the state Clean Air Act to implement all feasible measures to reduce ozone; provide a control strategy to reduce ozone, particulate matter, air toxics, and greenhouse gas (GHG) emissions in a single, integrated plan; and establish emission control measures to be adopted or implemented. The clean air plan contains the following primary goals:

59 Bay Area Air Quality Management District. 2017. Spare the Air – Cool the Climate: A blueprint for clean air and climate protection in the Bay Area. Final 2017 Clean Air Plan.

- Protect air quality and health at the regional and local scale: attain all state and national air quality standards, and eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and
- Protect the climate: reduce Bay Area GHG emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.

The clean air plan represents the most current applicable air quality plan for the Bay Area air basin. Consistency with this plan is the basis for determining whether the project would conflict with or obstruct implementation of air quality plans (checklist question D.7.a).

SAN JOAQUIN VALLEY AIR BASIN

The San Joaquin Valley Air Pollution Control District (San Joaquin Valley air district) is the agency responsible for monitoring and regulating air pollutant emissions from stationary, area, and indirect sources within the San Joaquin Valley air basin. The San Joaquin Valley air district also has responsibility for monitoring air quality as well as for setting and enforcing limits for source emissions. The San Joaquin Valley air district currently maintains plans for ozone, PM_{10}, and $PM_{2.5}$.

As discussed in Section D.17, Hazards and Hazardous Materials, any excavated soil that is classified as hazardous waste by state and federal standards would be disposed of at a Class I hazardous waste disposal facility such as the Kettleman Hills Landfill, which is within the San Joaquin Valley air basin and is under the jurisdiction of the San Joaquin Valley air district. Although haul trips to the Kettleman Hills Landfill would result in project construction-related emissions in the San Joaquin Valley air basin, the majority of project emissions would occur in the Bay Area air basin and the Bay Area air district requires more stringent measures. Therefore, compliance with Bay Area air district thresholds and plans has been applied to the analysis below.

Criteria Air Pollutants

In accordance with the state and federal Clean Air Acts, air pollutant standards are identified for the following six criteria air pollutants: ozone, carbon monoxide (CO), particulate matter (PM)[60], nitrogen dioxide (NO_2), sulfur dioxide (SO_2), and lead. These air pollutants are termed criteria air pollutants because they are regulated by developing specific public health- and welfare-based criteria as the basis for setting permissible levels. The state and federal air quality standards were developed to protect public health and welfare. Exposure to these criteria air pollutants, even for a short-term period, may increase the risk of health effects. In general, the Bay Area air basin experiences low concentrations of most pollutants when compared to federal or state standards. The Bay Area air basin is designated as either in *attainment*[61] or *unclassified*[62] for most criteria pollutants with the exception of ozone, $PM_{2.5}$, and PM_{10}, for which these pollutants are designated as *non-attainment*[63] for either the state or federal standards. Table 19 (p. 80) shows the air basin's attainment status for each criteria air pollutant. By its very nature, regional air pollution is largely a cumulative impact in that no single project is sufficient in size to, by itself, result in non-attainment of air

60 PM_{10} often is termed "coarse" particulate matter and is made of particles that are 10 microns in diameter or smaller. $PM_{2.5}$, termed "fine" particulate matter, is composed of particles that are 2.5 microns or less in diameter.

61 "Attainment" status refers to those regions that are meeting federal and/or state standards for a specified criteria pollutant.

62 "Unclassified" refers to regions where not enough data exist to determine the region's attainment status for a specified criteria air pollutant.

63 "Non-attainment" refers to regions that do not meet federal and/or state standards for a specified criteria pollutant.

quality standards. Instead, a project's individual emissions contribute to existing cumulative air quality impacts. If a project's contribution to cumulative air quality impacts is considerable, then the project's impact on air quality would be considered significant.

Projects may contribute to regional criteria air pollutants during their construction and operational phases. Land use projects typically result in ozone precursor and particulate matter emissions because of increases in vehicle trips, space heating and natural gas combustion, landscape maintenance, and construction activities. The Bay Area air district has established significance thresholds for non-attainment criteria air pollutants, as shown in Table 20 (p. 81).

The Bay Area air district's CEQA Air Quality Guidelines[64] provide additional evidence to support these thresholds. These thresholds of significance for risks and hazards were designed to ensure that no individual project (or source) would create a significant adverse impact and that no sensitive receptor would endure a significant adverse impact from any individual project. Projects that would result in criteria air pollutant emissions below these significance thresholds would not result in a cumulatively considerable net increase in non-attainment criteria air pollutants in the Bay Area air basin.[65]

64 Bay Area Air Quality Management District. 2022. *California Environmental Quality Act Air Quality Guidelines.* Available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed March 28, 2024.

65 Ibid.

Table 19 State and Federal Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Time	State (CAAQS)[a]		Federal (NAAQS)[b]	
		Standard	Attainment Status	Standard	Attainment Status
Ozone	1 hour	0.09 ppm	N	NA	-[c]
	8 hours	0.07 ppm	N[d]	0.070 ppm	N
Carbon monoxide (CO)	1 hour	20 ppm	A	35 ppm	A
	8 hours	9 ppm	A	9 ppm	A
Nitrogen dioxide (NO_2)	1 hour	0.18 ppm	A	0.100 ppm	U
	Annual	0.030 ppm	NA	0.053 ppm	A
Sulfur dioxide (SO_2)	1 hour	0.25 ppm	A	0.075	A
	24 hours	0.04 ppm	A	0.14	A
	Annual	NA	NA	0.03	A
Particulate matter (PM_{10})	24 hours	50 µg/m^3	N	150 µg/m^3	U
	Annual[e]	20 µg/m^3	N	NA	NA
Fine particulate matter ($PM_{2.5}$)	24 hours	NA	NA	35 µg/m^3	N
	Annual	12 µg/m^3	N	12 µg/m^3	U/A[f]
Sulfates	24 hours	20 µg/m^3	A	NA	NA
Lead	30 days	1.5 µg/m^3	A	NA	NA
	Cal. Quarter	NA	NA	1.5 µg/m^3	A
	Rolling 3-month average	NA	NA	0.15 µg/m^3	A
Hydrogen sulfide	1 hour	0.03 ppm	U	NA	NA
Visibility-reducing particles	8 hours	-[g]	A	NA	NA
Vinyl chloride	24 hours	0.010 ppm 26 µg/m^3	No information available	NA	NA

SOURCE: Bay Area Air Quality Management District. 2024. *Standards and Attainment Status*. Available: https://www.baaqmd.gov/about-air-quality/research-and-data/air-quality-standards-and-attainment-status#eleven. Accessed March 29, 2024.

NOTES:
A = Attainment; N = Nonattainment; U = Unclassified; NA = Not Applicable, no applicable standard; ppm = parts per million; µg/m3 = micrograms per cubic meter.

[a] CAAQS = California ambient air quality standards. CAAQS for ozone, CO (except Lake Tahoe), SO2 (one-hour and 24-hour), NO2, particulate matter, and visibility-reducing particles are values that are not to be exceeded. All other state standards shown are values not to be equaled or exceeded.

[b] NAAQS = national ambient air quality standards. NAAQS, other than ozone and particulates, and those based on annual averages or annual arithmetic means, are not to be exceeded more than once a year. The eight-hour ozone standard is attained when the three-year average of the fourth highest daily concentration is 0.08 ppm or less. The 24-hour PM10 standard is attained when the three-year average of the 99th percentile of monitored concentrations is less than the standard. The 24-hour PM2.5 standard is attained when the three-year average of the 98th percentile is less than the standard

[c] The U.S. Environmental Protection Agency (EPA) revoked the national one-hour ozone standard on June 15, 2005.

[d] This state eight-hour ozone standard was approved in April 2005 and became effective in May 2006.

[e] State standard = annual geometric mean; national standard = annual arithmetic mean

[f] In December 2012, EPA strengthened the annual PM2.5 NAAQS from 15 to 12 µg/m3. In December 2014, U.S. EPA issued final area designations for the 2012 primary annual PM2.5 NAAQS. Areas designated "unclassifiable/attainment" must continue to take steps to prevent their air quality from deteriorating to unhealthy levels. The effective date of this standard is April 15, 2015.

[g] Statewide visibility-reducing particle standard (except Lake Tahoe Air Basin): Particles in sufficient amount to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Table 20 Criteria Air Pollutants and Precursors Significance Thresholds (Project Level)

Pollutant	Construction Thresholds	Operational Threshold	
	Average Daily Emissions (pounds/day)	Average Daily Emissions (pounds/day)	Maximum Annual Emissions (tons/year)
ROG	54	54	10
NO_x	54	54	10
PM_{10}	82 (exhaust)	82	15
$PM_{2.5}$	54 (exhaust)	54	10
Fugitive Dust	Best Management Practices	None	

SOURCE: Bay Area Air Quality Management District, *CEQA Air Quality Guidelines*, 2022.

Ozone

As discussed previously, the Bay Area air basin currently is designated as non-attainment for ozone. Ozone is a secondary air pollutant produced in the atmosphere through a complex series of photochemical reactions involving reactive organic gases (ROG) and oxides of nitrogen (NOx). Ozone can cause respiratory problems (e.g., chest pain, airway construction, shortness of breath, coughing, throat irritation), cause eye irritation, and exacerbate existing respiratory problems, such as asthma, emphysema, and bronchitis.[66]

The significance thresholds for ROG and NOx are based on the stationary source limits in Bay Area air district regulation 2, rule 2, which requires that any new source that emits criteria air pollutants above the ROG and NOx emissions limit (shown in Table 20) must offset those emissions. Although this regulation applies to new or modified stationary sources, projects, such as the project would result in ROG and NOx emissions from increases in vehicle trips, architectural coating, and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of projects, and those projects that would result in emissions below these thresholds would not be considered to contribute to an existing or projected air quality violation or result in a considerable net increase in ROG and NOx emissions. Because of the temporary nature of construction activities, only the average daily thresholds for emissions occurring in the Bay Area air basin are applicable to construction phase emissions.

Carbon Monoxide

Carbon monoxide (CO) is an odorless, colorless gas usually formed because of the incomplete combustion of fuels. The single largest source of CO is motor vehicles; the highest emissions occur during low travel speeds, stop-and-go driving, cold starts, and hard acceleration. Exposure to high concentrations of CO reduces the oxygen-carrying capacity of the blood and can cause headaches, nausea, dizziness, and fatigue; impair central nervous system function; and induce angina (chest pain) in persons with serious heart disease. Very high levels of CO can be fatal. As shown in Table 19, CO is in attainment for both the state and federal standards.

66 U.S. Environmental Protection Agency. 2023. *Health Effects of Ozone Pollution*. Available: https://www.epa.gov/ground-level-ozone-pollution/health-effects-ozone-pollution. Accessed March 28, 2024.

Particulate Matter (PM_{10} and $PM_{2.5}$)

Particulate matter is a class of air pollutants that consists of heterogeneous solid and liquid airborne particles from human-made and natural sources. Particulate matter regulated by the state and federal Clean Air Acts is measured in two size ranges: PM_{10} for particles less than 10 microns in diameter, and $PM_{2.5}$ for particles less than 2.5 microns in diameter. Motor vehicles generate about one-half of the Bay Area air basin's particulates, through tailpipe emissions as well as brake pad and tire wear. Wood burning in fireplaces and stoves, industrial facilities, and ground-disturbing activities such as construction are other sources of fine particulates. These fine particulates are small enough to be inhaled into the deepest parts of the human lung and can cause adverse health effects. According to the California Air Resources Board (California air board), studies in the U.S. and elsewhere "have demonstrated a strong link between elevated particulate levels and premature deaths, hospital admissions, emergency room visits, and asthma attacks," and studies of children's health in California have demonstrated that particle pollution "may significantly reduce lung function growth in children." The California air board also reports that statewide attainment of particulate matter standards could prevent thousands of premature deaths, lower hospital admissions for cardiovascular and respiratory disease and asthma-related emergency room visits and avoid hundreds of thousands of episodes of respiratory illness in California. Among the criteria air pollutants that are regulated, particulates appear to represent a serious ongoing health hazard. In 1999, the air district's CEQA Air Quality Guidelines reported that studies had shown that elevated particulate levels contribute to the death of approximately 200 to 500 people per year in the Bay Area.

$PM_{2.5}$ is of particular concern. Epidemiologic studies have demonstrated that people who live near freeways and high-traffic roadways have poorer health outcomes, including increased asthma symptoms and respiratory infections, and decreased pulmonary function and lung development in children.[67] New studies are also showing that long-term average exposure to $PM_{2.5}$ is associated with an increased risk of death from the novel coronavirus 2019 disease (COVID-19) in the U.S. One study found that an increase of 1 microgram per cubic meter ($\mu g/m^3$) in $PM_{2.5}$ is associated with an 8 percent increase in the COVID-19 death rate.[68] Exposure to wildfire smoke (which includes $PM_{2.5}$) experienced by Californians in 2020 also could have contributed to increased cases of COVID-19.[69] These studies demonstrate a correlational relationship between exposure to $PM_{2.5}$ and increases in the COVID-19 death rate, not a causal relationship.

Similar to ozone precursor thresholds identified above, the significance thresholds for particulate matter is based on the emissions limit in the federal New Source Review for stationary sources in nonattainment areas. The project would result in particulate matter emissions from increases in vehicle miles traveled during operation and construction activities. Therefore, the above thresholds can be applied to the construction and operational phases of the project. Again, because project construction activities would be temporary, only the average daily thresholds would be applicable to construction-phase emissions.

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67 San Francisco Department of Public Health. 2008 (May7). *Assessment and Mitigation of Air Pollutant Health Effect from Intra-urban Roadways: Guidance for Land Use Planning and Environmental Review.*

68 Wu, X., R. C. Nethery, B. M. Sabath, D. Braun, and F. Dominici. 2020 (April 27). *Exposure to Air Pollution and COVID-19 Mortality in the United States: A nationwide cross-sectional study*. Available: https://doi.org/10.1101/2020.04.05.20054502. Accessed March 28, 2024.

69 Xiaodan, Z., K. Josey, L. Kamareddine, M. C. Caine, T. Liu, L. J. Mickley, M. Cooper, and F. Dominici. 2021 (August 13). *Excess of COVID-19 Cases and Deaths due to Fine Particulate Matter Exposure during the 2020 Wildfires in the United States*. Available: https://pubmed.ncbi.nlm.nih.gov/34389545/. Accessed March 28, 2024.

Fugitive Dust

Furthermore, fugitive dust emissions typically are generated during project construction. Studies have shown that the application of best management practices at construction sites significantly control fugitive dust and individual measures have been shown to reduce fugitive dust from between 30 and 90 percent.[70] The Bay Area air district has identified a number of best management practices to control fugitive dust emissions from construction activities.[71] The city's Construction Dust Control Ordinance (Ordinance No.176-08, effective July 30, 2008) requires a number of measures to control fugitive dust and best management practices employed in compliance with the city's construction dust control ordinance are an effective strategy for controlling construction-related fugitive dust.

LOCAL HEALTH RISKS AND HAZARDS

In addition to criteria air pollutants, individual projects may emit *toxic air contaminants*. Toxic air contaminants collectively refer to a diverse group of air pollutants that can cause chronic (i.e., of long duration) and acute (i.e., severe but short-term) adverse effects on human health, including carcinogenic effects. Human health effects of toxic air contaminants s include birth defects, neurological damage, cancer, and mortality. Hundreds of different types of toxic air contaminants exist with varying degrees of toxicity; at a given level of exposure, one toxic air contaminant may pose a hazard that is many times greater than another.

Unlike criteria air pollutants, toxic air contaminants do not have ambient air quality standards but are regulated by the Bay Area air district using a risk-based approach to determine which sources and pollutants to control as well as the degree of control. A health risk assessment is an analysis in which human health exposure to toxic substances is estimated and considered together with information regarding the toxic potency of the substances, to provide quantitative estimates of health risks.[72] Exposures to $PM_{2.5}$ are strongly associated with mortality, respiratory diseases, and decreased lung development in children, and other endpoints such as hospitalization for cardiopulmonary disease.[73] In addition to $PM_{2.5}$, diesel particulate matter (DPM) also is of concern. The California air board identified diesel particulate matter as a toxic air contaminant in 1998, primarily based on evidence demonstrating cancer effects in humans.[74] The estimated cancer risk from exposure to diesel exhaust is much higher than the risk associated with any other toxic air contaminant routinely measured in the region.

Air pollution does not affect every individual in the population in the same way, and some groups are more sensitive to adverse health effects than others. Certain land uses such as residences, schools, children's day care centers, hospitals, and nursing and convalescent homes are considered to be the most sensitive to poor

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70 Western Regional Air Partnership. 2006 (September 7). WRAP Fugitive Dust Handbook. Available: http://www.wrapair.org/forums/dejf/fdh/content/FDHandbook_Rev_06.pdf. Accessed March 29, 2024.

71 Bay Area Air Quality Management District. 2022. CEQA Air Quality Guidelines.

72 In general, a health risk assessment is required if the Bay Area air district concludes that projected emissions of a specific air toxic compound from a proposed new or modified source suggest a potential public health risk. The project then is subject to a health risk assessment for the source in question. Such an assessment generally evaluates chronic, long-term effects, estimating the increased risk of cancer from exposure to one or more toxic air contaminants.

73 San Francisco Department of Public Health. 2008 (May). *Assessment and Mitigation of Air Pollutant Health Effects from Intra-Urban Roadways: Guidance for Land Use Planning and Environmental Review*.

74 California Office of Environmental Health. 1998 (May). *Hazard Assessment, Part B: Health Risk Assessment for Diesel Exhaust*. Available: https://ww2.arb.ca.gov/sites/default/files/barcu/regact/diesltac/partb.pdf. Accessed March 28, 2024.

air quality because the population groups associated with these uses have increased susceptibility to respiratory distress or, as in the case of residential receptors, their exposure time is greater than that for other land uses. Therefore, these groups are referred to as sensitive receptors. Exposure assessment guidance typically assumes that residences would be exposed to air pollution 24 hours per day, 7 days a week, for 30 years.[75] Therefore, assessments of air pollutant exposure to residents typically result in the greatest adverse health outcomes of all population groups. In addition, the air district's CEQA Air Quality Guidelines recommend that, when required, health risks assessments analyze impacts to off-site workers.[76] Workers with preexisting health problems may be susceptible to poor air quality and these individuals are also considered sensitive receptors.[77]

To identify areas of San Francisco that are most adversely affected by sources of toxic air contaminants, San Francisco partnered with the Bay Area air district to conduct a citywide health risk assessment based on an inventory and assessment of air pollution and exposures from mobile, stationary, and area sources within San Francisco. Areas with poor air quality, termed the *air pollutant exposure zone* were identified based on health-protective criteria that considered estimated cancer risk, exposures to $PM_{2.5}$, proximity to freeways, and locations with particularly vulnerable populations. These zones were established by the San Francisco Department of Public Health and regulated under San Francisco's Environment Code chapter 25, Clean Construction Requirements for Public Works. The project site is within the air pollutant exposure zone. Each of the air pollutant exposure zone criteria is discussed below.

EXCESS CANCER RISK

The air pollutant exposure zone includes areas where modeled cancer risk exceeds 100 incidents per million persons exposed. This criterion is based on U.S. Environmental Protection Agency (EPA) guidance for conducting air toxic analyses and making risk management decisions on a facility and community scale.[78] The 100 per one million excess cancer cases also is consistent with the ambient cancer risk in the most pristine portions of the Bay Area based on Bay Area air district regional modeling.[79]

FINE PARTICULATE MATTER

Total fine particulate matter or $PM_{2.5}$ exposure concentrations, which include emissions from the primary sources that were modeled in the citywide health risk assessment (discussed above) and ambient (or background) $PM_{2.5}$ concentrations are compared against the annual average $PM_{2.5}$ National Ambient Air Quality Standards. In 2013, the USEPA lowered the annual average $PM_{2.5}$ standard from 15 $\mu g/m^3$ to 12 $\mu g/m^3$.[80] On February 7, 2024, the U.S. EPA published the Final Rule: Reconsideration of the National Ambient

75 California Office of Environmental Health. 2015 (February). *Hazard Assessment, Air Toxics Hot Spot Program Risk Assessment Guidelines*.

76 Bay Area Air Quality Management District, 2022 CEQA Air Quality Guidelines, Appendix E: Recommended Methods for Screening and Modeling Local Risks and Hazards, page E-14. Available online at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/appendix-e-recommended-methods-for-screening-and-modeling-local-risks-and-hazards_final-pdf.pdf?la=en. Accessed June 7, 2023.

77 When residential and worker receptors are both located at the same distance and direction from an emissions source, residential receptors would be expected to result in the greatest adverse health outcome, because of the longer exposure duration for residents as compared to workers.

78 Bay Area Air Quality Management District. 2022. *CEQA Air Quality Guidelines*.

79 Ibid.

80 U.S. Environmental Protection Agency. 2023 (January 27). National Ambient Air Quality Standard for Particulate Matter. Available: https://www.govinfo.gov/content/pkg/FR-2023-01-27/pdf/2023-00269.pdf. Accessed March 29, 2024.

Air Quality Standards (NAAQS) for Particulate Matter.[81] In this reconsideration document, the U.S. EPA lowered the primary annual $PM_{2.5}$ standard from 12 µg/m^3 to 9 µg/m^3. As discussed below, the air pollutant exposure zone for San Francisco's health vulnerable locations is based on the health protective $PM_{2.5}$ standard of 9 µg/m^3, and a standard of 10 µg/m^3 for all other areas.

PROXIMITY TO FREEWAYS

According to the California air board, studies have shown an association between the proximity of sensitive land uses to freeways and a variety of respiratory symptoms, asthma exacerbations, and decreases in lung function in children. Siting sensitive uses near freeways increases both exposure to air pollution and the potential for adverse health effects. Because evidence shows that sensitive uses in an area within a 500-foot buffer of any freeway are at an increased health risk from air pollution,[82] parcels that are within 500 feet of freeways are included in the air pollutant exposure zone. The project site is within 160 feet of I-280 and as stated above, is included in the air pollutant exposure zone.

HEALTH VULNERABLE LOCATIONS

Based on the Bay Area air district's evaluation of health vulnerability in the Bay Area, those zip codes (94102, 94103, 94110, 94124, and 94130) in the worst quintile of Bay Area health vulnerability scores from air pollution-related causes were afforded additional protection by lowering the standards for identifying parcels in the air pollutant exposure zone to: (1) an excess cancer risk greater than 90 per one million persons exposed, and/or (2) $PM_{2.5}$ concentrations in excess of 9 µg/m^3.[83]

In April 2007, the city adopted an ordinance requiring public projects to reduce emissions at construction sites beginning in 2009. In March 2015, the city expanded the ordinance to require public projects to reduce emissions at construction sites in areas with high background concentrations of air pollutants. Establishment of the air pollutant exposure zone was used as the basis for approving a series of amendments to the San Francisco Environment and Administrative codes, generally referred to as the Clean Construction Ordinance, or Environment Code chapter 25 (Ordinance 28- 15, effective April 19, 2015).[84] The purpose of the Clean Construction Ordinance is to protect the public health, safety, and welfare by requiring contractors on city projects to reduce diesel and other particulate matter emissions that are generated by construction activities. The ordinance requires the following for all public work "major construction projects" (defined as those that take 20 or more cumulative workdays to complete) that use off-road equipment which is 25 horsepower or greater for 20 hours or more during any portion of the project and occurring in the air pollutant exposure zone:

- Equipment must meet or exceed Tier 2 standards for off-road engines and operate with the most effective California Air Resources Board Verified Diesel Emissions Control Strategy (VDECS) available for the engine type (Tier 4 engines automatically meet this requirement)

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81 40 CFR Parts 50, 53, and 58, February 7, 2024.

82 California Air Resources Board. 2005 (April). *Air Quality and Land Use Handbook: A Community Health Perspective.*

83 San Francisco Planning Department and San Francisco Department of Public Health, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation.* September 2020.

84 City and County of San Francisco. 2015 (August 6). Clean Construction Requirements for Public Works Projects. Available: CHAPTER 25: CLEAN CONSTRUCTION REQUIREMENTS FOR PUBLIC WORKS (amlegal.com). Accessed March 28, 2024.

- Portable diesel engines are prohibited where access to alternative sources of power is available.
- Idling of off-road and on-road equipment is limited to two minutes at any location, except as provided in applicable state regulations (e.g., traffic conditions, safe operating conditions). The contractor must post legible and visible signs in English, Spanish, and Chinese in designated queuing areas and at the construction site to remind operators of the two-minute idling limit.
- A Construction Emissions Minimization Plan must be prepared before the start of construction. The plan is required to include estimates of the construction timeline by stage and a description of each piece of off-road equipment required for every construction stage (e.g., equipment type, manufacturer, identification number, model year, tier rating, horsepower, expected fuel usage, hours of operation). Additional details may be included for VDECS (e.g., technology type, serial number, make, model, manufacturer, California Air Resources Board verification number level). For off-road equipment using alternative fuels, the description must specify the type of alternative fuel being used.
- Monitoring and reporting actions are required during construction to document compliance with the ordinance. Waivers to the requirements of the Clean Construction Ordinance can be issued under certain circumstances (e.g., lack of available qualifying equipment).

As part of the project, SFPUC would implement SFPUC's Standard Construction Measure 2 (Air Quality), which requires all SFPUC projects in the city to comply with the Clean Construction Ordinance. In addition, projects within the air pollutant exposure zone require special consideration to determine whether the project's activities would add a substantial amount of emissions to areas already adversely affected by poor air quality.

HEALTH RISK AND HAZARDS THRESHOLDS

The department uses the air pollutant exposure zone criteria discussed above to define "substantial pollutant concentrations" with respect to toxic air contaminants that cause cancer and $PM_{2.5}$ concentrations; the department uses the air district's health risk thresholds for determining whether a project's contribution to cumulatively significant health risks is considerable in certain scenarios. In other scenarios, the department has determined that due to severity of cumulative health risks, a more health protective threshold is required for determining whether a project's contribution to health risks is considerable. The air pollutant exposure zone criteria as well as the project contribution thresholds are shown in Table 21 below.

Table 21 Health Risk Significance Thresholds

Affected Receptor	Thresholds for Construction and Operation	
	$PM_{2.5}$ (µg/m3)	Excess Cancer Risk (cases per one million population)
Air Pollutant Exposure Zone Criteria		
Outside Health Vulnerability zip code	10.0	100.0
Within Health Vulnerability zip code	9.0	90.0
Significance Thresholds		
Project contribution thresholds to receptor locations not within the *air pollutant exposure zone* but would meet the *air pollutant exposure zone* criteria because of the project[a]	0.3	10.0
Project contribution thresholds to receptor locations within the *air pollutant exposure zone*[b]	0.2	7.0

SOURCES: San Francisco Department of Public Health, Environmental Health, Planning, Memorandum to File regarding 2014 Air Pollutant Exposure Zone Map, April 9, 2014.

Bay Area Air Quality Management District, ***CEQA Air Quality Guidelines***, April 20, 2023, p. 5-14. Available at: https://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa-guidelines-2022/ceqa-guidelines-chapter-5-project-air-quality-impacts_final-pdf.pdf?la=en. Accessed June 16, 2023.

NOTES:

[a] $PM_{2.5}$ concentrations at or above 0.3 µg/m^3 or an excess cancer risk at or above 10.0 per million persons exposed at receptors are the Bay Area Air Quality Management District's project level thresholds. However, the project level thresholds do not consider existing sources of air pollution. Rather these thresholds are applied without consideration of substantial pollutant concentrations that may currently exist and be experienced by receptors.

[b] A 0.2 µg/m^3 increase in PM2.5 would result in a 0.28 percent increase in non-injury mortality or an increase of about 21 excess deaths per 1,000,000 population per year from non-injury causes in San Francisco. This information is based on Jerrett M. et al., *Spatial Analysis of Air Pollution and Mortality in Los Angeles*, Epidemiology, 16:727-736, 2005. This $PM_{2.5}$ concertation is 30 percent lower than the Air District's project level $PM_{2.5}$ threshold. The excess cancer risk threshold has similarly been proportionally reduced from the Air District's cancer risk threshold (see note c) to result in a significance criterion of 7 per million persons exposed.

Impact AQ-1: The project would not conflict with or obstruct implementation of the applicable air quality plan. *(Less than Significant)*

The most recently adopted air quality plan for the Bay Area air basin is the Bay Area air district's 2017 clean air plan.[85] The clean air plan is a road map that demonstrates how the San Francisco Bay Area will achieve compliance with the state ozone standards and how the region will reduce the transport of ozone and ozone precursors to neighboring air basins. In determining consistency with the clean air plan, this analysis considers whether the project would: (1) support the primary goals of the plan; (2) include applicable control

85 Bay Area Air Quality Management District. 2017 (April). *Spare the Air Cool the Climate, Final 2017 Clean Air Plan*. Available: https://www.baaqmd.gov/~/media/files/planning-and-research/plans/2017-clean-air-plan/attachment-a_-proposed-final-cap-vol-1-pdf.pdf?la=en. Accessed March 29, 2024.

measures from the plan; and (3) avoid disrupting or hindering implementation of control measures identified in the plan.

