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ADDENDUM 2 TO ENVIRONMENTAL IMPACT REPORT

Date of Publication of Addendum:	July 16, 2026
Date of EIR Certification:	January 30, 2020
Case No.	**2017-011878ENV-02**
Project Title:	**Potrero Power Station Mixed-Use Development Project**
Block/Lot:	4175/027, 4175/026, 4232/019, 4232/022, 4232/020, 4232/021, 4232/023, 4175/025, 4232/017, 4175/022, 4232/018, 4232/014, 4175/020, 4175/021, 4232/016, 4232/015, 4175/023, 4232/011, 4232/012, 4175/024, 4175/500, 4175/028, 4232/013, 4175/499 (partial), and non-assessed Port and City and County of San Francisco properties
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Remarks

Background

A final environmental impact report (FEIR) for the subject project, file number 2017-011878ENV, was certified on January 30, 2020.[1] The project analyzed in the FEIR is the Potrero Power Station Mixed-Use Development Project.

INTRODUCTION

The San Francisco Planning Commission certified the FEIR on the Potrero Power Station Mixed-Use Development Project (Power Station Development Mixed-Use Project) on January 30, 2020, and the San Francisco Board of Supervisors approved the project on April 21, 2020. The project sponsor is proposing changes to the previously approved project's Development Agreement (including its Phasing Plan, Housing Plan, Transportation Plan, Open Space Plan, and Design for Development (D4D) document),

(Continued on reverse side)

[1] San Francisco Planning Department, *Potrero Power Station Mixed-Use Development Project Final Environmental Impact Report*, Planning Department Case No. 2017-011878ENV, State Clearinghouse No. 2017112005, certified January 30, 2020. Available online at: https://sfplanning.org/environmental-review-documents?title=Potrero+Power+Station&field_environmental_review_categ_target_id=All&items_per_page=10, accessed August 11, 2025.

Remarks (Continued)

and the Potrero Power Station Special Use District (SUD) (Planning Code section 249.87). Consistent with the *California Environmental Quality Act (CEQA) Guidelines* section 15164, this addendum to the FEIR describes and analyzes the potential environmental effects of the proposed changes to the Power Station Mixed-Use Development Project.

PREVIOUSLY APPROVED PROJECT

The Power Station Mixed-Use Development project is located on an approximately 29.0-acre site along San Francisco's central bayshore waterfront, encompassing the site of the former Potrero Power Plant that closed in 2011. Project construction started in 2020 and was originally expected to be completed in 2035 for a total duration of 16 years. California Barrel Company LLC, the project sponsor, continues to redevelop the site with a multi-phased, mixed-use development, and activate a new waterfront open space with a variety of residential, commercial, parking, community facilities, and open space land uses. The residential uses included both market-rate and affordable housing, and the commercial uses included office, research and development/life science, institutional, retail, hotel, entertainment/assembly, and production, distribution, and repair (PDR) uses. The project also included public access areas and open space, and other active open space uses, such as playing fields, a dock facility and other shoreline improvements, transportation improvements and an internal grid of public streets, shared public ways, and utilities infrastructure. Overall, the project as approved in 2020 consisted of approximately 5.4 million gross square feet of development. The project site is located within the Central Waterfront neighborhood, generally bounded by 22nd Street, San Francisco Bay, 23rd Street, and Illinois Street.

The approvals granted for the project as approved by the board of supervisors on April 24, 2020 included amendments to the General Plan and Planning Code, creating a new Potrero Power Station SUD. The SUD established land use controls for the project site and incorporated design standards in a new Potrero Power Station D4D document. The board of supervisors also amended the Zoning Maps to reflect the SUD zoning, changing the zoning from M-2 (heavy industrial) and PDR-1-G (production, distribution and repair–general) to PPS-MU (Potrero Power Station mixed use), and to modify the existing height limits on the portions of the project site not owned by the Port of San Francisco. The rezoning modified the existing height limits of 40 and 65 feet to various heights ranging from 65 to 240 feet. The board of supervisors also approved a Development Agreement with a term of 30 years pursuant to Government Code section 65865 and chapter 56 of the San Francisco Administrative Code, to provide a vested right to construct the project in exchange for public benefits in excess of those required by the San Francisco Municipal Code.

CEQA ENVIRONMENTAL REVIEW PROCESS

FINAL EIR

The FEIR on the Power Station Development Mixed-Use Project, certified on January 30, 2020, consists of two documents: the Draft EIR, published in October 2018, and the Responses to Comments document, published in December 2019. A project-level EIR was prepared pursuant to the CEQA Guidelines section 15161 that evaluated the whole of the proposed action, including project-level impacts (offsite, onsite, construction-related, operational, direct, and indirect) and cumulative impacts. The Draft EIR described and analyzed the project as proposed at that time in 2018 and included an analysis of alternatives to the proposed project. The Responses to Comments document described and analyzed the "project variant," a refined version of the previously proposed project developed by the project sponsor in 2019; the project

variant retained some of the onsite historic features and modified the land use plan. Following certification of the FEIR, the San Francisco Planning Commission approved the project variant that was described and analyzed in the Responses to Comments document. Therefore, this FEIR addendum no longer uses the term "project variant" but instead refers to the (former) project variant as the "**certified FEIR project**."

Addendum 1

On September 9, 2020, the San Francisco Planning Department issued an addendum to the FEIR pursuant to CEQA Guidelines section 15164 to study certain proposed changes to the project's phasing plan. The proposed amendments to the phasing plan primarily altered the approach to and timing of the construction phasing of the project, reducing the number of development phases from six to three while maintaining the same overall 16-year construction duration of the previously approved project. It also included minor changes in the total building area, and specifically, minor changes in the anticipated gross square footage (gsf) of residential, commercial, and parking uses. In addition to requesting approval of an amendment to the project's phasing plan, the project sponsor also requested approval of a Development Phase Application by the Director of the San Francisco Planning Department. More specifically, the 2020 amendments to the phasing plan included:

- Implementation of the project in 3 phases as opposed to the 6 phases included in the Development Agreement;
- Block 15 (which houses "Station A") moved to Development Phase 1, where originally included in Phase 4 in the Development Agreement;
- Block 9 (hotel) moved to Development Phase 2, where originally included in Development Phase 1;
- Blocks 11 and 12 moved to Development Phase 1;
- Space for La Cocina moved to Blocks 11 or 12 in Phase 1, where originally located in Blocks 11 or 13 in Phase 6 or 2;
- Space for a Child Care facility moved to Block 7 in Phase 1, where originally located in Block 15 in Phase 4; and
- Space for the Public Library option moved to Block 1 in Phase 2, where originally included in Block 15 in Phase 4.

As a result of the changes to the order of the Blocks developed throughout the project, the approved phasing amendment also adjusted the construction of streets included in Phase 1 to include the following streets: the entirety of Maryland Street, Georgia Lane, Louisiana Paseo, and Louisiana Street, and a larger portion of Humboldt Street. The original Phase 1 Plan included construction of 23rd Street and portions of Maryland Street, Delaware Street, and Humboldt Street.

The certified FEIR project with the changes approved in 2020 is referred to in this FEIR addendum as the "**2020 re-phase program (Addendum 1)**."

Construction Status of Project Site

As of the preparation of this addendum, the project sponsor is nearing completion of work under the Phase 1 Street Improvement Permit (SIP), which includes the construction of the entirety of Maryland

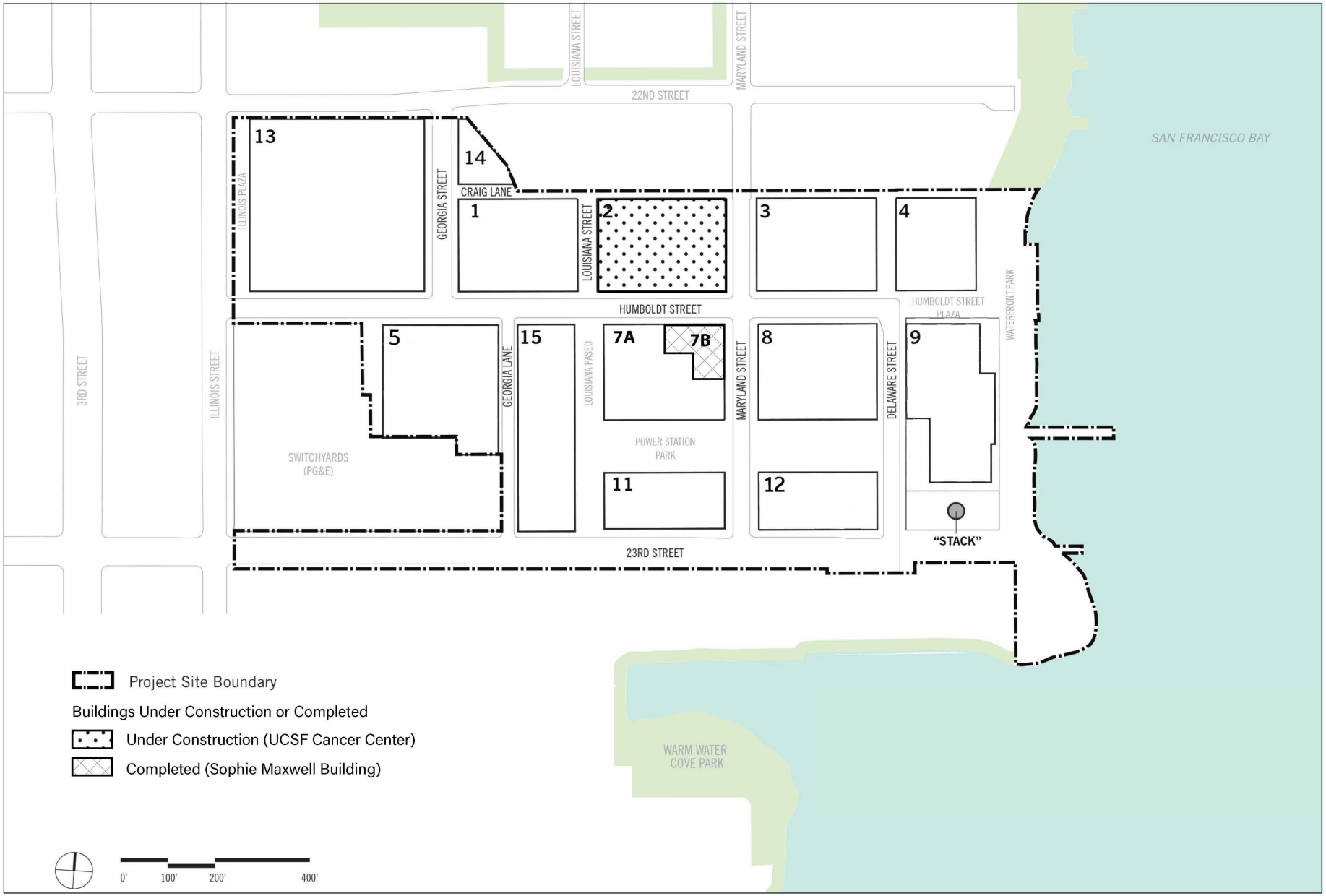
Street, Georgia Lane, Louisiana Street, Louisiana Paseo, a portion of Humboldt Street, and an extension of the privately-owned portion of 23rd Street. The project sponsor has also completed, and begun renting to tenants, the project's first residential building known as the Sophie Maxwell Building, a 104-unit (105 units inclusive of a manager's unit) 100 percent affordable housing project located on Block 7B with temporary surface parking. In August 2025, construction commenced on Block 2, the future site of the UCSF Cancer Center consisting of approximately 187,250 square feet of clinical use, 89,400 square feet of Research and Development, and 680 square feet of retail for a total gross floor area of approximately 277,300 square feet. Please see **Figure 1**, **Construction Status of Project Site (2026)**, for the locations of these projects.

EIR Addendum

CEQA Guidelines section 15164 states that the lead agency shall prepare an addendum to a previously certified EIR if the project sponsor needs to make some changes or additions to a project and if certain conditions are met. These conditions are based on *CEQA Guidelines* section 15162, which specifies the conditions that would require preparation of a subsequent EIR. If none of the conditions described in section 15162 calling for preparation of a subsequent EIR have occurred, then an EIR addendum is the appropriate document for changes to a project. Specifically, an EIR addendum is appropriate if *none* of the following three conditions occur:

1. Substantial changes are proposed in the project that will require major revision of the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
2. Substantial changes occur with respect to the circumstances under which the project is being undertaken that will require major revision to the EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the EIR was certified as complete, shows any of the following:
   (A) The project will have one or more significant effects not discussed in the previous EIR;
   (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
   (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
   (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

With respect to the first condition, this EIR addendum describes why the proposed changes to the approved Power Station Mixed-Use Development project are not substantial to the extent that there would be (1) new significant environmental effects from what was identified in the FEIR, (2) a substantial increase in the severity of previously identified significant effects.



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 1
Construction Status of Project Site (2026) (Addendum 2)

With respect to the second condition, as described below, there are no changed circumstances under which the project is being undertaken that require major revisions to the FEIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

With respect to the third condition, this EIR addendum describes why no new information of substantial importance (that was not known and could not have been known at the time the FEIR was certified as complete) shows any of the following: (1) one or more significant effects not discussed in the FEIR; (2) substantially more severe significant effects than previously examined in the FEIR; (3) mitigation measures or alternatives previously found not to be feasible would in fact be feasible; and (4) mitigation measures or alternatives considerably different from those analyzed in the FEIR would substantially reduce significant effects on the environment.

Therefore, pursuant to *CEQA Guidelines* section 15164, none of the three conditions requiring the preparation of a subsequent or supplemental EIR has occurred, and the San Francisco Planning Department has prepared this addendum to the certified FEIR on the Power Station Mixed-Use Development project.

Section 31.19(c)(1) of the San Francisco Administrative Code states that a modified project must be reevaluated and that, "If, on the basis of such reevaluation, the Environmental Review Officer determines, based on the requirements of CEQA, that no additional environmental review is necessary, this determination and the reasons therefor shall be noted in writing in the case record, and no further evaluation shall be required by this Chapter."

This addendum describes the proposed changes to the certified FEIR project and then analyzes the potential environmental effects of those changes, based on and using the same methodology as the analysis of the environmental impacts identified in the FEIR. It explains why the project with the proposed changes would: (1) not result in any new significant environmental impacts, (2) not result in a substantial increase in the severity of previously identified environmental impacts, and (3) not require the adoption of any new or considerably different mitigation measures or alternatives.

This Addendum 2 evaluates whether the proposed 2025 modified project would result in environmental effects beyond those previously evaluated in the FEIR. To provide context regarding the evolution of the Project, Addendum 2 also includes comparisons to the 2020 re-phase program (Addendum 1), which reflects the currently approved development program and phasing framework and portions of which have been constructed. Comparisons to the 2020 re-phase program (Addendum 1) are intended to assist the reader in understanding how the Power Station Development Mixed-Use Project has changed over time, while the CEQA analysis focuses on whether the 2025 modified project would result in new significant impacts or a substantial increase in the severity of impacts previously evaluated in the FEIR for the certified FEIR project.

Description of the Proposed 2025 Modified Project

Subsequent to the certification of the FEIR, and the issuance of Addendum 1, the project sponsor has proposed further revisions to the project. The proposed changes to the 2020 re-phase program (Addendum 1) consist of amendments to the (i) Development Agreement (including its Phasing Plan,

Housing Plan, Transportation Plan, Open Space Plan, and D4D document[2]), (ii) Potrero Power Station SUD (Planning Code section 249.87), and (iii) Zoning Map. On April 29, 2025, the project sponsor submitted a Development Agreement Subsequent Approval application (Application No. 2017-011878PHA-11) for approval of the above-described proposed amendments, as well as the project's Phase 2 Development Phase Application. Phase 2 is proposed to include street and open space improvements, residential and commercial vertical development, and the provision of utility infrastructure. Each of these amendments and approvals are discussed in greater detail under "Required Approvals" at the end of this project description.

The certified FEIR project with the proposed changes is referred to herein as the "**2025 modified project**." This description of the proposed 2025 modified project below first presents the long-term changes to the land use program and then presents the changes to the construction phasing plan.

LAND USE PLAN

The 2025 modified project would generally retain all the same general characteristics and components of the certified FEIR project, redeveloping the site with a multi-phased, mixed-use development and activating a new waterfront open space with a variety of residential, commercial, parking, community facilities, and open space land uses. Overall, the 2025 modified project could construct up to approximately 5.6 million gross square footage (gsf) of development, compared to 5.4 million gsf under the certified FEIR project.

Overall, even with the proposed minor changes to the gross square footage of various land uses, the conceptual land use plan would be unchanged from that of the certified FEIR project [see **Figure 2**, **Proposed Land Use Plan**, **2025 Modified Project (Addendum 2)**] except that the 2025 modified project would create land use flexibility to develop Blocks 5 and 12 with either residential or commercial uses, permit public (P) uses throughout the project site, permit PDR uses on any building floor on Block 5, and permit with Conditional Use Authorization a data center on Block 5.

As described in the FEIR, (FEIR pp. 9-39 to 9-43), the impact analysis of the certified FEIR project provides for the reasonable worst-case analysis by considering the full range of uses that could be implemented under the proposed flexible land use program designated for specific development blocks. Similar to the certified FEIR project, the 2025 modified project would include flexible land uses — in most instances either residential or commercial. Accordingly, (i) a maximum residential land use scenario was assessed for the certified FEIR project in the FEIR (characterized as the "**Maximum Residential**" scenario) and for the 2025 modified project in this Addendum 2 (characterized as the **"High Residential"** scenario), and (ii) a maximum commercial land use scenario was assessed for the certified FEIR project in the FEIR (characterized as the "**Maximum Office**" scenario) and the 2025 modified project in this Addendum 2 (characterized as the **"High Commercial"** scenario). The certified FEIR project and 2025 modified project reflect hotel uses for Block 9 under both the maximum residential and commercial scenarios. The High Commercial scenario under the 2025 modified project also assumes that Block 5 would be developed with office, research and development ("R&D") and a data center.

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[2] The D4D establishes the land uses, building height, building bulk, street and open space standards, and other design controls that govern the future development of the site. This addendum addresses the proposed changes in the D4D document.



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 2
Land Use Plan, 2025 Modified Project (Addendum 2)

In addition, as described in the FEIR, the project site includes multiple subareas, one of which is owned by PG&E. Since the project sponsor does not control the 3.8 acre PG&E subarea, development of land uses within the PG&E subarea would only occur when and if PG&E determines it is feasible to relocate its existing utility infrastructure and operations.[3] Therefore, similar to the CEQA environmental review of the certified FEIR project, this Addendum 2 also describes and analyzes a "no PG&E scenario" of the 2025 modified project that would exclude the PG&E subarea from the overall development. Under both the High Residential and High Commercial scenarios without the PG&E subarea there would be about 990,000 fewer gross square feet of development than would occur with the PG&E subarea included. See additional detail under *No PG&E Scenario*, further below. The land use controls applicable to the project under the SUD and D4D are "form based", meaning that the maximum number of residential units and gsf of other uses is governed by the permitted physical envelope of the building rather than a maximum number of dwelling units per lot area or maximum floor area ratio. Accordingly, the number of dwelling units and gsf of the land uses described below are reasonable estimates based on the anticipated physical envelope of each building.

Table 1 compares the gsf of the different land uses under the certified FEIR project with those proposed under the High Residential scenario for the 2025 modified project (Addendum 2), including both with and without the PG&E subarea [a comparison to the 2020 re-phase program (Addendum 1) is also included for informational purposes]. As shown in Table 1, under the 2025 modified program, the total building area would increase by approximately 4 percent under the High Residential scenario. There would be an increase in the number of dwelling units (228 units) and the square footage of residential uses (301,137 gsf), and institutional use (187,250 gsf) compared to the certified FEIR project, while there would be a decrease in the square footage of office (-72,905 gsf), R&D (-238,098 gsf, due to a conversion of R&D to Institutional use on Block 2), retail (-25,950 gsf), PDR (-3,000 gsf), and community facility (-8,000 gsf) uses. The proposed changes in square footage would occur on Blocks 1, 2, 5, 7, 8, 11, 12, and 15. All other blocks (Blocks 3, 4, 9, 13 and 14)[4] would have the exact same types and amounts of land uses as the certified FEIR project. In addition, as shown in Table 1, under the proposed changes, the number of vehicle parking spaces would increase by 413 spaces and the number of bicycle parking spaces would increase by 72 spaces.

Table 2 compares the gsf of the different land uses under the certified FEIR project with those proposed under the High Commercial scenario for the 2025 modified project (Addendum 2), including both with and without the PG&E subarea [a comparison to the 2020 re-phase program (Addendum 1) is also included for informational purposes]. As shown in Table 2, the total building area would increase by approximately 2 percent under the High Commercial scenario. There would be an increase in the square footage of office uses (170,804 gsf) compared to the certified FEIR project, while there would be a decrease in the number of dwelling units (-384 units) and the square footage of residential (-266,961 gsf), R&D (-158,398 gsf, due to a conversion of R&D to Institutional use on Block 2), retail (-25,950 gsf), PDR (-3,000 gsf), and community facility (-8,000 gsf) uses. In addition, there would be 30,000 square feet of utility and infrastructure land uses proposed for Block 5 (whereas the certified FEIR project did not propose any utility and infrastructure land uses). The proposed changes in square footage would occur on Blocks 1, 2, 5, 7, 8, 11, 12, and 15. All other blocks (Blocks 3, 4, 9, 13, and 14) would have the exact same types and amounts of land uses as the certified FEIR project.[5]

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[3] This area was formerly 4.8 acres. Since publication of the FEIR, the project sponsor has purchased portions of Blocks 1 and 14.

[4] Blocks 6 and 10 are included as part of Block 15.

[5] Blocks 6 and 10 are included as part of Block 15.

In addition, as shown in Table 2, under the proposed changes, the number of vehicle parking spaces would increase by 261 spaces and the number of bicycle parking spaces would decrease by 195 spaces. In addition to the changes in gross square footage of different land uses, the High Residential and High Commercial scenarios under the 2025 modified project are expected to result in the redistribution of the potential off-street parking supply. The revised parking supply is shown in **Figure 3**, **Off-Street Parking Supply**, **2025 Modified Project (Addendum 2)**, which updates Figure 9-7 in the FEIR, and redistributes parking on blocks 1, 2, 5, 7, 8, 11, 12, 15. The D4D and SUD establish a project-wide maximum parking cap, rather than fixed parking allocations for individual blocks. Parking may be redistributed among blocks within the project site so long as the total amount of parking does not exceed the project-wide maximum. The parking allocated to each block under Figure 3 represents a reasonable estimate of the allocation of permitted parking based on the phasing of building construction and land uses under the 2025 modified project. Under the certified FEIR project, all off-street parking was required to be accessory to permitted uses on the project site. The 2025 modified project would allow all off-street parking to be public (non-accessory) parking, however, the maximum amount of permitted off-street parking would remain the same except as described above.

Table 2 and Table 3 identify changes between the currently approved 2020 re-phase program (Addendum 1) and the 2025 modified project.

In all other respects, the land use plan under the 2025 modified project would be substantially the same as the project analyzed in the certified FEIR.

NO PG&E SCENARIO

For the no PG&E scenario under the 2025 modified project, the proposed land use changes would be analogous to the reduced development of the no PG&E scenario under the certified FEIR project. Compared to the High Residential scenario for the 2025 modified project with the PG&E subarea, there would be a reduction in the overall size of the site (-3.8 acres), number of dwelling units (-806), number of parking spaces (-497), number of bicycle parking spaces (-397), and square footage of residential uses (-787,210 gsf), PDR uses (-20,000 gsf), parking square footage (-182,421 gsf) and overall total building area (-989,631 gsf). Compared to the High Commercial scenario for the 2025 modified project with the PG&E subarea, there would be a reduction in the overall size of the site (-3.8 acres), number of dwelling units (-810), number of parking spaces (-500), number of bicycle parking spaces (-382), and square footage of residential uses (-787,210 gsf), PDR uses (-20,000 gsf), parking square footage (-183,340 gsf) and overall total building area (-990,550 gsf).

In the certified FEIR project, these differences with the PG&E subarea and no PG&E subarea would occur on Block 13, 14 and a portion of Block 1. The differences between those subareas in the 2025 modified project would only occur on Block 13, which is located within the PG&E subarea. None of Block 13 would be developed under the no PG&E scenario in the 2025 modified project. **Figure 4**, **Off-Street Parking Supply**, **2025 Modified Project**, **No PG&E Scenario (Addendum 2)**, shows the redistribution of off-street parking under this scenario.

Table 1 **Comparison of Land Uses of Certified FEIR Project with 2020 Re-Phase Program (Addendum 1) and 2025 Modified Project (Addendum 2): High Residential Scenario**

Characteristic	Certified FEIR Project		2020 Re-Phase Program (Addendum 1)		2025 Modified Project (Addendum 2): High Residential Scenario	
	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
LAND USES						
Area of site, acres	29.0	24.2	Same as project w/ PGE	Same as project, no PGE	Same as project w/ PGE	25.2
Residential, dwelling units	2,601	1,466	2,477	1,317	2,829	2,023
Residential, gsf	2,522,970	1,422,436	2,402,984	1,277,450	2,824,107	2,036,897
Hotel, rooms	250	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Hotel, gsf	241,574	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Commercial (office), gsf	814,240	Same as project w/ PGE	831,606	Same as 2020 re-phase w/ PGE	741,335	Same as 2025 modified project w/ PGE
Commercial (R&D), gsf	645,738	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	407,640	Same as 2025 modified project w/ PGE
Commercial (PDR), gsf	35,000	15,000	32,000	12,000	32,000	12,000
Commercial (retail),[a] gsf	99,464	Same as project w/ PGE	75,239	Same as 2020 re-phase w/ PGE	73,514	Same as 2025 modified project w/ PGE
Community Facilities,[b] gsf	50,000	Same as project w/ PGE	42,000	Same as 2020 re-phase w/ PGE	42,000	Same as 2025 modified project w/ PGE
Entertainment/Assembly, gsf	25,000	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Utility and Infrastructure, gsf	0	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	0	Same as project w/ PGE
Institutional, gsf	0	0	0	0	187,250	Same as 2025 modified project w/ PGE
Parking, no. of spaces	2,686	2,056	2,623	1,993	3,099	2,602
On-street parking spaces	52	31	Same as project w/ PGE	Same as project no PGE	Same as project w/ PGE	Same as project no PGE
On-street passenger loading spaces	22	22	Same as project w/ PGE	Same as project, no PGE	Same as project w/ PGE	Same as project, no PGE
On-street commercial loading spaces	34	30	Same as project w/ PGE	Same as project, no PGE	Same as project w/ PGE	Same as project, no PGE
Off-street commercial loading spaces	20	16	Same as project w/ PGE	Same as project, no PGE	21	Same as project, no PGE
Parking, gsf	965,458	736,361	886,801	657,704	1,046,265	863,844
Total Building Area, gsf	**5,399,444**	**4,049,813**	**5,182,942**	**3,808,311**	**5,620,685**	**4,631,054**
Open Space, acres	6.9	6.6	Same as project w/ PGE	Same as project, no PGE	6.2	5.9
Bicycle parking, class 1, no. of spaces	1,513	1,006	1,478	966	1,607	1,252
Bicycle parking, class 2, no. of spaces	349	285	346	273	327	285
Total bicycle parking, no of spaces	1,862	1,291	1,824	1,239	1,934	1,537
LAND USES BY BLOCK						
Block 1 (gsf)	Residential (399,204) Community Facilities (0)	Residential (138,640) Community Facilities (0)	Residential (394,204) Community Facilities (5,000)	Residential (108,640) Community Facilities (30,000)	Same as 2020 re-phase w/ PGE	Residential (369,204) Community Facilities (30,000)
Block 2 (gsf)	R&D (327,498) Retail (2,400)	Same as project w/ PGE	Same as project w PGE	Same as project w/ PGE	R&D (89,400) Retail (675) Institutional (187,250)	Same as 2025 modified project w/ PGE
Block 3 (gsf)	R&D (318,240) Retail (2,400)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 4 (gsf)	No Flex Uses Residential (163,000) Retail (7,757)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE

Characteristic	Certified FEIR Project		2020 Re-Phase Program (Addendum 1)		2025 Modified Project (Addendum 2): High Residential Scenario	
	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
LAND USES BY BLOCK (CONT.)						
Block 5 (gsf)	Residential (292,860) Retail (38,562)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Residential (354,860) Retail (38,562)	Same as 2025 modified project w/ PGE
Block 6 (gsf)	NA, part of Block 15	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 7 (gsf)	Residential (466,794) Retail (9,543) Community Facilities (17,500)	Same as project w/ PGE	Residential (407,400) Retail (5,000) Community Facilities (6,000)	Same as 2020 re-phase w/ PGE	Residential (498,360) Retail (5,000) Community Facilities (6,000)	Same as 2025 modified project w/ PGE
Block 8 (gsf)	Residential (361,142) Retail (11,814)	Same as project w/ PGE	Residential (305,550) Retail (5,000)	Same as 2020 re-phase w/ PGE	Residential (360,475) Retail (5,000)	Same as 2025 modified project w/ PGE
Block 9 (gsf)	Flex Residential/Hotel Hotel (241,574) Retail (4,120)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 10 (gsf)	NA, part of Block 15	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 11 (gsf)	Office (213,290) Retail (9,545) PDR (7,500) Community Facilities (7,500)	Same as project w/ PGE	Office (219,335) Retail (5,000) PDR (6,000) Community Facilities (6,000)	Same as 2020 re-phase w/ PGE	Office (219,335) Retail (5,000) PDR (6,000) Community Facilities (6,000) Assembly (25,000)	Same as 2025 modified project w/ PGE
Block 12 (gsf)	No Flex Uses Office (175,771) PDR (7,500) Assembly (25,000)	Same as project w/ PGE	No Flex Uses Office (177,271) PDR (6,000) Assembly (25,000)	Same as 2020 re-phase w/ PGE	Residential (213,238) PDR (6,000)	Same as 2025 modified project w/ PGE
Block 13 (gsf)	Residential (762,210) PDR (20,000) Community Facilities (25,000)	Not developed	Same as project w/ PGE	Not developed	Same as project w/ PGE	Not developed
Block 14 (gsf)	No Flex Uses Residential (77,760)	Not developed	Same as project w/ PGE	Not developed	Same as project w/ PGE	Same as project w/ PGE
Block 15 (gsf)	Office (425,179) Retail (13,323)	Office (425,179) Retail (13,323) Community Facilities (25,000)	Office (435,000) Retail (5,000)	Same as 2020 re-phase w/ PGE	Office (522,000) Retail (5,000)	Same as 2025 modified project w/ PGE

NOTE: The terms used in this table have a different meaning from what is used in Table 9-1 in the FEIR. In this table, the term "project" refers to the certified FEIR project. In Table 9-1 in the FEIR, the certified FEIR project is referred to as the "project variant," and the terms "proposed project" or "project" refer to an earlier version of the project that was analyzed in the Draft EIR. Bolded text for emphasis only.

a. Commercial retail is assumed to include a supermarket, sit-down restaurants, and quick service restaurants. See **Appendix PD.1** for assumed breakdown of these uses.
b. Community facilities is assumed to include childcare, library, and other community facilities. See **Appendix PD.1** for assumed breakdown of these uses.
c. The 2025 modified project reflects the use programs for Block 7B (which is completed) and Block 2, which is under construction as the date of the Addendum

SOURCE: California Barrel Company LLC, 2025.

Table 2 **Comparison of Certified FEIR project with 2020 Re-Phase Program (Addendum 1) and 2025 Modified Project Land Uses (Addendum 2): High Commercial Scenario**

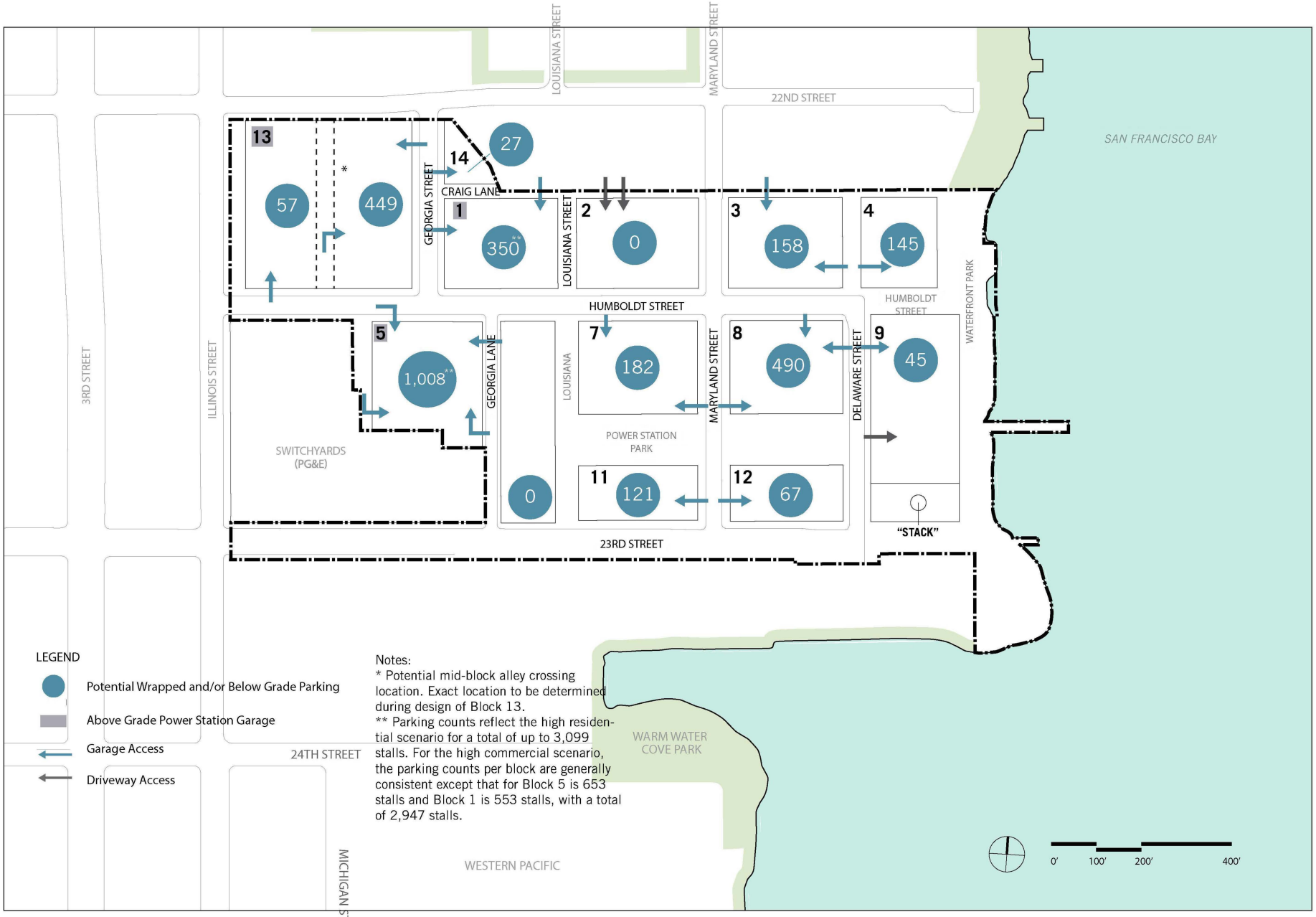
Characteristic	Certified FEIR project		2020 Re-Phase Program (Addendum 1)		2025 Modified Project (Addendum 1): High Commercial Scenario	
	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
LAND USES						
Area of site, acres	29.0	24.2	Same as project w/ PGE	Same as project, no PGE	Same as project w/ PGE	25.2
Residential, dwelling units	2,601	1,466	2,477	1,317	2,217	1,407
Residential, gsf	2,522,970	1,422,436	2,402,984	1,277,450	2,256,009	1,468,799
Hotel, rooms	250	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Hotel, gsf	241,574	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Commercial (office), gsf	814,240	Same as project w/ PGE	831,606	Same as 2020 re-phase w/ PGE	985,044	Same as 2025 modified project w/ PGE
Commercial (R&D), gsf	645,738	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	487,340	Same as 2025 modified project w/ PGE
Commercial (PDR), gsf	35,000	15,000	32,000	12,000	32,000	12,000
Commercial (retail),[a] gsf	99,464	Same as project w/ PGE	75,239	Same as 2020 re-phase w/ PGE	73,514	Same as 2025 modified project w/ PGE
Community Facilities,[b] gsf	50,000	Same as project w/ PGE	42,000	Same as 2020 re-phase w/ PGE	42,000	Same as 2025 modified project w/ PGE
Entertainment/Assembly, gsf	25,000	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Utility and Infrastructure, gsf	0	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	30,000	Same as 2025 modified project w/ PGE
Institutional	0	0	0	0	187,250	Same as 2025 modified project w/ PGE
Parking, no. of spaces	2,686	2,056	2,623	1,993	2,947	2,447
On-street parking spaces	52	31	Same as project w/ PGE	Same as project no PGE	Same as project w/ PGE	Same as project, no PGE
On-street passenger loading spaces	22	22	Same as project w/ PGE	Same as project, no PGE	Same as project w/ PGE	Same as project, no PGE
On-street commercial loading spaces	34	30	Same as project w/ PGE	Same as project, no PGE	Same as project w/ PGE	Same as project, no PGE
Off-street commercial loading spaces	20	16	Same as project w/ PGE	Same as project, no PGE	21	Same as project, no PGE
Parking, gsf	965,458	736,361	886,801	657,704	1,171,666	988,326
Total Building Area, gsf	**5,399,444**	**4,049,813**	**5,182,942**	**3,808,311**	**5,531,397**	**4,540,847**
Open Space, acres	6.9	6.6	Same as project w/ PGE	Same as project, no PGE	6.2	5.9
Bicycle parking, class 1, no. of spaces	1,513	1,006	1,478	966	1,356	1,006
Bicycle parking, class 2, no. of spaces	349	285	346	273	311	279
Total bicycle parking, no of spaces	1,862	1,291	1,824	1,239	1,667	1,285
LAND USES BY BLOCK						
Block 1 (gsf)	Residential (399,204) Community Facilities (0)	Residential (138,640) Community Facilities (0)	Residential (394,204) Community Facilities (5,000)	Residential (108,640) Community Facilities (30,000)	Same as 2020 re-phase w/ PGE	Residential (369,204) Community Facilities (30,000)
Block 2 (gsf)	R&D (327,498) Retail (2,400)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	R&D (89,400) Retail (675) Institutional (187,250)	Same as 2025 modified project w/ PGE
Block 3 (gsf)	R&D (318,240) Retail (2,400)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 4 (gsf)	No Flex Uses Residential (163,000) Retail (7,757)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE

Characteristic	Certified FEIR project		2020 Re-Phase Program (Addendum 1)		2025 Modified Project (Addendum 1): High Commercial Scenario	
	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
LAND USES BY BLOCK (CONT.)						
Block 5 (gsf)	Residential (292,860) Retail (38,562)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Office (66,438) R&D (79,700) Retail (38,562) Internet Service Exchange [c] (30,000)	Same as 2025 modified project w/ PGE
Block 6 (gsf)	NA, part of Block 15	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 7 (gsf)	Residential (466,794) Retail (9,543) Community Facilities (17,500)	Same as project w/ PGE	Residential (407,400) Retail (5,000) Community Facilities (6,000)	Same as 2020 re-phase w/ PGE	Residential (498,360) Retail (5,000) Community Facilities (6,000)	Same as 2025 modified project w/ PGE
Block 8 (gsf)	Residential (361,142) Retail (11,814)	Same as project w/ PGE	Residential (305,550) Retail (5,000)	Same as 2020 re-phase w/ PGE	Residential (360,475) Retail (5,000)	Same as 2025 modified project w/ PGE
Block 9 (gsf)	Flex Residential/Hotel Hotel (241,574) Retail (4,120)	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 10 (gsf)	NA, part of Block 15	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE	Same as project w/ PGE
Block 11 (gsf)	Office (213,290) Retail (9,545) PDR (7,500) Community Fac. (7,500)	Same as project w/ PGE	Office (219,335) Retail (5,000) PDR (6,000) Community Facilities (6,000)	Same as 2020 re-phase w/ PGE	Same as 2020 re-phase w/ PGE	Same as 2020 re-phase w/ PGE
Block 12 (gsf)	No Flex Uses Office (175,771) PDR (7,500) Assembly (25,000)	Same as project w/ PGE	No Flex Uses Office (177,271) PDR (6,000) Assembly (25,000)	Same as 2020 re-phase w/ PGE	Office (177,271) PDR (6,000) Assembly (25,000)	Same as 2025 modified project w/ PGE
Block 13 (gsf)	Residential (762,210) PDR (20,000) Community Fac. (25,000)	Not developed	Same as project w/ PGE	Not developed	Same as project w/ PGE	Not developed
Block 14 (gsf)	No Flex Uses Residential (77,760)	Not developed	Same as project w/ PGE	Not developed	Same as project w/ PGE	Same as project w/ PGE
Block 15 (gsf)	Office (425,179) Retail (13,323)	Office (425,179) Retail (13,323) Community Facilities (25,000)	Office (435,000) Retail (5,000)	Same as 2020 re-phase w/ PGE	Office (522,000) Retail (5,000)	Same as 2025 modified project w/ PGE

NOTE: The terms used in this table have a different meaning from what is used in Table 9-1 in the FEIR. In this table, the term "project" refers to the certified FEIR project. In Table 9-1 in the FEIR, the certified FEIR project is referred to as the "project variant," and the terms "proposed project" or "project" refer to an earlier version of the project that was analyzed in the Draft EIR. Bolded text for emphasis only.

a. Commercial retail is assumed to include a supermarket, sit-down restaurants, and quick service restaurants. See **Appendix PD.1** for assumed breakdown of these uses.
b. Community facilities is assumed to include childcare, library, and other community facilities. See **Appendix PD.1** for assumed breakdown of these uses.
c. Proposed modifications would include allowing utility and infrastructure uses (including internet service exchange and data center uses) on Block 5 subject to a CUA. PDR use is also allowed. As a conservative assumption for purposes of estimating travel demand, the internet service exchange use (which could include a data center) on Block 5 under the High Commercial scenario is analyzed in Addendum 2 as PDR land use. This addendum evaluates a 30,000 square feet data center.

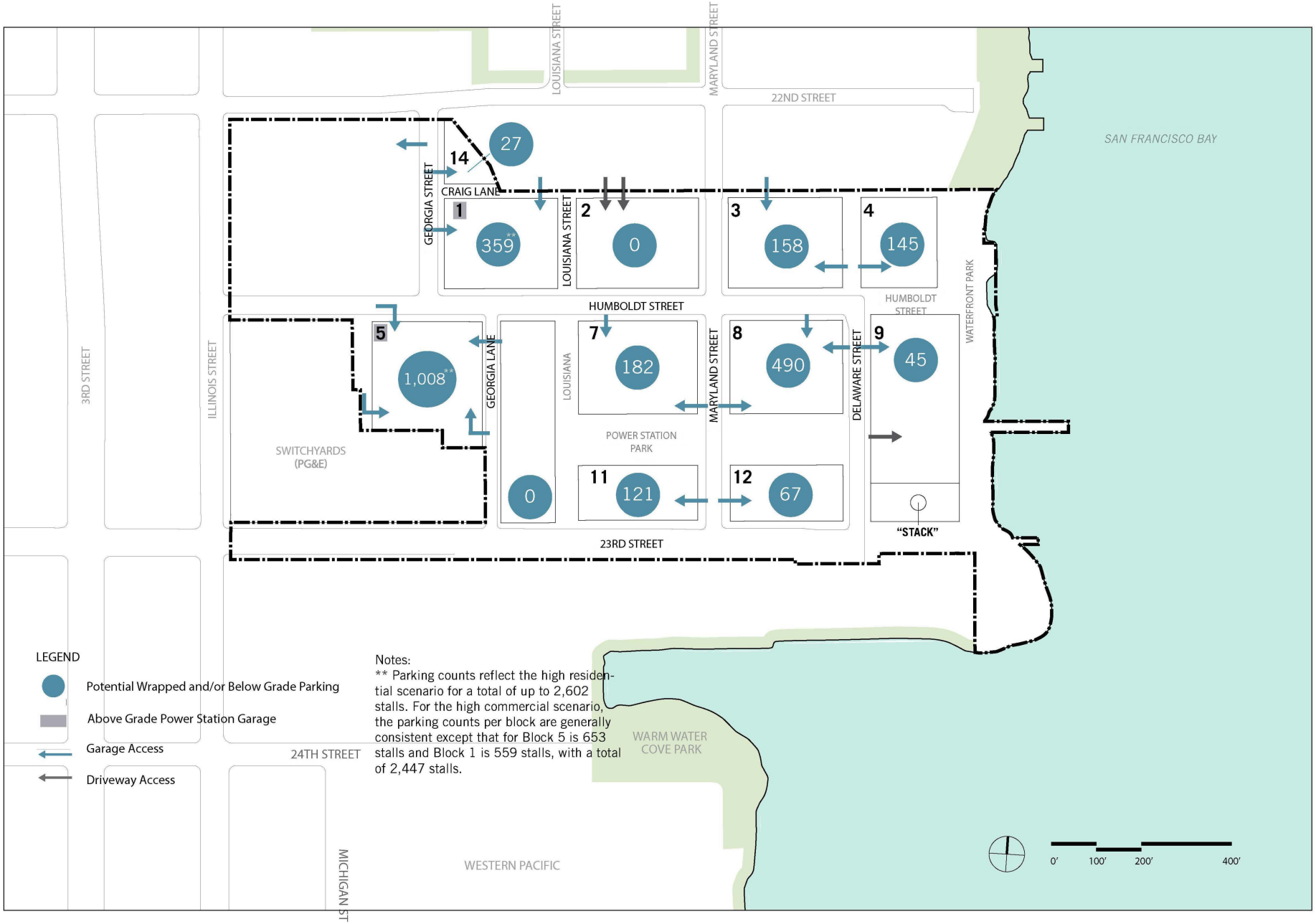
SOURCE: California Barrel Company LLC, 2025.



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 3
Off-Street Parking Supply, 2025 Modified Project (Addendum 2)



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 4
Off-Street Parking Supply, 2025 Modified Project (Addendum 2), No PG&E Scenario

DATA CENTER

Proposed modifications and clarifications to the approved Potrero Power Station SUD, with corresponding updates to the D4D as appropriate, would include allowing utility and infrastructure uses, including internet service exchange and data center uses, on Block 5 subject to a Conditional Use Authorization (CUA). As discussed above, development of utility and infrastructure uses at the project site is addressed under the High Commercial scenario. The project sponsor is not proposing to construct a data center at this time, but rather the sponsor is requesting changes to the SUD that would enable one as a potential future use. Specific parameters for a potential data center are not known at this time, but would be provided at the time a CUA is requested for any future proposal. However, for the purpose of analysis, this addendum considers a 30,000 square foot, 4-megawatt (MW) data center[6] with backup generators totaling up to 6.5 MW of power capacity. **Figure 5**, **Representative 4-MW Data Center Floor Plan and Section (Addendum 2)**, shows the potential configuration of a data center on Block 5. In total, the 2025 modified project, as built out under the High Commercial scenario, would contain 18 MW of diesel-powered backup generation power capacity.

BUILDING HEIGHTS AND SETBACKS

Under the 2025 modified project, maximum permitted heights would increase on the project site as illustrated on **Figure 6**, **Proposed Height Plan, 2025 Modified Project (Addendum 2)**. Specifically, as shown in Figure 6:

- On the residential blocks (Blocks 1, 4, 5, 7, 8, 9, 12, 13, and 14), the permitted maximum height on all residential parcels (including flex parcels) would increase by 8 feet. Accordingly, the maximum height permitted on the project site would increase from 240 feet to 248 feet on Block 7.
- On Block 1, the permitted maximum podium height would increase from 85 feet to 120 feet.
- On Block 5, the permitted maximum podium height would increase from 85 feet to 130 feet. Together with the 8 foot height increase on residential parcels, Block 5 would thus have a maximum permitted podium height of 138 feet if developed with residential uses.
- On Block 11, the permitted maximum height would increase from 130 feet to 145 feet.
- On Block 12, the maximum permitted height would increase from 100 feet to 115 feet. Together with the 8-foot height increase on residential parcels, Block 12 would thus have a maximum permitted height of 123 feet if developed with residential uses.
- On Block 15, the permitted maximum height would increase from 160 feet to 190 feet.

Under the 2025 modified project, certain streetwall heights on the project site would increase, as shown in **Figure 7**, **Proposed Building Setback Plan**, **2020 Modified Project (Addendum 2)**. Specifically, on Blocks 11 and 12, the permitted maximum streetwall heights would increase from 70 feet to 75 feet, and the maximum streetwall heights for certain frontages on Blocks 1, 5, 7, 8 and 13 would increase from 85 feet to 93 feet.

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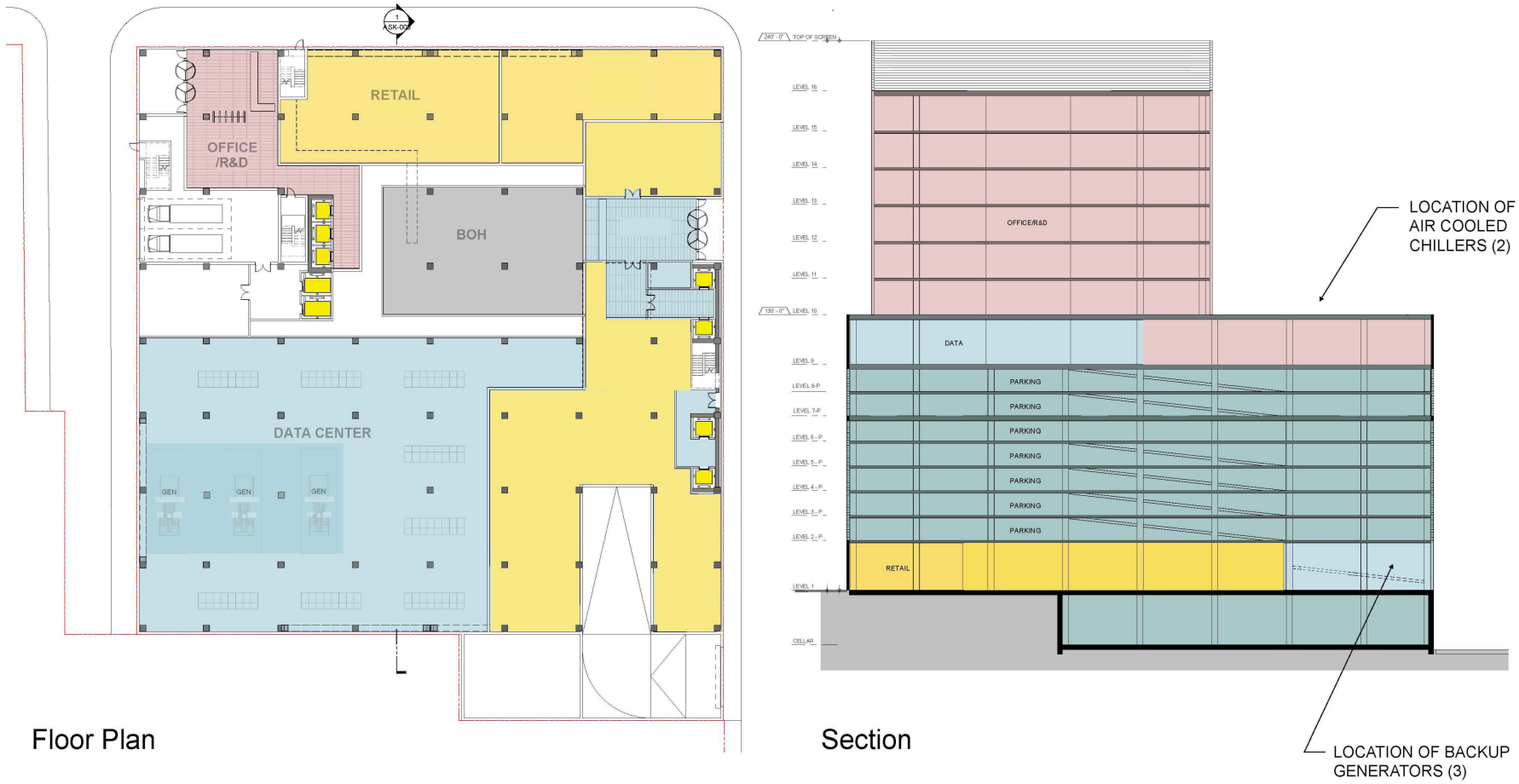
[6] PG&E has confirmed capacity for 4 MW of power supply to the block. Source: Rob Nguyen, PG&E, email correspondence with Paul Roberts, Director of Development, Fifth Space (previously Associate Capital), February 18, 2026.