The primary goals of the clean air plan are to: (1) protect air quality and health at the regional and local scale; (2) eliminate disparities among Bay Area communities in cancer health risk from toxic air contaminants; and (3) protect the climate by reducing GHG emissions. To meet the primary goals, the plan recommends 85 specific control measures and actions. These control measures are grouped into various categories and include stationary and area source measures, mobile source measures, transportation control measures, land use measures, and energy and climate measures. To the extent that the Bay Area air district would have regulatory authority over an emissions source that would be generated by the project, the control measures may be requirements of the project. Other measures in the plan not within the Bay Area air district's regulatory authority may be advisory or are otherwise not specifically applicable to land use development projects.

The clean air plan recognizes that to a great extent, community design dictates individual travel mode, and that a key long-term control strategy to reduce emissions of criteria pollutants, air toxics, and GHG emissions from motor vehicles is to channel future Bay Area growth into vibrant urban communities where goods and services are close at hand, and people have a range of viable transportation options.

The control measures most applicable to the project are transportation control measures and energy and climate control measures. The project's impact with respect to GHG emissions is discussed in Section E.8, Greenhouse Gas Emissions, which demonstrates that the project would comply with the applicable provisions of the city's Greenhouse Gas Reduction Strategy.

Furthermore, although some storage activities would remain at the 1990 Newcomb Avenue facility, the project would transfer most of existing operations from the 1990 Newcomb Avenue facility and the University Mound facility to the new 2000 Marin Street facility. The project would generate approximately 191 p.m. peak-hour vehicle trips. Because project operations would transfer from the existing facilities to the project site, net-new vehicle trips are not anticipated. Furthermore, the distance between the existing facilities and the project site is less than two miles, which would result in a negligible increase in VMT. Employees are anticipated to use similar modes of travel and commute patterns to the project site as the existing facilities. Transportation control measures that are identified in the clean air plan are implemented by the *San Francisco General Plan* and the planning code, for example, through the city's Transit First Policy, transportation demand management program requirements, and transit impact development fees. Compliance with these requirements would ensure that the project would include relevant transportation control measures specified in the clean air plan. Therefore, the project would include applicable control measures that are identified in the clean air plan to meet the plan's primary goals.

Projects that could cause the disruption or delay of the clean air plan control measures would be ones that would preclude the extension of a transit line or bike path, or projects that would propose excessive parking beyond parking requirements. The project would construct a new SFPUC City Water Distribution Division campus. It would not preclude the extension of a transit line or a bike path or any other transit improvement, and thus would not disrupt or hinder implementation of the clean air plan's control measures.

Therefore, the project would not conflict with or obstruct implementation of the clean air plan. As a result, the impact on air quality would be less than significant. No mitigation is required.

Impact AQ-2: The project's construction activities would generate fugitive dust and criteria air pollutants, but would not result in a cumulatively considerable net increase of non-attainment criteria air pollutants within the Bay Area air basin. (Less than Significant)

Construction activities (short-term) typically result in emissions of ozone precursors and particulate matter in the form of dust (fugitive dust) and exhaust (e.g., vehicle tailpipe emissions). Emissions of ozone precursors and particulate matter are primarily from the combustion of fuel from on-road and off-road vehicles. However, ROGs are emitted from activities that involve painting, other types of architectural coatings, or asphalt paving. Project construction activities would involve several phases: demolition, grading and utilities, foundations, building erection, architectural finishes, and site work. During the project's approximately 40-month construction period, construction activities would have the potential to result in emissions of ozone precursors and particulate matter, as discussed below.

Fugitive Dust

Project-related demolition, excavation, grading, and other construction activities may cause wind-blown dust that could contribute particulate matter into the local atmosphere. Depending on exposure, adverse health effects could occur from this particulate matter in general and because of specific contaminants, such as lead or asbestos that may be constituents of the soil. The current health burden of particulate matter demands that, where possible, public agencies take feasible available actions to reduce sources of particulate matter exposure.

In response, the San Francisco Board of Supervisors approved the Construction Dust Control Ordinance (Ordinance 176-08, effective July 30, 2008), with the intent of reducing the quantity of dust to be generated during site preparation, demolition, and construction work, to protect the health of the general public and onsite workers, minimize public nuisance complaints, and avoid orders to stop work by the department of building inspection. The construction dust control ordinance requires that all site preparation work, demolition, or other construction activities in San Francisco with the potential to create dust or to expose or disturb more than 10 cubic yards or 500 square feet of soil comply with specified dust control measures, whether or not the activity would require a permit from the department of building inspection.[86]

For projects sites greater than 0.5 acre, such as the project, the Construction Dust Control Ordinance would require that the project sponsor submit a Dust Control Plan for approval by the San Francisco Department of Public Health. The Department of Building Inspection would not issue a building permit without written notification from the Director of Public Health that the applicant has a site-specific Dust Control Plan unless the director waives the requirement. The SFPUC would comply with the substantive requirements of the Construction Dust Control Ordinance.

The site-specific Construction Dust Control Plan would require that the project sponsor submit of a map to the Director of Public Health, showing all sensitive receptors within 1,000 feet of the project site; wet down areas of soil at least three times per day; provide an analysis of wind direction and install upwind and downwind particulate dust monitors; record particulate monitoring results; hire an independent, third-party entity to conduct inspections and keep a record of those inspections; establish shut-down conditions based

86 The Director of the Department of Building Inspection may waive this requirement for activities on sites less than 0.5 acre that are unlikely to result in any visible wind-blown dust.

on wind and soil migration; establish a hotline for surrounding community members who may be potentially affected by project-related dust; limit the area subject to construction activities at any one time; install dust curtains and windbreaks on the property lines, as necessary; limit the amount of soil in hauling trucks to the size of the truck bed and securing the soil with a tarpaulin; enforce a 15-mile per hour speed limit for vehicles entering and exiting construction areas; sweep affected streets with water sweepers at the end of the work day; install and use wheel washers to clean truck tires; terminate construction activities when winds exceed 25 miles per hour; apply soil stabilizers to inactive areas; and sweep off adjacent streets to reduce particulate emissions. The project sponsor would be required to designate an individual to monitor compliance with these dust control requirements. San Francisco Ordinance 175-91 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction with any construction or demolition project occurring within the boundaries of San Francisco, unless permission is obtained from the SFPUC. Non-potable water must be used for soil compaction and dust control activities during project construction and demolition. The SFPUC operates a recycled water truck-fill station at the Southeast Water Pollution Control Plant (southeast plant) that provides recycled water for these activities at no charge.

Naturally occurring asbestos is found in the soil across the project site, as discussed in Section D.17 Hazards and Hazardous Materials. Construction activities may result in airborne asbestos exposure from naturally occurring asbestos through fugitive dust emissions. The dust control measures contained in the site-specific Dust Control Plan would address naturally occurring asbestos during construction. Additionally, SFPUC would comply with the California air board's asbestos airborne toxic control measure, which requires implementation of best available dust mitigation measures for construction and grading activities in areas where naturally occurring asbestos is likely to be found.

Furthermore, all SFPUC projects are required to comply with the Construction Dust Control Ordinance to minimize fugitive dust through Standard Construction Measure 2 (Air Quality). Implementation of fugitive dust control measures and development and implementation of a project-specific dust control plan, in compliance with the dust control ordinance and Standard Construction Measure 2 (Air Quality), would reduce the project's potential to result in a cumulatively considerable net increase of particulate matter. As a result, the impact on air quality would be less than significant. No mitigation is required.

Criteria Air Pollutants

As discussed above, project construction activities would result in emissions of criteria air pollutants from the use of off- and on-road vehicles and equipment and other construction activities. The project's construction criteria air pollutant emissions were quantitatively analyzed to determine whether the project may exceed the Bay Area air district's criteria air pollutant significance thresholds (identified in Table 20, p. 81). Construction-related criteria air pollutants would be generated by the project were modeled using the California Emissions Estimator Model (CalEEMod) and presented in an air quality and health risk assessment memorandum.[87] The model was developed, including default data (e.g., emission factors, meteorology), in collaboration with Bay Area air districts' staff. Default assumptions were used where project-specific information was unknown. For projects within the air pollutant exposure zone like the project, the Clean Construction Ordinance requires equipment to meet or exceed Tier 2 emission standards for off-road engines

87 ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project.*

and operate with the most effective California air board VDECS.[88] Therefore, the analysis assumed compliance with the Clean Construction Ordinance. Because construction of the project would occur over an approximately 40-month period, emissions were converted from tons/year to pounds/day using the estimated construction duration of 1,220 working days. Additional assumptions, methodology for calculating criteria air pollutants, and detailed results by construction phase are provided in the air quality and health risk assessment memorandum. The project's construction-related emissions are shown in Table 22.

As shown in Table 22, project construction emissions would be below the threshold of significance for ROG, NO_x, $PM_{2.5}$, and PM_{10} emissions. Therefore, project construction would not exceed any of the significance thresholds for criteria air pollutants. As a result, the impact on air quality would be less than significant. No mitigation is required.

Table 22 Average Daily Project Construction Emissions

	Pollutant Emissions (Average Pounds per Day)			
Construction/Year	ROG	NOx	Exhaust PM_{10}	Exhaust $PM_{2.5}$
2024	<1	11	<1	<1
2025	1	22	<1	<1
2026	3	19	<1	<1
2027	3	7	<1	<1
2028	<1	<1	<1	<1
Bay Area Air District Significance Threshold	54.0	54.0	82.0	54.0

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

Impact AQ-3: During project operations, the project would result in emissions of criteria air pollutants, but not at levels that would result in a cumulatively considerable net increase in non-attainment criteria air pollutants. (*Less than Significant*)

The project would generate criteria pollutant emissions associated with mobile sources (i.e., fleet, employee, and vendor delivery vehicles), on-site area sources, and testing of a backup diesel generator. On-site area sources would include the use of hazardous materials (i.e., solvent spray, paint spray, cutting lubricants) and a welding station in the fabrication and machine shop; paint used in the paint shop; smog testing in the auto shop; grinders and sanders used in the machine shop; and the use of blast cabinets in the carpenter, paint, meter, and machine shops. Most of these on-site area sources would be transferred from the existing 1990 Newcomb Avenue facility to the project site. Operational-related criteria air pollutants that would be

88 In compliance with the Clean Construction Ordinance, the project was modeled assuming that all equipment needs would meet Tier 4 interim emission standards. This was assumed to be representative of the Clean Construction Ordinance because little equipment likely would be Tier 2 with Level 3 VDECS, and a substantial amount of equipment likely would meet Tier 4 final standards. Assuming all equipment would meet Tier 4 interim standards is a reasonably conservative assumption.

generated by the project also were quantified using CalEEMod and presented in the air quality and health risk assessment memorandum.[89]

Because most operational emissions would be transferred from the 1990 Newcomb Avenue facility to the project site, the net emissions for project operations were evaluated. The net effect of the project was determined by evaluating the estimated daily and annual operational emissions from existing uses at the 1990 Newcomb Avenue site to be replaced by the project's uses at the 2000 Marin Street site and deducting those emissions from the project's estimated daily and annual operational emissions. Estimating net operational emissions for criteria air pollutants was determined to be appropriate because these would be regional air pollutants. The CalEEMod default trip lengths for fleet and delivery vehicle trips and employee vehicle trips were used for mobile sources emissions modeling because existing and project vehicle trips length data was not available. Although the distance between the existing 1990 Newcomb Avenue facility and the project site is approximately one mile, the CalEEMod default trip length of 8.4 miles one-way was conservatively applied for fleet and delivery vehicle trips for both existing operations at 1990 Newcomb Avenue and project analyses. Similarly, the CalEEMod default trip length of 13.2 miles one way was conservatively applied for employee vehicle trips. The estimated daily operational emissions from existing uses at 1990 Newcomb Avenue and proposed uses at the project site are summarized in Table 23 and Table 24 (p. 94). The net operational emissions for the project are shown in Table 25 (p. 95) and Table 26 (p. 95). The net emissions results show minor changes in emissions for each emissions category.

Table 23 Operational Criteria Pollutant Emissions for Existing Conditions (1990 Newcomb Avenue) and Project Operations (pounds per day)

Emission Source	ROG	NOx	PM_{10} Total	$PM_{2.5}$ Total
Existing Conditions at 1990 Newcomb Avenue				
Area	3	<1	<1	<1
Stationary	1	<1	1	1
Generators	<1	<1	<1	<1
Smog Testing	N/A	N/A	N/A	N/A
Welding	N/A	N/A	<1	<1
Fabrication Shop	<1	N/A	N/A	N/A
Paint Shop	1	N/A	N/A	N/A
Machine Shop	N/A	N/A	1	1
Sand Blasting	N/A	N/A	<1	<1
Mobile	7	19	1	<1
Total Existing Conditions	11	19	2	1
Project Conditions				
Area	5	<1	<1	<1

89 ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

Emission Source	ROG	NOx	PM_{10} Total	$PM_{2.5}$ Total
Stationary	1	1	1	1
Generators	<1	<1	<1	<1
Smog Testing	<1	<1	<1	<1
Welding	N/A	N/A	<1	<1
Fabrication Shop	<1	N/A	N/A	N/A
Paint Shop	1	N/A	N/A	N/A
Machine Shop	N/A	N/A	1	1
Sand Blasting	N/A	N/A	<1	<1
Mobile	7	18	1	<1
Total Project Conditions	13	19	2	1

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

Table 24 **Operational Criteria Pollutant Emissions for Existing Conditions (1990 Newcomb Avenue) and Project Operations (tons per year)**

Emission Source	ROG	NOx	PM_{10} Total	$PM_{2.5}$ Total
Existing Conditions at 1990 Newcomb Avenue				
Area	1	<1	<1	<1
Stationary	<1	<1	<1	<1
Generators	< 1	< 1	< 1	< 1
Smog Testing	N/A	N/A	N/A	N/A
Welding	N/A	N/A	< 1	< 1
Fabrication Shop	< 1	N/A	N/A	N/A
Paint Shop	< 1	N/A	N/A	N/A
Machine Shop	N/A	N/A	< 1	< 1
Sand Blasting	N/A	N/A	< 1	< 1
Mobile	1	2	<1	<1
Total Existing Conditions	2	3	<1	<1
Project Conditions				
Area	1	<1	<1	<1
Stationary	<1	<1	<1	<1
Generators	< 1	< 1	< 1	< 1
Smog Testing	< 1	< 1	< 1	< 1
Welding	N/A	N/A	< 1	< 1
Fabrication Shop	< 1	N/A	N/A	N/A
Paint Shop	< 1	N/A	N/A	N/A
Machine Shop	N/A	N/A	< 1	< 1
Sand Blasting	N/A	N/A	< 1	< 1
Mobile	1	2	<1	<1
Total Project Conditions	2	3	<1	<1

SOURCE: ICF. 2024 (June 9). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

Table 25 Net Operational Criteria Pollutant Emissions (Project minus Existing Conditions at 1990 Newcomb Avenue) (pounds per day)

Emission Source	ROG	NOx	PM_{10} Total	$PM_{2.5}$ Total
Area	2	<1	<1	<1
Stationary	<1	<1	<1	<1
Mobile	<1	<-1	<1	<1
Total	2	<1	<1	<1
Bay Area Air District Threshold	54	54	82	54

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

Table 26 Net Operational Criteria Pollutant Emissions (Project minus Existing Conditions at 1990 Newcomb) (tons per year)

Emission Source	ROG	NOx	PM_{10} Total	$PM_{2.5}$ Total
Area	<1	<1	<1	<1
Stationary	<1	<1	<1	<1
Mobile	<1	<-1	< 1	<1
Total	<1	<1	<1	<1
Bay Area Air District Threshold	54	54	82	54

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

As shown in Table 25 and Table 26 the project would not exceed any of the significance thresholds for criteria air pollutants. As a result, the impact on air quality would be less than significant. No mitigation is required.

Impact AQ-4: The project's construction and operational activities would generate toxic air contaminants, including diesel particulate matter, but would not expose sensitive receptors to substantial pollutant concentrations. ***(Less than Significant with Mitigation)***

As discussed above, the project site is within an air pollutant exposure zone, and therefore existing background health risks at the project site and vicinity would be substantial. Locations within the air pollutant exposure zone would be subject to a more stringent significance standard, to ensure that the project's contribution to existing health risks would not be significant. In these areas, any project resulting in a contribution to $PM_{2.5}$ concentrations above 0.2 µg/m^3 or resulting in an excess cancer risk of 7.0 per one million persons exposed would have a significant impact. These are the significance thresholds by which a project would result in a considerable contribution to existing cumulative health risks. Therefore, this analysis also addresses the cumulative health risks to sensitive receptors.

Toxic Air Contaminant Emission Sources

A health risk assessment was performed to evaluate potential health risks at offsite sensitive receptors within 1,000 feet.[90] The closest sensitive receptors to the project site are residences at 1250 Missouri Street, which is approximately 260 feet north of the project site. The residences at 1250 Missouri Street are the maximum exposed off-site residential receptors within 1,000 feet of the project site. The commercial use at 2090 Evans Avenue is the maximum exposed off-site worker receptor within 1,000 feet of the project site and is approximately 40 feet south of the project site.

The health risk assessment assessed cancer risk, non-cancer chronic risk, chronic and acute hazards, and $PM_{2.5}$ exhaust concentrations at existing sensitive receptors and off-site worker locations within 1,000 feet of project activities. The health risk assessment only analyzes project toxic air contaminant emissions and did not subtract existing toxic air contaminants emissions from the 1990 Newcomb Avenue facility because of the localized nature of toxic air contaminants. The assessment used the EPA's most recent air dispersion model, AERMOD (version 23132), cancer and chronic risk assessment values for diesel particulate matter provided by the Office of Environmental Health Hazard Assessment[91] and other assumptions for model inputs recommended by the Bay Area air district[92]. The health risk assessment also followed the San Francisco Department of Public Health and San Francisco Planning Department draft *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*[93]. Meteorological data for 2008 from Mission Bay, the nearest meteorological air monitoring site, was used. The analysis in the health risk assessment assumed the maximally exposed receptor would remain at the same location during project construction and over an operational life of 30 years. Additional details on assumptions and analysis methods for the health risk assessment are available in the air quality and health risk assessment memorandum.[94]

Construction

Project construction would take approximately 40 months to complete. Construction activities would result in short-term emissions of diesel particulate matter and other toxic air contaminants. However, project would be subject to the clean construction ordinance, requiring the use of Tier 2 or higher engines with the most effective VDECS, prohibiting portable diesel engines in most cases, restricting equipment idling to two minutes, and requiring contractors to properly maintain and tune their equipment in accordance with manufacturer specifications. The ordinance also would require preparation of a construction emissions minimization plan and monitoring of construction emissions from the start of construction.

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90 ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*. 2024.

91 Office of Environmental Health Hazard Assessment. 2015. *Air Toxics Hot Spots Program: Guidance Manual for Preparation of Health Risk Assessments*. Available: https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf. Accessed August 29, 2022.

92 Bay Area Air Quality Management District. 2020. *BAAQMD Health Risk Assessment Modeling Protocol*. Available: https://www.baaqmd.gov/~/media/files/ab617-community-health/facility-risk-reduction/documents/baaqmd_hra_modeling_protocol-pdf.pdf?la=en. Accessed August 29, 2022.

93 San Francisco Department of Public Health. 2020. *Draft San Francisco Citywide Health Risk Assessment: Technical Support Documentation*. Available: https://www.sfdph.org/dph/files/EHSdocs/AirQuality/Air_Pollutant_Exposure_Zone_Technical_Documentation_2020.pdf. Accessed March 21, 2023.

94 ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*. April 2.

Operations

During operations, the project would generate vehicle trips from the fleet, delivery, and from employee trips occurring at the 2000 Marin site. Diesel fleet, delivery, and employee vehicle trips would generate diesel particulate matter, $PM_{2.5}$, and fugitive dust from tire wear, brake wear, and road dust. Fleet vehicles used during project operations were categorized as large and regular fleet vehicles. The large fleet vehicle mix were assumed to be medium heavy-duty trucks and heavy-duty trucks. The regular fleet vehicle mix were assumed to be light-duty autos, light-duty trucks, light heavy-duty trucks, medium-duty vehicles, and medium heavy-duty trucks. The emissions modeling applied the CalEEMod default trip lengths (i.e., 8.4 miles one-way for fleet vehicles) for operational fleet vehicle trips. Employee vehicle trips were assumed to require two one-way trips per day. The employee vehicle trips emissions modeling applied the CalEEMod default trip length (i.e., 13.2 miles one-way) and fleet mix (e.g., light-duty autos and light-duty trucks). Off-site privately owned delivery vehicles would intermittently deliver materials to the project site. The delivery vehicle trips emissions modeling applied the CalEEMod default trip length (i.e., 8.4 miles one-way for delivery trucks) and fleet mix (e.g., medium heavy-duty trucks and heavy heavy-duty trucks).

During operations, the project would involve use of shop equipment, smog testing, and periodic testing of a 750-kilowatt diesel emergency generator, all of which emit toxic air contaminants. Toxic air contaminant emissions for hazardous materials used in the fabrication and machine shop were quantified based on the specific materials' volatile organic compounds content, consumption rate, and density. This would include toxic air contaminant emissions from cutting lubricants, solvent spray, and paint spray. Toxic air contaminant emissions were based on 2022 paint purchase records for paint types utilizing the latest air Bay area air board speciation profiles for volatile organics gas profiles associated with paint. Welding equipment in the fabrication and machine shop would generate toxic air contaminants in the form of hexavalent chromium, chromium III, cobalt, manganese, nickel, and lead. PM_{10} and toxic air contaminants emissions from welding equipment were quantified based on the EPA's AP-42 Chapter 12.19 Electric Arc Welding emission factors, by welding type and electrode consumption for metals other than Chromium-6. For Chromium-6, the modeled the average emission factor was based on the air board-sponsored study on "Improving Welding Toxic Metal Emission Estimate in California".[95] Toxic air contaminants from blast cabinets would generate hexavalent chromium, chromium III, cadmium, manganese, nickel, and lead. PM_{10} and toxic air contaminant emissions from blast cabinets used in the proposed auto, carpenter, paint, meter, and machine shops were quantified based on the EPA's AP-42 emission factors, Chapter 13.2.6 Abrasive Blasting, dust collector capacities, collection efficiency of 98 percent, and projected sand throughput. Criteria pollutant and diesel particulate matter emissions from heavy-duty diesel truck exhaust as a result of smog testing at the auto shop were quantified using engine exhaust flow rates and assumed testing occurred two times per year. Additionally, PM_{10} and toxic air contaminant emissions for grinders and sanders that would be used in the machine shops were quantified based on SFPUC-provided data and assumed a containment efficiency of 90 percent.

The 750-kilowatt diesel emergency generator was modeled as a Tier 4 interim generator with Level 1 diesel particulate filters, which would comply with the substantive requirements in San Francisco Health Code article 30. Emergency generators are regulated by the Bay Area air district through its New Source Review (regulation 2, rule 5) permitting process. SFPUC would be required to obtain applicable permits to operate

95 California Air Resources Board, 2004, Improving Welding Toxic Metal Emission Estimates in California. Available at: https://ww2.arb.ca.gov/sites/default/files/2021-07/report_0.pdf. Accessed on April 2, 2024.

this emergency generator from the Bay Area air district. Although the emergency generator would be intended only to be used in periods of power outages, monthly and annual testing of the generator would be required. The Bay Area air district would limit this testing to no more than 50 hours per year. In addition, as part of the permitting process, the Bay Area air district would limit the excess cancer risk from any facility to no more than ten per one million population and would require any source that would result in an excess cancer risk greater than one per one million population to install best available control technology for toxics.

Existing Plus Project Health Risks

Table 27 and Table 28 show the results of the health risk assessment and identify the increases in cancer risk and annual $PM_{2.5}$ concentration from project construction and operation at the maximum exposed off-site residential receptor and the maximum exposed off-site worker receptor. Project construction and operation would increase the cancer risk at both the maximum exposed off-site residential receptor and the maximum exposed off-site worker receptor and would increase annual $PM_{2.5}$ concentration at the maximum exposed off-site worker receptor. The impact would be significant.

Table 27 Estimated Project Level Health Risk Results from Construction and Operations at Maximum Exposed Off-site Residential Receptor within 1,000 Feet

Scenario	Cancer Risk (cases per million)	Annual $PM_{2.5}$ Concentrations (ug/m^3)[a]
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor (1250 Missouri Street)	136	10.2
Project Construction	4.9	0.01
Project Operations	2.5	0.11
Total (Construction and Operations)	7.4	0.11
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor plus Total (Construction and Operations)	143.4	10.3
Air Pollutant Exposure Zone Thresholds	7	0.2

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

NOTES:

[a] annual $PM_{2.5}$ concentrations were based on annual construction emissions and annual 1-hour operational emissions.

Table 28 Estimated Project Level Health Risk Results from Construction and Operations at Maximum Exposed Off-site Worker Receptor

Scenario	Cancer Risk (cases per million)	Annual $PM_{2.5}$ Concentrations (ug/m3)[a]
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site worker receptor (2090 Evans Avenue)	151	10.5
Project Construction	1.7	0.07
Project Operations	14.7	0.37
Total (Construction and Operations)	16.4	0.37
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site worker receptor plus Total (Construction and Operations)	167.1	10.9
Air Pollutant Exposure Zone Thresholds	7	0.2

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

NOTES:

[a] Annual PM2.5 concentrations were based on annual construction emissions and annual 1-hour operational emissions.

However, implementation of **Mitigation Measure M-AQ-4: $PM_{2.5}$ Controls for Operational Equipment** would be required to minimize health risk impacts by requiring collection and containment efficiencies for $PM_{2.5}$ for select operational activities to reduce the increase in cancer risk and $PM_{2.5}$ concentrations resulting from operation of the project.

Mitigation Measure M-AQ-4: PM2.5 Controls for Operational Equipment

Equipment for the following operational activities shall meet the following collection and containment efficiencies for $PM_{2.5}$:

- machine shop grinding and sanding equipment shall be designed to have a containment efficiency of 90 percent.
- sandblasting equipment shall be designed to have a collection efficiency of 98 percent.
- woodworking and sandblasting activities shall have a containment efficiency of 99.9 percent.

For the operational equipment listed above, specifications shall be submitted to the ERO for review and approval. The 99.9 percent containment efficiency for woodworking and sandblasting shall be achieved through the use of building air filters (DC-10). Once operational, equipment and building air filters shall be maintained in good working order in perpetuity and any future replacement of equipment or building air filters. The operator of the facility shall maintain records of the

maintenance of equipment and building filters and provide this information for review to the ERO within three months of requesting such information.

Table 29 and Table 30 show the results of the health risk assessment and identify the increases in cancer risk and annual $PM_{2.5}$ concentration from project construction and operation at the maximum exposed off-site residential receptor and the maximum exposed off-site worker receptor with implementation of **Mitigation Measure M-AQ-4**. With implementation of the mitigation measure, project construction and operation would not exceed the air pollutant exposure zone cancer risk or $PM_{2.5}$ concentrations at the maximum exposed off-site residential receptor. However, construction and operation of the project would exceed the $PM_{2.5}$ concentrations of 0.2 µg/m^3 at the maximally exposed off-site worker receptor by 0.02 µg/m^3.

Table 29 Estimated Project Level Health Risk Results from Construction and Operations at Maximum Exposed Off-site Residential Receptor within 1,000 Feet with Mitigation Incorporated

Scenario	Cancer Risk (cases per million)	Annual $PM_{2.5}$ Concentrations (ug/m^3)[a]
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor (1250 Missouri Street)	136	10.2
Project Construction	4.9	0.01
Project Operations with Mitigation Incorporated	0.1	0.06
Total (Construction and Operations with Mitigation Incorporated)	5.0	0.06
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor plus Total (Construction and Operations with Mitigation Incorporated)	141.0	10.6
Air Pollutant Exposure Zone Thresholds	7	0.2

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

NOTES:

[a] annual $PM_{2.5}$ concentrations were based on annual construction emissions and annual 1-hour operational emissions.

Table 30 Estimated Project Level Health Risk Results from Construction and Operations at Maximum Exposed Off-site Worker Receptor with Mitigation Incorporated

Scenario	Cancer Risk (cases per million)	Annual $PM_{2.5}$ Concentrations (ug/m3)[a]
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site worker receptor (2090 Evans Avenue)	151	10.5
Project Construction	1.7	0.07
Project Operations with Mitigation Incorporated	0.2	0.22
Total (Construction and Operations with Mitigation Incorporated)	1.9	0.22
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site worker receptor plus Total (Construction and Operations with Mitigation Incorporated)	152.9	10.7
Air Pollutant Exposure Zone Thresholds	7	0.2

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

NOTES:

[a] Annual PM2.5 concentrations were based on annual construction emissions and annual 1-hour operational emissions.

The health risk assessment for the project used conservative assumptions on exposure duration, which would likely result in overestimated health risk for both residential and worker receptors. Consistent with California EPA's Office of Environmental Health Hazard Assessment guidance, the health risk assessment for the project assumed that hypothetical residents at the sensitive receptor locations would spend 30 years at one location and offsite workers at the worker receptor locations would spend 25 years at one location. However, the EPA has estimated that 50 percent of the population lives in the same residence for only eight years, while only 10 percent remain in the same house for 32 years.[96] Accordingly, the actual risks to hypothetical residents at the modeled residential receptor locations are likely lower than those calculated in the project health risk assessment. Additionally, this analysis assumes that residents below the age of 16 years are exposed for 24 hours per day, 365 days per year at the same location. However, young residents usually leave their houses for school, shopping, and vacation. After age 16, project health risk assessment assumed the residents spend 73 percent of their time at home, although older residents may also leave their houses for large fractions of most days. Regarding off-site workers, the EPA has estimated that the median occupational tenure of the working population ages 16 years of age and older was 7.9 years for men and 5.4 years for women.[97] Accordingly, the actual risks to hypothetical workers at the modeled worker receptor locations would likely be lower than those calculated for the project health risk assessment. Because of the

96 EPA, 2011. Exposure Factors Handbook: 2011 Edition, Office of Research and Development, Washington, D.C. September, https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=236252. Accessed: April 2, 2024

97 Ibid.

conservative assumptions used in the project health risk assessment, it is assumed that the modeled cancer risk and annual $PM_{2.5}$ concentrations for the project would be lower than what is presented in this analysis.

As described above, the analysis of toxic air contaminant emissions does not deduct existing toxic air contaminants emissions from the 1990 Newcomb Avenue facility (to present a net change in emissions) due to the localized nature of toxic air contaminants and health risks. Health risks at sensitive receptors near the 1990 Newcomb Avenue facility would decrease as a result of the project, but those health risk reductions are not quantified as part of this analysis and are addressed qualitatively as follows.

Sensitive receptors within 1,000 feet of the 1990 Newcomb Avenue facility include adjacent (within 20 feet west and north) offsite workers, in addition to residences, parks, and schools. The nearest residential receptor is located approximately 225 feet south of the 1990 Newcomb Avenue facility, whereas the nearest residential receptor to the 2000 Marin Street project site is located at a slightly greater distance at approximately 260 feet north of the project site. Additionally, the closest worker receptor to the 1990 Newcomb Avenue facility is located 20 feet north, whereas the closest worker receptor to the 2000 Marin Street project site is located 40 feet to the north across Marin Street, Evans Avenue, and Cesar Chavez Street. Therefore, receptors are located closer to the 1990 Newcomb Avenue facility than they would be from the proposed 2000 Marin Street project site. Due to the relative proximity of receptor locations to the existing and proposed sites, it is very likely that unmitigated operational health risks and $PM_{2.5}$ concentrations associated with the 1990 Newcomb Avenue facility would be higher than the operational health risks and $PM_{2.5}$ concentrations associated with the 2000 Marin Street project site at their respective maximum exposed off-site resident and maximum exposed off-site worker receptor locations.

Additionally, operational toxic air contaminants and $PM_{2.5}$ emissions at the 1990 Newcomb Avenue facility are largely uncontained due to aging equipment and infrastructure, whereas operational toxic air contaminants and $PM_{2.5}$ emissions associated with grinding, sanding, woodworking, and sandblasting activities at the proposed project site would be contained through implementation of **Mitigation Measure M-AQ-4,**which requires building air filters for woodworking activities and sandblasting activities that would reduce ambient concentrations of particulate matter by 99.9 percent. Therefore, current operations at the existing 1990 Newcomb Avenue facility would result in higher toxic air contaminant and $PM_{2.5}$ concentrations at nearby maximum exposed off-site resident and maximum exposed off-site worker receptors than the proposed project's operational toxic air contaminant and $PM_{2.5}$ emissions at the 2000 Marin Street site, with implementation of the proposed controls. The net effect of the project would be a reduction in exposure of maximum exposed off-site resident and maximum exposed off-site worker receptors to toxic air contaminant and $PM_{2.5}$ emissions from existing baseline conditions. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. As a result, the associated health risk impact would be less than significant with implementation of mitigation.

Impact AQ-5: The proposed project would not create objectionable odors that would adversely affect a substantial number of people. ***(Less than Significant)***

Typical odor sources of concern would include wastewater treatment plants, sanitary landfills, transfer stations, composting facilities, petroleum refineries, asphalt batch plants, chemical manufacturing facilities, fiberglass manufacturing facilities, auto body shops, rendering plants, and coffee roasting facilities. During project construction and operation, diesel exhaust from equipment would generate some odors, which could increase odors temporarily in the immediate vicinity of the equipment being operated. Construction-related odors would be temporary and would not persist after completion of construction.

Operational activities, including vehicle fueling, smog testing, and use of shop equipment, also would generate diesel exhaust that would generate odors. The majority of onsite sources of odors would be transferred from the existing 1990 Newcomb Avenue facility to the project site and the project would not result in net new sources of odor. Diesel exhaust would dissipate with increasing distance from the sources. As discussed above, the nearest sensitive residential receptor would be approximately 260 feet north of the project boundary at 1250 Missouri Street, and the nearest worker receptor would be approximately 40 feet south of the project boundary. However, the nearest on-site shop to the maximally exposed off-site residential receptor and maximally exposed off-site worker receptor is 300 feet and 170 feet, respectively. Odors from on-site sources are expected to dissipate at these distances.

Therefore, the project would not result in other emissions, such as odors, which could adversely affect a substantial number of people. As a result, the impact relative to odors would be less than significant. No mitigation is required.

Impact C-AQ-1. The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on air quality. ***(Less than Significant with Mitigation)***

As discussed above, regional air pollution generally is considered a cumulative impact. Emissions from past, present, and future projects contribute to the region's adverse air quality on a cumulative basis. No single project by itself would be sufficient in size to result in regional non-attainment of ambient air quality standards. Instead, a project's individual emissions would contribute to existing cumulative adverse air quality impacts.[98] The project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to result in a considerable net increase in non-attainment criteria air pollutants. Therefore, the cumulative criteria air pollutant analysis is presented in Impacts AQ-2 and AQ-3. The remainder of this cumulative air quality analysis addresses cumulative health risks and odors to sensitive receptors.

Cumulative projects that are within 1,000 feet of the maximally exposed off-site residential receptors and maximally exposed off-site worker receptor would have the potential to cause cumulative construction and operational-related health risk impacts on the receptors. As shown in Table 31 (p. 105) the Potrero Hope SF, 1111 Pennsylvania Avenue, and Bay Corridor Transmission and Distribution Phase 4 and Improvements project sites are within 1,000 feet of the of the maximally exposed off-site residential receptor. The Potrero Hope SF and Bay Corridor Transmission and Distribution Phase 4 Improvements project sites also are within 1,000 feet of the maximally exposed off-site worker receptor. The Bay Corridor Transmission and Distribution Phase 4 and Improvements project was determined to be categorically exempt under CEQA and was not required to complete a health risk assessment. The Potrero Hope SF cumulative project quantified health risks for construction and operation. The 1111 Pennsylvania Avenue project analyzed health risk impacts for construction and operation qualitatively (cancer risk and $PM_{2.5}$ concentration were not quantified).

The 1111 Pennsylvania Avenue, Potrero Hope SF, and Bay Corridor Transmission and Distribution Phase 4 and Improvements projects would require use of diesel construction equipment that would emit diesel particulate matter and toxic air contaminants. The 1111 Pennsylvania Avenue and Potrero Hope SF cumulative projects also would introduce new permanent stationary sources of emissions, including an

98 Bay Area Air Quality Management District. 2022 *CEQA Air Quality Guidelines*.

emergency generator, which would generate toxic air contaminant emissions. Vehicle trips and stationary sources of diesel from cumulative projects would increase diesel particulate matter and toxic air contaminants.

Table 32 and Table 33 (p. 106) show the cumulative health risk at the maximally exposed off-site residential receptor and maximally exposed off-site worker receptor within 1,000 feet of the cumulative projects. These tables include an analysis of existing health risks as modeled in the 2020 San Francisco Citywide Health Risk Assessment plus proposed project lifetime health risks, with mitigation incorporated, and quantified health risks from the Potrero Hope SF cumulative project.[99] When considering the cumulative project contribution, the health risks at the project's maximally exposed off-site residential receptor and maximally exposed off-site worker receptor would increase compared to existing plus project conditions. For those locations that exceed the air pollutant exposure zone criteria of an excess cancer risk of 100 per 1 million and/or a $PM_{2.5}$ concentration of 10 $\mu g/m^3$, including at the maximally exposed off-site residential receptor and maximally exposed off-site worker receptor, a significant cumulative health risk impact would occur.

The proposed project's health risk contribution would be cumulatively considerable if the project would exceed the significance threshold of a $PM_{2.5}$ concentration at or above 0.2 $\mu g/m^3$ or an excess cancer risk at or greater than 7.0 per million. As shown in Table 32, the project's health risk contribution at the maximally exposed off-site residential receptor would not exceed the health risk significance thresholds. However, the project would exceed the $PM_{2.5}$ concentrations of 0.2 $\mu g/m^3$ at the maximally exposed off-site worker receptor. As discussed above, while the project would exceed the $PM_{2.5}$ concentrations of 0.2 $\mu g/m^3$ at the maximally exposed off-site worker receptor by 0.02 $\mu g/m^3$, the health risk assessment for the project used conservative assumptions on exposure duration, which would likely result in overestimated health risk for both residential and work receptors. In addition, it is assumed that operational health risks and $PM_{2.5}$ concentrations associated with the 1990 Newcomb Avenue facility would be higher than the operational health risks and $PM_{2.5}$ concentrations associated with the 2000 Marin Street project. Because of the conservative assumptions used in the project health risk assessment, it is assumed that the modeled cancer risk and annual $PM_{2.5}$ concentrations for the project are lower than what is presented in this analysis. The operational toxic air contaminants and $PM_{2.5}$ emissions associated with grinding, sanding, woodworking, and sandblasting activities at the project site would be contained through implementation of **Mitigation Measure M-AQ-4**, unlike the operational toxic air contaminants and $PM_{2.5}$ emissions at the 1990 Newcomb Avenue facility, which are largely uncontained due to aging equipment and infrastructure. For these reasons, the project's health risk impact would not be cumulatively considerable. Therefore, cumulative health risks from construction and operation of the project would be less than significant with mitigation incorporated.

99 The Bay Corridor Transmission and Distribution Phase 4 and Improvements Project and 1111 Pennsylvania Avenue Project did not quantify health risks, and therefore are not included in the tables.

Table 31 Approximate Distance from Cumulative Projects to Project's Maximally Exposed Off-site Residential and Worker Receptors

Cumulative Project	Distance from Project Site (feet)	Distance from Maximally Exposed Off-site Residential Receptor (feet)	Distance from Maximally Exposed Off-site Worker Receptor (feet)
Potrero Hope SF	600	265	460
1111 Pennsylvania Avenue	857	1,000	1,106
Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project	30	230	40

SOURCE: ICF. 2024 (June). Air Quality and Health Risk Assessment for the 2000 Marin Street Project.

Table 32 Estimated Cumulative Health Risk Results at Maximum Exposed Off-site Residential Receptor

Scenario	Cancer Risk (cases per million)	Annual $PM_{2.5}$ Concentrations (ug/m^3)
Project Construction and Operation with Mitigation Incorporated	5.0	0.06
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor (1250 Missouri Street)	136	10.2
Potrero Hope SF Cumulative Project	113	1.01
Total (Project plus background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor)	254.1	11.27

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

NOTES:

[a] The on-cancer hazard index and annual $PM_{2.5}$ concentrations were based on annual construction emissions and annual 1-hour operational emissions.

[b] Ramboll. 2020 (February). *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*. Available: San Francisco Citywide Health Risk Assessment Technical Support Document (sfdph.org).

[c] The cancer risk and annual $PM_{2.5}$ concentrations associated with the Potrero Hope SF project include both construction and operational health risks, even though construction was anticipated to cease in 2023. Also, the cancer risk and $PM_{2.5}$ concentrations are reported at the Potrero Hope SF Project maximally exposed off-site residential receptor, which are different from the project's maximally exposed off-site residential receptor or maximally exposed off-site worker receptor. Worker receptors were not analyzed for Potrero Hope SF.

Table 33 Estimated Cumulative Health Risk Results at Maximum Exposed Off-site Worker Receptor

Scenario	Cancer Risk (cases per million)	Annual $PM_{2.5}$ Concentrations (ug/m^3)
Project Construction and Operation with Mitigation Incorporated	1.9	0.22
Background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site worker receptor (2090 Evans Avenue)	154	10.7
Potrero Hope SF Cumulative Project	113	1.01
Total (Project plus background 2020 Citywide Health Risk Assessment at the project maximally exposed off-site residential receptor)	268.9	11.93

SOURCE: ICF. 2024 (June). *Air Quality and Health Risk Assessment for the 2000 Marin Street Project*.

NOTES:

[a] The non-cancer hazard index and annual $PM_{2.5}$ concentrations were based on annual construction emissions and annual 1-hour operational emissions.

[b] Ramboll. 2020 (February). *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*. Available: sfdph.org.

[c] The cancer risk and annual $PM_{2.5}$ concentrations associated with the Potrero Hope SF project include both construction and operational health risks, even though construction was anticipated to cease in 2023. Also, the cancer risk and PM2.5 concentrations are reported at the Potrero Hope SF Project maximally exposed off-site residential receptor, which are different from the project's maximally exposed off-site residential receptor or maximally exposed off-site worker receptor. Worker receptors were not analyzed for Potrero Hope SF.

As discussed under Impact AQ-5, construction of the project would generate odors from vehicle fueling, smog testing, and use of shop equipment. The project and cumulative projects would generate some odors during construction, but odors would be temporary and localized and would therefore not combine to result in a significant cumulative odor impact. Upon completion of construction activities cumulative projects combined with the project would not generate substantial odors for the reasons that follow. Operation of the project would generate odors from vehicle fueling, smog testing, and use of shop equipment that would generate odors. However, given the distance of the project site from the nearest receptors and because odors dissipate with distance and the identified cumulative projects would not generate odors during operations. Therefore, a significant cumulative impact would not result during operation of the project (no impact). No mitigation is required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
8. GREENHOUSE GAS EMISSIONS. Would the project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐	☐
b) Conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐	☐

Greenhouse gas (GHG) emissions and global climate change represent cumulative impacts. GHG emissions cumulatively contribute to the significant adverse environmental impacts of global climate change. No single project could generate enough GHG emissions to noticeably change the global average temperature; instead, the combination of GHG emissions from past, present, and future projects have contributed and would continue to contribute to global climate change and its associated environmental impacts. For this reason, the analysis of the project's impact on climate change focuses on the project's contribution to cumulatively significant GHG emissions, and this section does not include an individual, project-specific impact statement.

On April 20, 2022, the Bay Area Air Quality Management District (air district) adopted updated GHG thresholds.[100] Consistent with CEQA Guidelines sections 15064.4 and 15183.5 which address the analysis and determination of significant impacts from a project's GHG emissions, the updated thresholds for land use projects, such as the project, maintains the air district's previous GHG threshold that allow projects that are consistent with a GHG reduction strategy to conclude that those project's GHG impacts are less than significant.

San Francisco's 2023 GHG Reduction Strategy Update[101] presents a comprehensive assessment of policies, programs, and ordinances that collectively represent San Francisco's GHG reduction strategy in compliance with the air district's guidelines and CEQA Guidelines. These GHG reduction actions have resulted in a 48 percent reduction in GHG emissions in 2020, compared to 1990 levels,[102] which far exceeds the goal of 2020 GHG emissions, equaling those in 1990, set in Executive Order S-3-05[103] and the California Global Warming Solutions Act.[104] The city has also met and exceeded the 2030 target of 40 percent reduction below 1990

100 Bay Area Air Quality Management District, *CEQA Thresholds and Guidelines Update*, available: https://www.baaqmd.gov/plans-and-climate/california-environmental-quality-act-ceqa/updated-ceqa-guidelines. Accessed: September 2, 2022.

101 San Francisco Planning Department, *2023 Greenhouse Gas Reduction Strategy Update,* October 2023. Available: https://sfplanning.org/project/greenhouse-gas-reduction-strategies. Accessed: March 4, 2024.

102 San Francisco Department of the Environment, *San Francisco's 2019 Carbon Footprint*. Available: https://sfenvironment.org/carbonfootprint. Accessed: August 16, 2022.

103 Office of the Governor, Executive Order S-3-05, June 1, 2005. Available: https://www.library.ca.gov/wp-content/uploads/GovernmentPublications/executive-order-proclamation/5129-5130.pdf. Accessed: August 16, 2022.

104 California Legislative Information, Assembly Bill 32, September 27, 2006. Available: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf. Accessed: August 16, 2022.

levels, set in the California Global Warming Solutions Act of 2016[105] and the air district's 2017 Clean Air Plan[106] more than 10 years before the target date.

San Francisco's GHG reduction goals, updated in July 2021 by ordinance 117-02,[107] are consistent with, or more aggressive than, the long-term goals established under Executive Orders S-3-05,[108] B-30-15,[109] B-55-18,[110] the California Global Warming Solutions Act of 2016.[111] The updated GHG ordinance demonstrates the city's commitment to continued GHG reductions by establishing targets for 2030, 2040, and 2050 and setting other critical sustainability goals. In particular, the updated ordinance sets a goal to reach net-zero sector-based GHG emissions by 2040 and sequester any residual emissions using nature-based solutions.[112] Thus, the city's GHG reduction goal is consistent with the state's long-term goal of reaching carbon neutrality by 2045. The updated GHG ordinance required that the San Francisco Department of the Environment prepare and submit to the mayor a climate action plan (CAP) by December 31, 2021. The CAP, which was released on December 8, 2021, and will be updated every five years, carries forward the efforts of the city's previous CAPs and charts a path toward meeting the GHG commitments of the Paris Agreement (e.g., limit global warming to 1.5 degrees Celsius) as well as the reduction targets adopted in the GHG ordinance.

In summary, the CEQA Guidelines and air district-adopted GHG thresholds allow projects consistent with an adopted GHG reduction strategy to determine a less-than-significant GHG impact. San Francisco has a GHG reduction strategy that is consistent with near- and long-term state and regional GHG reduction goals and is effective because the city has demonstrated its ability to meet state and regional GHG goals in advance of target dates.

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105 California Legislative Information, Senate Bill 32, September 8, 2016. Available: https://leginfo.legislature.ca.gov/faces/billPdf.xhtml?bill_id=201520160SB32&version=20150SB3288CHP. Accessed: August 16, 2022.

106 Bay Area Air Quality Management District. 2017. *Clean Air Plan*. September 2017. Available: http://www.baaqmd.gov/plans-and-climate/air-quality-plans/current-plans. Accessed: August 16, 2022.

107 San Francisco Board of Supervisors, 2021 (July 20, Ordinance No. 117-21, File No. 210563, available: https://sfbos.org/sites/default/files/o0117-21.pdf, accessed August 16, 2022. San Francisco's GHG reduction goals are codified in Section 902(a) of the Environment Code and include the following goals: (1) by 2030, a reduction in sector-based GHG emissions of at least 61 percent below 1990 levels; (2) by 2030, a reduction in consumption-based GHG emissions equivalent to a 40 percent reduction compared to 1990 levels; (3) by 2040, achievement of net zero sector-based GHG emissions by reducing such emissions by at least 90 percent compared to 1990 levels and sequestering any residual emissions; and (4) by 2050, a reduction in consumption-based GHG emissions equivalent to an 80 percent reduction compared to 1990 levels.

108 Executive Order S-3-05 sets forth a goal of an 80 percent reduction in GHG emissions by 2050. San Francisco's goal of net zero sector-based emissions by 2040 requires a greater reduction of GHG emissions.

109 Office of the Governor, 2015 (April 29), Executive Order B-30-15, available: https://www.ca.gov/archive/gov39/2015/04/29/news18938/, accessed August 16, 2022. Executive Order B-30-15 sets a State GHG emissions reduction goal of 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

110 Office of the Governor, 2018(September 18), Executive Order B-55-18, available: https://www.ca.gov/archive/gov39/wp-content/uploads/2018/09/9.10.18-Executive-Order.pdf, accessed August 16, 2022. Executive Order B-55-18 establishes a statewide goal of achieving carbon neutrality as soon as possible, but no later than 2045, and achieving and maintaining net negative emissions thereafter. San Francisco's goal of net zero sector-based emissions by 2040 is a similar goal but requires achievement of the target 5 years earlier.

111 Senate Bill 32 amends California Health and Safety Code Division 25.5 (also known as the California Global Warming Solutions Act of 2006), by adding Section 38566, which directs that statewide GHG emissions be reduced by 40 percent below 1990 levels by 2030. San Francisco's 2030 sector-based GHG reduction goal of 61 percent below 1990 levels requires a greater reduction of GHG emissions.

112 Nature-based solutions are those that remove remaining emissions from the atmosphere by storing them in natural systems that support soil fertility or employing other carbon farming practices.

A GHG analysis checklist was completed for the project that outlines project compliance with adopted regulations and ordinances.[113] The project would comply with all applicable regulations/ordinances and was determined to be in compliance with the city's GHG reduction strategy. Therefore, projects that are consistent with San Francisco's GHG reduction strategy would not result in GHG emissions that would have a significant effect on the environment, and would not conflict with state, regional, or local GHG reduction plans and regulations (less than significant). No mitigation is required.

Impact C-GG-1: The proposed project would generate GHG emissions, but not at levels that would result in a significant impact on the environment or conflict with any policy, plan, or regulation adopted for reducing GHG emissions. ***(Less than Significant)***

The proposed project would increase the intensity of use of the site by replacing the existing 75,035-gross square-foot building and 295,967 gross-square-foot parking lot with 219,515 gross square feet of parking, 87,285 gross square feet of industrial use, and 64,050 gross square feet of office use.

Thus, the proposed project would contribute to the cumulative effects of climate change by directly or indirectly emitting GHGs during construction and operation. Construction activities would result in a temporary increase in GHG emissions. Direct operational effects from the proposed project would include GHG emissions from new stationary sources (e.g., diesel generator, fuel station) and employee and fleet vehicles. Operational equipment that would be used in the shops would be all electric and would not emit GHGs. Indirect effects would include GHG emissions from electricity providers, including the generation of the energy required to pump, treat, and convey water; other GHG emissions are associated with waste removal, waste disposal, and landfill operations. Operation of the proposed project would not represent a substantial change in GHG emissions because the project would mostly relocate the sources of emissions that currently occur at 1990 Newcomb Avenue to the new 2000 Marin Street facility.

The proposed project would be subject to regulations adopted to reduce GHG emissions, as identified in the GHG reduction strategy and demonstrated in the GHG checklist, completed for the proposed project.[114] For example, the proposed project would comply with the city's Commuter Benefits Ordinance; Healthy Air and Clean Transportation Ordinance; Clean Construction Ordinance; Biodiesel for Municipal Fleets(executive directive 06-02); Tenant Bicycle Parking in Existing Commercial Buildings Ordinance; Resource Conservation Ordinance; Construction and Demolition Debris Recovery Ordinance; Mandatory Recycling and Composting Ordinance; Construction Recycled Content Ordinance; Bottled and Package Free Water Ordinance; Food Service and Packing Waste Reduction Ordinance; Site Runoff Ordinance; Stormwater Management Ordinance; Water Efficient Irrigation Ordinance; Environmentally Preferable Purchasing Ordinance; and Arsenic-treated Wood Ordinance, and requirements to provide bicycle parking, showers, and lockers in new and expanded buildings. The proposed project would comply with green building requirements for energy efficiency, such as complying with current water fixture and fitting efficiency requirements, street planting requirements, and solar photovoltaic requirements, and would meet Leadership in Energy and Environmental Design standards. Additionally, all proposed buildings would be electrically powered. The

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113 San Francisco Planning Department, 2022 (July 27), *Greenhouse Gas Analysis: Compliance Checklist for 2022-000702ENV*.

114 Ibid.

proposed project also would be required to meet the requirements of the San Francisco Green Building Code.

In addition, the proposed project would comply with other applicable regulations that would reduce its GHG emissions related to energy use, waste disposal, and wood burning. As discussed above, these regulations have proved effective because San Francisco has reduced its GHG emissions by 48 percent below 1990 levels, far exceeding statewide and regional 2020 GHG reduction targets. Furthermore, the city's GHG reductions in 2020 also met statewide and regional 2030 targets more than 10 years in advance of the target year. Therefore, because the proposed project would be subject to regulations adopted to reduce GHG emissions, the proposed project would be consistent with San Francisco's GHG reduction strategy and would not generate significant GHG emissions nor conflict with state, regional, and local GHG reduction plans and regulations.

The proposed project would be consistent with the city's GHG reduction strategy. The proposed project also would be consistent with the GHG reduction goals of Executive Orders S-3-05, B-30-15, and B-55-18, California Global Warming Solutions Act of 2016, and the clean air plan. Therefore, the proposed project would not make a cumulatively considerable contribution to a significant GHG cumulative impact (less than significant).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
9. WIND. Would the project:					
a) Create wind hazards in publicly accessible areas of substantial pedestrian use?	☐	☐	☒	☐	☐

Impact WI-1: The proposed project would not create wind hazards in publicly accessible areas of substantial pedestrian use. ***(Less than Significant)***

A project's wind impacts are related directly to its height, orientation, design, location, and surrounding development context. Based on wind analyses for other infill development projects in San Francisco, a building that does not exceed a height of 85 feet generally has little potential to cause substantial changes in ground-level wind conditions.

The project would demolish an existing 34-foot-tall building and surface parking lot and would construct five new buildings ranging from 20 to 60.5 feet in height. The proposed buildings would be similar in height to existing buildings in the project vicinity. In the city, westerly to northwesterly winds are the most frequent and strongest winds during all seasons.[115] Cesar Chavez Street is 11 feet higher in elevation than the project site, and commercial buildings northwest of the project site along Cesar Chavez Street would be expected to shelter the project buildings. Because of the heights of the proposed buildings and presence of surrounding development acting as wind barriers, the project would not cause substantial changes to ground-level wind conditions adjacent to the project site. Therefore, the project would not create wind hazards in publicly

115 San Francisco Planning Department, 2021 (April), *530 Sansome Street Preliminary Mitigated Negative Declaration*.

accessible areas of substantial pedestrian use. As a result, the impact relative to wind hazards would be less than significant. No mitigation is required.

Impact C-WI-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to wind. ***(No Impact)***

The cumulative context for wind impacts would be local and limited to the immediate project vicinity. Cumulative development projects within an approximately 0.25 mile of the project site are listed in Section B, Project Setting, and include the Channel Force Main Intertie Project, Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, 1111 Pennsylvania Avenue Project, Potrero Hope SF Project, 1399 Marin Street Project, 1801 Evans Avenue Project, and Islais Creek Bridge Project. Significant cumulative wind impacts could occur if the proposed project, in combination with cumulative projects, would combine to result in the creation of wind hazards in publicly accessible areas of substantial pedestrian use.

The 1801 Evans Avenue project would not involve new construction, and the building height would remain the same. The Channel Force Main Intertie Project and Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would primarily involve subsurface construction and would not include any above ground facilities that could create wind hazards in publicly accessible areas. The Islais Creek Bridge Project would replace the existing bridge and would not include any new aboveground structures that would create wind hazards to publicly accessible areas. The 1111 Pennsylvania Avenue (813 feet northeast of the proposed project site), Potrero Hope SF (650 feet north of the proposed project site), and 1399 Marin Street (968 feet east of the proposed project site) projects would include construction of buildings ranging from 30 to 65 feet in height. Therefore, the buildings proposed for the 1111 Pennsylvania Avenue, Potrero Hope SF, and 1399 Marin Street projects would not be tall enough or close enough to the proposed project site to combine with the proposed project to create a significant cumulative wind hazard. In addition, the identified cumulative projects are not located in an area of substantial pedestrian use. As a result, a significant cumulative wind impact would not occur (no impact).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
10. SHADOW. Would the project:					
a) Create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces?	☐	☐	☒	☐	☐

Impact SH-1: The proposed project would not create new shadow that substantially and adversely affects the use and enjoyment of publicly accessible open spaces. ***(Less than Significant)***

Section 295 of the planning code, the Sunlight Ordinance, was adopted in 1984 following voter approval of Proposition K to protect certain public open spaces from shadowing new structures. The ordinance generally prohibits structures greater than 40 feet in height that would cast additional shadows on property under the jurisdiction of the San Francisco Recreation and Parks Department from 1 hour after sunrise until 1 hour before sunset at any time during the year unless the San Francisco Recreation and Park Commission determines that the shadow would not have an adverse effect on the use of such property.