SOURCE: Adamson Associates, Inc., 2026

Potrero Power Station 2025 Modified Project

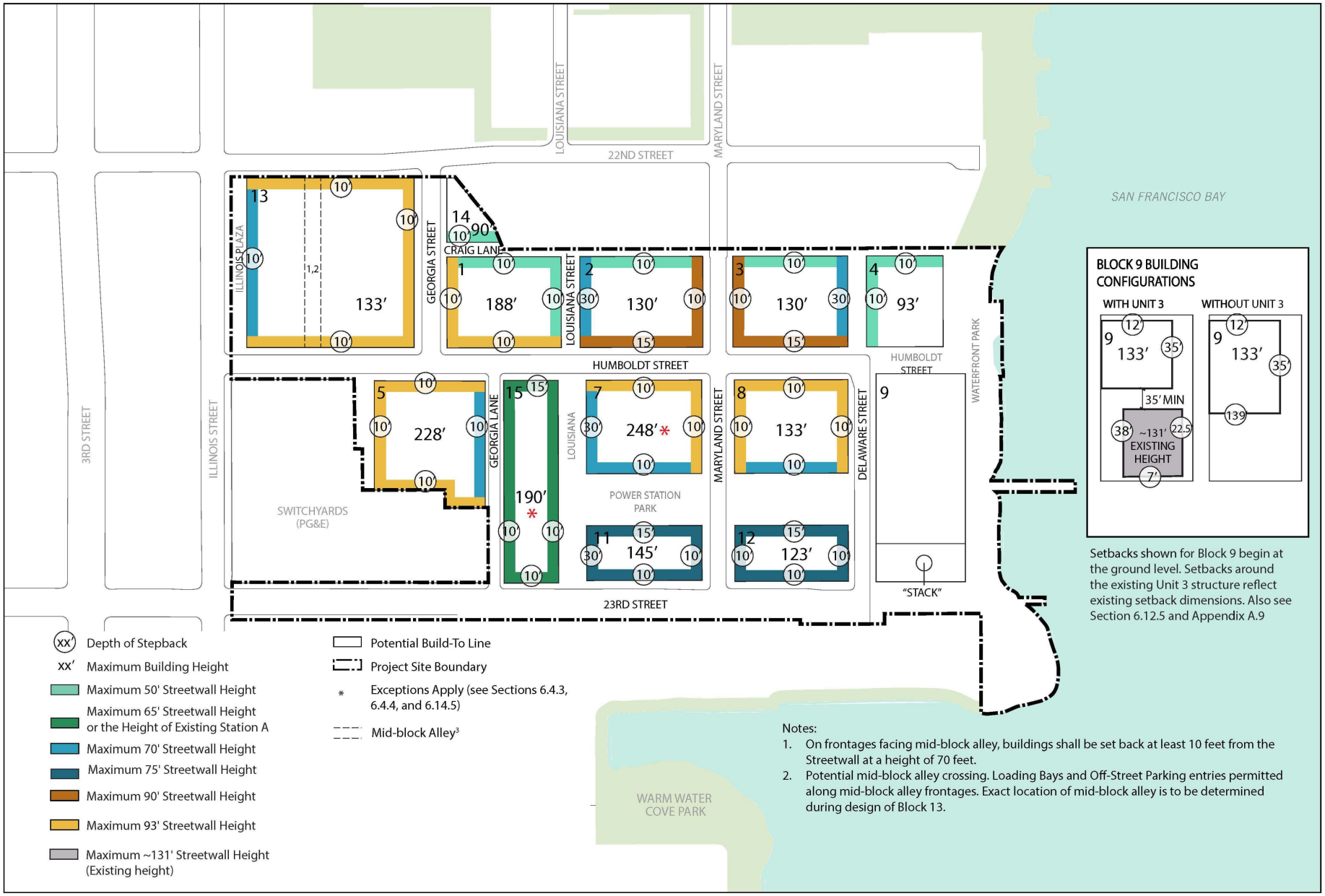
Figure 5
Representative 4-MW Data Center Floor Plan and Section (Addendum 2)



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 6
Proposed Height Plan, 2025 Modified Project (Addendum 2)



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 7
Proposed Building Setback Plan, 2025 Modified Project (Addendum 2)

OTHER PROPOSED MODIFICATIONS

The 2025 modified project would implement building code section 106A.1.17.1, also known as the All-Electric New Construction Ordinance, for all development phases, which requires applications for all permits submitted after June 1, 2021, to construct new buildings to be designed and constructed such that all space conditioning, water heating, cooking, and clothes drying systems are all-electric, and the installation of infrastructure, piping systems, or piping related to the distribution of natural gas or propane to such uses is prohibited. The 2025 modified project would not use natural gas.

There would be no changes to the planned internal street network or configuration of offsite transportation network changes, dock and other shoreline features, and historical features from what will occur under the certified FEIR project.

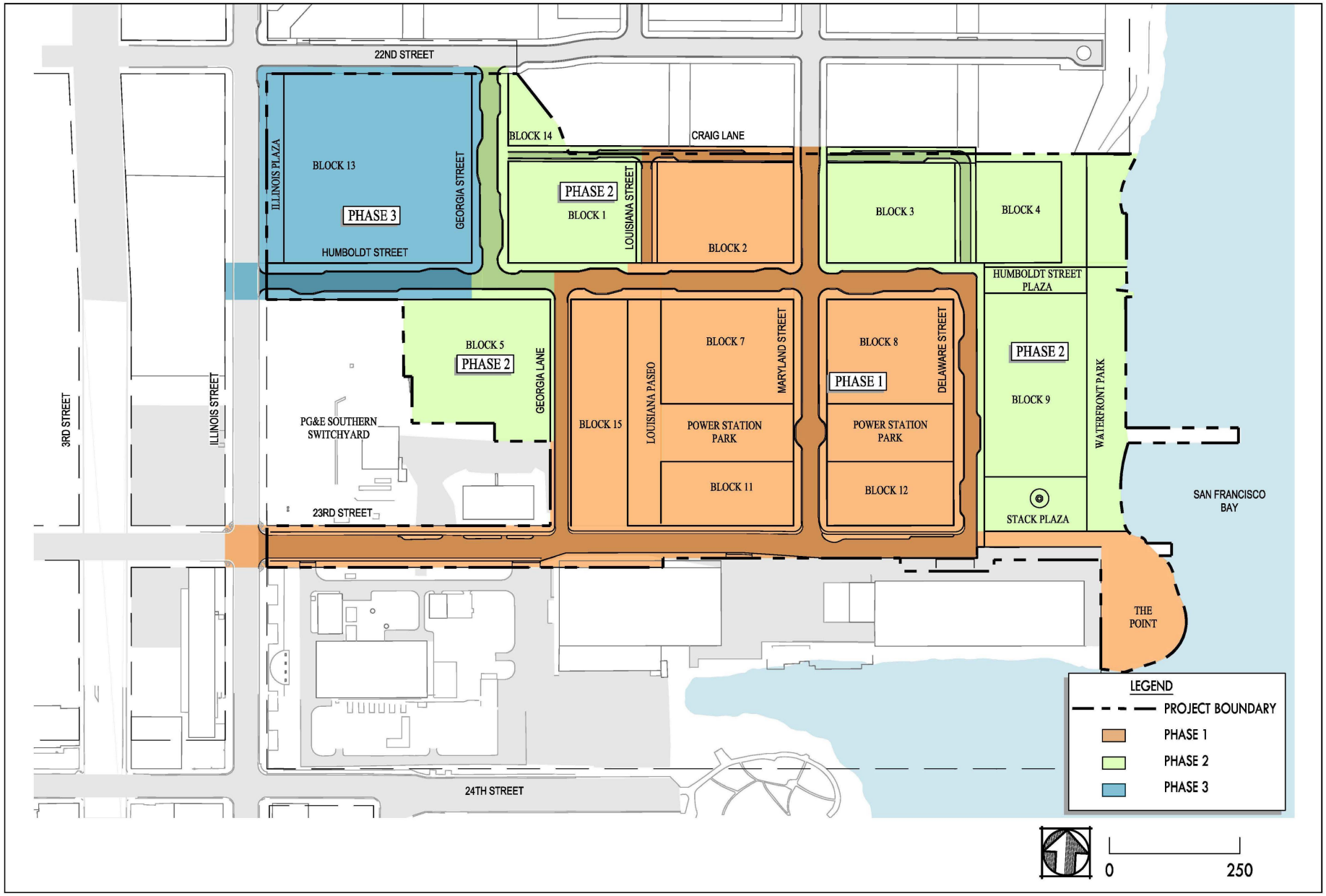
PHASING PLAN

The proposed modifications to the phasing plan amend the project's development phases to move Block 5 from Development Phase 3 to Development Phase 2. Block 13 (currently owned by PG&E) would be the only block included in Development Phase 3. The modifications would remove the requirement for construction of a soccer field on the rooftop of a parking garage and instead would encourage the construction of an active recreation use at another location on the project site. The proposed modifications to the Phasing Plan also include alterations to the approach to and timing of construction of certain infrastructure and community improvements. The modifications would allow for the completion of Power Station Park later than contemplated in the certified FEIR project.

COMPARISON OF CONSTRUCTION PHASING AND SCHEDULE OF THE 2025 MODIFIED PROJECT (ADDENDUM 2) TO THE CERTIFIED FEIR PROJECT AND 2020 RE-PHASE PROGRAM (ADDENDUM 1)

The 2025 modified project would generally maintain the same overall construction schedule and duration as the certified FEIR project and 2020 re-phase program (Addendum 1), with construction of all blocks excluding Block 13 taking place over a 16-year period starting in 2020 and ending in 2035. Under the 2025 modified project, construction of Phase 3 (Block 13) would commence in 2038 (with vertical construction starting in 2039), which is later than the anticipated commencement of construction of Block 13 by the certified FEIR project and 2020 re-phase program (Addendum 1) (2032 and 2031, respectively).

Similar to the 2020 re-phase program (Addendum 1), because of the desire to expedite construction of the internal street network, the reconstruction of Station A, and development of Block 5, the 2025 modified project would revise the approach to and timing of the construction phasing as compared to the certified FEIR project. The 2025 modified project would consolidate the six overlapping construction phases under the certified FEIR project into three overlapping phases, and it would modify the schedule for when individual blocks would be developed. **Figure 8**, **Proposed Construction Phasing Plan**, **2025 Modified Project (Addendum 2)**, shows the proposed construction phasing for the 2025 modified project. **Table 3** shows how the proposed three-phase approach under the 2025 modified project compares to the three-phase approach under the 2020 re-phase program (Addendum 1) and the six-phase approach under the certified FEIR project. **Table 4** depicts how the construction schedule of individual blocks (vertical construction) would change under the 2025 modified project as compared to the certified FEIR project and the 2020 re-phase program (Addendum 1). **Table 5** provides a breakdown of the construction phasing for land development, open space, and vertical construction for the 2025 modified project.



SOURCE: California Barrel Company, 2026

Potrero Power Station 2025 Modified Project

Figure 8
Construction Phasing Plan, 2025 Modified Project (Addendum 2)

Table 3 **Comparison of Estimated Construction Schedule for Certified FEIR project, 2020 Re-phase Program (Addendum 1) and 2025 Modified Project (Addendum 2)**

	Certified FEIR Project		2020 Re-phase Program (Addendum 1)		2025 Modified Project (Addendum 2)	
Year	Block	Phase	Block	Phase	Block	Phase
2020	Entire site	0	Entire site	0	Entire site	0
2021	Entire site		Entire site		Entire site	
2022	Entire site		Entire site	1	Entire site	
2023	Blocks 8, 9, 12	1	Block 15		Entire site	1
2024	Blocks 8, 9, 12		Blocks 2, 7, 15		Blocks 7	
2025	Blocks 7, 8, 9, 11, 12	2	Blocks 2, 7, 8, 11, 15		Blocks 2, 7	
2026	Blocks 7, 8, 9, 11, 12	3	Blocks 2, 7, 8, 11, 12, 15	2	Blocks 2, 7, 8	
2027	Blocks 3, 4, 7, 11		Blocks 1, 8, 11, 12, 14		Blocks 1, 2, 7, 8, 12	2
2028	Blocks 3, 4	4	Blocks 1, 9, 12, 14		Blocks 1, 2, 5, 7, 8, 11, 12, 15	
2029	Blocks 3, 4, 5, 15		Blocks 1, 3, 4, 9,		Blocks 1, 3, 5, 7, 11, 12, 15	
2030	Blocks 5, 15		Blocks 1, 3, 4, 9	3	Blocks 3, 5,7, 11, 15	
2031	Blocks 1, 2, 5, 15	5	Blocks 3, 4, 13		Blocks 3, 4, 5, 7, 14, 15	
2032	Blocks 1, 2, 13, 14, 15	6	Blocks 5, 13		Blocks 4, 7, 14	
2033	Blocks 1, 2, 13, 14		Blocks 5, 13		Blocks 4, 9, 14	
2034	Block 13		Blocks 5, 13		Block 9	
2035	Block 13		Block 13		Block 9	
2039-2043					Block 13	3

NOTE: See Figure 8 for phasing of open space and street segments. The blocks listed reflect years when vertical construction would occur.

Table 4 **Comparison of Estimated Construction Schedule, By Block, for Certified FEIR project, 2020 Re-phase Program (Addendum 1) and 2025 Modified Project (Addendum 2)**

	Block																																					
	1	2	3	4	5	7	8	9	11	12	13	14	15	1	2	3	4	5	7	8	9	11	12	13	14	15	1	2	3	4	5	7	8	9	11	12	13	14	15
Year	Certified FEIR Project													2020 Re-Phase Program (Addendum 1)													2025 Modified Project (Addendum 2)												
2020																																							
2021																																							
2022																																							
2023							X	X		X																X														
2024							X	X		X					X				X							X						X							
2025						X	X	X	X	X					X				X	X		X				X		X				X							
2026						X	X	X	X	X					X				X	X		X	X			X		X				X	X						
2027			X	X		X			X					X						X		X	X		X		X	X				X	X			X			
2028			X	X										X							X		X		X		X	X			X	X	X			X			X
2029			X	X	X								X	X		X	X				X						X		X		X	X			X	X			X
2030					X								X	X		X	X				X								X		X	X			X				X
2031	X	X			X								X			X	X							X					X		X	X					X	X
2032	X	X									X	X	X					X						X								X		X				X	
2033	X	X									X	X						X						X								X			X			X	
2034											X							X						X											X				
2035											X													X												X				
2039-2043																																					X		

NOTE: Schedules for individual block construction indicate vertical development only.

- Phase 0
- Phase 1
- Phase 2
- Phase 3
- Phase 4
- Phase 5
- Phase 6

Table 5 2025 Modified Project (Addendum 2), Detailed Construction Schedule

Phase	Block	Land Development		Vertical Development		Open Space		Duration (years)
		Start	Finish	Start	Finish	Start	Finish	
0	all	2020	2023	NA	NA	NA	NA	4
		2023	2025			2026	2032	9
1	2			2025	2028			
	7			2024	2032			
	8			2026	2028			
	11			2028	2030			
	12			2027	2029			
	15			2028	2031			
2		2027	2029			2028	2035	9
	1			2027	2029			
	5			2028	2031			
	3			2029	2031			
	4			2031	2033			
	14			2031	2033			
	9			2033	2035			
3		2038	2040			2041	2043	6
	13			2039	2043			

SOURCE: California Barrel Company, 2025.

As shown in Table 3, under the 2025 modified project, Phase 0 would be one year longer relative to that of the certified FEIR project and 2020 re-phase program (Addendum 1), lasting four years from 2020 through 2023 (instead of completion in 2022). Phase 1 would be almost as long under the 2025 modified project as all of Phases 1-4 in the certified FEIR project and would be three years longer than under the 2020 re-phase program (Addendum 1), lasting nine years from 2023 through 2031. Phase 2 would last nine years, from 2027 through 2035, which corresponds approximately with the timing of most of the certified FEIR project's Phase 3, and all of Phase 4 and Phase 5. Phase 3 would last six years, from 2038 through 2043, which would be nine years later than the certified FEIR project's anticipated start of its Phase 6.

Phase 0 is complete and consisted of demolition, site preparation, and rough grading work across the entire site for all development phases and interim surface parking improvements. Some of the earthwork that was previously planned to occur under certified FEIR project's Phases 3 and 5 was moved to Phase 0.

Table 4 shows how following Phase 0, under the 2025 modified project, the order of block-by-block vertical construction would change compared to the certified FEIR project and the 2020 re-phase program (Addendum 1). Under the certified FEIR project, Phase 1 commences construction on Blocks 8, 9, and 12, followed by Phase 2 construction on Blocks 7 and 11, Phase 3 construction on Blocks 3 and 4, Phase 4 construction on Blocks 5 and 15, Phase 5 construction on Blocks 1, 2, and 14, and Phase 6 construction on Block 13. Note that Block 7 includes two distinct parcels (Block 7A and 7B), each of which would be developed with a separate building.

Instead, construction of Block 7B (the Sophie Maxwell Building) began in July 2024 and was completed in 2025. Under the 2025 modified project, after Block 7B, Phase 1 would continue with construction on Block 2 followed (in order) by construction on Blocks 8, 12, 11, 7A and 15. Like the certified FEIR project, Phase 1 would also include 23rd Street and the southeast shoreline portion of the site, but unlike the certified FEIR project, the 2025 modified project would construct the remainder of the shoreline open space, including the dock, during Phase 2. Under the 2025 modified project, vertical construction during Phase 2 would start with Block 1, followed by Blocks 5, 3, 4, and 14, and then Block 9. Vertical construction in Phase 3 would start and end with Block 13.

Table 6 lists the same construction phasing information for the 2025 modified project as shown in Tables 3 and 4, but it also includes the construction phasing details with and without the PG&E subarea for the certified FEIR project, the 2020 re-phase program (Addendum 1), and the 2025 modified project. Under the no PG&E scenario of the 2025 modified project, similar to the no PG&E scenario of the certified FEIR project and the 2020 re-phase program (Addendum 1), overall construction duration would be reduced, with all of the reduction occurring in Phase 3, as shown in Table 5.

Similar to the certified FEIR project, all start and finish dates for construction of the 2025 modified project would be affected by market conditions, PG&E's and the project sponsor's remediation process as required by applicable laws and regulations, and the City's permitting process, among other factors.

RESIDENTIAL AND EMPLOYEE POPULATIONS [7]

Table 7 shows that under the High Residential scenario for the 2025 modified project, the residential population would be incrementally higher (3 percent) than under the Maximum Residential scenario for the certified FEIR project. In addition, under the High Commercial scenario for the 2025 modified project, the employment population increase would potentially be up to 4 percent greater than under the Maximum Office scenario for the certified FEIR project. Estimated population calculation details are shown in **Appendix PD.1**, **Residential and Employment Population: Certified FEIR project and Proposed 2025 Modified Project**.

Required Approvals

The 2025 modified project would require a number of plan amendments and approvals, as described below.

Phasing Plan. The Development Agreement contemplates and permits the amendment of the phasing plan by the Director of the San Francisco Planning Department. The proposed modifications to the phasing plan amend the project's development phases to move Block 5 from Development Phase 3 to Development Phase 2. Block 13 (currently owned by PG&E) would be the only block included in Phase 3.