The project proposes the construction and operation of a new City Water Distribution Division campus at the project site, consisting of five buildings ranging from 35 to 60.5 feet in height. The nearest public open space is the Marin & Pennsylvania – Islais Creek parcel, located 200 feet east of the project site. The proposed buildings would not cast substantial shadows that would reach any public parks or open spaces in the project vicinity.[116] Although the project would shade portions of streets, sidewalks, and private properties in the project vicinity at various times of the day throughout the year, these shadows would not exceed levels commonly expected in urban areas. Therefore, the project would not create new shadows that would substantially and adversely affect the use and enjoyment of publicly accessible open spaces. As a result, the shadow impact would be less than significant. No mitigation is required.

Impact C-SH-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to shadow. ***(No Impact)***

Cumulative development projects within approximately 0.25 mile of the project site are listed in Section B, Project Setting, and they include Channel Force Main Intertie Project, Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, 1111 Pennsylvania Avenue Project, Potrero Hope SF Project, 1399 Marin Street Project, 1801 Evans Avenue Project, and Islais Creek Bridge Project. Significant cumulative shadow impacts could occur if the proposed project, in combination with cumulative projects, would combine to result in the creation of shadows on public accessible areas.

The 1111 Pennsylvania Avenue (813 feet northeast of the proposed project site), Potrero Hope SF (650 feet north of the proposed project site), and 1399 Marin Street (968 feet east of the proposed project site) projects would include construction of buildings ranging from 30 to 65 feet in height. However, none of the new buildings proposed under these cumulative projects would be tall enough or close enough to the project site to combine with the proposed project to create significant cumulative shadow impacts on public open space. The 1801 Evans Avenue Project would not involve new construction, and the building height would not change. The Channel Force Main Intertie Project and Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would primarily involve subsurface construction and would not include any above ground facilities that could create shadows in publicly accessible areas. The Islais Creek Bridge Project would replace the existing bridge and would not create new substantial sources of shadow on publicly accessible areas. As a result, significant cumulative shadow impacts would not occur (no impact).

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116 San Francisco Planning Department, 2023 (January 19), Shadow Fan Analysis.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
11. RECREATION. Would the project:					
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?	☐	☐	☒	☐	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐	☐

Impact RE-1: The proposed project would not increase the use of existing neighborhood and regional parks and other recreational facilities, to such an extent that substantial physical deterioration of the facilities would occur or be accelerated. ***(Less than Significant)***

No parks or other recreational facilities are in the immediate project vicinity. The neighborhood parks and recreational facilities closest to the project site that are owned and managed by San Francisco Recreation and Parks Department include Potrero Hill Recreation Center (0.38 mile to the north), Potrero del Sol Park (0.4 mile to the west), James Rolph Jr. Playground (0.47 mile to the west), and Potrero Hill Mini Park (0.54 mile to the north).[117] The residents of the Potrero Hill and Dogpatch neighborhoods own and maintain Starr King Open Space (0.26 mile to the northwest),[118] Tunnel Top Park (0.17 mile to the north),[119] Progress Park (0.3 mile to the northeast),[120] and Minnesota Grove (0.35 mile to the northeast). The Port of San Francisco owns and maintains Islais Creek Park (0.3 mile to the east) and Tulare Park (0.36 mile to the east).[121] The Marin & Pennsylvania – Islais Creek parcel open space parcel is located 200 feet east of the project site.

The project would transfer a total of approximately 463 employees from the 1990 Newcomb Avenue and the University Mound facilities to work at the proposed 2000 Marin Street location. To accommodate future operational needs, the new 2000 Marin Street campus could employ up to 490 employees. On-site employees, outside of working hours, could occasionally use the parks, open spaces, and other recreational facilities in the project vicinity, but use of these recreational facilities by employees would likely be limited. The project includes development of a Community Hub and an outdoor plaza for staff, which is expected to meet much of the facility's employee needs for recreational facilities. In addition, because existing operations and employees would be transferred from existing facilities within 2 miles of the project site, the project would not induce substantial population growth in the project area that could substantially increase the use of existing parks or recreational facilities, such that substantial physical deterioration of the facilities

117 San Francisco Recreation and Park Department, 2022, *Parks and Facilities*, available: https://sfrecpark.org/facilities, accessed July 7, 2022.

118 Starr King Open Space, 2022, *Starr King Open Space*, available: https://starrkingopenspace.org/wp-content/uploads/2010/12/info_about_SKOS_flyer_20111.pdf, accessed July 8, 2022.

119 Tunnel Top Park, 2022, *Tunnel Top Park*, available: https://tunneltoppark.org/our-story, accessed July 8, 2022.

120 Green Benefit District, 2021, *Green Benefit District*, available: https://www.greenbenefit.org, accessed July 8, 2022.

121 Port of San Francisco, 2022, *Port of San Francisco*, available: https://sfport.com/node/6249, accessed July 8, 2022.

would occur or be accelerated. As a result, the impact relative to recreational facilities would be less than significant. No mitigation is required.

Impact RE-2: The proposed project would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. ***(Less than Significant)***

The project would provide a Community Hub and an outdoor plaza that would be accessible only to City Water Distribution Division staff during work hours. The environmental impacts of the recreational facilities proposed as part of the project are analyzed in this initial study. The project would not require construction of new or the expansion of existing recreational facilities in the project vicinity. Therefore, the project would not cause any adverse physical effects on the environment related to construction or expansion of recreational facilities. As a result, the impact relative to the construction of recreational facilities would be less than significant. No mitigation is required.

Impact C-RE-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts related to recreation. ***(No Impact)***

The geographic scope of potential recreational impacts includes the project site and the recreational resources in the Bayview and Potrero Hill neighborhoods of San Francisco. Implementation of the identified cumulative projects in the project vicinity would result in the collective construction of 194,445 square feet of manufacturing space, 1,700 residential units, 15,000 square feet of retail space, and 35,000 square feet of community space. Implementation of these cumulative development projects in the project vicinity would intensify land uses, and a cumulative increase in the demand for recreational facilities and resources would occur. However, the city has accounted such growth as part of the Recreation and Open Space Element in the general plan.[122] In addition, San Francisco voters passed two bond measures in 2008 and 2012, to fund the acquisition, planning, and renovation of the city's network of recreational resources.

As discussed previously, 11 recreational facilities are within 0.5 mile of the project site. The existing recreational facilities would be able to accommodate the increase in demand for recreational resources generated by nearby cumulative development projects because the identified cumulative residential development projects in the area would be subject to planning code open space requirements regarding the provision of public and/or private open space. In addition, the Potrero Hope SF Project would include development of 3.62 acres of public open space, and the 1111 Pennsylvania Avenue Project would include development of 5,900 square feet of private open space for building occupants. As a result, adherence by the identified cumulative projects to the provisions of the planning code requiring open space would meet the projected demand for recreational resources and would offset the potential for deterioration and/or degradation of existing recreational resources in the project area. Therefore, a significant cumulative impact relative to recreational resources would not result (no impact).

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122 San Francisco Planning Department, 2014 (April), *San Francisco General Plan*, Recreation and Open Space Element, available: http://generalplan.sfplanning.org/Recreation_OpenSpace_Element_ADOPTED.pdf, accessed January 24, 2022.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
12. UTILITIES AND SERVICE SYSTEMS. Would the project:					
a) Require or result in the relocation or construction of new or expanded, water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

Impact UT-1: The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. ***(Less than Significant)***

Water Supply

Water service to the project site would be provided by SFPUC. As discussed in Section A, Project Description, SFPUC would transfer employees from its existing 1990 Newcomb Avenue and University Mound facilities to the project site. The existing water supply serving San Francisco would be sufficient to meet the needs of staff and facilities that would be relocated at the project site given that the project would not represent a net increase in demand for potable water. The project would not require expanded off-site infrastructure to provide portable water infrastructure to the project site, but modification of the on-site water infrastructure to provide service to the proposed buildings and facilities would be required. Project modifications would include capping and decommissioning the existing underground water facilities, construction of new water facility connections, and installation of a new 12-inch-diameter, ductile iron, low-pressure water pipeline on the east side of the project site. The new water pipeline would be approximately 425 feet in length and would join the existing water connections. The water pipeline is part of the project analyzed in this initial study. As a result, the project would not require the relocation, construction, or expansion of additional potable water infrastructure that could cause significant environmental effects. The impact relative to the construction of new water supply infrastructure would be less than significant. No mitigation is required.

Wastewater and Stormwater

Wastewater and stormwater generated at the project site would be treated at the SFPUC's southeast plant, which would have adequate capacity for treatment, given that the SFPUC would transfer its operations and approximately existing 463 employees from the existing and currently operational 1990 Newcomb Avenue and University Mound facilities to the project site. As a result, there would be no substantial increase in the volume of wastewater being received at the southeast plant.

As discussed under Impact HY-2, a majority of the existing project site is paved and covered with impervious surfaces, except for the northern portion of the parcel along Cesar Chavez Street and landscaped areas around the western parking area. Because the project would replace more than 5,000 square feet of impervious surface, it would be required to comply with the city's stormwater management ordinance (ordinance 83-10) and the 2016 Stormwater Management Requirements and Design Guidelines,[123] which require the project to be designed in a manner that reduces or eliminates the existing volume and rate of stormwater runoff discharged from the project site. The proposed project would result in a net decrease of approximately 9,500 square feet of impervious surfaces at the project site by installing several flow-through bioretention planters that route runoff directly to the combined sewer/wastewater system, several vegetated planting areas distributed across the site, and an outdoor plaza paved with permeable unit pavers. As required by the SFPUC's Stormwater Management Requirements and Design Guidelines, the project's stormwater management system would be designed and installed to retain runoff on site and limit site discharges from entering the city's combined stormwater/sewer system. As a result, the project would not require the relocation, construction or expansion of wastewater treatment or stormwater drainage facilities. The impact related to the relocation or construction of new or expanded stormwater drainage facilities would therefore be less than significant. No mitigation is required.

Electrical Power, Natural Gas, and Telecommunications

Given that the project would be constructed and operated in a developed, urban area, and that it would relocate existing facilities and staff to a new, nearby location, there would be no substantial increase in the demand for electricity, natural gas, or telecommunications infrastructure. The project site, which previously operated as a newspaper plant, is already served by the necessary electrical, gas, and telecommunications infrastructure such that no new, expanded, or relocated infrastructure would need to be constructed to serve the project site.

However, the project would require modification of the on-site electrical facilities to connect service to the newly constructed buildings and facilities. Existing utility connections that are not needed would be capped and decommissioned in-place. New electrical utility connections on the east side of the project site, approximately 375 feet in length, would be constructed and would join the existing electrical connections. Modifications to existing on-site telecommunication infrastructure may also be required. All project buildings would be electrically powered and would meet the certification requirements to be gold certified pursuant to the Leadership in Energy and Environmental Design program. Solar photovoltaic panels would be installed on the roofs of the shop and warehouse buildings, which would improve energy efficiency compared to the existing 1990 Newcomb Avenue facility. Electrical power to the project buildings would be supplemented by the SFPUC. Project operation would therefore not result in an increase in SFPUC's electrical use because use would be similar to or less than that being used by the employees at the 1990 Newcomb Avenue facility who

123 San Francisco Public Utilities Commission, 2016 (May), *San Francisco Stormwater Management Requirements and Design Guidelines, Urban Watershed Management Program*, available: https://sfport.com/node/5558.

would be transferred to the project site. New utility connections would be installed on the east side of the project site, but this would not represent a substantial increase in the demand for service provided by existing infrastructure in the project area by existing utility service providers because these new utility connections are project features analyzed in this initial study and would not require additional off-site infrastructure. Thus, the utilities demand associated with the project would not require the relocation, construction, or expansion of electricity, natural gas, or telecommunications infrastructure. Therefore, the impact would be less than significant. No mitigation is required.

Impact UT-2: The proposed project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. *(Less than Significant)*

SFPUC adopted the 2020 Urban Water Management Plan (2020 Plan) in June 2021.[124] The 2020 Plan estimates that current and projected water supplies will be sufficient to meet future demand for retail water[125] customers through 2045 under wet- and normal-year conditions; however, in dry years, SFPUC would implement water use and supply reductions through its water shortage contingency plan and a corresponding retail water shortage allocation plan. [126]

In December 2018, the State Water Resources Control Board (state water board) adopted amendments to the water quality control plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary, which establishes water quality objectives to maintain the health of our rivers and the Bay-Delta ecosystem (the Bay-Delta Plan Amendment).[127] The city, along with multiple water agencies, filed suit in 2019 challenging the Bay-Delta Plan Amendment.[128] In January 2021, the State Water Resources Control Board moved forward with implementing the Bay-Delta Plan Amendment on the Tuolumne River by issuing a water quality certification under the Clean Water Act for reissuing licenses for the New Don Pedro and La Grange dams.[129] The city and other water users on the Tuolumne River filed administrative challenges to the Tuolumne River actions. As of 2022, the State Water Resources Control Board has issued a CEQA Notice of Preparation for an alternative means of implementing the Bay-Delta Plan Amendment. Implementation of the Bay-Delta Plan Amendment would result in a substantial reduction in SFPUC's water supplies from the Tuolumne River watershed during dry years, requiring rationing to a greater degree in San Francisco than previously anticipated to address supply shortages.

Implementation of the Bay-Delta Plan Amendment is uncertain for several reasons. Whether, when, and the form in which the Bay-Delta Plan Amendment would be implemented, and how those amendments could

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124 San Francisco Public Utilities Commission (SFPUC), 2021 (June 11), *2020 Urban Water Management Plan for the City and County of San Francisco*, available: Urban Water Management Plan | SFPUC.

125 "Retail" demand represents water the SFPUC provides to individual customers within San Francisco. "Wholesale" demand represents water the SFPUC provides to other water agencies supplying other jurisdictions.

126 SFPUC, op cit., *Appendix K – Water Shortage Contingency Plan.*

127 State Water Resources Control Board, 2018 (December 12), *Resolution No. 2018-0059, Adoption of Amendments to the Water Quality Control Plan for the San Francisco Bay/Sacramento-San Joaquin Delta Estuary and Final Substitute Environmental Document*, available: https://www.waterboards.ca.gov/plans_policies/docs/2018wqcp.pdf.

128 SFPUC, 2022 (October 24), Approve Water Supply Assessment for the 3251 20th Avenue (Stonestown) Project.

129 Ibid.

affect SFPUC's water supply currently are unknown. In acknowledgment of these uncertainties, the 2020 Plan presents future supply scenarios both with and without the Bay-Delta Plan Amendment, as follows:

1. Without implementation of the Bay-Delta Plan Amendment, wherein the water supply and demand assumptions contained in section 8.4 of the 2020 Plan would be applicable.
2. With implementation of a voluntary agreement between SFPUC and the state water board that would include a combination of flow and non-flow measures, designed to benefit fisheries at a lower water cost particularly during multiple dry years than would occur under the Bay-Delta Plan Amendment.
3. With implementation of the Bay-Delta Plan Amendment as adopted, wherein the water supply and demand assumptions contained in section 8.3 of the 2020 Plan would be applicable.

Water supply shortfalls during dry years would be lowest without implementation and highest with implementation of the Bay-Delta Plan Amendment. Shortfalls under the proposed voluntary agreement would be between those with and without implementation of the Bay-Delta Plan Amendment.[130]

Under these three scenarios, SFPUC would have adequate water to meet demand in San Francisco through 2045 in wet and normal years.[131] Without implementation of the Bay-Delta Plan Amendment, water supplies would be available to meet demand in all years except for a 4-million-gallon-per-day (5.3 percent) shortfall in years 4 and 5 of a multiple year drought, based on 2045 demand.

With implementation of the Bay-Delta Plan Amendment, shortfalls would range from 11.2 million gallons per day (15.9 percent) in a single dry year to 19.2 million gallons per day (27.2 percent) in years 2 through 5 of a multiple year drought, based on 2025 demand levels, and from 20.5 million gallons per day (25.4 percent) in a single dry year to 28.5 million gallons per day (35.4 percent) in years 4 and 5 of a multiple year drought, based on 2045 demand.

Under sections 10910 through 10915 of the California Water Code, urban water suppliers like SFPUC must prepare water supply assessments for certain large "water demand" projects, as defined in section 15155 of the CEQA Guidelines.[132] The project would result in approximately 87,285 square feet of industrial production, distribution, and repair use; 64,050 square feet of office use; and 219,515 square feet of parking

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130 On March 26, 2019, SFPUC adopted Resolution No. 19-0057 to support its participation in the voluntary agreement negotiation process. To date, those negotiations are ongoing under the California Natural Resources Agency. SFPUC submitted a proposed project description to the State Water Board on March 1, 2019, that could be the basis for a voluntary agreement. As the proposed voluntary agreement has yet to be accepted by the State Water Board as an alternative to the Bay-Delta Plan Amendment, the shortages that would occur with its implementation are not known with certainty; however, if accepted, the voluntary agreement would result in dry year shortfalls of a lesser magnitude than under the Bay-Delta Plan Amendment.

131 Based on historic records of hydrology and reservoir inflow from 1920 to 2017, current delivery and flow obligations, and fully implemented infrastructure under the 2018 Phased Water System Improvement Program Variant, normal or wet years occurred 85 out of 97 years. This translates into roughly nine normal or wet years out of every 10 years. Conversely, system-wide rationing is required roughly one out of every 10 years. This frequency is expected to increase as climate change intensifies.

132 Pursuant to Section 15155(1) of the CEQA Guidelines, "a water-demand project" is defined as follows:
(A) a residential development of more than 500 dwelling units.
(B) a shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(C) a commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor area.
(D) a hotel or motel, or both, having more than 500 rooms.
(E) an industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than

use; thus, it would not qualify as a "water-demand" project as defined by section 15155(a)(1) of the CEQA Guidelines.[133] Therefore, a water supply assessment is not required and has not been prepared for the project. The following discussion considers the potential water supply impacts for projects—such as the proposed project—that do not qualify as "water-demand" projects.

No single development project alone in San Francisco would require development of new or expanded water supply facilities or require SFPUC to take other actions, such as imposing a higher level of rationing across the city in the event of a supply shortage in dry years. Therefore, a separate project-only analysis is not provided for this topic. Instead, the following analysis considers whether the project in combination with both existing development and projected growth through 2045 would require new or expanded water supply facilities, the construction or relocation of which could have significant impacts on the environment. It also considers whether a high level of rationing would be required that could have significant cumulative impacts. Only under this cumulative context could development in San Francisco have the potential to require new or expanded water supply facilities or require SFPUC to take other actions, which in turn could result in significant physical environmental impacts related to water supply. If significant cumulative impacts could result, then the analysis needs to consider whether the project would make a cumulatively considerable contribution to the significant cumulative impact.

Based on guidance from the California Department of Water Resources and a citywide demand analysis, SFPUC has established 50,000 gallons per day as the maximum water demand for projects that do not meet the definitions provided in section 15155(a)(1) of the CEQA Guidelines.[134] The project's development would represent 25.6 percent of the 250,000 square feet of office space provided in section 15155(1)(C) and 13.4 percent of the 650,000 square feet of manufacturing plant space provided in section 15155(1)(E). In addition, the project would incorporate water-efficient fixtures as required in title 24 of the California Code of Regulations and the city's Green Building Ordinance. Therefore, the project would reasonably be assumed to result in an average daily demand of substantially less than 50,000 gallons of water per day.

Assuming the project would demand no more than 50,000 gallons of water per day, its water demand would represent a small fraction of the total projected demand for the city, ranging at most from 0.06 to 0.07 percent between 2025 and 2045.

Sufficient water supplies would be available to serve the project and reasonably foreseeable future development in normal, dry, and multiple dry years unless the Bay-Delta Plan Amendment is implemented. As indicated above, the project's maximum demand would represent less than 0.06 percent of the total demand in 2045, when the retail supply shortfall projected to occur with implementation of the Bay-Delta Plan Amendment would be up to 35.4 percent in a multi-year drought. SFPUC has indicated that it is accelerating its efforts to develop additional water supplies and explore other projects that would improve overall water supply resilience, through an alternative water supply program. SFPUC has taken action to fund the study of additional water supply projects, but it has not determined the feasibility of the possible projects and has determined that the identified potential projects would take several years to implement.

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133 40 acres of land, or having more than 650,000 square feet of floor area.
(F) a mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.
(G) a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

134 Ritchie, Steven R. Assistant General Manager, Water Enterprise, San Francisco Public Utilities Commission. May 31, 2019—memorandum to Lisa Gibson, Environmental Review Officer, San Francisco Planning Department.

The potential impacts that could result from construction and/or operation of any such water supply facility projects cannot be identified at this time. In any event, under such a worst-case scenario, the demand for SFPUC to develop new or expanded dry-year water supplies would exist, regardless of whether the project is constructed.

Because of the long lead times associated with developing additional water supplies, in the event that the Bay-Delta Plan Amendment takes effect sometime after 2024 or an alternative means of implementing the Bay-Delta Plan Amendment is provided, and results in a dry-year shortfall, the expected action of SFPUC for the next 8 to 30 years (or more) would be limited to requiring increased rationing. SFPUC has established a process through its *Retail Water Shortage Allocation Plan* for actions it would take under circumstances requiring rationing.[135] The level of rationing that could be required for the project is unknown at this time. Both direct and indirect environmental impacts could result from high levels of rationing. However, any increase in potable water demand attributable to the project compared to citywide demand would not substantially affect the levels of dry-year rationing that otherwise would be required throughout the city, especially because the project involves the relocation of existing staff and facilities, rather than new uses. Therefore, the project would not make a cumulatively considerable contribution to a significant cumulative environmental impact caused by implementation of the Bay-Delta Plan Amendment. As a result, the cumulative impact on water supplies would be less than significant. No mitigation is required.

Impact UT-3: The proposed project would not result in a determination by its wastewater treatment provider that it would have inadequate capacity to serve the proposed project's projected demand in addition to the provider's existing commitments. ***(Less than Significant)***

As discussed under Impact UT-1 and UT-2, project implementation would involve transferring approximately 463 employees from the existing 1990 Newcomb Avenue and University Mound facilities to the project site. The project could accommodate up to 490 employees, which would not result in a substantial increase in wastewater flows to the southeast plant. In addition, the project would incorporate modern water-efficient fixtures, as required under title 24 of the California Code of Regulations and the San Francisco Green Building Ordinance. Compliance with these regulations would likely reduce wastewater flows to the southeast plant compared to the existing facilities at 1990 Newcomb Avenue and University Mound, both of which are equipped with older, less efficient water fixtures. As a result, project implementation would not result in a determination by its wastewater treatment provider that it would have inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. As a result, the impact relative to wastewater capacity would be less than significant. No mitigation is required.

Impact UT-4: The proposed project would not generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. ***(Less than Significant)***

In September 2015, the City of San Francisco approved an agreement with Recology for transport and disposal of municipal solid waste at Recology's Hay Road Landfill in Solano County. Under this agreement,

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135 SFPUC, 2021 (March), 2020 Retail Water Conservation Plan, available at https://sfpuc.org/sites/default/files/documents/2020ConservationPlan_draft_25MAR2021v2.pdf. Accessed on March 29, 2024.

disposal of municipal solid waste will continue through September 2024, or until 3.4 million tons have been disposed, whichever occurs first. The city has an option to renew the agreement for 6 years or until an additional 1.6 million tons have been disposed, whichever occurs first. [136] The Recology Hay Road Landfill is permitted to accept up to 2,400 tons of solid waste per day. At that maximum permitted rate, the landfill has the capacity to accommodate solid waste until approximately 2034. Under existing conditions, the landfill receives an average of approximately 1,850 tons of solid waste per day from all sources, with approximately 1,200 tons of solid waste per day from San Francisco, which includes residential and commercial waste and demolition and construction debris that cannot be re-used or recycled. [137] At the current rate of disposal, the landfill has operating capacity until 2041. Assuming the renewal of the agreement noted above, the city's contract with the Recology Hay Road Landfill will extend until 2031, or when the city has disposed 5 million tons of solid waste, whichever occurs first. At that point, the city either will need to extend the landfill contract again or find and entitle an alternative landfill site.

CONSTRUCTION

Project construction would result in approximately 40,900 cubic yards of graded and excavated soil material and 6,440 cubic yards of debris from demolition of the existing building. The Hay Road Landfill, a Class III facility in Vacaville, would have sufficient capacity to accept the excavated soil and demolition material from construction. The project also would be required to comply with the city of San Francisco's Construction and Demolition Debris Recovery Ordinance 27-06, which requires submittal of a waste diversion plan to the San Francisco Department of the Environment that provides for a minimum of 65 percent diversion from landfill of construction and demolition debris, and source separation for re-use or recycling. As discussed in Section D.17, Hazards and Hazardous Materials, contaminated soils are present within the project site. If the excavated soil is classified as hazardous waste, the soil would be disposed of at an appropriate Class I hazardous waste disposal facility. The closest Class I landfill for hazardous waste is the Kettleman Hill Landfill, in Kettleman City, with a permitted capacity of 4.9 million cubic yards.

OPERATION

Operation of the project also would comply with the Mandatory Recycling and Composting Ordinance 100-09, which requires all people in San Francisco to separate solid waste into recyclables, compostables, and landfill trash. Compliance with these ordinances would reduce the amount of solid waste generated by project construction and operation.

As a result, the project, during construction and operation, would not generate solid waste in excess of state or local statutes and regulations or the capacity of local infrastructure. The impact relative to solid waste would be less than significant. No mitigation is required.

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136 City and County of San Francisco, 2015 (July 22), *Landfill Disposal Agreement between the City and County of San Francisco and Recology San Francisco*.

137 San Francisco Planning Department, 2015 (May 21), *Disposal of San Francisco Municipal Waste at Recology Hay Road Landfill in Solano County. Final Negative Declaration*, Planning Department Case No. 2014.053.

Impact UT-5: The proposed project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. ***(Less than Significant)***

San Francisco introduced its Advancing Towards Zero Waste Declaration in 2018, which aims to reduce municipal solid waste by 15 percent by 2030 and reduce landfill disposal by 50 percent by 2030.[138] As described under Impact UT-4, the project would be required to comply with the San Francisco's Construction and Demolition Debris Recovery Ordinance 27-06 and the Mandatory Recycling and Composting Ordinance 100-09, which would support San Francisco's zero waste goals. In addition, the Hay Road Landfill is permitted to accept the types of non-hazardous waste that would be generated by the project. If any hazardous waste is encountered, it would be disposed of in accordance with all applicable regulations at a Class I hazardous waste disposal facility such as the Kettleman Hill Landfill. As a result, project construction and operation would comply with all federal, state, and local requirements and regulations related to solid waste, including the California Integrated Waste Management Act of 1989 (Assembly Bill 939). The impact relative to solid waste reduction would therefore be less than significant. No mitigation is required.

Impact C-UT-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on utilities and service systems. ***(Less than Significant)***

The geographic scope of cumulative impacts on water, wastewater treatment, and stormwater drainage facilities encompasses the Bayside Drainage Basin.

Water Supply

As discussed under Impact UT-2, no single development project alone in San Francisco would require development of new or expanded water supply facilities. The analysis presented under Impact UT-2 considers whether the proposed project, in combination with both existing infrastructure and projected growth through 2045, would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. Therefore, no separate cumulative analysis is required. The identified cumulative projects would not combine to result in a significant cumulative environmental impact related to water supply (less than significant impact).

Wastewater and Stormwater

The city's combined sewer system and treatment facilities are designed to accept both wastewater and stormwater flows. All reasonably foreseeable projects in the drainage basin would be required to comply with San Francisco regulations regarding wastewater and stormwater generation. Permit requirements would ensure that discharges to the combined sewer system would not exceed the volume or treatment requirements of the southeast plant. As a result, a significant cumulative impact on wastewater treatment and stormwater drainage facilities would not occur (less than significant impact).

Electric Power, Natural Gas, and Telecommunication

The geographic scope of cumulative impacts on electric power, natural gas, and telecommunication infrastructure includes the Bayview-Hunters Point neighborhood.

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138 C40 Cities, Advancing Towards Zero Waste Declaration, 2022, available at https://www.c40.org/news/global-cities-and-regions-advance-towards-zero-waste/.

The seven identified cumulative projects within this geographic scope would be constructed and operated in a developed urban area with existing electric power, natural gas, and telecommunication infrastructure. As a result, there would be no substantial increase in the demand for electricity, natural gas, or telecommunications infrastructure from the identified cumulative projects and, therefore, no new, expanded, or relocated infrastructure would need to be constructed to serve the Bayview-Hunters Point neighborhood. Consequently, the identified cumulative projects would not combine to create a significant cumulative impact related to these utilities (less than significant impact).

Solid Waste

For landfill capacity and solid waste, the geographic scope includes Recology's Hay Road Landfill in Solano County (that serves San Francisco), where recycling, re-use, and disposal of construction-related waste would occur and the Kettleman Hills Landfill where hazardous waste would be disposed.

The identified cumulative projects would generate construction and household waste, which would be disposed of at off-site disposal facilities. All projects would be required to comply with San Francisco's construction and demolition debris recovery/recycling and composting ordinances. Given that the identified cumulative projects would comply with these ordinances and given that (as discussed above) adequate landfill capacity exists to serve the area in which these projects would be located, no significant cumulative impact relative to solid waste disposal would result (less than significant impact).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
13. PUBLIC SERVICES. Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services such as fire protection, police protection, schools, parks, or other public facilities?	☐	☐	☒	☐	☐

The project area receives police services from the San Francisco Police Department. The nearest San Francisco police station is the Bayview Station, approximately 1.3 miles south of the project site.[139] The project site receives fire protection and emergency medical services from San Francisco Fire Department Battalion 10. The nearest San Francisco fire stations are Station 9 at 2245 Jerrold Avenue and Station 25 at 3305 3rd Street, approximately 0.34 mile southwest and 0.37 mile southeast of the project site, respectively.[140]

139 San Francisco Police Department, 2022, *Station Finder*, available: https://www.sanfranciscopolice.org/your-sfpd/sfpd-stations/station-finder, accessed July 18, 2022.

140 San Francisco Fire Department, 2021, *Fire Station Locations*, available: https://sf-fire.org/fire-station-locations, accessed July 18, 2022.

Parks within 0.5 mile of the project site are discussed in D.11, Recreation. The Arise Educational Center and Starr King Elementary School are located approximately 370 feet and 1,375 feet north of the project site, respectively.

Impact PS-1: The proposed project would not increase the demand for public services to such an extent that construction of new or physically altered facilities would be required. ***(Less than Significant)***

CONSTRUCTION

Incidents requiring law enforcement, fire protection, or emergency medical services could occur during construction. Responding to such incidents is routine for the police and fire departments as construction projects are common and ongoing throughout the city. As described in Section A. Project Description, construction of the project would occur over a period of approximately 40 months and would require an average of 50 workers and a maximum of 120 workers onsite during construction activities. As discussed under Impact PH-1, project construction workers who do not live in the project vicinity would most likely commute from elsewhere in the region rather than relocate from more distant cities or towns and would not cause population growth in the area. Any incremental increase in demand for these services during construction would be temporary and would not require construction of new or physically altered facilities to maintain service ratios. Similarly, project construction would not result in the need for new or expanded schools or parks as a result of relocation of construction workers. Therefore, impacts related to the provision of new or altered public service facilities during project construction would be less than significant. No mitigation is required.

OPERATION

The project would permanently transfer approximately 463 employees from the existing facilities at 1990 Newcomb Avenue and the University Mound to the project site. The proposed facilities could accommodate up to 490 employees for long-term operational needs. The current operations at 1990 Newcomb Avenue and University Mound that would be consolidated as part of the project are within 2 miles of the project site and transferred employees would not be expected to relocate housing due to the proximity of the project site to their existing places of employment. Furthermore, as discussed under Impact PH-1, the project would not induce population growth through the development of new housing. As such, the project would not cause an increase in demand for existing schools that would affect school enrollment or performance objectives and would not result in the need for new or expanded parks.

While the proposed facilities may accommodate up to 27 additional future employees, no increase in staffing is currently proposed and any increase in the number of employees would occur gradually over the span of several years during project operation. Furthermore, even with an increase of 27 employees, the increase would be at a scale that would not change the demand for public services substantially from existing conditions, particularly in a densely populated urban setting where population fluctuations are common and ongoing. In addition, project operation would not require an elevated level of emergency response or result in an increase in public safety–related requests because the project would be developed in accordance with all applicable fire codes and public safety standards. Therefore, operation of the project would not create a substantial net increase in the demand for any public services nor would it create the need for the construction or expansion of any public service facilities. As a result, the impact relative to the construction of public service facilities would be less than significant. No mitigation is required.

Impact C-PS-1: The proposed project, combined with cumulative projects, would not result in significant cumulative impacts on police, fire, and school district services such that new or physically altered facilities, the construction of which could cause significant environmental impacts, would be required in order to maintain acceptable levels of service. ***(No Impact)***

The cumulative context for public services impacts includes the areas served by police districts, fire stations, schools, and parks within the Bayview-Hunters Point neighborhood. Within that area, five cumulative projects—1801 Evans Avenue, 1399 Marin Street, Islais Creek Bridge Project, Channel Force Main Intertie Project, and Bay Corridor Transmission and Distribution—involve a range of different land uses, including housing, industrial, commercial, and transportation. Implementation of these identified cumulative projects in the project vicinity would not result in a substantial increase in population and/or demand for fire protection, police protection, school services, parks, and library services. The Fire Department, Police Department, San Francisco Unified School District, and other city agencies have accounted growth in providing public services to the residents of San Francisco. Fire protection, emergency medical services, and police protection are redeployed regularly based on need, to maintain acceptable service ratios. Nearby cumulative development projects would be subject to development impact fees to mitigate the impacts of their development on public services and infrastructure.[141] Therefore, the identified cumulative projects would not combine to create a significant cumulative impact related to the provision of public services in the area (no impact).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
14. BIOLOGICAL RESOURCES. Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐	☒

141 San Francisco Planning Department, 2021, *Development Impact Fees*, available: https://sfplanning.org/project/development-impact-fees, accessed August 16, 2021.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒	☐
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

The project site is developed, features a building and paved parking lot, and is within a built industrial environment. The project site does not contain any riparian habitat, other sensitive natural communities, or federally protected wetlands. No adopted habitat conservation plans, natural community conservation plans, or other approved local, state, or regional habitat conservation plans apply to the project site. Therefore, topics D.14.b, D.14.c, and D.14.f are not applicable to the project.

Impact BI-1: The proposed project would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. ***(Less than Significant)***

The project site is covered by impervious surfaces and is in an industrial environment with high levels of human activity. Because of the developed nature of the project site and the surrounding area, the project site does not provide suitable habitat for any rare or endangered plant or wildlife species.

The trees in the project site and street trees on Marin Street could support habitat for nesting birds that are protected under the California Fish and Game Code and/or the Migratory Bird Treaty Act. Nesting birds in the project site are expected to be highly acclimated to noise and visual disturbances because of their exposure to existing levels of noise, humans, and equipment activity at the project site and traffic noise from Marin Street and the busy Caesar Chavez Street traffic corridor. Therefore, noise and visual disturbances associated with project construction would not be anticipated to affect nesting birds or their behavior. However, approximately 3 trees that could provide habitat for nesting birds would be removed from the project site during construction. If nesting birds are present in the project area during construction and project construction resulted in the loss of an active nest, this could constitute unauthorized take under the federal Migratory Bird Treaty Act and/or the California Fish and Game Code (a potentially significant impact). However, the SFPUC would implement its Standard Construction Measure 7 (Biological Resources), which requires a qualified biologist to conduct a nesting bird survey of the project site to identify any active migratory bird nests (containing eggs or chicks or raptors showing mating behavior). If nesting birds are present, the SFPUC would implement measures to ensure active nests are not destroyed or adversely affected, such as establishing work buffer zones, restricting certain types of activities, monitoring, or activities could be delayed until the nestlings have fledged. The project would also replace removed trees at a greater than 1:1 ratio and would, therefore, restore potential nesting habitat for birds. With implementation

of SFPUC's Standard Construction Measure 7 (Biological Resources), as required for the project, impacts on nesting birds would be less than significant. No mitigation is required.

Impact BI-2: The proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. ***(Less than Significant)***

Migratory birds could be present in street trees or trees in the project site and could pass through the project area. San Francisco is within the Pacific Flyway, a major north-south route of travel for migratory birds along the western portion of the Americas. The southeast corner of the project site is within 300 feet of an urban bird refuge associated with Islais Creek; however, none of the project buildings are within 300 feet of the urban bird refuge.[142]

Structures in an urban setting may present risks for birds as they traverse their migratory paths, because of building locations and/or features. The city has adopted guidelines to address this issue and provided regulations for bird-safe design within the city.[143] Planning code section 139, Standards for Bird-Safe Buildings, establishes building design standards to reduce avian mortality rates associated with bird strikes. The building standards are based on two types of hazards: (1) location-related hazards that pertain to new buildings within 300 feet of an urban bird refuge, and (2) feature-related hazards, which may create increased risk to birds regardless of where the structure is located, such as freestanding glass walls, wind barriers, skywalks, balconies, and greenhouses on rooftops that have unbroken glazed segments 24 square feet or larger. Any project that contains building-feature hazards must apply bird-safe glazing treatments on 100 percent of the feature, in compliance with planning code section 139.

The project would need to comply with the section 139 building feature-related hazards by using bird-safe glazing treatments on 100 percent of any building feature-related hazards, such as free-standing glass walls, wind barriers, and balconies. Compliance with the city's bird-safe building standards would ensure that the project would not significantly interfere with the movement of native resident or wildlife species, or with an established native resident or migratory wildlife corridor. As a result, the impact on migratory species would be less than significant. No mitigation is required.

142 An urban bird refuge is defined by San Francisco Planning Code Section 139(c)(1) as an open spaces two acres and larger dominated by vegetation, including vegetated landscaping, forest, meadows, grassland, or wetlands, or open water.

143 San Francisco Planning Department, 2022, *Standards for Bird-Safe Buildings*, available: https://sfplanning.org/sites/default/files/documents/reports/bird_safe_bldgs/Standards%20for%20Bird%20Safe%20Buildings%20-%2011-30-11.pdf, accessed July 18, 2022.

Impact BI-3: The proposed project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. ***(No Impact)***

Within San Francisco, unpermitted damage to or removal of a landmark tree,[144] street tree, or significant tree[145] would conflict with article 16 of the San Francisco Public Works Code, and therefore would be considered a significant impact. Project construction would require removal of approximately 3 trees and would plant a minimum of 43 trees (for a greater than 1:1 replacement). The project would not require the removal of any street trees, landmark trees, or significant trees.[146] As a result, the project would not conflict with any local policies or ordinances protecting biological resources. No impact would occur. No mitigation is required.

Impact C-BI-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on biological resources. ***(Less than Significant)***

As discussed under Impact BI-1, the trees on Marin Street and in the project site could support nesting birds. Nesting birds that may occur in the cumulative project area (within approximately 0.25 mile of the project site) would be acclimated to urbanized environments. Cumulative projects would also be subject to the California Fish and Game Code and Migratory Bird Treaty Act regulations, the city's bird safe building standards, and the San Francisco public works code. Therefore, cumulative projects would not combine to result in a significant cumulative adverse impact on any species identified as a candidate, sensitive, or special-status species. In addition, the proposed project would not conflict with any local policies or ordinances protecting biological resources, and therefore would not contribute to any such potential cumulative impact (less-than-significant impact). No mitigation would be required.

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144 A landmark tree is a tree that has been nominated for and designated with the status by the San Francisco Department of Public Works board of supervisors, indicating that the tree holds environmental, cultural, historical, botanical, or other significance.

145 A significant tree is a tree that is (1) on property under the jurisdiction of the San Francisco Department of Public Works or (2) on privately owned-property with any portion of its trunk within 10 feet of the public right-of-way, and (3) that satisfies at least one of the following criteria: (a) a diameter at breast height in excess of 12 inches, (b) a height in excess of 20 feet, or (c) a canopy in excess of 15 feet.

146 Personal communication between Shelby Campbell, SFPUC, and William Bulkley, San Francisco Public Works, April 10, 2024

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
15. GEOLOGY AND SOILS. Would the project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the state geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☒	☐	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐	☐

In the California Building Industry Association v. Bay Area Air Quality Management District case decided in 2015,[147] the California Supreme Court held that CEQA does not generally require lead agencies to consider how existing environmental conditions might affect a project's occupants, except where the project would significantly exacerbate an existing environmental condition. Accordingly, hazards resulting from a project that would place development in an existing or future seismic hazard area or an area with unstable soils are not considered impacts under CEQA unless the project would significantly exacerbate the seismic hazard or unstable soil conditions. Thus, the analysis below evaluates whether the project would exacerbate existing or future seismic hazards or unstable soils at the project site and result in a substantial risk of loss, injury, or death.

147 California Building Industry Association v. Bay Area Air Quality Management District, 62 Cal.4th 369. Opinion Filed December 17, 2015.

The project site is not located within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act, and no active or potentially active faults exist on or in the immediate vicinity of the site. [148] The project would connect to San Francisco's sewer and stormwater collection and treatment system and does not propose septic tanks or alternative wastewater disposal systems. Therefore, Topics E.16(a)(i) and E.15(e) are not applicable to the project.

This section is based on the information and findings provided in a geotechnical investigation that was conducted for the project site and project.[149] The geotechnical investigation included seven exploratory borings drilled to maximum depths of 117 feet, 10 cone penetration tests to a maximum depth of 70 feet, and 17 test pits excavated on the west end of the project site. The project site was determined to be underlain by artificial fill ranging in depth from 1 to 20 feet that increases in thickness from west to east. The eastern portion of the project site is underlain by young bay mud/estuarine tidal marsh deposits that range in thickness from 2 to 10 feet. Undifferentiated alluvial and estuarine sediments also underlay the project site, and the thickness of the deposits vary across the site. Franciscan Complex bedrock underlies the project site at depths ranging from 1 foot to more than 80 feet beneath ground surface.

Impact GE-1: The proposed project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving fault rupture, strong seismic ground shaking, seismically induced ground failure, including liquefaction, or landslides. ***(Less than Significant)***

Seismic Ground Shaking

The San Francisco Bay Area is a seismically active region. According to the U.S. Geological Survey, the overall probability of a magnitude 6.7 or greater earthquake to occur in the San Francisco Bay Area during the next 30 years is 72 percent.[150] Therefore, periodic minor earthquakes and a strong to very strong earthquake would be likely to affect the project during its lifetime. The major active faults in the area are the San Andreas, Hayward, and San Gregorio faults, the closest of which is the San Andreas Fault, which is approximately 7 miles southwest of the project site.[151]

Ground shaking is the primary cause of earthquake damage to human-made structures. Strong ground shaking could cause shearing, differential settlement, or heave of structures resulting in damage to buildings and structures. The project site is located in an area of high seismicity where amplified strong to very strong ground shaking could occur resulting from a large earthquake on the San Andreas Fault Zone or any of the active regional faults.

The intensity of earthquake ground motion at the project site would depend upon the characteristics of the generating fault, distance to the earthquake fault, magnitude and duration of the earthquake, and specific subsurface conditions. The Federal Emergency Management Agency produces maps showing how earthquake hazards vary across the United States and categorize the likelihood of experiencing earthquake

148 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus San Francisco, California, Geotechnical Interpretive Report.*

149 Ibid.

150 U.S. Geological Survey, 2015 (March), *Uniform California Earthquake Rupture Forecast* (UCERF3), Fact Sheet 2015-3009, UCERF3: A New Earthquake Forecast for California's Complex Fault System.

151 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus San Francisco, California Geotechnical Interpretive Report.*

shaking of various intensities into five seismic design classifications. The project site is in an area mapped as "E/red." Areas within this seismic design category are near major fault lines capable of producing the most intense shaking.[152]

As shown in Table 3 of the Project Description, and as discussed in the project-specific geotechnical report, the parking garage would be constructed on a shallow foundation system of spread footings on the underlying bedrock to provide passive resistance to seismic lateral inertial loads. Drilled shafts are the proposed foundation for the administrative building, as the lateral load demands at this location are relatively high and drilled shafts can accommodate higher lateral loads in pile flexure. Micro-pile foundations would be used where lateral loads are moderate. Both drilled shaft and micro-pile foundations transfer axial structure loads to the underling bedrock, thereby minimizing building settlement. These foundation design features would minimize impacts related to seismic ground shaking.[153]

To ensure that the potential for adverse effects related to geology and soils are adequately addressed, San Francisco relies on the state and local regulatory process for review and approval of building permits, pursuant to the California Building Code and the San Francisco Building Code, which is the state building code plus local amendments that supplement the state building code, including the building department's administrative bulletins. The SFPUC complies with the substantive requirements of the building department's implementing procedures, including administrative bulletins, which are part of the local building code, and information sheets, which clarify building department requirements and procedures. On November 21, 2018, the building department issued Administrative Bulletin AB-082, Guidelines and Procedures for Structural, Geotechnical, and Seismic Hazard Engineering Design Review.[154] The guidelines describe the review process for structural, geotechnical, and seismic hazard engineering design, including the characteristics considered in determining whether review is required and, if so, which reviews are required.

As described in Section A, Project Description, the SFPUC is not required to obtain permits normally required by city ordinances, but SFPUC must meet the substantive requirements of city ordinances. Therefore, SFPUC would comply with the building department's plan review process, which would ensure that the project's structural and foundation plans would comply with applicable building code provisions, conform to the measures recommended in the project-specific geotechnical report, and follow the recommendations made by the engineering design review team, as required by Administrative Bulletin AB-082. Therefore, the project would not directly or indirectly cause potential substantial adverse effects related to seismic ground shaking. As a result, the impact would be less than significant. No mitigation is required.

Seismic-Related Ground Failure and Liquefaction

Seismic-related ground failure such as liquefaction is the phenomenon in which saturated granular sediments temporarily lose their shear strength due to increases in pore pressure during periods of earthquake-induced strong ground shaking. The eastern half of the project site is mapped as a liquefaction

152 FEMA,2020 (August). Earthquake Hazards Map. Available at: https://www.fema.gov/emergency-managers/risk-management/earthquake/hazard-maps, accessed on April 3 2024.

153 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus San Francisco, California, Geotechnical Interpretive Report.*

154 San Francisco Department of Building Inspection, 2018 (November 21), *Guidelines and Procedures for Structural Design Review*, Administrative Bulletin 082, available: https://codelibrary.amlegal.com/codes/san_francisco/latest/sf_building/0-0-0-95162, accessed November 12, 2021.

hazard zone.[155, 156] Artificial fill at the project site contains pockets of medium-dense granular soil that has high potential for liquification. Ground deformations from liquefaction would be likely to impact the proposed shops east of the proposed administration building, as well as the proposed auto shop, and warehouse buildings, and potentially could impact the eastern edge of the administration building. The auto shop, warehouse, and administration building would be constructed on micro-pile foundations, with a maximum depth ranging from 70 feet to 110 feet. The shops connected to the administration building would be constructed on a shaft foundation, with depths ranging from 15 to 45 feet. Supporting the building structures with deep foundation systems would minimize the potential for impacts from liquefaction. Furthermore, existing fill material at the project site would be excavated, replaced, and recompacted as engineered fill, to support foundation ground improvement.[157] Therefore, the project would not result in substantial adverse effects related to seismic-related ground failure, including liquefaction. As a result, the impact relative to ground failure and liquefaction would be less than significant. No mitigation is required.

Landslides

The slope at the project site globally stable due to the strength and nature of the exposed bedrock.[158] Although limited portions of the project site are mapped as having slopes of 20 percent or greater,[159] most of the site is level and the risk of landslides is low to negligible across the project site based on topographic and lithologic data.[160] Furthermore, the project site is not within a mapped landslide hazard zone.[161] The project would comply with the geotechnical recommendations outlined in the geotechnical report, including constructing slope gradients of 2:1 (horizontal : vertical) or flatter across the site, with the exception of the existing bedrock cut slope located at the west edge of the project site. Therefore, the project would not result in substantial adverse effects related to landslides. As a result, the impact relative to landslides would be less than significant. No mitigation is required.

Impact GE-2: The proposed project would not result in substantial erosion or loss of topsoil. ***(Less than Significant)***

The project site is developed and occupied by the existing building and surface pavements. The majority of the project site is impervious, with the exception of the northern portion of the parcel along Cesar Chavez Street and landscaped areas around the western parking area.

Existing rubble mounds were placed on the project site during the late 1980's for landscaping purposes associated with the San Francisco Chronicle building. The project would remove the existing rubble mounds, which includes the removal of the topsoil layer and underlying rubble. Topsoil removal would involve separating the topsoil from the rubble for reuse elsewhere on site. Any topsoil loss from construction of the project would be minimal because there are only limited planted areas that may contain topsoil on the site.

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155 San Francisco Planning Department, 2019, San Francisco Property Information Map, Map Viewer.

156 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus, Geotechnical Interpretive Report*.

157 Ibid.

158 Ibid.

159 San Francisco Planning Department, 2019, San Francisco Property Information Map, Map Viewer.

160 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus, Geotechnical Interpretive Report*.

161 Ibid.

The project would require excavation of approximately 40,900 cubic yards of soil and grading across the site, which could create the potential for windborne and waterborne soil erosion. As discussed in Section E.16, Hydrology and Water Quality, the project would require a Construction General Permit and would be required to develop and implement a Stormwater Water Pollution Prevention Plan. The plan would include best management practices to reduce stormwater runoff and erosion. These best management practices may include measures such as use of straw wattles to filter stormwater runoff, sandbags for sediment control and diverting water, silt fencing to retain soil, and covering stockpiles to control erosion and sedimentation during construction and prevent discharge of soils into stormwater runoff. The SFPUC would conduct routine inspections of all best management practices to document compliance and identify deficiencies to be corrected. Additionally, SFPUC Standard Construction Measure 3 (Water Quality) requires the implementation of erosion and sediment controls (e.g., fiber rolls and/or gravel bags around storm drain inlets, silt fencing, etc.) to minimize the potential for soil erosion during construction. Compliance with these requirements would ensure that the project would not result in substantial erosion or loss of topsoil. As a result, the impact relative to a loss of topsoil would be less than significant. No mitigation would be required.

Impact GE-3: The proposed project would not result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse by being located on a geologic unit or soil that is unstable, or that could become unstable. ***(Less than Significant)***

As discussed under Impact GE-1, the project site is relatively level and potential for a landslide to occur at the project site is low. The potential for lateral spreading is also low because of the anticipated lack of a continuous liquefied soil layer and the flat topography of the project site.[162] The area immediately surrounding the project site is also relatively level and has low potential for landslides. There are mapped landslide hazard zones approximately 0.1 and 0.15 miles north of the project site. However, the project would not affect these landslide hazard zones and would not result in an off-site landslide.

As discussed under Impact GE-1, liquefaction has the potential to occur at the project site and could result in ground deformations that would potentially affect several of the proposed buildings. As discussed under GE-1, the project would incorporate foundation design recommendations from the geotechnical report to minimize impacts related to seismically induced liquefaction. The project would comply with the provisions of the California Building Code and the San Francisco Building Code that address issues related to seismic safety and unstable soil. Implementation of these recommendations would ensure that the project would not cause the soil underlying the project site to become unstable and result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. As a result, the impact relative to unstable soil or geologic units would be less than significant. No mitigation is required.

Impact GE-4: The proposed project would not create substantial risks to life or property by being located on expansive soils. ***(Less than Significant)***

Expansive soils are characterized by their ability to undergo significant volume change (i.e., to shrink and swell) because of variations in moisture content. Expansive soils typically are very fine-grained and have a

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162 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus, Geotechnical Interpretive Report*.

high to very high percentage of clay. The project site is underlain by artificial fill, young bay mud, Holocene alluvial deposits, undifferentiated alluvial and estuarine sediments, and bedrock. Artificial fill blankets the project site and varies in thickness from 1 foot to approximately 20 feet. The fill consists of a heterogeneous deposit of loose to medium dense clayey gravel and poorly graded gravel with sand, with some fill areas including gravel and sand in a stiff to hard clay matrix. Young bay mud underlies the artificial fill in the south central and eastern areas of the project site, with deposit depths between approximately 19 to 32 feet below ground surface. The young bad mud deposits consist of high-plasticity clay with organics. Holocene alluvial deposits are found above a subsurface ridge of bedrock and consist of sandy lean clay or fat clay with rootlets and wood fibers, and loose to medium dense sand. Pleistocene-aged slope debris and ravine fill is found at the central portion of the site and consists of clayey gravel and sandy lean clay, containing gravel and cobbles of Franciscan origin. Franciscan complex bedrock underlies the project site and consists of serpentinite with minor inclusions of gabbro and shale. Depth-to-bedrock increases toward the east side of the site and ranges from 1 foot to over 80 feet in depth.[163]

Section 1803 of the California Building Code requires soil testing be completed for projects located in areas likely to have expansive soil to determine where such soils are found, and the geotechnical report must include recommendations and special design and construction provisions for foundations of structures on expansive soils, as necessary. The geotechnical investigation tested near-surface soils at the project site for their expansion potential.[164] According to this report, the soil at the project site tested very-low to low for expansion potential, and therefore the project would not create substantial risk to life or property due to the presence of expansive soils. As a result, the Impact relative to expansive soils would be less than significant. No mitigation Is required.

Impact GE-5: The proposed project would not directly or indirectly destroy a unique geologic feature. ***(Less than Significant)***

A unique geologic feature embodies distinctive characteristics of any regional or local geologic principles, provides a key piece of information important to geologic history, contains minerals not known to occur elsewhere in the county, and/or is used as a teaching tool. Unique geologic features may be exposed or created from natural weathering and erosion processes, or from human excavations. The project site is located within a heavily modified urban environment and does not contain any unique geologic features. Therefore, no impact to unique geologic features would occur. No mitigation is required.

Impact GE-6: The proposed project could directly or indirectly destroy a unique paleontological resource. ***(Less than Significant with Mitigation)***

Paleontological resources include fossilized remains or traces of animals, plants, and invertebrates from a previous geological period. Paleontological resources are deposited and preserved within particular lithologic (rock) units. Lithologic units that may contain fossils include sedimentary and volcanic formations. Collecting localities and the geologic formations containing those localities also are considered

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163 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus, Geotechnical Interpretive Report*.

164 Ibid.

paleontological resources because they represent a limited, nonrenewable resource that, once destroyed, cannot be replaced. Paleontological potential consists of both (a) the potential for yielding abundant or significant vertebrate fossils or for yielding a few significant fossils, large or small, vertebrate, invertebrate, plant, or trace fossils and (b) the importance of recovered evidence for new and significant taxonomic, phylogenetic, paleoecologic, taphonomic, biochronologic, or stratigraphic data.[165] These data are important because they are used to examine evolutionary relationships, provide insight on the development of and interaction between biological communities, establish time scales for geologic studies, and for many other scientific purposes.

Paleontological "sensitivity" is defined as the potential for a geologic unit to produce scientifically significant fossils. The potential of geologic units in a particular area to yield unique paleontological resources depends on the geologic age and origin of the units as well as on the processes they have undergone, both geologic and anthropogenic.[166]

For assessment of paleontological resource impacts, each surficial geologic unit in the City is assigned a paleontological potential level, based on the potential fossil yield classification system for paleontological resources developed by the U.S. Bureau of Land Management in consultation with qualified experts, regarding the geologic units in San Francisco.[167] Under this system, the classification of geologic units is based on the relative abundance of scientifically significant paleontological resources and their potential to yield paleontological resources. This system provides guidance for predicting, assessing, and mitigating impacts on paleontological resources. The levels of potential (i.e., very low, low, moderate, high, very high, and unknown) are defined as outlined below.[168] Surficial geologic unit mapping does not account for the paleontological potential of underlying geologic units. It is possible for a geologic unit with moderate paleontological potential, for example, to underlie a surficial geologic unit with low or very low potential.

> **Very Low Potential:** Geologic units (Precambrian Age) are not likely to contain recognizable paleontological resources. Units are igneous or metamorphic, excluding air-fall and reworked volcanic ash. Potential for significant paleontological resource impact is usually negligible, and impact reduction requirement is unnecessary except in rare or isolated circumstances. This unit is designated with the identifier "1" under the city's paleontological resource impact evaluation guidelines.
>
> **Low Potential:** Geologic units (i.e., younger than 10,000 years before present [recent aeolian deposits]) are not likely to contain paleontological resources. Fossil preservation is unlikely. The potential for a significant paleontological resource impact is generally low; an impact reduction requirement is usually unnecessary, except in rare or isolated circumstances. This unit is designated with the identifier "2" under the city's paleontological resource impact evaluation guidelines.
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> **Moderate Potential:** Sedimentary geologic units (marine in origin) where fossil content varies in significance, abundance, and the predictability of occurrence. The potential for a significant paleontological resource impact is moderate. Impact reduction options could include record

165 Society of Vertebrate Paleontology (SVP), 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Society of Vertebrate Paleontology, Impact Mitigation Guidelines Revision Committee.