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[7] It should be noted that the actual employment under the 2025 modified program would be dependent in part on the type of Utility and Infrastructure land use(s) developed at the site. The Utility and Infrastructure land use designation proposed on Block 5 under the High Commercial scenario would allow for a variety of potential uses to be developed, with a corresponding range in employment generated. For purposes of conservatively estimating employment for the Utility and Infrastructure land uses in this Addendum, a generic PDR use is assumed in Table 7. However, please note that other potential allowed uses such as internet service exchange or a data center would generate comparatively lower employment.

Table 6 **Comparison of Construction Phasing for Certified FEIR project, 2020 Re-Phase Program (Addendum 1) and 2025 Modified Project (Addendum 2)**

Characteristic	Certified FEIR Project		2020 Re-Phase Program (Addendum 1)		2025 Modified Project (Addendum 2)	
	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
Construction Start Date	2020	Same as project	Same as project	Same as project	Same as project	Same as project
Construction End Date	2035	2033	Same as project w PGE	Same as project w PGE	Same as project w PGE	Same as project, no PGE
Total Construction Duration, years	16	14	Same as project w PGE	Same as project w PGE	16 years for Phases 0, 1 and 2, plus 5 years for Phase 3	Same as project, no PGE
Construction phases, number of phases	6 phases, plus Phase 0	5 phases, plus Phase 0	3 phases, plus Phase 0	3 phases, plus Phase 0	3 phases, plus Phase 0	3 phases, plus Phase 0
Phase 0, years and affected portion of site	2020 – 2022 entire site	2020 – 2022 entire site minus PGE	Same as project w/ PGE	Same as project w/ PGE	2020-2023	2020-2023
Phase 1, years and affected portion of site	2023 – 2026 Blocks 8, 9, 12, 23rd St.	Same as project w/ PGE	2022 – 2028 Blocks 2, 7, 8, 11, 12,15, 23rd St., certain parks	2022 – 2028 Blocks 2, 7, 8, 11, 12,15, 23rd St., certain parks	2023 – 2032 Blocks 2, 7, 8, 11, 12,15, 23rd St., certain parks)	Same as re-phase w/ PGE
Phase 2, years and affected portion of site	2025 – 2027 Blocks 7, 11	Same as project w/ PGE	2026 – 2031 Blocks 1, 3, 4, 9,14	2026 – 2031 Blocks 1, 3, 4, 9,14	2027 – 2035 Blocks 1, 3, 4, 5, 9,14	2027 – 2035 Blocks 1, 3, 4, 5, 9, 14
Phase 3, years and affected portion of site	2026 – 2029 Blocks 3, 4	Same as project w/ PGE	2030 – 2035 Blocks 5, 13	2030 – 2035 Blocks 5, 13	2038 – 2043 Block 13	NA
Phase 4, years and affected portion of site	2028 – 2032 Blocks 5, 15	Same as project w/ PGE	NA	NA	NA	NA
Phase 5, years and affected portion of site	2031 – 2033 Blocks 1, 2, 14	2031 – 2033 Blocks 1, 2	NA	NA	NA	NA
Phase 6, years and affected portion of site	2031 – 2035 Block 13	NA	NA	NA	NA	NA

NOTE:

a. The terms used in this table have a different meaning from what is used in Table 9-1 in the FEIR. In this table, the term "project" refers to the certified FEIR project. In Table 9-1 in the FEIR, the certified FEIR project is referred to as the "project variant," and the terms "proposed project" or "project" refer to an earlier version of the project that was analyzed in the Draft EIR.

b. All start/finish dates are approximate and could be affected by market conditions, PG&E's remediation process (as may be required by applicable laws and regulations), the City's permitting process, among other factors

SOURCE: California Barrel Company, 2019, 2020, and 2025.

Table 7 Comparison of Certified FEIR Project, 2020 Re-Phase Program (Addendum 1), and 2025 Modified Project (Addendum 2): Maximum Residential and Employment Population

Population Metric	Certified FEIR Project, Flex Block Scenario		2020 Re-Phase Program (Addendum 1), Flex Block Scenario		2025 Modified Project (Addendum 2), Flex Block Scenario	
	Maximum Residential	Maximum Office	Maximum Residential	Maximum Office	High Residential	High Commercial
Total residents	6,238	5,904	5,956	5,623	6,422	5,033
Total employees	5,211	5,431	5,176	5,395	4,489	5,658

SOURCE: Environmental Science Associates, 2026 (Appendix PD.1).

The modifications would remove the requirement that the project construct a soccer field on the rooftop of a parking garage and instead would encourage that the project construct an active recreation use at another location on the project site. The proposed modifications to the Phasing Plan also include alterations to the approach to and timing of construction of certain infrastructure and community improvements. The modifications would allow for the completion of Power Station Park later than contemplated in the certified FEIR project. Other minor changes are shown in **Appendix PD.2**, **Phasing Plan Table**, **2025 Modified Project (Addendum 2)**.

Housing Plan. The proposed modifications to the Housing Plan would increase the permitted average area median income (AMI) for Affordable Rental Units from 72 percent to 80 percent and Affordable For-Sale Units from 99 percent to 120 percent upon full buildout of the project site, and eliminate the requirement that the project construct (or pay an in lieu fee for) affordable housing within a limited period of time after completion of certain square footage thresholds of commercial development.

Potrero Power Station SUD. The following are the proposed modifications and clarifications to the approved SUD, with corresponding updates to the D4D as appropriate:

- Amend the D4D and the SUD to allow structures (such as an elevator penthouse) within privately-owned open spaces in certain circumstances where such structures are accessory to below-grade parking facilities located beneath those open spaces.
- Revise Table 249.87-1 to:
  - Conditionally permit internet service exchange, which include data center uses, on Block 5 subject to the Planning Commission's approval of a CUA under Section 303 of the Planning Code.[8]
  - New bulk controls for commercial buildings on Block 5 to account for flexible land uses.
  - Permit production, distribution and repair (PDR) uses throughout the entire building of Block 5, instead of limiting these uses to the basement, first, mezzanine and second floors of the building.

[8] This change would allow for a potential data center use on Block 5, with a conditional use authorization. For the purposes of environmental analysis, this document assumes a 30,000 square foot, 4 MW data center with 6.5 MW of fossil-fuel-powered backup generators. Any proposal exceeding those sizes would need additional environmental review, in addition to the conditional use authorization. Internet service exchanges, including data center uses, are not permitted elsewhere throughout the site.

  - Permit residential uses on Block 12. As noted below, if Block 12 is developed with residential uses, the maximum permitted height will increase by 8 feet. The other uses permitted on Block 12 would remain unchanged.
  - Permit Public (P) uses across the project site.
  - Remove limitations on the number of permitted rooftop bars.
  - Remove requirement that one commercial building be restricted to Life Science uses, which was approved by Minor Modification #2 to the Development Agreement and recorded on June 20, 2023.
  - Remove requirement that a recreational sports field be located on a parking garage roof.
  - Permit all off-street parking (garage or lot) to be public (non-accessory); however, the maximum amount of permitted off-street parking would remain the same except as described below.
  - Permit Intermediate Length Occupancy use characteristic notwithstanding certain limitations in Planning Code section 202.10.
- Revise Table 249.87-4 and D4D Section 6.20 to:
  - Provide that Institutional Healthcare Uses are permitted a maximum of 2 off-street parking spaces per 1,500 gross square feet of Occupied Floor Area (as compared to 1 space per 1,500 gross square feet of Occupied Floor Area under the current controls).
  - Provide that permitted parking for all uses not listed in Table 249.87-4 is regulated by Planning Code section 151.1 UMU district controls.
  - Provide that General Grocery or Special Grocery Uses are permitted a maximum of 4 off-street parking spaces per 1,000 gross square feet of Occupied Floor Area (as compared to 3 spaces per 1,000 gross square feet of Occupied Floor Area under the current controls).
- Clarify that Planning Code section 342 (Health Care Master Plan Consistency Determination) is not required in the SUD.
- Remove the requirement that a mid-block passage be provided within the Station A (Block 15) building.
- Reduce common open space requirements for dwelling units to 36 feet per unit (as compared to the existing requirement of 48 square feet per unit).
- Permit Intermediate Length Occupancy dwelling units notwithstanding percentage, locational, and total unit cap set forth in Planning Code section 202.10.
- Amend Table 249.87-3 to create bulk controls for newly-permitted commercial uses on Block 5. These controls would allow a maximum average floorplate of 25,000 square feet, a maximum plan length of 195 feet, a maximum diagonal of 220 feet, and a maximum apparent face of 175 feet.
- On Unit 3, allow structures up to 15 feet in height that support the use of Unit 3 for any permitted use, including elevated seating, landscaping, and circulation areas.
- Allow for an above-grade pedestrian bridge connecting Station A and Block 5.
- Remove the requirement that privately owned public open spaces (POPOS) be provided in conjunction with certain active rooftop uses.
- Create modified dwelling unit exposure, ground floor ceiling height, useable open space, and active use requirements for 100% affordable housing projects.

Zoning Map. The proposed amendments include modifying Planning Code section 249.87 and Zoning Map HT08 to increase building heights as follows:

- *Residential Blocks (Blocks 1, 4, 5, 7, 8, 9, 12, 13, and 14)*. Increase the permitted maximum height on all residential parcels (including flex parcels) by 8 feet. The maximum height permitted on the project site would thus increase from 240 feet to 248 feet on Block 7.
- *Block 1*. Increase the permitted maximum podium height on Block 1 from 85 feet to 120 feet.
- *Block 5*. Increase the permitted maximum podium height on Block 5 from 85 feet to 130 feet. Together with the 8 foot height increase on residential parcels, Block 5 would thus have a maximum permitted podium height of 138 feet if developed with residential uses.
- *Block 11*. Increase the permitted maximum height on Block 11 from 130 feet to 145 feet and the maximum streetwall height from 70 feet to 75 feet.
- *Block 12*. Increase the permitted maximum height on Block 12 from 100 feet to 115 feet and the maximum streetwall height from 70 feet to 75 feet. With the 8 foot height increase on residential parcels, Block 12 would have maximum height of 123 feet from 108 feet as a residential building.
- *Block 15*. Increase the permitted maximum height on Block 15 from 160 feet to 190 feet.

Other Development Agreement Modifications. In addition to the proposed modifications to the SUD, Zoning Map, D4D, Phasing Plan, and Housing Plan, the proposed amendments include various clarifications to the provisions of the Development Agreement (including its Transportation and Open Space Plan) that are intended to facilitate implementation of the certified FEIR project. None of these modifications are related to the physical environment.

Phase 2 Development Phase Application. In addition to requesting approval of the proposed amendments, the project sponsor has also requested approval of a Phase 2 Development Phase Application by the Director of the San Francisco Planning Department. Approval of the requested Phase 2 Development Phase Application relies on this Addendum 2, because the requested Phase 2 Development Phase Application reflects Phase 2 under the 2025 modified project, rather than Phase 2 under the certified FEIR project.

Revised Settlement Agreement. Should the project, with or without the potential data center, exceed the amount of fossil-fuel-powered backup generator capacity permitted by the Form of Fossil Fuel Deed Restriction (Exhibit I of the Settlement Agreement dated as of August 13, 2009 between the City and County of San Francisco and Mirant Potrero, LLC), which includes a total allowable fossil-fuel-powered backup generator capacity on the project site of 10 MW, an amendment to the deed restriction would be required.

Project Setting

Cumulative Development

Two approaches to a cumulative impact analysis are provided in CEQA Guidelines section 15130(b)(1): (1) the analysis can be based on a list of past, present, and reasonably foreseeable future projects producing closely related impacts that could combine with those of a proposed project, or (2) a summary of projections contained in a general plan or related planning document. The analyses in this Addendum 2

employ both the list-based approach and a projections-based approach, depending on which approach best suits the resource topic being analyzed.

For the resource topics using the list-based approach, **Table 8**, **Cumulative Projects in the Project Vicinity**, presents a comprehensive list of cumulative development and infrastructure projects generally located within 0.5 mile of the project site that are considered in the various cumulative analyses. Though in order to consider larger projects this table considers some projects beyond 0.5 mile of the project site when they were also included in the adjacent Pier 70 Mixed-Use District Project EIR cumulative list, and generally excludes projects that are smaller than nine new units or primarily entail renovations. In general, these cumulative projects are either under construction, which means they were "Under Construction" at the date of Addendum 2 and will likely be completed prior to the approval/operation of the 2025 modified project; "Planning Entitled," which means the project is approved by the planning department but not yet approved for construction; "Building Permit Approved," meaning the project has permits necessary to start construction but has not yet started construction; and "Under Review," in which case, the project has an application on file with the planning department.

Analysis of Potential Environmental Effects

As described above, the proposed 2025 modified project would amend the project's Development Agreement (including its Phasing Plan, Housing Plan, Transportation Plan, Open Space Plan, and D4D document), and the Potrero Power Station SUD, which would primarily result in changes in the approach to timing and duration for, and geographic extent of certain construction phases compared to the project analyzed in the certified FEIR. The order of development of the project's blocks would be amended, but there would be no substantial changes to the overall magnitude of construction activities. The 2025 modified project would also result in minor changes in gross square footage of certain land uses, and would create land use flexibility to develop Blocks 5 and 12 with either residential or commercial uses. In addition, the 2025 modified project would increase the maximum permitted heights on Blocks 1, 4, 5, 7, 8, 9, 11, 12, 13, 14, and 15. Therefore, the discussion below provides a detailed analysis of potential impacts only on the five resources that could be potentially affected by the proposed changes — transportation and circulation; noise; air quality; shadow; and wind. This is followed by *Other Resource Top*ics, below, which addresses all other remaining resource topics at a lesser level of detail.

Transportation and Circulation

SUMMARY OF TRANSPORTATION IMPACTS OF THE CERTIFIED FEIR PROJECT

The FEIR did not identify any significant transportation and circulation impacts of the certified FEIR project related to construction-related transportation impacts, potentially hazardous conditions, accessibility, vehicle miles traveled (VMT), loading and parking and did not require any mitigation measures. The FEIR identified significant impacts of the certified FEIR project related to Muni transit operations and accessibility for people walking, and mitigation measures were identified. The FEIR concluded that with implementation of the mitigation measures, the accessibility impacts for people walking would be reduced to less than significant, however, impacts on Muni transit operations would remain significant and unavoidable.

Table 8 Cumulative Projects in the Project Vicinity[a]

Key #	Project Name (Case File No.)	Status as of Addendum 2	Dwelling Units	Commercial/ Retail (gsf)[b]	Office (gsf)	Industrial (gsf)	Public Open Space (gsf)	Child Care (children)	Total # of Employees & Residents[c]
1	Pier 70 Mixed-Use District (also referred to as the Pier 70 project) (2014-001272ENV)[d]	U/C (long-term project)	1,000–2,000	400,000	900,000–1,810,000		304,900	50	12,250
2	600 20th Street	Building Permit Issued	1	9,291	10,822				69
3	Crane Cove Park (2015-001314ENV)	Partially complete; remainder U/C					426,900		3
4	Mission Bay Ferry Landing (2017-008824ENV)	Construction 2026-27							-
5	Seawall Lot 337/Pier 48 (2013.0208E) (Mission Rock)	U/C (long-term)	1,500	1,250,000	700,000		348,500		9,515
6	Potrero Hope SF Master Plan (2010.0515E)	U/C (long-term)	1,700		10,000			40-60	3,905
7	Central Bayside System Improvement Project (Indiana Street Channel Tunnel and Carolina Street Channel Tunnel) (2017-000181ENV)[e]	Under Construction							
8	Port of San Francisco Pier 80 Subsidence Repairs (2025-005768PRJ) – Repairs to existing facility; no new development	Under Review							
9	1399 Marin Street – SFMTA Refresh Project (2023-009380ENV) - Upgrade of existing facility; no new development	CEQA Exemption Issued							
10	1801 Cesar Chavez Street – SFMTA Bus Electric Charging Stations (2024-002037PRJ)- Upgrade of existing facility; no new development	CEQA Exemption Issued							
11	1111 Pennsylvania Avenue (2023-011398ENV)	Planning Entitled							
12	2800 3rd Street (2020-008189PRJ)	Planning Entitled			196,500	35,200			799
13	700 Indiana Street (2023-001074PRJ)	Planning Entitled				70,650			174
14	98 Pennsylvania Avenue (2020-010275ENX)	Planning Entitled	64						145
15	249 Pennsylvania Avenue (2024-001361GPR)	Proposed	120						272

Key #	Project Name (Case File No.)	Status as of Addendum 2	Dwelling Units	Commercial/ Retail (gsf)[b]	Office (gsf)	Industrial (gsf)	Public Open Space (gsf)	Child Care (children)	Total # of Employees & Residents[c]
16	Islais Creek Bridge Replacement	Construction 2027-29							
17	San Francisco Housing Element 2022 Update (2019-016230ENV)	Adopted	50,000[f]						113,500
Total[g]			**54,385 – 55,385**	**1,659,291**	**1,817,322 – 2,727,322**	**105,850**	**1,080,300**	**90 - 110**	**140,613**

NOTES:

a. The following projects from the FEIR Cumulative Projects table have been completed and therefore are no longer included: 20th Street Historic Core at Pier 70 (2016-000346ENV); 2420 Third Street (2013.0673E); 901 Tennessee Street (2013.0321E); 950 Tennessee Street (2014.1434ENV); 2290 Third Street (2005.0408E); 815-825 Tennessee Street (2013.0220E); 2171 Third Street/590 19th Street (2013.0784E); 595 Mariposa Street (2014.1579ENV); 2051 Third Street/650 Illinois Street (2010.0726E); Mariposa Pump Station Upgrade (2014-002522ENV); Golden State Warriors Event Center and Mixed-Use Development (2014.1441E); Bayfront Park (ER 919-97); 650 Indiana Street (2012.1574E); 800 Indiana Street (2011.1374E); 645 Texas Street (2012.1218E); 790 Pennsylvania Avenue / 1395 22nd Street (2011.0671E); 1201–1225 Tennessee Street (2012.0493E) Also removed from the FEIR's cumulative table is 3150-3240 3rd Street (2021-009704PPA); for this site, a preliminary project assessment was filed in 2021, but no official project application was submitted.

b. Includes Laboratory and Arts Activity uses.

c. Employment and Residential generation rates generated using the following: Dwelling Units: 2.27 persons/unit, Commercial/ Retail: 350 sf/employee, Office: 276 sf/employee, Event Center: uses values from Event Center and Mixed-Use Development at Mission Bay Blocks 29-32 Subsequent EIR of 2,728 full time equivalent employees and 1,000 day of game staff, Public Open Space: 3.8acres/employee, Child Care - 6 children per employee (http://childcareaware.org/child-care-providers/management-plan/staffing), Industrial: 405 sf/employee.

d. Approved Pier 70 Mixed-Use District entails a range of development land uses, therefore the population generation assumes highest employment and population rates from highest end of project range of approved 2017 project.

e. The Central Bayside Improvement Project will address the sewer system need; the design team is investigating a potential tunnel to provide reliable and redundant gravity conveyance and storage of wastewater flows from the Channel Pump Station to the Southeast Treatment Plant. Pump station improvements and a new pump station are also under consideration.

f. The Housing Element 2022 Update would not, in itself, result in the development of additional housing units. However, the EIR for Housing Element 2022 Update estimates that up to approximately 50,000 potential housing units could be allowed for beyond those that would be developed absent adoption of the Housing Element 2022 Update.

g. Transportation network improvements and development projects are not included in this table as they primarily relate to Section 4.E, and are therefore addressed in that section.