166 *Anthropogenic* means caused by human activity.

167 U.S. Department of the Interior, Bureau of Land Management, *Potential Fossil Yield Classification System*, 2016, https://www.blm.gov/sites/blm.gov/files/uploads/IM2016-124_att1.pdf, accessed July 11, 2019.

168 Ibid.

searches, pre-disturbance surveys, monitoring, mitigation, or avoidance. A preconstruction study may be required. This unit is designated with the identifier "3" under the city's paleontological resource impact evaluation guidelines.

High Potential: No occurrence in San Francisco.

Very High Potential: No occurrence in San Francisco.

Unknown Potential: Geologic units that cannot receive an informed class assignment or have not been studied in detail; reports of finds are anecdotal and unverified. Geological units may exhibit features or preservation conditions that suggest unique paleontological resources could be present, but little information about the actual paleontological resources of the unit or area is known. There is no information on the age of the unit. In San Francisco, this applies to units that are listed as being Holocene to Pleistocene. Holocene-age sediments are generally considered too young to contain in situ fossils. Pleistocene-age sediments have produced Ice Age fossils in San Francisco. Based on the mapping of surface geology, most areas in San Francisco are classified as having unknown paleontological resource sensitivity. Because of the unknown sensitivity potential, mitigation during ground-disturbing activities may be necessary. This unit is designated with the identifier "U" under the city's paleontological resource impact evaluation guidelines.

Subsurface project construction would include excavations ranging from 3 to 10 feet deep and installation of shaft foundations and/or piles from 45 to 110 feet deep. As described under Impact GE-4, the project site is directly underlain by artificial fill, which has no paleontological sensitivity. Below the artificial fill layer, is a layer of young bay mud. Invertebrate fossils such as mollusk shells have been observed in the young bay mud, but due to its young age, Holocene young bay mud is considered to have low or undetermined potential for significant fossils. Underlying the young bay mud and tidal marsh deposits is Pleistocene-aged alluvial and estuarine deposits, which is considered to have moderate paleontological sensitivity. A relatively thin layer of Pleistocene-aged slope debris and ravine fill generally underlies these deposits in the eastern portion of the project site. The slope debris and ravine fill was also determined be present in the northcentral portion of the site, though the geotechnical borings indicate that most of the mapped slope debris and ravine fill has been replaced by artificial fill in the upper 5 to 15 feet below ground surface.[169] Although drilling for and installation of micro-pile foundations and shaft foundations would penetrate the Pleistocene-aged alluvial and estuarine deposit layer, this activity would involve limited disruption of the underlying geologic units and would be unlikely to expose paleontological resources. However, excavation to a depth of 10 feet below ground surface for demolition of the existing San Francisco Chronicle Production Plant building and trenching for utility connections (up to a depth of 7 feet belowground surface) have the potential to expose Pleistocene-aged alluvial and estuarine deposits. These activities could result in damage or destruction of a unique paleontological resource, which would result in a significant impact.

Implementation of **Mitigation Measures M-GE-6: Inadvertent Discovery of Paleontological Resources during Construction** would minimize potential paleontological impacts by ensuring that workers are trained to recognize paleontological resources and by establishing procedures should unforeseen discovery of paleontological resources occur. The measure outlines stop work procedures and requires establishment of a buffer around any resource discovered until the potential resource, monitoring, resource evaluation, and

169 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus, Geotechnical Interpretive Report*.

preservation methods. With implementation of the mitigation measure, the impact on paleontological resources would be reduced to less than significant with mitigation incorporated.

Mitigation Measure M-GE-6: Inadvertent Discovery of Paleontological Resources during Construction

Worker Awareness Training. Prior to commencing construction, and ongoing throughout ground-disturbing activities (e.g., excavation, utility installation), the SFPUC shall engage a qualified paleontologist meeting the standards specified by the Society of Vertebrate Paleontology (Society of Vertebrate Paleontology 2010) to train all project construction workers regarding how to recognize paleontological resources and on the contents of the paleontological resources alert sheet, as provided by the Planning Department. The paleontological resources alert sheet shall be prominently displayed at the construction site during ground-disturbing activities for reference regarding potential paleontological resources. In addition, the SFPUC shall inform the contractor and construction personnel of the immediate stop work procedures and other procedures to be followed if bones or other potential fossils are unearthed at the project site. Should new workers that will be involved in ground-disturbing construction activities begin employment after the initial training has occurred, the construction supervisor shall ensure that they receive the worker awareness training as described above.

Paleontological Resource Discoveries. In the event of the discovery of an unanticipated paleontological resource during project construction, ground-disturbing activities shall temporarily be halted within 25 feet of the find until the discovery is examined by a qualified paleontologist as recommended by the Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 2010) and best practices in mitigation paleontology (Murphey et al. 2019). The paleontologist shall consult the ERO. Work within the sensitive area shall resume only when deemed appropriate by the qualified paleontologist in consultation with the ERO.

The qualified paleontologist shall determine 1) if the discovery is scientifically significant; 2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and 3) methods for resource recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a paleontological evaluation letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906, CEQA Guidelines section 15064.5, Public Resources Code Chapter 17, section 5097.5, Paleontological Resources Preservation Act 2009). The paleontological evaluation letter shall be submitted to the ERO for review within 30 calendar days of the discovery.

If in consultation with the ERO the qualified paleontologist determines that a paleontological resource is of scientific importance, the qualified paleontologist shall make a recommendation as to what action, if any, is warranted and prepare a paleontological mitigation program. The mitigation program shall include measures to fully document the resource of scientific importance. It shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation of paleontological resources of scientific importance into an appropriate repository; and 4) preparation of a Paleontological Resources Report (report or paleontology report) at the conclusion of ground-disturbing activities. The qualified paleontologist

shall submit the mitigation program to the ERO for review and approval within ten business days of the discovery.

To avoid construction delays, fully exposed fossils will be immediately removed by the paleontologist to the extent feasible. Consistent with the Society of Vertebrate Paleontology 2010 guidelines, samples of the soil matrix where the discovery occurred may need to be removed from the project site and processed elsewhere. Mitigation required by this measure could suspend construction within an appropriate buffer zone around a discovered paleontological resource or area for up to a maximum of four weeks. At the direction of the ERO and in coordination with the SFPUC, the suspension of construction may be extended beyond four weeks for a reasonable time required to implement appropriate mitigation only if such a suspension is the only feasible means to reduce potential effects on a significant paleontological to a less-than-significant level.

Upon approval by the ERO, ground-disturbing activities in the project area shall resume and be monitored as determined by the qualified paleontologist for the duration of such activities.

The paleontology report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. The SFPUC shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The paleontology report shall be submitted to the ERO for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the ERO.

Impact C-GE-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts on geology, soils, or paleontological resources. ***(Less than Significant)***

The geographic scope for potential cumulative impacts related to geology and soils generally are local and site-specific, encompassing the project site and immediate vicinity. The geographic scope for potential cumulative impacts related paleontological resources could include projects that are adjacent to each other if they could both impact the same paleontologically sensitive geologic unit. Except for the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, none of the cumulative projects listed in Section A, Project Setting, would be constructed in the immediate project vicinity. Cumulative impacts associated with the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project are described below.

Seismic Ground Shaking, Seismic-Related Ground Failure, and Landslides

The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project could be subject to strong ground shaking and a portion of the project is located in a liquefaction hazards zone. The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would be designed and constructed in accordance with current building codes, standards, and engineering practices to protect against seismic and soil-related hazards. Additionally, the project involves underground infrastructure and does not involve any buildings or structures that would be used or occupied by people. Therefore, this cumulative project would not result in a significant impact relative to seismic safety and unstable soils and would not combine with the proposed project to result in a significant cumulative impact (less than significant).

Soil Erosion

The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project could increase the potential for erosion in the immediate project area. However, this cumulative project would be subject to article 4.2 of the San Francisco Public Works Code to reduce the potential for topsoil loss and erosion. Furthermore, because the identified cumulative project is a SFPUC project, it would be required to implement SFPUC Standard Construction Measure 3 (Water Quality). This measure requires the use of erosion and sediment controls (e.g., fiber rolls and/or gravel bags around storm drain inlets, silt fencing, etc.) to minimize the potential for soil erosion during construction. Therefore, the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would not result in a significant impact related to erosion and would not combine with the proposed project to result in a significant cumulative impact (less than significant).

Unstable and Expansive Soils

The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project alignment traverses relatively level land and is not located within a landslide hazard zone.[170] The portions of the alignment are within a liquefaction hazard zone that could affect the underground infrastructure.[171] Construction of this cumulative project would be designed and constructed in accordance with current state, and/or federal building codes, standards, and engineering practices to address expansive soil risks. Therefore, the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project would not result in a significant impact related to unstable and expansive soils and would not combine with the proposed project to result in a significant cumulative impact (less than significant).

Paleontological Resources

The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project involves excavation down to 12-feet deep, which could potentially extend into geological units that could be fossil bearing and could have the potential to uncover and disturb previously unidentified unique paleontological resources (if present), which would be a significant impact. The Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project could affect the same unique paleontological resources, if any are present, as the proposed project due to the close proximity of the two projects, which could result in a significant cumulative impact. As discussed under Impact GE-6, the proposed project also has the potential to damage unique paleontological resources if they are present during excavation at the proposed project site. However, this impact would be less than significant with implementation of **Mitigation Measure M-GE-6: Inadvertent Discovery of Paleontological Resources during Construction**. Should an unanticipated paleontological resource be discovered at the project site, appropriate steps would be taken to reduce the impact to less than significant. Therefore, the proposed project's contribution to a potential cumulative impact on paleontological resources would be less than cumulatively considerable (less than significant).

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170 San Francisco Planning Department, 2019, San Francisco Property Information Map, Map Viewer.

171 Ibid.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
16. HYDROLOGY AND WATER QUALITY. Would the project:					
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would:					
i) Result in substantial erosion or siltation on- or offsite;	☐	☐	☒	☐	☐
ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	☐	☐	☒	☐	☐
iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐	☐
iv) Impede or redirect flood flows?	☐	☐	☒	☐	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☒	☐	☐	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐	☐

Impact HY-1: The proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. ***(Less than Significant)***

As discussed in Section D.12, Utilities and Service Systems, project-related wastewater and stormwater would flow into the city's combined stormwater/sewer system. These flows would be treated according to the standards contained in the city's National Pollutant Discharge Elimination System permit for the southeast plant before discharge into the San Francisco Bay. The National Pollutant Discharge Elimination System standards are set and regulated by the San Francisco Bay Area Regional Water Quality Control Board.

Construction

Construction activities such as excavation, earthmoving, and grading would expose soil and could result in erosion and excess sediments being carried in stormwater runoff to the combined stormwater/sewer system.

In addition, stormwater runoff from temporary on-site use and storage of vehicles, fuels, wastes, and other hazardous materials could carry pollutants to the combined stormwater/sewer system if proper handling methods are not employed, resulting in a potentially significant impact on water quality. However, runoff from the project site would be properly treated at the southeast plant before being discharged into the San Francisco Bay. Under the federal Clean Water Act, the discharge of pollutants to waters of the United States is prohibited unless performed in compliance with a National Pollutant Discharge Elimination System permit. Any stormwater discharge during construction that flows into the city's combined sewer system would receive treatment to standards set forth in the facility's National Pollutant Discharge Elimination System permit prior to discharge into the bay.

The project would involve disturbance of over 5,000 square feet and would comply with the substantive requirements of article 4.2 of the San Francisco Public Works Code, section 146, Construction Site Runoff Control, which requires the development and implementation of an erosion and sediment control plan. The erosion and sediment control plan must include the following information: location and perimeter of the site, location of nearby storm drains and/or catch basins, existing and proposed roadways and drainage patterns within the site, and a drawing or diagram of the sediment and erosion control devices to be used onsite. Additionally, because the project would disturb more than 1 acre of ground disturbance, SFPUC would be required to comply with the State Water Resources Control Board Construction General Permit. The Construction General Permit requires the development and implementation of a stormwater pollution prevention plan for construction activities that disturb one or more acres of soil. Implementation of the stormwater pollution prevention plan would involve installation and monitoring of stormwater best management practices tailored to the project site throughout construction, such as fiber rolls and/or gravel bags around stockpiles, and silt fences. Implementation of fiber rolls and silt fences would minimize excavated soils from being carried in stormwater runoff into the combined stormwater/sewer system or nearby waterways. Article 4.2 provides that for projects subject to both the Construction General Permit and article 4.2, a stormwater pollution prevention plan may be prepared in lieu of the erosion and sediment control plan.[172] SFPUC's Standard Construction Measure 6 (Hazardous Materials) would also be required and contains measures intended to prevent the release of hazardous materials during construction including storing materials pursuant to manufacturer recommendation, maintaining spill kits onsite, providing secondary containment, and containing any spills that occur to the extent safe and feasible. Additionally, as discussed in Section D.17, Hazards and Hazardous Materials, a Department of Toxic Substances Control-approved soil management plan was developed for the project, which describes procedures and protocols that must be implemented during project construction to prevent the release of hazardous materials, including encapsulating soils that exceed Department of Toxic Substances Control screening levels, off-hauling hazardous soils to the appropriate Class I hazardous waste disposal facility, and implementing decontamination procedures to prevent residual contamination from leaving the project site by construction equipment personnel during excavation activities. As a result, the project would not violate surface water quality standards or waste discharge requirements during construction. The impact on water quality would therefore be less than significant. No mitigation is required.

Groundwater is present at approximately 14 feet below ground surface, at the shallowest point.[173] Project excavation would reach a maximum depth of 10 feet and is not expected to encounter groundwater;

172 SFPUC, Construction Site Runoff Control Program, 2018, https://sfpuc.org/programs/pretreatment-program/construction-site-runoff, accessed on February 28, 2019.

173 ENGEO, 2021 (October 20), *City Distribution Division (CDD) Headquarters Campus, Geotechnical Interpretive Report*.

however, drilling would occur up to a maximum depth ranging from 70 feet to 110 feet below ground surface and could encounter groundwater. Dewatering may be required during project construction, and any encountered groundwater would be discharged into the combined stormwater/sewer system and be subject to the requirements of the San Francisco Sewer Use Ordinance 19-92, amended by Ordinance 116-97, as supplemented by San Francisco Public Works Order 158170, which include specific requirement for discharging into the city's combined stormwater/sewer system to prevent the discharge of pollutants into the sewer system that would violate regulatory requirements or harm human health or the environment. . The project would comply with these regulations and therefore would not degrade water quality during construction. As a result, the impact on water quality would be less than significant. No mitigation is required.

Operation

During project operation, wastewater and stormwater from the project site would continue to flow into the combined stormwater/sewer system and be treated to the standards specified in the city's National Pollutant Discharge Elimination System permit for the southeast plant before discharge into the San Francisco Bay. Furthermore, the project would comply with the substantive requirements of article 4.2 of the San Francisco Public Works Code, section 147, (stormwater management ordinance). SFPUC has developed the San Francisco 2016 Stormwater Management Requirements and Design Guidelines (stormwater management guidelines),[174] in accordance with the requirements of this ordinance. The intent of the city's stormwater management program is to reduce the volume of stormwater entering the city's combined and separate sewer systems, and to protect and enhance the water quality of receiving waters, pursuant to and consistent with federal and state laws, lawful standards, and orders applicable to stormwater and urban runoff control and the city's authority to manage and operate its drainage systems. Under the stormwater management guidelines, projects that create and/or replace over 5,000 square feet of impervious surface are required to manage stormwater discharge into the combined sewer system and prepare a stormwater control plan. Stormwater control plans are required to demonstrate how a project would meet all applicable stormwater performance requirements and describe the best management practices (e.g., vegetative roofs and rainwater harvesting) that would be implemented to minimize stormwater runoff. Specifically, the plan would include the following elements: site characterization, design and development goals, site plan, site design, source controls, treatment best management practices, comparison of design to established goals, and an operations and maintenance plan. Treatment best management practices that could be utilized to reduce pollutant loads in stormwater include infiltration basins, rain gardens, or biofiltration areas. Compliance with all applicable federal state, and local laws, lawful standards, and orders would ensure that project operation would not violate water quality standards or waste discharge requirements. Therefore, the project would not substantially degrade surface or groundwater quality. As a result, the impact on water quality would be less than significant. No mitigation is required.

174 San Francisco Public Utilities Commission, 2016 (May), San Francisco Stormwater Management Requirements and Design Guidelines, Urban Watershed Management Program, available at https://sfport.com/node/5558.

Impact HY-2: The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the proposed project may impede sustainable groundwater management of the basin. ***(Less than Significant)***

Construction

As discussed under Impact HY-1, groundwater at the project site occurs at a depth of approximately 14 feet below ground surface. Because project-related excavations would reach a maximum depth of 10 feet, it is not anticipated that groundwater would be encountered. Installation of micro pile foundations for the auto shop, warehouse, and administration building would occur up to a maximum depth ranging from 70 feet to 110 feet. The shaft foundation for the shops connected to the administration building would be installed at a depth ranging from 15 to 45 feet. In the event shallow groundwater is encountered during drilling for micro pile or shaft foundation installation, dewatering may be required to provide dry working areas. Dewatering would be conducted on a short-term and temporary basis during excavation and below-ground activities, but because of its limited duration and scale, this would not result in a loss of water that would substantially deplete groundwater supplies. No other construction activities would affect groundwater supplies. For these reasons, the project would not require long-term dewatering and would not substantially decrease any underlying groundwater supplies during operation. As a result, the impact on groundwater supplies would be less than significant. No mitigation is required.

Operation

Impervious surfaces cover 331,687 square feet of the existing project site, which is the majority of the existing project site, except for the northern portion of the site along Caesar Chavez Street and landscaped areas around the western parking lot. In accordance with the city's stormwater management guidelines, the project would install several flow-through bioretention planters that route runoff directly to the combined sewer/wastewater system, several vegetated planting areas distributed across the site, and a plaza area paved with permeable unit pavers that would allow for water infiltration and recharge. Once constructed, impervious surfaces would cover approximately 325,153 square feet[175] of the project site, resulting in a net increase in total permeable cover across the project site. As discussed under Impact HY-1, the project would also comply with the substantive requirements of article 4.2 of the San Francisco Public Works Code, which requires the preparation of a stormwater control plan for projects that create and/or replace over 5,000 square feet of impervious surface. Project operation would therefore not interfere substantially with groundwater recharge. As a result, the impact on groundwater recharge would be less than significant. No mitigation is required.

175 Permeable pavers are not included in the total amount of impervious surface because they allow for water infiltration and recharge.

Impact HY-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that would result in substantial erosion, siltation, or flooding on or off site; that would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or that would impede or redirect flood flows. ***(Less than Significant)***

The project site does not contain any streams or water bodies. Therefore, the project would have no impact with respect to altering the course of a stream or river.

Construction

During construction, erosion and transportation of soil particles potentially could occur at the project site. The State Water Resources Control Board Construction General Permit requires the implementation of a stormwater pollution prevention plan for construction activities that disturb one or more acres of soil. As discussed under Impact HY-1 and HY-2, the SWPPP for the project would contain best management practices to reduce construction-related stormwater discharges, which may include the installation of silt fencing, fiber rolls, or geotextiles. In addition, the SFPUC would comply with the substantive requirements of article 4.2 of the San Francisco Public Works Code, which requires the preparation of an erosion and sediment control plan. As described in article 4.2 of the code, for projects subject to both the Construction General Permit and article 4.2, a stormwater pollution prevention plan may be prepared in lieu of the erosion and sediment control plan.[176] Additionally, as described under Impact HY-1, the SFPUC would implement s Standard Construction Measure 3 (Water Quality), which requires the implementation of erosion and sediment controls (e.g., fiber rolls and/or gravel bags around storm drain inlets, silt fencing, etc.) tailored to the project to prevent discharges of sediment and other pollutants into storm drains and all surface waters during construction. As a result, the impact relative to the alteration of drainage patterns would be less than significant. No mitigation is required.

Operation

As discussed under Impacts HY-1 and HY-2, replacement of impervious surfaces requires compliance with the city's stormwater management ordinance; the ordinance requires compliance with stormwater design requirements and guidelines. In compliance with these requirements, the project would install several flow-through bioretention planters that route runoff directly to the combined sewer/wastewater system, several vegetated planting areas distributed across the site, and an outdoor plaza paved with permeable unit pavers, which would result in a net increase in the total amount of permeable surface across the project site. The reduction in impervious surfaces would reduce stormwater runoff and encourage on-site infiltration, thereby reducing stormwater runoff into existing or planned stormwater drainage systems compared to existing conditions. Additionally, as discussed under Impact Haz-1, the SFPUC would comply with Chapter 6.95 of the California Health and Safety Code for the handling and storage of hazardous substances and the substantive requirements of article 21 of the San Francisco Health Code, which regulate the use and handling of hazardous materials and waste and would minimize the potential for release of hazardous substances that could pollute stormwater runoff. As such, the project would not substantially alter the existing drainage pattern of the site or surrounding areas in a manner that would result in substantial erosion, siltation, or flooding on or off site, nor would it create or contribute runoff water that would exceed the capacity of

176 SFPUC, Construction Site Runoff Control Program, 2018, Construction Site Runoff (sfpuc.org) accessed on March 5, 2024.

existing or planned stormwater drainage systems, nor would it provide substantial additional sources of polluted runoff. Furthermore, the project site is currently developed and redevelopment associated with the project would not change the topography or drainage in such a way that would impede flood flows. As a result, the impact on the capacity of stormwater drainage systems during operation would be less than significant. No mitigation is required.

Impact HY-4: The proposed project would not risk release of pollutants due to project inundation in flood hazard, tsunami, or seiche zones. ***(Less than Significant with Mitigation)***

Although the eastern and southern boundaries of the project site are within 350 feet of a Tsunami Hazard Area, the project site itself is not within a designated Tsunami Hazard Area. [177] Therefore, the project would not be at risk of inundation by tsunami.[178] Flood-inducing seiches are not known to occur in the San Francisco Bay; therefore, the project would not be subject to seiche. As a result, impacts involving the release of pollutants due to project inundation by a tsunami or seiche would not occur (no impact).

Construction

The project site is not located in the Federal Emergency Management Agency's (FEMA) 100-year floodplain;[179] however, the SFPUC Storm Flood Risk Map indicates that a small portion of the eastern side of the project site is within a 100-year storm flood zone.[180] As discussed under Section D.17, Hazards and Hazardous Materials, soils at the project site are known to contain contaminants. During construction, excavated soil would be stockpiled temporarily at the project site before being hauled to a facility for disposal. In the event of a flood, stockpiled soil or construction chemicals such as equipment fuels and fluids, if located within the eastern portion of the project, could flow off-site. As discussed under Impact HY-1, implementation of the project's stormwater pollution prevention plan and compliance with local and state regulations would ensure proper containment and handling of hazardous materials throughout construction, which would minimize the potential for a release. Furthermore, as discussed in Section D.17, Hazards and Hazardous Materials, SFPUC would implement Standard Construction Measure 6 (Hazardous Materials), which requires the preparation and implementation of a plan for treating, containing, and removing contaminated or hazardous materials in accordance with applicable local, state, and federal regulations. In addition, storage of excavated soil on site would be temporary and short term, prior to permanent disposal at appropriate landfill facilities. Although implementation of the stormwater pollution prevention plan and Standard Construction Measure 6 (Hazardous Materials) and the short duration of stockpiling would minimize the risk of pollutant release, if contaminated soil is stockpiled within the 100-year storm flood zone and a major flood event occurs, the potential for the release of pollutants would still exist, the impact of which would be significant.

Implementation of **Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zones** would minimize impacts related to release of pollutants due to flooding by prohibiting any excavated soil from being

177 California Department of Conservation, 2021, San Francisco County Tsunami Hazard Areas, available: https://www.conservation.ca.gov/cgs/tsunami/maps/san-francisco, accessed August 2, 2022.

178 ENGEO, 2021, *City Distribution Division (CDD) Headquarters Campus San Francisco, California Geotechnical Interpretive Report*.

179 Ibid.

180 SFPUC, 2019 (July), 100-Year Storm Flood Risk Map, available: https://sfplanninggis.org/floodmap/, accessed August 2, 2022.

stockpiled within the designated 100-year flood zone during construction. Implementation of this mitigation measure, together with implementation of the stormwater pollution prevention plan and compliance with SFPUC Standard Construction Measure 6 (Hazardous Materials), would reduce the project's potential to release pollutants in the event of inundation to less than significant with mitigation incorporated.

Operation

Project operations would be similar to existing operation at the 1990 Newcomb Avenue facility and would include the use, transport, and storage of hazardous waste. Project operation would not include the storage or use of any hazardous materials not already stored or used at the existing 1990 Newcomb Avenue facility. As discussed under Section D.17, Hazards and Hazardous Materials, the project would comply with the federal Resource Conservation and Recovery Act, United States Department of Transportation regulations, California Occupational Safety and Health Administration health and safety requirements, and article 21 of the San Francisco Health Code, which regulates the use and handling of hazardous materials in accordance with state law. As required, the project would implement a hazardous materials management plan, detailing storage and control procedures for hazardous materials present at the project site. The hazardous materials management plan would include an inventory of hazardous materials handled at the project site, secondary containment specifications, an emergency response plan, and an employee training plan for handling, storage, and disposal of hazardous materials. Implementation of the hazardous materials plan and emergency response plan would minimize the potential for a release of pollutants. As a result, the impact relative to the release of pollutants during flooding would be less than significant. No mitigation is required.

Impact HY-5: The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. ***(Less than Significant)***

As discussed under Impact HY-1, during construction and operation, project-related wastewater and stormwater would flow into the combined stormwater/sewer system and would be required to meet the standards contained in the city's National Pollutant Discharge Elimination System permit for the southeast plant and SFPUC's stormwater management requirements before discharge into the San Francisco Bay. Standard best management practices would be implemented to control construction site runoff and reduce the discharge of pollutants to storm drain systems from stormwater runoff. As part of compliance with regulatory requirements during ground-disturbing or other project construction activities, implementation of water quality control measures and best management practices would ensure that water quality standards would be met, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the basin plan.

In the event groundwater is encountered during project construction, SFPUC would be required to meet certain water quality standards before being discharged into the combined stormwater/sewer system. As discussed under Impact HY-2, the project would not permanently or substantially deplete groundwater resources during construction, nor would it significantly prevent groundwater recharge during operations. For these reasons, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. As a result, the impact on implementation of water quality control plan or on a ground water management plan would be less than significant. No mitigation is required.

Impact C-HY-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact on hydrology and water quality. ***(Less than Significant with Mitigation)***

The geographic scope for potential cumulative impacts on hydrology and water quality would encompass the project area and water bodies that could be affected by the identified cumulative projects along with the proposed project.

Water Quality, Water Quality Standards, and Waste Discharge Requirements

Construction and operational activities associated with all of the cumulative projects located within approximately 0.25 mile of the proposed project either drain directly into Islais Creek and the central San Francisco Bay, or drain into sewer systems that ultimately drain into the San Francisco Bay. Islais Creek and the central San Francisco Bay are currently impaired waterbodies with levels of several types of pollutants in excess of standards.[181]

Cumulative development that increases impervious surfaces would result in an increase in stormwater discharge. Cumulative projects could further exacerbate the pollutant levels in central San Francisco Bay through: 1) erosion and sedimentation from construction site activities or stormwater runoff to the storm drain system and waterways; 2) accidental releases of chemicals and fuels; or 3) discharges of dewatering waste or pollutants released due to inundation. The identified cumulative projects would be subject to the same water conservation, stormwater management, and wastewater discharge ordinances that would be applicable to the proposed project, including article 4.2 of the San Francisco Public Works Code, which requires an erosion and sediment control plan, or the Construction General Permit for projects that disturb more than 1 acre. The erosion and sediment control plan and Construction General Permit would require implementation of best management practices for the management of construction wastewater and stormwater runoff, which may include use of straw wattles, sandbags, and silt fencing that would control erosion and sedimentation during construction and prevent discharge of soils into stormwater runoff. Compliance with regulatory requirements and permits would minimize potential impacts on water quality. The proposed project and the cumulative SFPUC projects (Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project and the Channel Force Main Intertie Project) would also implement SFPUC Standard Construction Measures 3 (Water Quality) and 6 (Hazardous Materials), which would reduce the potential cumulative impact on water quality. However, several cumulative projects are located partially or entirely within the 100-year flood zone: the 1399 Marin Street Project, 1801 Evans Avenue Project, Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project, and Islais Creek Bridge Project.[182] These cumulative projects could require the use of hazardous materials and/or have the potential to expose contaminated soils or materials during construction, which could result in pollutant release during flooding. This would be a significant cumulative impact. As discussed under Impact HY-4, the project's contribution to this impact would be less than cumulatively considerable with implementation of **Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zone** (less than significant with mitigation).