SOURCE: San Francisco Property Information Map (https://sfplanninggis.org/pim/). Accessed November 5, 2025.

SUMMARY OF TRANSPORTATION ASSUMPTIONS FOR THE 2025 MODIFIED PROJECT

The following highlights the key assumptions for the transportation and circulation impact analysis of the 2025 modified project and differences in methodology between the FEIR and the 2025 modified project:

- The transportation and circulation analyses of the 2025 modified project considers, as appropriate, the four land use scenarios presented in Tables 1 and 2 in the project description.
- The transportation analysis of the 2025 modified project follows the same methodology and impact topics described in the FEIR, with minor modifications. The FEIR transportation topics of traffic hazards, pedestrians, bicyclists and emergency access are consolidated into the updated topics of potentially hazardous conditions and accessibility per the 2019 San Francisco Transportation Impact Analysis Guidelines for Environmental Review (SF transportation guidelines).
- The project travel demand methodology for the 2025 modified project is the same as presented in the FEIR. The 2025 modified project's institutional use (i.e., outpatient clinic use, a refinement of a R&D land use in the FEIR) was added to the travel demand analysis to reflect the UCSF clinical building currently under construction on Block 2. In addition, as a conservative assumption for purposes of estimating travel demand, the internet service exchange use (which could include a data center) on Block 5 under the High Commercial scenario is analyzed as PDR land use.[9]
- Consistent with the FEIR, the travel demand analysis for the 2025 modified project also includes a combined scenario that selects the maximum number of inbound and outbound vehicle and transit trips during the peak hours among the 2025 modified project's land use scenarios.
- The transit delay analysis of the 2025 modified project uses the combined scenario travel demand estimates to factor the quantitative transit delay analysis presented in the FEIR.
- The VMT analysis of the 2025 modified project uses the updated average daily VMT per capita for the transportation analysis zone in which the project is located (i.e., the latest VMT information for 2020 and 2050 conditions provided in the planning department's Transportation Information Map).
- The cumulative impact analysis for the 2025 modified project considers the cumulative projects identified in Table 8 above.

2025 MODIFIED PROJECT TRAVEL DEMAND

The 2025 modified project's travel demand analysis for the High Residential and High Commercial scenarios presented in Tables 1 and 2 in the project description, respectively, is based on the same methodology used for the certified FEIR project in the FEIR. The 2025 modified project includes the same land uses as the certified FEIR project, with the exception of an outpatient clinic use currently under construction on the project site for UCSF, an institutional use permitted under the R&D land use category. The trip generation characteristics for the outpatient clinic use are based on the analysis conducted for a clinical building on Block 34 of the UCSF Mission Bay campus.[10] The outpatient clinical use has a higher trip generation rate than the R&D use (about 2.5 times higher) and has a greater proportion of trips occurring during the a.m. peak hour (23 percent of daily trips for clinical uses versus 18 percent for R&D uses) and a lesser proportion

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[9] As a conservative assumption for the transportation impact analysis, the 2025 modified program's potential inclusion of a data center on Block 5 under the High Commercial Scenario was analyzed as a higher trip generating use of PDR land use (18.1 daily trips per 1,000 square feet for PDR compared to 0.8 daily trips per 1,000 square feet for data center use). See **Appendix TR.1**.

[10] UCSF, Addendum #5 to the UCSF 2014 Long Range Development Plan EIR, Mission Bay East Campus Phase 2 Clinical Building and Parking Garage on Block 34, March 2021.

during the p.m. peak hour (10 percent of daily trips for clinical uses versus 16 percent for R&D). The travel demand analysis also calculated the 2025 modified project's freight delivery and service vehicle loading space demand and vehicle parking space demand. See **Appendix TR.1** for the 2025 modified project travel demand assumptions and calculations.

The change in the off-street parking supply from an accessory use under the certified FEIR project to publicly accessible parking under the 2025 modified project (i.e., all off-street parking supply on the project site would be public parking) would not affect the travel demand assumptions (e.g., trip generation rates, ways of travel, origins and destinations) or methodology. This is due to the location of the project site along the eastern edge of 23rd Street (i.e., bordering San Francisco Bay) and the distribution of off-street parking throughout the project site, and because the 2025 modified project's parking supply would primarily serve from a practical standpoint the project land uses rather than function as a public parking garage for adjacent land uses (e.g., a stand-along public parking garage in downtown such as the Fifth & Mission/Yerba Buena Garage).

2025 MODIFIED PROJECT TRIPS

Table 9, **Certified FEIR project and 2025 Modified Project Trip Generation by Way of Travel and Time Period – High Residential Scenario: External Trips Only**, and **Table 10**, **Certified FEIR project and 2025 Modified Project Trip Generation by Way of Travel and Time Period – High Commercial Scenario: External Trips Only**, present the comparison of person and vehicle trips for the certified FEIR project (described in the FEIR as the project variant) as presented in Table 9-6 (FEIR p. 9-59) and trip generation for the 2025 modified project's High Residential and High Commercial scenarios, respectively, with and without the PG&E subarea. Due to the shifts in permitted land uses and the inclusion of the outpatient clinic use with its associated travel characteristics, compared to the certified FEIR project, there would be both increases and decreases in the number of person and vehicle trips, depending on development scenario, mode of travel, and time of day. Under both the High Residential and High Commercial scenarios with the no PG&E scenario there would be about 990,000 fewer gross square feet of development than would occur with the PG&E subarea included. Therefore, as shown in Tables 9 and 10, compared to the certified FEIR project, the increases in trips would be less than for conditions with the PG&E subarea and the decrease in trips would be more than for conditions with the PG&E subarea.

- **High Residential Scenario** - As shown on Table 9, compared to the certified FEIR project, the 2025 modified project's High Residential scenario with and without the PG&E subarea would generate fewer daily and p.m. peak hour person and vehicle trips, but generally more a.m. peak hour person and vehicle trips. Compared to the certified FEIR project, daily person trips would decrease by between 15 and 18 percent, while daily vehicle trips would decrease by between 6 and 13 percent. During the a.m. peak hour, compared to the certified FEIR project, the High Residential scenario would generate between 173 fewer and 451 more person trips (between a decrease of 3 percent with the no PG&E scenario and an increase of 9 percent with the PG&E subarea) and between 87 and 340 more vehicle trips (an increase of between 5 percent with the no PG&E scenario and 18 percent with the PG&E subarea). During the p.m. peak hour, compared to the certified FEIR project, the High Residential scenario would generate between 993 and 1,437 fewer person trips (a decrease of between 13 percent with the PG&E subarea and 19 percent with the no PG&E scenario) and between 150 and 373 fewer vehicle trips (a decrease of between 6 percent with the PG&E subarea and 15 percent with the no PG&E scenario).

Table 9 **Certified FEIR Project and 2025 Modified Project Trip Generation by Way of Travel and Time Period – High Residential Scenario: External Trips Only[a,b]**

Time Period/Certified FEIR Project/2025 Modified Project Scenarios with and without the PG&E Subarea	Person Trips by Way of Travel				Vehicle Trips
	Auto[c]	Transit	Other[c]	Total	
DAILY					
Certified FEIR Project	32,510	15,706	17,515	65,731	19,113
High Residential Scenario with PG&E subarea	28,907	14,119	13,035	56,061	17,941
Net change compared to the certified FEIR project	-3,603	-1,587	-4,480	-9,670	-1,172
% Change compared to the certified FEIR project	-11%	-10%	-26%	-15%	-6%
High Residential Scenario with the no PG&E scenario	27,690	12,866	13,065	53,621	16,575
Net change compared to the certified FEIR project	-4,820	-2,841	-4,449	-12,110	-2,537
% Change compared to the certified FEIR project	-15%	-18%	-25%	-18%	-13%
A.M. PEAK HOUR					
Certified FEIR Project	2,498	1,822	833	5,154	1,897
High Residential Scenario with PG&E subarea	2,976	1,819	809	5,605	2,237
Net change compared to the certified FEIR project	478	-3	-24	451	340
% Change compared to the certified FEIR project	19%	0%	-3%	9%	18%
High Residential Scenario with the no PG&E scenario	2,710	1,556	714	4,980	1,984
Net change compared to the certified FEIR project	212	-266	-119	-173	87
% Change compared to the certified FEIR project	8%	-15%	-14%	-3%	5%
P.M. PEAK HOUR					
Certified FEIR Project	3,681	2,165	1,628	7,474	2,483
High Residential Scenario with PG&E subarea	3,261	2,013	1,207	6,482	2,333
Net change compared to the certified FEIR project	-421	-151	-421	-993	-150
% Change compared to the certified FEIR project	-11%	-7%	-26%	-13%	-6%
High Residential Scenario with the no PG&E scenario	3,082	1,755	1,200	6,037	2,109
Net change compared to the certified FEIR project	-599	-410	-428	-1,437	-373
% Change compared to the certified FEIR project	-16%	-19%	-26%	-19%	-15%

NOTES:
a. Numbers may not sum to total due to rounding.
b. External trips are those whose origin or destination is outside the project site.
c. Auto includes private autos, carpools, and app-based ride hailing services (e.g., Uber, Lyft). Other ways of travel include walk, bicycle, motorcycle, and additional modes such as taxis.

SOURCE: Potrero Power Station 2025 Modified Project Travel Demand Calculations, April 2026. See **Appendix TR.1.**

- **High Commercial Scenario** - As shown on Table 10, compared to the certified FEIR project, the 2025 modified project's High Commercial scenario with and without the PG&E subarea would generate fewer daily and p.m. peak hour person and vehicle trips, but generally more a.m. peak hour person and vehicle trips. Compared to the certified FEIR project, daily person trips would decrease by between 8 and 10 percent, while daily vehicle trips would decrease by between 3 and 8 percent. During the a.m. peak hour, compared to the certified FEIR project, the High Commercial scenario would generate between 63 fewer and 564 more person trips (between a decrease of 1 percent with the no PG&E scenario and an

increase of 11 percent with the PG&E subarea) and between 109 and 363 more vehicle trips (an increase of between 6 percent with the no PG&E scenario and 19 percent with the PG&E subarea). During the p.m. peak hour, compared to the certified FEIR project, the High Commercial scenario would generate between 969 and 1,403 fewer person trips (a decrease of between 13 percent with the PG&E subarea and 19 percent with the no PG&E scenario) and between 188 and 398 fewer vehicle trips (a decrease of between 8 percent with the PG&E subarea and 16 percent with the no PG&E scenario).

Table 10 Certified FEIR Project and 2025 Modified Project Trip Generation by Way of Travel and Time Period – High Commercial Scenario: External Trips Only[a,b]

Time Period/Certified FEIR Project/2025 Modified Project Scenarios with and without the PG&E Subarea	Person Trips by Way of Travel				Vehicle Trips
	Auto[c]	Transit	Other[c]	Total	
DAILY					
Certified FEIR Project	32,510	15,706	17,515	65,731	19,113
High Commercial Scenario with PG&E subarea	31,171	14,508	14,592	60,271	18,587
Net change compared to the certified FEIR project	-1,339	-1,198	-2,923	-5,460	-525
% Change compared to the certified FEIR project	-4%	-8%	-17%	-8%	-3%
High Commercial Scenario with the no PG&E scenario	30,504	13,373	15,016	58,893	17,516
Net change compared to the certified FEIR project	-2,006	-2,333	-2,499	-6,838	-1,597
% Change compared to the certified FEIR project	-6%	-15%	-14%	-10%	-8%
A.M. PEAK HOUR					
Certified FEIR Project	2,498	1,822	833	5,154	1,897
High Commercial with PG&E subarea	3,088	1,814	816	5,718	2,260
Net change compared to the certified FEIR project	590	-8	-18	564	363
% Change compared to the certified FEIR project	24%	0%	-2%	11%	19%
High Commercial Scenario with the no PG&E scenario	2,821	1,550	720	5,091	2,006
Net change compared to the certified FEIR project	323	-272	-113	-63	109
% Change compared to the certified FEIR project	13%	-15%	-14%	-1%	6%
P.M. PEAK HOUR					
Certified FEIR Project	3,681	2,165	1,628	7,474	2,483
High Commercial with PG&E subarea	3,363	1,890	1,252	6,506	2,295
Net change compared to the certified FEIR project	-319	-275	-375	-969	-188
% Change compared to the certified FEIR project	-9%	-13%	-23%	-13%	-8%
High Commercial Scenario with the no PG&E scenario	3,174	1,671	1,227	6,072	2,085
Net change compared to the certified FEIR project	-508	-494	-401	-1,403	-398
% Change compared to the certified FEIR project	-14%	-23%	-25%	-19%	-16%

NOTES:
a. Numbers may not sum to total due to rounding.
b. External trips are those whose origin or destination is outside the project site.
c .Auto includes private autos, carpools, and app-based ride hailing services (e.g., Uber, Lyft). Other ways of travel include walk, bicycle, motorcycle, and additional modes such as taxis.

SOURCE: Potrero Power Station 2025 Modified Project Travel Demand Calculations, April 2026. **See Appendix TR.1**.

Similar to the certified FEIR project, the 2025 modified project would include development controls for the site that would allow for flexible land uses, depending on future market conditions. In the case of the 2025 modified project, these flexible land use controls would newly apply to Blocks 5 and 12 (either residential or commercial uses), as well as to Block 9 (residential and/or hotel uses), the latter of which was designated for flexible land uses under the certified FEIR project. For purposes of a conservative impact analysis, the travel demand analysis for the certified FEIR project in the FEIR included a combined scenario which selected the maximum number of inbound and outbound vehicle and transit trips during the peak hours among the certified FEIR project's flex block analysis scenarios (i.e., the certified FEIR project's Maximum Residential and Maximum Office scenarios). These maximum vehicle and transit trips identified in the combined scenario were used in the quantitative analysis for the certified FEIR project's transit, air quality, and noise impact analyses. This combined scenario was prepared for the 2025 modified project using the a.m. and p.m. peak hour trip generation for the High Commercial and High Residential scenarios with the PG&E subarea.

Table 11, **Certified FEIR project and 2025 Modified Project Vehicle and Transit Trip Generation Used in Quantitative Analysis**, presents a comparison of the certified FEIR project's combined scenario with the combined scenario for the 2025 modified project for the weekday a.m. and p.m. peak hour conditions.

Table 11 Certified FEIR Project and 2025 Modified Project Combined Scenario Vehicle and Transit Trip Generation Considered in Quantitative Analysis

Trips/Certified FEIR Project/2025 Modified Project	a.m. Peak Hour			p.m. Peak Hour		
	Inbound	Outbound	Total	Inbound	Outbound	Total
VEHICLE TRIPS						
Certified FEIR Project Combined Scenario	1,073	848	1,920	1,184	1,315	2,491
2025 Modified Project Combined Scenario	1,491	884	2,375	1,104	1,323	2,427
Net change compared to certified FEIR project	418	37	455	-80	8	-72
% Change compared to certified FEIR project	39%	4%	24%	-7%	1%	-3%
TRANSIT TRIPS						
Certified FEIR Project Combined Scenario	969	878	1,846	1,096	1,090	2,185
2025 Modified Project Combined Scenario	1,060	872	1,932	1,048	1,007	2,055
Net change compared to certified FEIR project	91	-5	86	-47	-83	-130
% Change compared to certified FEIR project	9%	-1%	5%	-4%	-8%	-6%

NOTE: Numbers may not sum to total due to rounding. Includes only external trips with origins or destinations outside of the project site.
SOURCE: Potrero Power Station 2025 Modified Project Travel Demand Calculations, April 2026. **See Appendix TR.1**, pages TR-130 to TR-133.

As shown in Table 11, the number of vehicle and transit trips for the 2025 modified project's combined scenario would be more than those generated by the certified FEIR project's combined scenario during the a.m. peak hour, but similar during the p.m. peak hour:

- During the a.m. peak hour the total number of vehicle trips under the 2025 modified project's combined scenario would be about 24 percent (455 vehicle trips) greater than the certified FEIR project's combined scenario, while the number of transit trips would be about 5 percent (86 transit trips) greater. This increase in the a.m. peak hour trips is primarily due to the replacement of about 187,250 gross square feet of R&D land uses under the certified FEIR project with outpatient clinical uses under the 2025

modified project. As described above, the outpatient clinical use has a greater proportion of trips that occur during the a.m. peak hour than the R&D land use it replaces.

- During the p.m. peak hour the total number of vehicle trips under the 2025 modified project's combined scenario would be about 3 percent (72 vehicle trips) less than the certified FEIR project's combined scenario, while the number of transit trips would be about 6 percent (130 transit trips) less. The smaller change in p.m. peak hour trips compared to the a.m. peak hour is also primarily due to the outpatient clinical use, which has smaller proportion of trips that occur during the p.m. peak hour than the R&D land use assumed under the certified FEIR project.

As described above and shown on Table 11, the number of a.m. peak hour vehicle and transit trips would increase under the 2025 modified project's combined scenario from the certified FEIR project's combined scenario. However, the a.m. peak hour vehicle and transit trips used in the analysis of the 2025 modified project would be lower than those analyzed for p.m. peak hour conditions for both the 2025 modified project and the certified FEIR project's combined scenarios (see Appendix TR.1, pages TR-130 to TR-133). The weekday p.m. peak period is typically the period when most overall travel happens, and the transportation network is typically more congested during the weekday p.m. peak hour than during the weekday a.m. peak hour.

FREIGHT DELIVERY AND SERVICE VEHICLE LOADING DEMAND

Table 12, **Certified FEIR Project and 2025 Modified Project Freight Delivery and Service Vehicle Loading Space Demand**, summarizes the freight delivery and service vehicle loading space demand during the peak hour of loading activities (generally between 11 a.m. and 2 p.m.) for the certified FEIR project and the 2025 modified project's High Residential and High Commercial scenarios, with the PG&E subarea and the no PG&E scenario.

Table 12 Certified FEIR Project and 2025 Modified Project Freight Delivery and Service Vehicle Loading Space Demand

Freight Delivery and Service Vehicle Loading Space Demand	Certified FEIR Project	High Residential Scenario		High Commercial Scenario	
		With PG&E subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
Peak hour of loading activities	43	35	34	39	37

SOURCE: Potrero Power Station 2025 Modified Project Travel Demand Calculations, April 2026. **See Appendix TR.1**.

As shown in Table 12, the demand for freight delivery and service vehicle loading spaces during the peak hour of loading activities for the 2025 modified project scenarios, with and without the PG&E subareas, would range between 34 and 39 spaces. The 2025 modified project's freight delivery and service vehicle loading space demand would be between four and nine fewer loading spaces than for the certified FEIR project.

VEHICLE PARKING DEMAND

Table 13, **Certified FEIR project and 2025 Modified Project Vehicle Parking Space Demand**, summarizes the vehicle parking space demand during the midday and evening peak periods of parking activities (generally between noon and 2 p.m., and after 7 p.m.) for the certified FEIR project and the 2025 modified project's High Residential and High Commercial scenarios, with and without the PG&E subarea.

Table 13 Certified FEIR Project and 2025 Modified Project Vehicle Parking Space Demand

Vehicle Parking Space Demand	Certified FEIR Project	High Residential Scenario		High Commercial Scenario	
		With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
Weekday midday	4,415	4,355	3,916	4,620	4,206
Weekday evening	2,967	2,849	2,278	2,493	1,941

SOURCE: Potrero Power Station 2025 Modified Project Travel Demand Calculations, April 2026. **See Appendix TR.1**.

As shown in Table 13, the 2025 modified project would generate a vehicle peak parking demand during the weekday midday period that would range between 3,916 and 4,620 vehicle parking spaces. The weekday midday vehicle parking demand would be less than the certified FEIR project for the High Residential with the PG&E subarea, High Residential with the no PG&E scenario, and the High Commercial with the no PG&E scenarios (i.e., a decrease in vehicle parking demand of between 60 and 499 vehicle parking spaces from the certified FEIR project), and would be greater than the certified FEIR project for the High Commercial with PG&E subarea scenario (i.e., an increase in vehicle parking demand of 205 vehicle parking spaces from the certified FEIR project).

During the weekday evening period, the 2025 modified project would generate a vehicle peak parking demand that would range between 1,941 and 2,849 vehicle parking spaces. The weekday evening parking demand would be less than the certified FEIR project for all of the 2025 modified project scenarios (i.e., a decrease in vehicle parking demand of between 118 and 1,026 vehicle parking spaces from the certified FEIR project).

CONSTRUCTION

The 2025 modified project would include similar construction activities as the certified FEIR project because the 2025 modified project would involve construction of a similar number of buildings and buildout of the same internal street network as the certified FEIR project. Under the 2025 modified project, the total building area for the High Residential scenario would increase by about 4 percent from the certified FEIR project, while the total building area for the High Commercial scenario would increase by about 2 percent from the certified FEIR project.

The construction duration of the 2025 modified project for either the High Residential scenario or the High Commercial scenario would increase by six years (22 years total) from the certified FEIR project (16 years total). The 2025 modified project would also alter the timing of the construction phasing of the project, reducing the number of development phases from six to three.[11] For the 2025 modified project conditions with the no PG&E scenario, fewer buildings would be constructed, and the construction duration would be shorter (14 years), the same as for the certified FEIR project. Average construction-related haul and vendor truck traffic increases on local access streets under the 2025 modified project would be expected to be similar to what was analyzed for the certified FEIR project, but the construction phasing and duration

[11] As explained in the Project Description, a change from six development phases to three was previously approved as part of the project revisions analyzed in the previously prepared EIR Addendum 1 for the 2020 re-phase program. The 2025 modified program would generally maintain the same overall construction schedule and duration as the approved project and 2020 re-phase program (Addendum 1).

changes under the 2025 modified project would alter the timing of construction truck traffic and may also decrease its intensity (i.e., number of trucks per day) given the longer construction period.

Similar to the certified FEIR project, construction of the 2025 modified project would not result in significant construction-related transportation impacts given the project's location (e.g., project site is at the eastern end of 23rd Street, construction activities would occur within the project site, interactions between construction activities and the adjacent land uses would primarily be limited to trucks and workers accessing the site) and the city regulations and orders governing safety and access in and out of the construction site as well as within the project site as blocks are developed and occupied (i.e., vehicular, pedestrian and bicycle access for residents, workers and visitors of completed and occupied buildings would be maintained through Phase 3 of the construction schedule).

Similar to the certified FEIR project, construction of the 2025 modified project would not substantially delay public transit. There are no bus stops located adjacent to the project site on Illinois or 23rd streets, and therefore Muni bus routes would not be affected. The 48 Quintara/24th Street bus route runs southbound on Illinois Street between 20th and 22nd streets, however there are no bus stops on Illinois Street, and therefore relocation of bus stops would not be required. Near the project site the T Third Street light rail line operates within an exclusive median, and therefore construction activities on the project site and construction vehicle travel to and from the project site would not affect the T Third Street light rail line operations. Furthermore, construction vehicle trips would not typically coincide with peak commute periods. Similar to the certified FEIR project, the project contractor would coordinate with Muni Street Operations and Special Events Office to coordinate construction activities and minimize any conflicts with transit operations on Illinois and Third streets.

Therefore, consistent with the certified FEIR project, the 2025 modified project, with or without development of the PG&E subarea, would have less-than-significant impacts related to construction-related transportation impacts, and no mitigation measures are required. Consistent with the certified FEIR project, the 2025 modified project would implement Improvement Measure I-TR-A to further minimize construction-related transportation impacts. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe impacts related to construction than were identified in the FEIR, and no new mitigation measures would be required.

POTENTIALLY HAZARDOUS CONDITIONS

The 2025 modified project would not change the planned internal street network or configuration of offsite transportation network changes compared to the certified FEIR project. As for the certified FEIR project, the street network under the 2025 modified project would be designed consistent with the Better Streets Plan to prioritize safe travel for people walking, bicycling and driving within and near the site, (e.g., implement daylighting at intersections, limit curb cuts into garages and loading facilities, provide adequate turning radii and sight distances at intersections and driveways, new traffic signals). The 2025 modified project would be designed consistent with the specification in the project's D4D document and would be subject to approval by the San Francisco Municipal Transportation Agency (SFMTA), public works, the fire department, and other city agencies, so that the streets are designed consistent with city policies and design standards and do not result in traffic hazards.

Under the 2025 modified project, the location of curb cuts and driveway widths would remain the same as for the certified FEIR project, with the exception of Blocks 8 and 15. On Block 8, a driveway would be

relocated from Delaware Street under the certified FEIR project to Humboldt Street under the 2025 modified project; the driveway on Maryland Street would remain the same under both the certified FEIR project and the 2025 modified project. On Block 15, the off-street parking facility and driveway would be eliminated under the 2025 modified project, however, the curb cuts would be replaced by a wider curb cut for multiple at-grade loading spaces. The loading spaces and associated curb cut would be designed consistent with public works and SFMTA design specifications for wider curb cuts, and therefore would not result in traffic hazards.

Under the High Residential scenario with and without the PG&E subarea, the central parking garage on Block 5 would contain 1,008 parking spaces, an increase of 189 spaces from the certified FEIR project (under the High Commercial scenario with and without the PG&E subarea the garage would contain 653 spaces, 166 fewer spaces than the certified FEIR project). Similar to the certified FEIR project, the central garage under the 2025 modified project would contain two entrances/exits with access/queuing lanes from Humboldt and Georgia streets and would accommodate vehicle queuing onsite without spilling out into the adjacent traffic lanes or blocking sidewalks. In addition to the central garage, a garage queuing analysis was conducted for two additional blocks where the garages would be larger (i.e., with more than 450 spaces) and/or the number of spaces would increase substantially from the certified FEIR project under either the High Residential and/or High Commercial scenarios: Block 1 with 559 spaces under the High Commercial scenario with the no PG&E scenario (an increase of 462 spaces from the certified FEIR project) and Block 8 with 490 spaces under all scenarios (an increase of 120 spaces from the certified FEIR project). Both of these garages would have two entry/exit driveways, and their design would accommodate inbound vehicles without vehicle queuing spilling back into the adjacent travel lanes or blocking sidewalks. Similar to the certified FEIR project, the 2025 modified project would implement Improvement Measure I-TR-B that would include monitoring and abatement of garage queues should they affect people walking or bicycling, or vehicular circulation.

While the number of a.m. peak hour vehicle trips would increase under the 2025 modified project from the certified FEIR project's combined scenario, the a.m. peak hour trips would be lower than those analyzed under the certified FEIR project and the 2025 modified project for p.m. peak hour conditions. The weekday p.m. peak period is typically the period when most overall travel happens, and the transportation network in the project vicinity is typically more congested during the weekday p.m. peak hour than during the weekday a.m. peak hour. Therefore, under the 2025 modified project, conditions for people walking, bicycling and driving would be similar to those identified for the certified FEIR project. Thus, the 2025 modified project would not create potentially hazardous conditions for people walking, bicycling, or driving, or for public transit operations.

There are three large event facilities in the eastern side of San Francisco, including the Oracle Park ballpark (located 1.5 miles north of the project site in South Beach/SoMa), the Chase Center arena (0.75 miles north of the project site in Mission Bay), and the Pier 80 Warehouse (0.35 miles south of the project site in Bayview-Hunters Point). Both the ballpark and arena implement event transportation management plans for varying attendance levels that address pre-game and post-game conditions at and nearby their respective sites. For events at the ballpark and arena, SFMTA deploys officers to manage pedestrian and traffic flows through the area via a series of road closures and direct control at intersections. Due to the distance between these facilities and the project site, none of the intersections controlled under the event transportation management plans include those adjacent to the project site. Events at the Pier 80 Warehouse are individually permitted by the Port of San Francisco, and as part of the permitting process

the event sponsor must include a plan for managing travel with minimal effect on the surrounding neighborhoods. The 2025 modified project does not include land uses that would generate a substantial amount of travel that would overlap with the primarily evening and weekend peaks of the event spaces. In addition, when there are events at these facilities there are options for the proposed project vehicle trips to avoid the ballpark and arena to the north (e.g., travel south to Cesar Chavez Street) and Pier 80 to the south (e.g., go north towards 20th, 18th, Mariposa, or 16th streets). Therefore, when there are events at the ballpark, the arena or at Pier 80, including overlapping events, the 2025 modified project would not create potentially hazardous conditions for people walking, bicycling, or driving, or for public transit operations.

Thus, consistent with the certified FEIR project, the 2025 modified project, with or without the PG&E subarea, would have less-than-significant impacts related to potentially hazardous conditions, and no mitigation measures are required. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe impacts related to potentially hazardous conditions than were identified in the FEIR, and no new mitigation measures would be required.

ACCESSIBILITY

The 2025 modified project would have the same street network changes within the project site as the certified FEIR project and would accommodate people walking and bicycling within the project site. Consistent with the certified FEIR project, the 2025 modified project would include the same offsite improvements (e.g., signalization of the intersections of Illinois Street/23rd Street and Illinois Street/Humboldt Street, sidewalk reconstruction on the east side of Illinois Street between Humboldt and 23rd streets) which would enhance accessibility for people walking and bicycling adjacent to the project site.

The FEIR identified a significant impact related to pedestrian accessibility at the intersection of Illinois Street/22nd Street due to a combination of the physical conditions at the intersection at the time the FEIR was being prepared and the large number of people generated by the certified FEIR project who may be walking between the project site and destinations to the north and west. The improvements planned as part of the Pier 70 project have been implemented at this intersection (i.e., sidewalk reconstruction with corner bulbouts, accessible ramps, new traffic signal with pedestrian countdown signals, crosswalks in the continental design) and therefore, the significant impacts related to accessibility for people walking would not occur with the 2025 modified project. As such, Mitigation Measure M-TR-7 is no longer applicable to the 2025 modified project. Therefore, the 2025 modified project would not interfere with access or circulation for people walking or bicycling. Consistent with the certified FEIR project, under the 2025 modified project the streets would be designed to accommodate fire department vehicles and would not result in inadequate emergency access.

Therefore, unlike the certified FEIR project, the 2025 modified project, with or without development of the PG&E subarea, would have less-than-significant impacts related to accessibility, and no mitigation measures are required. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe impacts related to accessibility than were identified in the FEIR, and no new mitigation measures would be required.

TRANSIT DELAY

The a.m. and p.m. peak hour vehicle and transit trips presented in Table 11 for the 2025 modified project's combined scenario[12] were used in assessing the potential transit delay impacts of the 2025 modified project during the a.m. and p.m. peak hours. As shown in Table 11, the number of vehicles and transit trips for the 2025 modified project's combined scenario would be more than those generated by the certified FEIR project's combined scenario during the a.m. peak hour but would be similar to or less than the certified FEIR project during the p.m. peak hour.

Transit delay impacts of the certified FEIR project were measured in terms of increases in weekday a.m. and p.m. peak hour transit travel times for the 22 Fillmore[13] and the 48 Quintara/24th Street bus routes, and the T Third light rail line.[14] The transit delay analysis conducted for the FEIR considered the following three factors when evaluating potential transit delay impacts: traffic congestion delay, transit reentry delay, and passenger boarding delay.[15] To determine the 2025 modified project's potential change in transit delay compared to the certified FEIR project, the transit delay analysis assessed the changes in transit and vehicle trips between the certified FEIR project and the 2025 modified project. This assessment was conducted quantitatively during the a.m. peak hour (during which the FEIR analyses had not identified any significant transit delay impacts), and qualitatively for the p.m. peak hour (during which the FEIR analysis had identified that significant transit delay impacts would occur). The same thresholds of significance used in the transit delay analysis in the FEIR for the certified FEIR project were used for evaluating the 2025 modified project.

The quantitative transit delay analysis conducted for the FEIR was reviewed to determine whether the changes in the number of vehicle trips presented in Table 11 for the a.m. peak hour would result in new transit delay impacts. This assessment was conducted by factoring the project-specific transit travel time increases in Table 4.E-18, FEIR p. 4.E-70 by the percentage increase in vehicle trips between the values used in that analysis and the 2025 modified project's combined scenario. An additional growth factor was then added to account for the fact that intersection vehicle delay increases faster than linearly with the addition of vehicles. Because transit trips would decrease between the certified FEIR project and the 2025 modified project, as a conservative assumption, no changes to passenger boarding delay were assumed. **Table 14**, **Muni Transit Travel Times by Route for Weekday A.M. and P.M. Peak Hours for the Certified FEIR Project and the 2025 Modified Project**, presents the results of the transit delay analysis, and **Appendix TR.3** contains the detailed calculations.

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[12] The combined scenario presented in Table 11 selects the maximum number of inbound and outbound vehicle and transit trips during the peak hours among the 2025 modified program's four flex block scenarios. The travel demand for the combined scenario was used for the quantitative transit delay analysis.

[13] In January 2021, the 22 Fillmore route shifted to begin serving Mission Bay, and the portion of the 22 Fillmore route serving the project vicinity was incorporated into the new 55 Dogpatch bus route. Because in the vicinity of the project site the 55 Dogpatch bus route travels on the same or similar types of streets as the prior 22 Fillmore bus route (e.g., Third Street, Tennessee Street, 16th Street for the 55 Dogpatch versus 18th Street for the prior 22 Fillmore bus route), with similar traffic volumes, the transit delay analysis for the prior 22 Fillmore bus route in the FEIR was determined to remain applicable for analysis of the 2025 modified program.

[14] The transit delay analysis presented on FEIR Table 4.E-18 is for a slightly larger project than the approved project.

[15] Traffic congestion delays are average delays experienced at intersections along the transit route, transit reentry delays are delays experienced by transit vehicles after stopping to pick up and drop off passengers while waiting for gaps in adjacent street traffic in order to pull out of bus stops, and passenger boarding delay is the amount of time a transit vehicle has to stop for boarding passengers. See FEIR p. 4.E-39.

During the a.m. peak hour, the number of vehicle trips generated by the 2025 modified project's combined scenario would increase by 24 percent over the certified FEIR project's combined scenario (see Table 11). As shown on Table 14, the resulting transit travel time increases for the 2025 modified project during the a.m. peak hour would increase on the two bus routes but would not exceed the significance threshold of half the headway (i.e., four minutes for the 22 Fillmore and five minutes for the 48 Quintara/24th Street). Transit delay on the T Third Street light rail line would be no higher than presented for the certified FEIR project because the T Third Street line operates within a semi-exclusive right-of-way and is only affected by increases in passenger boardings and alightings, which in the case of the 2025 modified project would be lower than the those for the certified FEIR project. Therefore, similar to the certified FEIR project, the 2025 modified project would not substantially delay Muni transit during the a.m. peak hour.