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181 State Water Resources Control Board, *Final 2014/2016 California Integrated Report (Clean Water Act ection 303(d) List/305(b) Report),* April 11, 2018, *https://www.waterboards.ca.gov/water_issues/programs/tmdl/integrated2014_2016.shtml*.

182 SFPUC, 2022 (July), 100-Year Storm Flood Risk Map, available: https://sfplanninggis.org/floodmap/, accessed May 23, 2024.

Groundwater, Stormwater, and Flood Flows

In the event that groundwater is encountered during the construction of the proposed project and the cumulative projects, dewatering may be required. Any cumulative effects related to lowering the water table due to construction dewatering would be temporary and only required during short-term and limited construction phases (i.e., excavation and construction of below-ground facilities) of the cumulative projects. Furthermore, none of the cumulative projects would involve dewatering during operations. The cumulative projects would be subject to the same groundwater dewatering requirements as the proposed project, including San Francisco Sewer Use Ordinance 19-92, amended by Ordinance 116-97, as supplemented by San Francisco Public Works Order 158170, which include specific water quality requirements for discharging into the city's combined stormwater/sewer system.

Similar to the proposed project site, the existing cumulative project development sites are highly urbanized, developed, and are largely covered by existing impervious surfaces, as shown in Figure 6 (p. 25). Therefore, development of the cumulative projects would not substantially increase the amount of impervious surfaces above current existing impervious conditions. Furthermore, similar to the proposed project, cumulative development and redevelopment projects (such as the 1111 Pennsylvania Avenue and Potrero Hope SF projects) would also be required to comply with the SFPUC's Stormwater Management Requirements and Design Guidelines to incorporate current low-impact development and green infrastructure elements, which would reduce runoff and potential for flood flows and would encourage groundwater recharge. Therefore, the identified cumulative projects would not combine with the proposed project to result in a significant cumulative impact related to groundwater, stormwater, or flood flows (less than significant). No mitigation is required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
17. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐	☐

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐	☐

The project site is not within an area covered by an airport land use plan or within 2 miles of a public airport or a public use airport, nor would the project be located in or near wildlands. Therefore, Topics D.17(e) and D.18(g) would not apply to the project and are not discussed further.

Impact HZ-1: The proposed project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. ***(Less than Significant)***

CONSTRUCTION

Project construction would require the routine use of hazardous materials, such as fuels, lubricants, paints, and solvents for motorized heavy equipment (e.g., excavators, bulldozers, backhoes). During construction, minor maintenance activities and refueling of equipment and vehicles (from mobile or stationary fuel supply sources) could occur at the project site. If not managed responsibly, the routine transport, use, and disposal of hazardous materials could pose a risk to human health or the environment. For example, hazardous materials would have the potential to spill accidentally during maintenance, refueling, or servicing of equipment and vehicles. Improperly disposed, spilled, or leaking hazardous materials could create a significant hazard to workers, the public, or the environment.

Hazardous materials handling, disposal, and transportation would occur in accordance with applicable federal, state, and local regulations. Specifically, handling of hazardous materials would be conducted in accordance with title 29, section 1910 of the Code of Federal Regulations, whereas transportation of hazardous materials would comply with the Resource Conservation and Recovery Act and U.S. Department of Transportation regulations. The Resource Conservation and Recovery Act also governs hazardous material disposal, ensuring that only facilities permitted to accept a specific waste are used by the project.

In addition, the SFPUC would handle hazardous materials in accordance with its Standard Construction Measure 6 (Hazardous Materials), which requires the implementation of measures to prevent the release of hazardous materials used during construction, such as proper storage in areas away from surface waters; maintaining spill kits onsite; and containing any spills that occur, followed by collection and disposal in accordance with applicable laws. Compliance with regulatory requirements and implementation of SFPUC

Standard Construction Measure 6 (Hazardous Materials) would therefore minimize potential impacts related to routine transport, use, or disposal of hazardous materials and reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As a result, the impact relative to the creation of a significant hazard to the public or the environment during construction would be less than significant. No mitigation is required.

OPERATION

Project operation would be similar to existing operations at the 1990 Newcomb Avenue facility and would include hazardous materials storage and use as well as hazardous waste transport associated with vehicles and maintenance or other industrial operations, as well as the periodic pick-up and drop-off of hazardous materials, such as paints, lubricants, and solvents. Hazardous materials stored would include two 8,000-gallon aboveground fuel tanks and small quantities of lubricants, degreasers, and paints. Hazardous waste generated by operation of the project may include oils and lubricants from machines and the equipment shops, paints, blast waste, and solvents. However, the project would comply with the Resource Conservation and Recovery Act, U.S. Department of Transportation, the California Department of Toxic Substances Control, Title 22 of the California Code of Regulations, and California Health and Safety Code Division 20, Chapter 6.5 for the handling, transport, and disposal of hazardous materials. Chapter 6.95 of the California Health and Safety Code requires that any business that handles, stores, or disposes of a hazardous substance at a given threshold quantity must prepare a site-specific hazardous materials business plan. Hazardous materials business plans are intended to minimize hazards to human health and the environment from fires, explosions, or an unplanned release of hazardous substances into air, soil, or surface water. The project would be required to prepare a new hazardous materials business plan, which would contain an inventory of hazardous materials at the facility, emergency response plans and procedures to be followed in the event of a release of a hazardous material, training requirements for employees, and a site map that shows evacuation staging areas, hazardous material handling and storage areas, and emergency response equipment locations. The SFPUC would also continue to comply with the substantive requirements of article 21 of the San Francisco Health Code, which regulate the use and handling of hazardous materials and waste. Under article 21, any business which exceeds certain hazardous materials criteria specified in section 1110 of the San Francisco Health Code must obtain and keep a hazardous materials certificate and implement a hazardous materials management plan. The hazardous materials management plan describes hazardous materials present onsite and required hazardous materials management and control procedures to protect workers from potential health and physical hazards from the accidental release of hazardous materials. Article 21 incorporates the requirements of Chapter 6.95 California Health and Safety Code for hazardous business plans. The project would comply with these requirements and project operations would be conducted similar to existing operations at the 1990 Newcomb Avenue facility and the University Mound facility including auto repairs and maintenance, water meter and pipe repairs, and vehicle, equipment, and material storage. Therefore, project operation would not pose substantial public health or safety hazards resulting from routine use, transport, or disposal of hazardous materials. As a result, the impact relative to the creation of a significant hazard during operation would be less than significant. No mitigation is required.

Impact HZ-2: The proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. ***(Less than Significant)***

This impact discussion focuses on hazardous building materials, naturally occurring asbestos, and the use of hazardous materials during construction and operation of the project. Impacts related to the potential release of contaminated soil are discussed under Impact HZ-4.

CONSTRUCTION

HAZARDOUS BUILDING MATERIALS

The existing San Francisco Chronicle Production Plant building at the project site, which would be demolished during project construction, was constructed in the 1980s, after the ban on the use of asbestos-containing materials. Nevertheless, potential asbestos containing building materials and lead-based paint were documented in the hazardous materials management plan prepared for the project.[183] The plan includes a description of hazardous materials present within the existing building at the project site and required hazardous materials management and control procedures during building demolition. During a hazardous materials inspection conducted on the interior and exterior of the building samples were collected from building materials and asbestos, lead, and polychlorinated biphenyl -containing materials were found in the building materials.

Demolition of the existing building could result in release of asbestos, lead, and polychlorinated biphenyl -containing materials into the environment. Asbestos wastes must be handled and disposed of in accordance with the federal, State, and local regulations, including the Occupational Health and Safety Administration (OSHA) Asbestos Construction Standard (Title 29 Code of Federal Regulations Section 1926.1101), which regulates construction work involving demolition of facilities containing asbestos, worker training, and disposal of asbestos waste. For example, these regulations require specific enclosures or regulated areas (a marked-off site where construction workers work with asbestos, including adjoining areas where debris and waste from asbestos work accumulates or where airborne concentrations of asbestos exceed, or can possibly exceed, the permissible exposure limit) to contain asbestos, including filtration systems and vacuums or collection devices and regular testing and monitoring of airborne asbestos during asbestos-removal activities. Furthermore, the National Emission Standards for Hazardous Air Pollutants, established by the U.S. Environmental Protection Agency, requires specific work practices for asbestos to be followed during demolitions of all structures, installations, and buildings such as the existing building at the project site. These work practices include notifying all appropriate agencies before any demolition of buildings that could contain a certain threshold amount of asbestos or asbestos-containing material. The California Division of Occupational Safety and Health (CAL OSHA) enforces requirements on lead safety during construction activities such as demolition of structures containing lead under California Code of Regulations, Title 8, Section 1532.1. This regulation requires proper lead sampling and testing, regular air sampling to ensure appropriate protective requirements are used, implementation of specific requirements during demolition (e.g., working training, control of lead by HEPA vacuuming and wet clean up, use of respirators, etc.), and development of a compliance program.

183 ENGEO, 2021 (November 17), City Distribution Division Headquarters Campus Hazardous Materials Management Plan.

Other applicable regulations include the air district's regulation 11, rule 2: Hazardous Pollutants–Asbestos Demolition, Renovation, and Manufacturing; title 8, section 1529 (asbestos) of the California Code of Regulations; and title 8, section 1532.1 (lead) of the California Code of Regulations. The air district's regulation 11, rule 2 requires that the disturbance/removal and management of asbestos containing materials be performed in accordance with the air district's regulations, to ensure that asbestos would not be released into the environment. The identification, removal, and disposal of asbestos-containing materials is regulated by title 8, section 1529 which controls emissions of asbestos into the atmosphere during demolition and removal of structures containing asbestos and establish appropriate waste disposal procedures. Title 8, section 1532.1 pertains to lead safety measures for construction employers and abatement measures designed to reduce or eliminate lead hazards or lead-based paint to reduce the risk of employee lead poisoning.

The pre-demolition survey identified light fixtures with fluorescent bulbs and ballasts that may contain polychlorinated biphenyl-containing (PCB) materials. The identification, removal, and disposal of PCBs is regulated under the Toxic Substances Control Act (Title 40, Chapter 1, Subchapter R, Part 761) and State of California regulations (22 CCR § 66263.44). Under these regulations, the light tubes must be removed without breakage and disposed of at a licensed facility permitted to accept the materials. Upon completion of abatement measures, if applicable, the contractor is required to provide written documentation that testing and abatement have been completed in accordance with all federal, state, and local laws and regulations.

With compliance with the regulations described above, the project would not create a significant hazard to the public or the environment related to the accidental release of hazardous building materials into the environment. As a result, the impact relative to such releases would be less than significant. No mitigation is required.

NATURALLY OCCURRING ASBESTOS

Asbestos was found in soil across the site, which is likely naturally occurring in ultramafic rock at the project site.[184] The California air board has adopted an asbestos airborne toxic control measure, contained in Title 17 of the CCR, section 93105, that applies to any construction that would disturb an area with naturally occurring asbestos, serpentine, or ultramafic rock. For ground disturbance greater than one acre, the measure requires the preparation and implementation of an asbestos dust mitigation plan, for review and approval by the Bay Area air district, which would specify dust mitigation practices that would prevent offsite migration of asbestos-containing dust from construction and grading activities. Dust mitigation practices included in the asbestos dust mitigation plan may include track-out prevention and control measures (e.g., gravel pads, tire shakers, wheel wash system), keeping active storage piles adequately wetted or covered with tarps, applying chemical dust suppressants, and installing wind barriers. Additionally, the project would also be required to prepare a dust control plan in compliance with article 22B, Construction Dust Control Ordinance, of the San Francisco Health Code, as described under Impact AQ-2. Compliance with title 17 of the CCR, section 93105 and article 22B would reduce the potential that demolition of the existing building and excavation into soil containing naturally occurring asbestos would create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the

184 Ramboll, 2019 (June 3), Phase II Investigation Report for 2000 Marin Street San Francisco, California. Accessed on April 2, 2024.

release of hazardous materials into the environment to a less-than-significant level. No mitigation is required.

USE OF HAZARDOUS MATERIALS

As discussed under Impact HZ-1, project construction would require the use of hazardous materials such as fuels, lubricants, paints, and solvents for motorized heavy equipment, such as excavators, bulldozers, and backhoes, and minor maintenance activities and refueling of equipment and vehicles from mobile or stationary fuel supply sources could occur at the project site. If not properly managed, hazardous materials have the potential to be released or spilled accidentally during maintenance, refueling, or servicing of equipment and vehicles. Improperly disposed of, spilled, or leaking hazardous materials could create a significant hazard to workers, the public, or the environment. The project must comply with federal, state, and local regulations regarding the handling, disposal, and transportation of hazardous materials, including the federal Resource Conservation and Recovery Act and United States Department of Transportation Regulations. In addition to complying with mandatory regulatory requirements, potential impacts would be further reduced by implementing SFPUC Standard Construction Measure 6 (Hazardous Materials), which specifies measures to prevent the release of hazardous materials used during construction, such as storing hazardous materials pursuant to manufacturer recommendation, maintaining spill kits onsite, and containing any spills that occur to the extent safe and feasible, followed by collection and disposal in accordance with applicable laws. SFPUC Standard Construction Measure 6 (Hazardous Materials) also specifies that the SFPUC must report spills of reportable quantity to applicable agencies. Compliance with regulatory requirements and implementation of SFPUC Standard Construction Measure 6 (Hazardous Materials) would minimize potential impacts related to the reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As a result, the impact on the public or the environment from accidental releases would be less than significant. No mitigation is required.

OPERATION

As stated under Impact HZ-1, project operations would include use and storage of oils, lubricants, paints, solvents, gasoline, and diesel consistent with the uses at the 1990 Newcomb Avenue facility. The project would comply with the Resource Conservation and Recovery Act, U.S. Department of Transportation, the California Department of Toxic Substances Control, Title 22 of the California Code of Regulations, and California Health and Safety Code Division 20, Chapter 6.5 for the handling, transport, and disposal of hazardous materials. In accordance with Chapter 6.95 of the California Health and Safety Code, the project would prepare a hazardous material business plan that would ensure that hazardous materials are stored properly, and that employees are trained adequately to handle hazardous materials. Under article 21 of the San Francisco Health Code, the project would be required to prepare and implement a hazardous materials plan that manages the use and handling of hazardous materials and waste at the project site. The hazardous material plan would require an inventory of hazardous materials at the facility, emergency response plans, and procedures in the event of a release or potential release of a hazardous material, and requirements to train employees in safety procedures to follow in the event of a release of a hazardous material. All hazardous building materials from the existing building would be removed during project construction, and the new buildings would not use any hazardous building materials. Ground disturbance that could release naturally occurring asbestos into the environment is not proposed during project operations. Therefore, impacts related to hazardous building materials and naturally occurring asbestos during project operations would not occur. Implementation of the hazardous materials plan would further minimize the potential for the release of hazardous materials into the environment and provide for the prompt cleanup of any

unanticipated releases. As a result, the impact on the public or the environment resulting from a release of hazardous materials into the environment would be less than significant. No mitigation is required.

Impact HZ-3: The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. ***(Less than Significant)***

CONSTRUCTION

The project area is primarily comprised of industrial uses and, therefore, schools are not prevalent in the vicinity. The only school within 0.25 mile of the project site is the Arise Educational Center, approximately 450 feet north of the project site at 1760 Cesar Chavez. Construction activities, specifically building demolition and soil excavation, could result in disturbance to asbestos, releases of lead-based paint and of other contaminants, if hazardous materials are present and are not handled or disposed of properly. However, it is unlikely that the project would expose the school to these types of hazardous materials during construction because potential impacts associated with exposure to construction fuels and materials are highly localized, and the school is not located adjacent to the project site. As discussed under Impact HZ-2, project construction would be performed in compliance with federal, state, and local regulations related to the abatement of hazardous materials in building materials, including the Occupational Health and Safety Administration Asbestos Construction Standard and air district's regulation 11, rule 2 which regulate demolition of facilities containing asbestos and title 8, section 1532.1 (lead) of the California Code of Regulations which pertains to lead safety measures. SFPUC would prepare an asbestos dust mitigation plan, in compliance with California air board's adopted asbestos airborne toxic control measure, to address release of naturally occurring asbestos at the project site. Additionally, the project would comply with the federal Resource Conservation and Recovery Act and United States Department of Transportation Regulations, which address the handling, disposal, and transportation of hazardous materials. In addition to complying with mandatory regulatory requirements, potential impacts would be further reduced by implementing SFPUC Standard Construction Measure 6 (Hazardous Materials), which specifies measures to prevent the release of hazardous materials used during construction. Compliance with federal, state, and local regulations would therefore minimize the potential for project construction to release hazardous emissions that could present a hazard to nearby schools. As a result, the impact relative to the emission or handling of hazardous materials near schools would be less than significant. No mitigation is required.

OPERATION

Project operations would include the storage, handling, and disposal of hazardous materials including the use of oils, lubricants, solvents, diesel fuel, gasoline, and paints. As discussed under impact HZ-1, operational activities would be required to comply with the federal and state regulatory requirements, including the preparation and implementation of a hazardous materials business plan, to minimize potential for release of hazardous materials. The project would also comply with substantive requirements of article 21 of the San Francisco Health Code that requires the project to obtain a hazardous materials certificate and implement a hazardous materials plan, as discussed under Impact HZ-1. Compliance with these requirements would minimize the potential for hazardous material releases during operation. Additionally, as discussed in in health risk assessment in Section D.7, Air Quality, the project would not expose sensitive receptors, including schools, to substantial pollutant concentrations with implementation of **Mitigation Measure M-AQ-4: $PM_{2.5}$ Controls for Operational Equipment** and would therefore not emit hazardous

emissions near a school**.** As a result, the project would not create a significant hazard to the public or schools within 0.25 mile of the project site. The impact would therefore be less than significant. No mitigation is required. Therefore, the project would not expose sensitive receptors to substantial pollutant concentrations. As a result, the associated health risk impact would be less than significant with implementation of mitigation.

Impact HZ-4: The proposed project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 but would not create a significant hazard to the public or the environment. ***(Less than Significant with Mitigation)***

The project site is included on a list of hazardous materials sites that was compiled pursuant to Government Code 65962.5, also known as the "Cortese List."[185] The project site was first developed in 1939 as the Federated Fry Metals facility that manufactured and recycled metals, brass ingots, cathodic protection, lead, and scrap metal.[186] The existing building at the project site was constructed in 1989, after demolition of the metal manufacturing facility and the removal of two underground fuel storage tanks.[187] During site investigations beginning in 1987 and continuing into the 1990s, contaminants were found in the shallow soil of the project site, including lead, nickel, zinc, copper, cadmium, antimony, and mercury. Historical sampling also found the presence of total petroleum hydrocarbons, volatile organic compounds (VOCs), semi-volatile organic compounds, and polychlorinated biphenyls at relatively low concentrations across the project site, with limited localized exemptions.[188] In 1997, the San Francisco Newspaper Agency executed a Voluntary Cleanup Agreement with the Department of Toxic Substances Control to remediate the site. Remediation and regulatory closure consisted of installation and maintenance of an asphalt concrete cap ranging from 4 to 12 inches in thickness throughout the site.[189] In May 2003, the San Francisco Newspaper Agency and Department of Toxic Substances Control established a land use covenant, requiring the site owner to maintain the integrity of the remedial cap, avoid disturbance of site soils, and comply with activity use limitations.[190] The agreement requires a 30-day advance notice to the Department of Toxic Substances Control if the property is sold, leased, or otherwise conveyed. The deed restriction also limits site development to commercial and industrial uses and prohibits school, daycare, hospital, and residential uses.[191] Under the covenant, semi-annual inspections and 5-year reviews of the implemented remedial action area are required. Project activities that disturb the asphalt cap (i.e., excavation, trenching, and drilling for micro-piles and shaft foundation) would be subject to Department of Toxic Substances Control approval and would need to comply with a project-specific soil management plan and health and safety plan, both of which are also subject to Department of Toxic Substances Control approval.

185 CalEPA, 2022, Cortese List: Section 65962.5(a), available: https://calepa.ca.gov/sitecleanup/corteselist/section-65962-5a/, accessed September 9, 2022.

186 Pangea, 2010 (March 29), *Phase I Environmental Site Assessment Report San Francisco Chronicle City Plant 2000 Marin Street/1901 Army (Cesar Chavez) Street San Francisco, California.*

187 Ramboll, 2019 (June 3), Phase II Investigation Report 2000 Marin Street San Francisco, California.

188 Pangea, 2010 (March 29), *Phase I Environmental Site Assessment Report San Francisco Chronicle City Plant 2000 Marin Street/1901 Army (Cesar Chavez) Street San Francisco, California*

189 Ramboll, 2019 (June 3), Phase II Investigation Report 2000 Marin Street San Francisco, California.

190 Ibid.

191 Ibid.

Although the Department of Toxic Substances Control has jurisdiction over the management and remediation of the project site, because the project site is also within the Maher zone and would disturb more than 50 cubic yards of soil, it is also subject to the requirements of article 22A of the San Francisco Health Code (also known as the Maher Ordinance).[192, 193] The Maher Ordinance would require the project sponsor to retain the services of a qualified professional to prepare an environmental site assessment, meeting the requirements of section 22.A.6 of the San Francisco Health Code. In compliance with the Maher Ordinance, phase I and phase II environmental assessments were completed for the project site.[194,195] The Maher application was submitted to the San Francisco Department of Public Health (health department) in February 2021. Although the health department would typically have regulatory oversight of specific Maher requirements, the health department has deferred oversight of the project site to the Department of Toxic Substances Control because of their jurisdiction over the project site.

Furthermore, in compliance with the land use covenant, a soil management plan was developed for the project and approved by the Department of Toxic Substances Control in March 2022.[196, 197] The plan describes procedures and protocols that must be implemented during project construction, such as encapsulating soils that exceed Department of Toxic Substances Control screening levels, off-hauling hazardous soils to the appropriate Class I hazardous waste disposal facility, and developing transportation routes to limit the transport of hazardous soils through residential areas. Any soils at the project site that exhibit contaminants of concern would be encapsulated within the development footprint by using one of three approaches: (1) under a clean soil cap measuring at least 12 inches in thickness, (2) under pavement, base rock, and/or clean soil cap measuring at least 12 inches in combined thickness, or (3) under structure footprints. Excavated soil would be transported off-site for disposal. The soil management plan also contains decontamination procedures to prevent residual contamination from leaving the project site by construction equipment personnel during excavation activities and protocols in the event that underground structures or features of potential environmental concern are identified during project construction.

In addition to the soil management plan, and in accordance with the land use covenant, the project would be required to prepare and implement a project-specific health and safety plan. The site-specific construction health and safety plan would generally include an assessment of hazardous substances present onsite, personal protection equipment, site operating procedures (e.g., personnel training requirements, sanitation, daily operating procedures), and emergency response procedures. The site health and safety plan would ensure that appropriate work procedures and personal protective equipment would be utilized so that construction workers and the public would not be exposed to contaminants in soil and groundwater. The SFPUC must comply with the provisions of the covenant, specifically procedures for soil management and health and safety, as well as all regulations related to hazardous waste storage, handling,

192 San Francisco Planning Department, San Francisco Property Information Map – Map Viewer, available: https://sfplanninggis.org/pim/map.html, accessed July 15, 2022.

193 City and County of San Francisco, 2024 (March 7), Frequently Asked Questions about the Maher Ordinance, available at: https://www.sf.gov/information/frequently-asked-questions-about-maher-ordinance, accessed on April 3, 2024.

194 Pangea, 2010 (March 29), *Phase I Environmental Site Assessment Report San Francisco Chronicle City Plant 2000 Marin Street/1901 Army (Cesar Chavez) Street San Francisco, California*.

195 Ramboll, 2019 (June 3), Phase II Investigation Report 2000 Marin Street San Francisco, California.

196 ENGEO, 2022, *City Distribution Division Headquarters Campus 2000 Marin Street San Francisco, California Soil Management Plan*.

197 Department of Toxic Substances Control, 2022 (March 3), Approval letter for the City Distribution Division Headquarters Campus Site at 2000 Marin Street Soil Management Plan.

transportation, and disposal. With this required compliance, impacts associated with construction activities on a hazardous waste site would, in most instances, not result in adverse effects to people or the environment.

However, as discussed under Impact HY-4 in Section D.17, Hydrology and Water Quality, a small portion of the eastern side of the project site is within a 100-year storm flood zone, as designated by SFPUC Storm Flood Risk Map.[198] Stockpiling of contaminated soil within the flood zone during construction could create a significant hazard to the public or the environment if inundation of this portion of the project site were to occur and contaminated soil were released into the surrounding environment. This would be a significant impact. Implementation of **Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zones** would minimize this impact to less-than-significant levels by prohibiting the stockpiling of any excavated soil within the designated flood zone during construction. Implementation of Mitigation Measure M-HAZ-4, in combination with implementation of the project-specific soil management plan and health and safety plan and compliance with regulatory requirements (i.e., Maher Ordinance), would further reduce the project's potential to create a significant hazard to the public or the environment. As a result, the impact related to the creation of a significant hazard to the public or the environment would be less than significant with mitigation incorporated.

> **Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zones**
>
> Soil excavated from the project site during construction shall not be stockpiled within the eastern portion of the project site that is designated as a 100-year storm flood zone as identified in the SFPUC Storm Flood Risk Map.

OPERATION

Although the project site is included on a list of hazardous materials sites, compiled pursuant to section 65962.5 of the Government Code, operation of the project a would not create a significant risk to the public or the environment from exposure to hazardous materials from historical site uses due to the required implementation of the approved soil management plan and compliance with local, state, and federal requirements. As stated in the land use covenant, the site, as remediated, does not present an unacceptable threat to human safety or the environment if the site is limited to commercial and industrial use.[199] No ground disturbance during project operation is proposed. Project operations would be conducted in compliance with the land use covenants, SFPUC's Standard Construction Measures, and hazardous waste and transport regulations described above. As a result, maintenance activities that would disturb soil onsite would not result in significant hazard to the public or environment from potential release of contaminated soil and groundwater. The impact would therefore be less than significant. No mitigation is required.

198 SFPUC, 2022 (July), 100-Year Storm Flood Risk Map, Available: https://sfplanninggis.org/floodmap/, accessed May 23, 2024.

199 Department of Toxic Substances Control, 2003, Covenant to Restrict Use of Property.

Impact HZ-5: The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. ***(Less than Significant)***

CONSTRUCTION

The project construction would not interfere with the San Francisco Emergency Response Plan[200] because the plan does not designate emergency response or evacuation routes. Furthermore, project construction would not require any temporary traffic lane closures, as construction vehicles and equipment would be parked, staged, stored, and operated within the project site during construction. Project construction would increase truck trips on nearby roadways, but not to the extent that would impede emergency vehicle access because section 21806 of the California Vehicle Code requires that drivers yield the right-of-way to emergency vehicles and remain stopped until the emergency vehicle passes (California Vehicle Code section 21806). As discussed in Section D.5, Transportation and Circulation, project construction would comply with SFMTA's Blue Book, which sets forth rules and guidance for work in public rights-of-way to minimize safety hazards and ensure the least possible interference with pedestrian, bicycle, transit, and vehicular traffic. Therefore, the temporary increase in construction vehicle trips would not impede emergency vehicle access. The project would not otherwise impair implementation of the San Francisco Emergency Response Plan. As a result, the impact relative to emergency response plans would be less than significant. No mitigation is required.

OPERATION

Project operation would relocate approximately 1,220 daily vehicles trips within the southeast portion of the city. As discussed in Section D.5, Transportation and Circulation, vehicle trips to and from the project site would be dispersed throughout the existing street grid, so that no significant adverse impacts on transportation conditions would occur. Furthermore, the project would not permanently alter the existing street network, nor would it introduce any new design features that could impede or hinder the movement of emergency vehicles at the project site or in the project vicinity. As a result, the project would not interfere with emergency response or evacuation and the impact would be less than significant. No mitigation is required.

Impact C-HZ-1: The proposed project, in combination with cumulative projects, would not result in a significant cumulative impact related to hazards and hazardous materials. ***(Less than Significant)***

The geographic scope for cumulative impacts related to hazards and hazardous materials would encompass the project site and immediate project vicinity. With the exception of the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project, none of the cumulative development projects would be close enough to the project site, nor close enough to each other, to result in a cumulative impact related to hazards and hazardous materials. Because the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project may involve the handling and transport of contaminated soils and be located within an area containing contaminated soils and groundwater, it would be subject to the same fire safety, emergency response, and hazardous materials regulations as those applicable to the proposed project. Furthermore, the Bay Corridor Transmission and Distribution Phase 4 and Water Improvements Project is

200 City and County of San Francisco, 2017 (May), Emergency Response Plan, Available: https://sfdem.org/file/916, accessed September 9, 2022.

also a SFPUC project; therefore, it would also be required to comply with SFPUC's Standard Construction Measure 6 (Hazardous Materials) to minimize construction impacts. Thus, the identified cumulative projects would not combine with the proposed project to create a significant cumulative impact related to use of hazardous materials (less than significant). No mitigation is required.

All of the identified cumulative projects are either partially or entirely located within the Maher zone and, as discussed in Impact C-HY-1, several cumulative projects are located partially or entirely within the 100-year flood zone: the 1399 Marin Street Project, 1801 Evans Avenue Project, Bay Corridor Transmission and Distribution Phase 4 Water Improvements Project, and Islais Creek Bridge Project.[201] These cumulative projects have the potential to expose contaminated soil during construction and, in the event of flooding, could create a significant hazard to the public or the environment, thereby resulting in a significant cumulative impact. As discussed under Impact HY-4, the proposed project's contribution to this impact would be less than cumulatively considerable with implementation of **Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zone** (less than significant with mitigation).

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
19. ENERGY. Would the project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐	☐

Impact EN-1: The proposed project would not result in wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation. ***(Less than Significant)***

CONSTRUCTION

Project construction would require the use of fuel- and electric-powered equipment and vehicles. The vast majority of project construction activities would rely on fuel-powered equipment and vehicles that would consume gasoline or diesel fuel. Heavy construction equipment (e.g., cranes, pile drivers, dump trucks, backhoes, loaders, etc.) and generators would be diesel powered, while smaller construction vehicles, such as pickup trucks, would be gasoline powered. The precise amount of fuel required for project construction is uncertain. However, due to its temporary nature and to the construction contractor's incentive to reduce costs, project construction would not encourage activities that would result in the use of substantial amounts of fuel, water, or energy, or use them in a wasteful manner. In addition, the San Francisco Clean Construction Ordinance restricts the idling time of all on-road and stationary diesel construction equipment

201 SFPUC, 2022 (July), 100-Year Storm Flood Risk Map, available: https://sfplanninggis.org/floodmap/, accessed May 23, 2024.

to two minutes, thereby limiting any potential wasteful use of fuel during idling. Additionally, for projects located within the Air Pollutant Exposure Zone (such as the proposed project), the Clean Construction Ordinance requires equipment to meet Tier 2 engines or higher for off-road engines and operate with the most effective Verified Diesel Emission Control Strategies (Tier 4 engines automatically meet this requirement). AsAs a result, fuel and energy usage during construction would not be wasteful or inefficient, and the impact from construction fuel and energy usage would therefore be less than significant. No mitigation is required.

OPERATION

The project would be required to comply with title 24 of the California Code of Regulations and the 2019 San Francisco Green Building Ordinance.[202] The ordinance, which aims to reduce impacts that buildings have on the environment, was updated in 2016 to incorporate changes to California's Green Building Standards and title 24 of the Energy Efficiency Standards (part 6). New commercial buildings that are 10 stories or less are required to install solar electric, thermal, or green roofs, and to meet San Francisco's Green Building requirements tied to Leadership in Energy and Environmental Design and GreenPoint building rating systems. The SFPUC would be responsible for ensuring compliance with title 24. The project would incorporate solar photovoltaic panels on the roofs of two new shop buildings and the warehouse building. The energy generated from the solar photovoltaic panels would provide a sustainable form of power for the buildings. Any supplemental energy required for operation of project buildings would be supplied by the SFPUC. In addition, the project proposes to meet the certification requirements to attain a LEED gold rating pursuant to the Leadership in Energy and Environmental Design program.[203] As a result, the project would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. The impact would therefore be less than significant. No mitigation is required.

Impact EN-2: The proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. *(Less than Significant)*

State plans for renewable energy and energy efficiency include California's Renewables Portfolio Standard Program (as revised by Senate Bill 100[204]) and the California Energy Efficiency Strategic Plan. The renewables standard program requires utilities to increase their renewable energy generation to 60 percent by 2030, and for all of the state's electricity to come from carbon-free resources by 2045.[205] The plan, which was developed in 2008, outlines goals to improve the energy efficiency of new construction within all major sectors throughout the state. Local plans include the City of San Francisco's energy efficiency requirements. The project would increase energy efficiency because the new buildings would adhere to current energy conservation measures, including those detailed in the San Francisco Green Building Code and title 24 of the California Energy Efficiency Standards. Solar photovoltaic panels would be installed on the roofs of the new shop and warehouse buildings, generating energy from sustainable sources during operation. Therefore, the

202 San Francisco Department of the Environment, 2019, *San Francisco Green Building Code*.

203 Compliance Checklist Table for Greenhouse Gas Analysis: Table 2. Municipal Projects, SFPUC City Distribution Division Campus Project at 2000 Marin Street, April 10, 2024.

204 California Legislative Information, 2018, Senate Bill 100, California Renewables Portfolio Standard Program: Emissions of Greenhouse Gases.

205 California Public Utilities Commission, 2020, *Renewables Portfolio Standard (RPS) Program*.

project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The impact would be less than significant. No mitigation is required.

Impact C-EN-1: The proposed project, in combination with cumulative projects, would not result in significant cumulative impacts related to the wasteful, inefficient, or unnecessary consumption of energy resources or conflict with or obstruct a state or local plan for renewable energy or energy efficiency. ***(Less than Significant)***

The geographic scope for potential cumulative impacts on energy resources would consist of the project vicinity as well as the broader region. Although overall energy demand in California is increasing, commensurate with increasing population, the state also is making concerted energy conservation efforts. Although San Francisco makes a substantial demand for energy and fuel, both city and state policies seek to minimize increases in demand through conservation and energy efficiency regulations and policies, so that energy is not used in a wasteful manner.

All current and proposed projects in San Francisco would require the use of fuel and energy for construction and potentially operation. However, all projects would also be required to promote energy efficiency to the extent possible in compliance with all applicable building codes as well as local and state energy efficiency regulations, ordinances, and plans, including California's Renewables Portfolio Standard Program, the California Energy Efficiency Strategic Plan, and City of San Francisco's energy efficiency standards. Therefore, a significant cumulative impact relative to energy resources or conflicts with state or local plans for renewable energy or energy efficiency would not result (less than significant). No mitigation is required.

Topics:	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant Impact	No Impact	Not Applicable
22. MANDATORY FINDINGS OF SIGNIFICANCE. Does the project:					
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

Sources: Public Resources Code sections 21083 and 21083.05, 21083.09. Reference: section 65088.4, Government Code; Public Resources Code sections 21073, 21074, 21080(c), 21080.1, 21080.3, 21083, 21083.05, 21083.3, 21080.3.1, 21080.3.2,21082.3, 21084.2, 21084.3, 21093, 21094, 21095, and 21151; *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296; *Leonoff v. Monterey Board of Supervisors* (1990) 222 Cal.App.3d 1337; *Eureka Citizens for Responsible Govt. v. City of Eureka* (2007) 147 Cal.App.4th 357; *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th at 1109; *San Franciscans Upholding the Downtown Plan v. City and County of San Francisco* (2002) 102 Cal.App.4th 656.

The project would not substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or wildlife community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in Section D.3, Cultural Resources and D.4, Tribal Cultural Resources, project construction would not result in a substantial adverse change in the significance of a cultural or tribal cultural resource but could result in vibration impacts to a potentially historic bridge adjacent to the project, which could also result in a substantial adverse change in the significance of a historical resource. **Mitigation Measure M-NO-2: Protection of Adjacent Structures from Construction-generated Vibration** would reduce these impacts to a less than significant level. As discussed in Section D.15, Geology and Soils, project construction could directly or indirectly destroy a unique paleontological resource or site. Implementation of **Mitigation Measure M-GE-6: Inadvertent Discovery of Paleontological Resources During Construction** would reduce this impact to a less than significant level. Therefore, the project would not substantially reduce the habitat of a species, cause a substantial adverse change in the significance of a cultural resources or tribal cultural resource, eliminate important examples of the major periods of California history or prehistory, nor would it destroy a unique paleontological resource.

Section C, Summary of Environmental Effects, provides a cumulative project list of reasonably foreseeable projects. The geographic context for the project's cumulative impact analyses is projects within approximately 0.25 mile of the proposed project. Cumulative impacts for each environmental topic are

provided in Section D.1 through D.18. As discussed, the project would not result in impacts that are individually limited, but cumulatively considerable with incorporation of mitigation.

As discussed in Section D, Evaluation of Environmental Effects, the project is anticipated to result in less-than-significant impacts or less-than-significant impacts with mitigation incorporated for the topics included in the initial study checklist. Where necessary, mitigation measures have been identified to be implemented to reduce impacts to less-than-significant levels. Impact determinations of "no impact" or "less than significant impact" were made for the following environmental issues that could affect human beings directly or indirectly: aesthetics, land use and planning, population and housing, cultural resources, tribal cultural resources, transportation and circulation, noise, greenhouse gas emissions, wind and shadow, recreation, utilities and service systems, public services, biological resources, hydrology and water quality, and energy. Therefore, with the implementation of **Mitigation Measure M-NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction-** specified in Sections D.3, Cultural Resources and D.7, Noise, **Mitigation Measure M-AQ-4: PM2.5 Controls for Operational Equipment** specified in Section D.7, Air Quality, and **Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zones** specified in Section D.15, Hazards and Hazardous Materials, the proposed project would not result in substantial adverse effects, direct or indirect, on human beings.

E. Public Notice and Comment

On December 8, 2022, the planning department mailed a Notification of Project Receiving Environmental Review to owners of properties within 300 feet of the project site, adjacent occupants, and neighborhood groups. The planning department and SFPUC did not receive any responses to the notice.

F. Determination

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

Devyani Jain
for Lisa Gibson

Lisa Gibson
Environmental Review Officer
for
Rich Hillis
Director of Planning

DATE June 18, 2024

G. Initial Study Preparers

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MMRP

San Francisco Planning

MITIGATION MONITORING AND REPORTING PROGRAM

Record No.:	2022-000702ENV	*Block/Lot:*	4346/003, 4347/001, 4346/001, 4346/001A, 4349/011
Project Title:	SFPUC City Distribution Division Campus Project at 2000 Marin Street	*Lot Size:*	9.1 acres
		Project Sponsor:	San Francisco Public Utilities Commission, Allison Chan – 415.554.3186, alchan@sfwater.org
BPA Nos:	N/A		
Zoning:	PDR-2 and M-2 use districts 65-J Height and Bulk District	*Lead Agency:*	San Francisco Planning Department
		Staff Contact:	Timothy Johnston – 628.652.7569, timothy.johnston@sfgov.org

The table below indicates when compliance with each mitigation measure must occur. Some mitigation measures span multiple phases. Substantive descriptions of each mitigation measure's requirements are provided on the following pages in the Mitigation Monitoring and Reporting Program.

Adopted Mitigation Measure	Period of Compliance			Compliance with Mitigation Measure Completed?
	Prior to the Start of Construction*	During Construction**	Post-construction or Operational	
Mitigation Measure M-AQ-4: PM2.5 Controls for Operational Equipment			X	
Mitigation Measure M-NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction	X	X	X	
Mitigation Measure M-GE-6: Inadvertent Discovery of Paleontological Resources during Construction	X	X		
Mitigation Measure M-HAZ-4: No Soil Stockpiling in Flood Zones		X		

NOTES:

* Prior to any ground disturbing activities at the project site.

** Construction is broadly defined to include any physical activities associated with construction of a development project including, but not limited to: site preparation, clearing, demolition, excavation, shoring, foundation installation, and building construction.

*** Post-construction is used for a reporting action that has a discrete end after construction (i.e., five years of surveys). Operational refers to ongoing activities over the life of the project.

In addition to the mitigation measures in this Mitigation Monitoring and Reporting Program, the SFPUC's standard construction measures are required to be implemented for work undertaken by the SFPUC. The standard construction measures would also be required to apply as part of any funding agreement.

MITIGATION MONITORING AND REPORTING PROGRAM

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
MITIGATION MEASURES AGREED TO BY SFPUC				
NOISE				
Mitigation Measure M NO-2: Protection of Adjacent Structures and Vibration Monitoring During Construction After completion of the demolition phase of the project and prior to the start of the grading and utilities construction phase, the project sponsor shall submit a project-specific Pre-construction Survey and Vibration Management and Monitoring Plan for approval to the Environmental Review Officer (ERO) or the ERO's designee for the Evans Avenue Bridge. The plan shall identify all feasible means to avoid damage to the potentially affected structure. The project sponsor shall ensure that the requirements of the Pre-construction Survey and Vibration Management and Monitoring Plan are included in contract specifications, as necessary. • *Maximum Vibration Level.* Based on the anticipated construction and condition of the affected adjacent structure, a qualified acoustical/vibration consultant, in coordination with a structural engineer (or professional with similar qualifications) and, in the case of a potentially affected historic structure, a qualified historic preservation professional, shall establish a maximum vibration level that shall not be exceeded at the adjacent structure, based on existing conditions, character-defining features, soil conditions, and anticipated construction practices (common standards are a peak particle velocity a PPV of 0.5 inch per second for new residential structures and modern industrial/commercial buildings, or 0.12 for sensitive structures).	1. SFPUC EMB	1. Design	1. SFPUC EMG	1. Ensure contract documents include the collection and containment efficiencies. Submit for ERO review and approval.
	2. SFPUC CM Team (qualified acoustical/vibration professional, structural engineer, historic preservationist)	2. Pre-construction of grading and utilities construction (but after demolition)	2. SFPUC EMG, ERO	2. Establish maximum vibration level threshold to prevent structural damage to bridge. Submit documentation of selected threshold to ERO for approval
	3. SFPUC CM Team (qualified acoustical/vibration professional)	3. Pre-construction of grading and utilities construction (but after demolition)	3. SFPUC EMG, ERO	3. Measures existing vibration. If existing vibration exceeds established maximum, the Pre-construction Survey and Vibration Management and Monitoring Plan may not be required, as determined in consultation with the ERO.
	4. SFPUC CM Team (qualified acoustical/vibration professional)	4. Pre-construction of grading and utilities construction (but after demolition)	4. SFPUC EMG, ERO	4. Prepare and submit Pre-construction Survey and Vibration Management and Monitoring Plan to ERO for approval.

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
Note that baseline vibration (to be determined via measurements) can be taken into consideration when evaluating the potential for project construction to affect the bridge, and when determining the appropriate maximum vibration level that shall be applied to the bridge. If existing vibration levels (from vehicles traveling on the bridge) already exceed the threshold applied to the structure, then a less stringent threshold may be considered for project-related construction vibration. Depending on the threshold selected and the vibration levels estimated to result from project construction, project vibration levels may not result in vibration levels greater than existing conditions. In this instance, the Pre-construction Survey and Vibration Management and Monitoring Plan may not be required. This determination would be made by a structural engineer in consultation with a qualified acoustical/vibration consultant, and would be approved by the Environmental Review Officer (ERO) or the ERO's designee. • *Pre-construction Survey.* Prior to the start of any ground-disturbing activity, the project sponsor shall engage a consultant to undertake a pre-construction survey of the potentially affected structure. If the potentially affected structure is not potentially historic, a structural engineer or other professional with similar qualifications shall document and photograph the existing conditions of the potentially affected structure. The project sponsor shall submit the survey for review and approval prior to the start of vibration-generating construction activity.	5. SFPUC CM Team (qualified acoustical/vibration professional, structural engineer, historic preservationist)	5. Construction (after demolition)	5. SFPUC EMG, ERO	5. Monitor to ensure that the contractor implements measures in the Pre-construction Survey and Vibration Management and Monitoring Plan contract documents, report noncompliance, and ensure corrective action. In the event of a damage, immediately notify the ERO and submit a report documenting damage.
	6. SFPUC CM Team (qualified acoustical/vibration professional, structural engineer, historic preservationist)	6. Post-construction	6. SFPUC EMG, ERO	6. Prepare and submit Vibration Monitoring Results Report, including discussing any damage and corrective actions taken to repair damage to the ERO.

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
If the nearby affected structure is a known historic resource or potentially identified as a historic resource, unless there is evidence in the record that the structure is not a historic resource (as determined a planning department preservation planner) or would not be particularly sensitive to construction vibration, the project sponsor shall engage a qualified historic preservation professional and a structural engineer or other professional with similar qualifications to undertake a pre-construction survey of the potentially affected historic structure. The pre-construction survey shall include descriptions and photographs of the identified historic structure, including all details of the character-defining features that could be damaged during construction, and shall document existing damage, such as cracks and loose or damaged features. The report shall also include pre-construction drawings that record the pre-construction condition of the structure and identify cracks and other features to be monitored during construction. The qualified historic preservation professional shall be the lead author of the pre-construction survey if the historic structure could be affected by the project. The pre-construction survey shall be submitted to the ERO for review and approval prior to the start of vibration-generating construction activity for the grading and utilities construction phase, and all subsequent construction phases. • *Vibration-Generating Equipment*. The plan shall identify all vibration-generating equipment to be used during construction phases, including, but not limited to, excavation, shoring, foundation installation, and building construction (excluding demolition).				

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
• *Alternative Construction Equipment and Techniques.* The plan shall identify potential alternative equipment and techniques that could be implemented if construction vibration levels are observed in excess of the established standard (e.g., drilled shafts [caissons] could be substituted for driven piles, if feasible, based on soil conditions, or smaller, lighter equipment could be used in some cases). • *Buffer Distances*. The plan shall identify buffer distances to be maintained, based on vibration levels, the applied vibration-related damage criterion, and site constraints between vibration-generating construction equipment and the potentially affected structure to avoid damage to the extent possible. • *Vibration Monitoring*. The plan shall identify the method and equipment for vibration monitoring to ensure that construction vibration levels do not exceed the established standards identified in the plan. o Should construction vibration levels be observed in excess of the standards established in the plan, the contractor(s) shall halt construction and put alternative construction techniques identified in the plan into practice, to the extent feasible. o The qualified historic preservation professional (for effects on a historic structure) and/or structural engineer (for effects on both historic and non-historic structures) shall inspect the affected structure in the event the construction activities exceed the vibration levels identified in the plan.				

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
○ The structural engineer and/or historic preservation professional shall submit monthly reports to the ERO during vibration-inducing activity periods that identify and summarize any vibration level exceedances and describe the actions taken to reduce vibration. ○ If vibration has damaged a nearby structure that is not historic, the structural engineer shall immediately notify the ERO and prepare a damage report documenting the features of the structure that have been damaged. ○ If vibration has damaged a nearby structure that is historic, the historic preservation consultant shall immediately notify the ERO and prepare a damage report documenting the features of the structure that have been damaged. ○ Following incorporation of the alternative construction techniques and/or planning department review of the damage report, vibration monitoring shall recommence to ensure that the allowable vibration level at the nearby historic structure (Evans Avenue Bridge) is not exceeded. • *Periodic Inspections.* The plan shall identify the intervals and parties responsible for periodic inspections. The qualified historic preservation professional (for effects on a historic structure) and/or structural engineer (for effects on a structure that is either historic and non-historic) shall conduct regular periodic inspections of the affected adjacent structure during vibration-generating construction activity that occurs within 50 feet of the bridge. The plan will specify how often inspections shall occur.				

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
• *Repair Damage.* The plan shall also identify provisions to be followed should damage to the nearby structure occur due to construction-related vibration. The structure shall be remediated to its pre-construction condition (at the conclusion of vibration-generating activity on the site). For historic resources, should damage occur at the adjacent structure, the structure shall be restored to its pre-construction condition in consultation with the qualified historic preservation professional and planning department preservation staff. • *Vibration Monitoring Results Report.* After construction is complete, the project sponsor shall submit a final report from the qualified historic preservation professional (for effects on a historic structure). The report shall include, at a minimum, collected monitoring records, building and/or structure condition summaries, descriptions of all instances of vibration level exceedance, identification of damage incurred due to vibration, and corrective actions taken to restore damage to the structure. The ERO shall review and approve the Vibration Monitoring Results Report.				
AIR QUALITY				
Mitigation Measure M-AQ-4: PM2.5 Controls for Operational Equipment Equipment for the following operational activities shall meet the following collection and containment efficiencies for PM2.5: • machine shop grinding and sanding equipment shall be designed to have a containment efficiency of 90 percent. • sandblasting equipment shall be designed to have a collection efficiency of 98 percent.	1. SFPUC EMB	1. Design	1. SFPUC EMG, ERO	1. Ensure contract documents include the collection and containment efficiencies. Submit for ERO review and approval.

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
• woodworking and sandblasting activities shall have a containment efficiency of 99.9 percent. For the operational equipment listed above, specifications shall be submitted to the ERO for review and approval. The 99.9 percent containment efficiency for woodworking and sandblasting shall be achieved through the use of building air filters (DC-10). Once operational, equipment and building air filters shall be maintained in good working order in perpetuity and any future replacement of equipment or building air filters. The operator of the facility shall maintain records of the maintenance of equipment and building filters and provide this information for review to the ERO within three months of requesting such information.	2. SFPUC Water Enterprise (CDD)	2. Operations	2. SFPUC Water Enterprise (CDD)	2. Maintain equipment maintenance records. Submit to the ERO (if requested).
GEOLOGY AND SOILS				
Mitigation Measure M-GE-6: Inadvertent Discovery of Paleontological Resources during Construction *Worker Awareness Training*. Prior to commencing construction, and ongoing throughout ground-disturbing activities (e.g., excavation, utility installation), the SFPUC shall engage a qualified paleontologist meeting the standards specified by the Society of Vertebrate Paleontology (Society of Vertebrate Paleontology 2010) to train all project construction workers regarding how to recognize paleontological resources and on the contents of the paleontological	1. SFPUC EMB	1. Design	1. SFPUC EMG	1. Ensure contract documents include requirements for all construction personnel to attend training measures applicable to accidental discoveries.
	2. SFPUC CM Team (qualified paleontologist)	2. Pre-construction and during ground-disturbing activities	2. SFPUC EMG	2. Monitor that personnel attend training prior to beginning work and sign training sign-in sheet. Maintain file of signature sheets

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
resources alert sheet, as provided by the Planning Department. The paleontological resources alert sheet shall be prominently displayed at the construction site during ground-disturbing activities for reference regarding potential paleontological resources. Should new workers that will be involved in ground-disturbing construction activities begin employment after the initial training has occurred, the construction supervisor shall ensure that they receive the worker awareness training as described above. *Paleontological Resource Discoveries*. In the event of the discovery of an unanticipated paleontological resource during project construction, ground-disturbing activities shall temporarily be halted within 25 feet of the find until the discovery is examined by a qualified paleontologist as recommended by the Society of Vertebrate Paleontology standards (Society of Vertebrate Paleontology 2010) and best practices in mitigation paleontology (Murphey et al. 2019). The paleontologist shall consult the ERO. Work within the sensitive area shall resume only when deemed appropriate by the qualified paleontologist in consultation with the ERO. The qualified paleontologist shall determine 1) if the discovery is scientifically significant; 2) the necessity for involving other responsible or resource agencies and stakeholders, if required or determined applicable; and 3) methods for resource recovery. If a paleontological resource assessment results in a determination that the resource is not scientifically important, this conclusion shall be documented in a paleontological evaluation letter to demonstrate compliance with applicable statutory requirements (e.g., Federal Antiquities Act of 1906, CEQA Guidelines section 15064.5, Public Resources Code Chapter 17, section 5097.5, Paleontological Resources Preservation Act 2009). The paleontological evaluation letter shall be submitted to the ERO for review within 30 calendar days of the discovery.	3. SFPUC CM Team	3. Construction	3. SFPUC EMG, ERO	3. Monitor to ensure that the contractor implements measures in contract documents, report noncompliance, and ensure corrective action. In the event of a potential discovery, ensure contractor suspends activities within 25 feet are temporarily halted, notify the ERO, and mobilize a qualified paleontologist.
	4. SFPUC CM Team (qualified paleontologist)	4. Construction	4. SFPUC EMG, ERO	4.Qualified paleontologist to evaluate the find and advise ERO as to the significance of the discovery. If not significant, work may resume once approved by the ERO.
	5. SFPUC CM Team (qualified paleontologist	5. Construction	5. SFPUC EMG, ERO	5. If the discovery is significant, prepare and submit a Paleontological Mitigation Program Plan to the ERO within 10 business days of the discovery.
	6. SFPUC CM Team (qualified paleontologist	6. Construction	6. SFPUC EMG, ERO	6. Prepare and submit a Paleontological Mitigation Results Report to the ERO within 30 business of the conclusion of ground-disturbing activities, or as negotiated with the ERO.

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
If in consultation with the ERO the qualified paleontologist determines that a paleontological resource is of scientific importance, the qualified paleontologist shall make a recommendation as to what action, if any, is warranted and prepare a paleontological mitigation program. The mitigation program shall include measures to fully document the resource of scientific importance. It shall include: 1) procedures for construction monitoring at the project site; 2) fossil preparation and identification procedures; 3) curation of paleontological resources of scientific importance into an appropriate repository; and 4) preparation of a Paleontological Resources Report (report or paleontology report) at the conclusion of ground-disturbing activities. The qualified paleontologist shall submit the mitigation program to the ERO for review and approval within ten business days of the discovery. To avoid construction delays, fully exposed fossils will be immediately removed by the paleontologist to the extent feasible. Consistent with the Society of Vertebrate Paleontology 2010 guidelines, samples of the soil matrix where the discovery occurred may need to be removed from the project site and processed elsewhere. Mitigation required by this measure could suspend construction within an appropriate buffer zone around a discovered paleontological resource or area for up to a maximum of four weeks. At the direction of the ERO and in coordination with the SFPUC, the suspension of construction may be extended beyond four weeks for a reasonable time required to implement appropriate mitigation only if such a suspension is the only feasible means to reduce potential effects on a significant paleontological to a less-than-significant level.				

Adopted Mitigation Measure	Monitoring and Reporting Program[a]			
	Implementation Responsibility	Mitigation Schedule	Monitoring/Reporting Responsibility	Monitoring Actions/ Completion Criteria
Upon approval by the ERO, ground-disturbing activities in the project area shall resume and be monitored as determined by the qualified paleontologist for the duration of such activities. The paleontology report shall include dates of field work, results of monitoring, fossil identifications to the lowest possible taxonomic level, analysis of the fossil collection, a discussion of the scientific significance of the fossil collection, conclusions, locality forms, an itemized list of specimens, and a repository receipt from the curation facility. The SFPUC shall be responsible for the preparation and implementation of the mitigation program, in addition to any costs necessary to prepare and identify collected fossils, and for any curation fees charged by the paleontological repository. The paleontology report shall be submitted to the ERO for review within 30 business days from conclusion of ground-disturbing activities, or as negotiated following consultation with the ERO.				
HAZARDS AND HAZARDOUS MATERIALS				
Soil excavated from the project site during construction shall not be stockpiled within the eastern portion of the project site that is designated as a 100-year storm flood zone as identified in the SFPUC Storm Flood Risk Map.	1. SFPUC EMB	1. Design	1. SFPUC EMG	1. Ensure contract documents include requirement.
	2. SFPUC CM Team	2. Construction	2. SFPUC EMG	2. Monitor to ensure that the contractor implements measures, report noncompliance, and ensure corrective action.

NOTES:

[a] Definitions of MMRP Column Headings:

Adopted Mitigation and Improvements Measures: Full text of the mitigation measure(s) copied verbatim from the final CEQA document.

Implementation Responsibility: Entity who is responsible for implementing the mitigation measure. In most cases this is the project sponsor and/or project's sponsor's contractor/consultant and at times under the direction of the planning department.

Mitigation Schedule: Identifies milestones for when the actions in the mitigation measure need to be implemented.

Monitoring/Reporting Responsibility: Identifies who is responsible for monitoring compliance with the mitigation measure and any reporting responsibilities. In most cases it is the Planning Department who is responsible for monitoring compliance with the mitigation measure. If a department or agency other than the planning department is identified as responsible for monitoring, there should be an expressed agreement between the planning department and that other department/agency. In most cases the project sponsor, their contractor, or consultant are responsible for any reporting requirements.

Monitoring Actions/Completion Criteria: Identifies the milestone at which the mitigation measure is considered complete. This may also identify requirements for verifying compliance.

Acronyms Used in Table:

ERO = (SF Planning Department) Environmental Review Officer
FARR = Final Archaeological Resources Report
MM = Mitigation Measure
SFPUC = San Francisco Public Utilities Commission
SFPUC EMG = Environmental Management Group
SFPUC CM Team = Construction Management Team
SFPUC EMB = Engineering Management Bureau
SFPUC PMB = Project Management Bureau

Per CEQA guidelines 15097(a): A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation. Where applicable, implementation responsibility to another agency is subject to acceptance.

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