Table 14 Muni Transit Travel Times by Route for Weekday A.M. and P.M. Peak Hours for the Certified FEIR Project and the 2025 Modified Project

Muni Route/Line	Existing Service Headway[a]	Certified FEIR Project[b]		2025 Modified Project	
		Travel Time Increase (min:Sec)	Travel Time Increase as % of Headway	Travel Time Increase (min:Sec)	Travel Time Increase as % of Headway[c]
A.M. PEAK HOUR					
22 Fillmore	8	1:10	15%	1:24	18%
48 Quintara/24th Street	10	2:13	22%	2:40	27%
T Third Street[d]	8	1:21	17%	1:21	17%
P.M. PEAK HOUR					
22 Fillmore	8	4:24	**55%**	4:24	**55%**
48 Quintara/24th Street	14	6:27	46%	6:27	46%
T Third Street	8	1:34	20%	1:34	20%

NOTES:
a. A service headway is the number of minutes between buses or trains on a particular bus route or light rail line.
b. The transit delay analysis presented in FEIR Table 4.E-18, p. 4.E-70 was conducted for a slightly larger project than the certified FEIR project.
c. **Bold** and shaded text indicates the increase in transit travel time exceeds the significance threshold for the route (i.e., more than 50 percent of the route's existing service headway).
d. The travel time increases for the T Third Street light rail line are exclusively due to passenger boarding/alighting delay as this line experiences no increases in transit vehicle reentry delay or intersection delay due to its operation within a dedicated median right-of-way.

SOURCE: FEIR, Table 4.E-18, p. 4.E-70, Adavant Consulting/LCW Consulting, 2026. **See Appendix TR.3**.

As shown on Table 11, during the p.m. peak hour, the number of vehicles generated by the 2025 modified project's combined scenario would decrease by 3 percent over the certified FEIR project's combined scenario, and transit trips would decrease by 6 percent. Because the change in vehicle and transit trips from the prior analysis is minimal, the transit travel time analysis for weekday p.m. peak hour conditions presented in the FEIR were determined to remain applicable for the 2025 modified project. Therefore, similar to the certified FEIR project, the 2025 modified project, with or without the PG&E subarea, would not change the results of the certified FEIR project analysis for the p.m. peak hour (i.e., significant transit delay impact on the 22 Fillmore route, no significant transit delay impact on the 48 Quintara/24th Street route or the T Third light rail line). Therefore, similar to the certified FEIR project, the 2025 modified project would substantially delay Muni transit during the p.m. peak hour.

There are no regional bus routes in the vicinity of the project site and Caltrain operates completely within an exclusive right-of-way. Thus, consistent with the certified FEIR project, the 2025 modified project, with

or without development of the PG&E subarea, would not affect regional transit operations. Therefore, consistent with the certified FEIR project, the 2025 modified project would not substantially delay regional transit.

Similar to the certified FEIR project, Mitigation Measure M-TR-5, Implement Measures to Reduce Transit Delay (FEIR p. 4.E-72), would be applicable to the 2025 modified project with or without development of the PG&E subarea. Similar to the certified FEIR project, because it is not certain that implementation of this mitigation measure would reduce project-generated vehicles to the level required to mitigate significant impacts of the 2025 modified project to less-than-significant levels, the impact of the 2025 modified project, with or without development of the PG&E subarea, on Muni transit operations would be significant and unavoidable with mitigation. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe transit delay impacts than were identified in the FEIR, and no new mitigation measures would be required.

Mitigation Measure M-TR-5 has been modified (new text shown in underline and deleted text shown in ~~strikethrough~~) for the 2025 modified project to reflect the change in phasing and the number of weekday p.m. peak hour vehicle trips by phase, to account for the already occupied residential building and the planned 2028 opening of UCSF's outpatient clinical building on the project site, as well as to clarify monitoring and reporting procedures. The modifications to the mitigation measure do not change the performance standard and therefore would not reduce the effectiveness of the mitigation measure. The changes to Mitigation Measure M-TR-5 are as follows:

Mitigation Measure M-TR-5 (~~Variant~~2025 Modified Project): Implement Measures to Reduce Transit Delay

Performance Standard. The project sponsor shall be responsible for implementing transportation demand management (TDM) measures to limit the number of project-generated vehicle trips during the p.m. peak hour to a maximum of 89 percent of the 2025 modified project's ~~EIR~~ estimated values of each of the phases of project development (performance standard), as shown in the table below. The number of vehicle trips by phase to meet the above stated performance standard shall be: ~~included in the approved TDM Plan.~~

Project Development Phase	Maximum P.M. Peak Hour Vehicle Trips			
	~~Project Variant~~ With PG&E Subarea		~~No PG&E Subarea~~No PG&E Scenario	
	Phase Total	Running Total	Phase Total	Running Total
Phase 1	~~370~~1,130	~~370~~1,130	~~370~~1,130	~~370~~1,130
Phase 2	~~440~~670	~~810~~1,800	~~440~~730	~~810~~1,860
Phase 3	~~250~~240	~~1,060~~2,040	~~250~~NA	~~1,060~~NA
~~Phase 4~~	~~630~~	~~1,690~~	~~670~~	~~1,730~~
~~Phase 5~~	~~240~~	~~1,930~~	~~240~~	~~1,970~~
~~Phase 6~~	~~280~~	~~2,210~~	~~NA~~	~~NA~~

Monitoring and Reporting. Within ~~one year of~~six months following issuance of the ~~project's first~~ certificate of occupancy for the third building constructed at the project site, ~~the project sponsor shall retain~~ a qualified transportation consultant selected by the project sponsor (or the Sitewide TDM Coordinator as defined in the TDM Plan) and approved by the SFMTA ~~to~~ shall begin monitoring

~~daily and~~ p.m. peak period (4 p.m. to 7 p.m.) vehicle trips in accordance with this mitigation measure (as defined in the TDM Plan). ~~an SFMTA and San Francisco Planning Department agreed upon monitoring and reporting plan, which shall be included as a part of the approved TDM Plan~~ Once the number of project-generated vehicle trips during the p.m. peak period equals or exceeds 65 percent of the performance standard, the Sitewide TDM Monitoring Report (as defined in the TDM Plan) shall include counts of the number of vehicles entering and exiting the project site on internal streets at the site boundaries on 22nd, Illinois, and 23rd streets for three weekdays during the p.m. peak period (4 p.m. to 7 p.m.). The data for the three weekdays (Tuesday, Wednesday, and Thursday) shall be averaged, and the surveys shall be conducted within the same month annually. The qualified transportation consultant or Sitewide TDM Coordinator, as applicable, shall submit the proposed methodology for the Planning Department's approval prior to conducting the components of the trip count. It is anticipated that the Planning Department will have a standard trip count methodology developed and available to Developer and the Sitewide TDM Coordinator at the time of data collection.

~~The vehicle data collection shall include counts of the number of vehicles entering and exiting the project site on internal streets at the site boundaries on 22nd, Illinois, and 23rd streets for three weekdays. The data for the three weekdays (Tuesday, Wednesday or Thursday) shall be averaged, and surveys shall be conducted within the same month annually.~~ A document with the results of the annual vehicle counts shall be submitted to the Environmental Review Officer and the SFMTA for review within 30 days of the data collection, or with the project's annual Sitewide TDM monitoring report as required by the TDM Plan (if the latter is preferable to Environmental Review Officer in consultation with the SFMTA).

~~The project sponsor shall begin submitting monitoring reports to the Planning Department 18 months following 75 percent occupancy of the first phase. Thereafter, annual monitoring reports shall be submitted (referred to as "reporting periods") until eight consecutive reporting periods show that the fully built project has met the performance standard, or until expiration of the project's Development Agreement, whichever is earlier.~~

If the City, based on vehicle trip monitoring data, finds that the project has exceeded the stated performance standard ~~for any development phase~~, the project sponsor (or, in all cases herein, the Sitewide TDM Coordinator as specified in the TDM Plan) shall select and implement additional TDM measures in order to reduce the number of project-generated vehicle trips to meet the performance standard for that development phase. These measures could include expansion of measures already included in the project's TDM Plan (e.g., providing additional project shuttle routes to alternative destinations, increases in tailored transportation marketing services, etc.), other measures identified in the City's TDM Program Standards Appendix A (as such appendix may be amended by the Planning Department from time to time) that have not yet been included in the project's approved TDM Plan, or, at the project sponsor's discretion, other measures not included in the City's TDM Program Standards Appendix A that the City and the project sponsor agree are likely to reduce peak period driving trips.

~~For any development phase where additional TDM measures are required~~If additional TDM Measures are required due to the foregoing, the project sponsor shall have 30 months from implementation of such additional TDM measures to demonstrate a reduction in vehicle trips to meet the performance standard. If the performance standard is not met within 30 months, the

project sponsor shall submit to the Environmental Review Officer and the SFMTA a memorandum ~~documenting proposed~~ supplemental to the Sitewide TDM Monitoring Report that proposes methods of enhancing the effectiveness of the TDM measures and/or additional feasible TDM measures that would be implemented by the project sponsor, along with any reasonably necessary additional annual monitoring of the project-generated vehicle trips to demonstrate their effectiveness in meeting the performance standard.~~The comprehensive monitoring and reporting program shall be terminated upon the earlier of (i) expiration of the project's Development Agreement, or (ii) eight consecutive reporting periods showing that the fully built project has met the performance standard. However, compliance reporting for the City's TDM Program shall continue to be required.~~ The project sponsor shall no longer be required to conduct vehicle trip counts or otherwise provide or report the information required for compliance with this mitigation measure upon the earlier of: (i) eight (8) consecutive Reporting Periods during which the Fully Built Project achieves the performance standard set forth in Mitigation Measure M-TR-5, or (ii) expiration of the Development Agreement. Thereafter, trip count information shall no longer be required; provided, however, that the Sitewide TDM Monitoring Report shall continue to be submitted as otherwise required by the TDM Plan. "Reporting Period" shall mean each annual reporting cycle for which a Sitewide TDM Monitoring Report is submitted pursuant to the TDM Plan. "Fully Built Project" shall mean the completion of all development contemplated by the Development Agreement, as evidenced by issuance of the First Certificate of Occupancy for the last building to be constructed under the Development Agreement. Thereafter, trip count information shall no longer be required; provided, however, that the Sitewide TDM Monitoring Report shall continue to be submitted as otherwise required herein.

If the additional TDM measures do not achieve the performance standard, then the City, in coordination with the project sponsor, shall ~~impose~~ identify and implement additional measures to reduce vehicle trips as prescribed ~~under~~ to meet the ~~Development Agreement~~performance standard above, which may include onsite or offsite capital improvements designed to reduce vehicle trips from the project. Capital measures may include, but are not limited to, peak period or all-day transit-only lanes (e.g., along 22nd Street), turn pockets, bus bulbs, queue jumps, turn restrictions, pre-paid boarding pass machines, and/or boarding islands, or other measures that support sustainable trip making.

~~The monitoring and reporting plan described above may be modified by the Environmental Review Officer in coordination with the SFMTA to account for transit route or transportation network changes, or major changes to the development program.~~ The Planning Department in coordination with the SFMTA may reasonably modify the data and methodology requirements of the Sitewide TDM Monitoring Report to account for transit route or transportation network changes, or major changes within the project site. The modification of the Sitewide TDM ~~m~~Monitoring ~~and r~~Report~~ing plan~~, however, shall not change the performance standard set forth in this mitigation measure.

VMT

The project site is located in an area of the city where the existing VMT is more than 15 percent below the existing regional average for residential and nonresidential uses. See **Appendix TR.4**. In addition, the project site meets the "Proximity to Transit" screening criterion, which also indicates that the 2025 modified

project would not result in substantial additional VMT and the 2025 modified project would include a TDM plan that would be essentially the same as the TDM plan for the certified FEIR project.

With respect to induced automobile travel, similar to the certified FEIR project, the 2025 modified project's features that would alter the transportation network would fit within the general types of projects that would not substantially induce automobile travel (e.g., buildout of the internal street network, reconstruction of the sidewalks and bicycle lanes, and new traffic signals). Therefore, consistent with the certified FEIR project, the 2025 modified project, with or without development of the PG&E subarea, would have less-than-significant impacts related to VMT and induced automobile travel, and no mitigation measures are required. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe impacts related to VMT than were identified in the FEIR, and no new mitigation measures would be required.

LOADING

The 2025 modified project would provide 21 onsite loading spaces under both the High Residential and High Commercial scenarios, compared to 20 spaces for the certified FEIR project. The 2025 modified project under both the High Residential and High Commercial scenarios with the no PG&E scenario would provide 16 onsite loading spaces, which is the same number provided for the certified FEIR project. In addition to the onsite loading spaces, subject to SFMTA approval, the 2025 modified project would provide 30 and 34 on-street commercial loading spaces under both the High Residential and High Commercial scenarios, with and without the PG&E subarea, the same as the certified FEIR project. The 2025 modified project would also provide 22 on-street passenger loading/unloading zones throughout the project site, the same as the certified FEIR project.

Table 15, **Certified FEIR Project and 2025 Modified Project Freight Delivery and Service Vehicle Loading Supply and Demand**, presents a comparison of the freight delivery and service vehicle loading space supply and demand for the peak hour of loading activities for the certified FEIR project and the 2025 modified project scenarios.

Table 15 Certified FEIR Project and 2025 Modified Project Freight Delivery and Service Vehicle Loading Supply and Demand

Supply and Demand	Certified FEIR Project	2025 Modified Project High Residential Scenario		2025 Modified Project High Commercial Scenario	
		With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
Loading Supply					
Off-street (onsite) spaces	20	21	16	21	16
On-street spaces	34	34	30	34	30
Total Supply	54	55	46	55	46
Loading Demand	43	35	34	39	37
Surplus (Shortfall)	11	20	12	16	9

SOURCE: Adavant Consulting/LCW Consulting, 2026. **See Appendix TR.5**.

Freight Delivery and Service Vehicle Loading. The 2025 modified project would result in a peak hour freight delivery and service vehicle loading space demand of 35 loading spaces for the High Residential scenario (34 loading spaces with the no PG&E scenario) and 39 loading spaces for the High Commercial scenario (37 loading spaces with the no PG&E scenario).

As shown on Table 15, consistent with the certified FEIR project, the combined onsite and on-street loading space supply would accommodate the projected peak hour loading demand for all 2025 modified project scenarios. Thus, the 2025 modified project would not result in freight delivery and service vehicle loading deficit (i.e., the demand for loading spaces cannot be accommodated within the supply, thereby resulting in a loading deficit) that could result in secondary impacts such as potentially hazardous conditions for people walking, bicycling or driving, or potentially delay transit.

Passenger Loading. Consistent with the certified FEIR project, the 2025 modified project's 22 on-street curbside passenger loading spaces for the High Residential and High Commercial scenarios with and without the PG&E subarea would be located throughout the project site, with more passenger loading spaces located adjacent to land uses that generate higher passenger loading demand (e.g., the outpatient clinic use under the R&D land use generates more passenger loading demand than residential or office uses). Furthermore, subject to SFMTA approval, the location and/or number of passenger loading spaces could be changed (e.g., convert on-street vehicle parking spaces to passenger loading spaces) to accommodate changing passenger loading needs within the project site. Thus, the on-street curbside passenger loading supply would accommodate the expected passenger loading demand. Therefore, the 2025 modified project would not result in a passenger loading deficit that could result in secondary impacts such as potentially hazardous conditions for people walking, bicycling or driving, or potentially delay transit.

Therefore, consistent with the certified FEIR project, the 2025 modified project, with or without development of the PG&E subarea, would have less-than-significant impacts related to loading, and no mitigation measures are required. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe impacts related to loading than were identified in the FEIR, and no new mitigation measures would be required.

PARKING

The SF transportation guidelines include screening criteria for projects that would not result in a substantial parking deficit.[16] Per the SF transportation guidelines, if a project site is located within the planning department's map-based screening area for the VMT analysis (i.e., consistent with Public Resources Code 21099(d)), it would not result in a substantial parking deficit and secondary effects[17] would be less than significant. The project site is within the planning department's map-based screening area, which indicates that the 2025 modified project would not result in a substantial parking deficit.

The 2025 modified project would provide between 261 and 413 more onsite off-street vehicle parking spaces than the certified FEIR project (3,099 vehicle parking spaces under the High Residential scenario

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[16] San Francisco Planning Department, Transportation Impact Analysis Guidelines, October 2018. Available online at: https://sfplanning.org/project/transportation-impact-analysis-guidelines-environmental-review-update, accessed June 25, 2026.

[17] Per the SF transportation guidelines, secondary effects of parking deficits could include 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 transit.

with the PG&E subarea and 2,947 vehicle parking spaces under the High Commercial scenario with the PG&E subarea, compared to 2,686 spaces for the certified FEIR project). The number of parking spaces would decrease by about 500 spaces for both the High Residential and High Commercial scenarios with the no PG&E scenario. See **Appendix TR.6** for additional detail on vehicle parking supply for the 2025 modified project. In addition, subject to SFMTA approval, the number of on-street vehicle parking spaces within the project site proposed under either the High Residential or High Commercial scenarios with the PG&E subarea would be same as for the certified FEIR project, with 52 on-street vehicle spaces (42 standard and 10 ADA spaces). Under either the High Residential or High Commercial scenarios with the no PG&E scenario, a total of 31 on-street vehicle spaces would be provided (25 standard and 6 ADA spaces), the same as the certified FEIR project

Table 16, **Certified FEIR Project and 2025 Modified Project Vehicle Parking Supply and Demand**, presents a comparison of the vehicle parking supply and demand for weekday midday and evening conditions for the certified FEIR project and the 2025 modified project scenarios.

Table 16 Certified FEIR Project and 2025 Modified Project Vehicle Parking Supply and Demand

Vehicle Parking Supply/Demand	Certified FEIR Project	2025 Modified Project High Residential Scenario		2025 Modified Project High Commercial Scenario	
		With PG&E Subarea	No PG&E Scenario	With PG&E Subarea	No PG&E Scenario
Project Supply[a]	2,686	3,099	2,602	2,947	2,447
Project Demand					
Midday	4,415	4,355	3,916	4,620	4,206
Evening	2,967	2,849	2,278	2,493	1,941
Surplus (Shortfall)					
Midday	(1,729)	(1,256)	(1,314)	(1,673)	(1,759)
Evening	(281)	250	324	454	506

NOTES:
a. Proposed off-street vehicle parking supply only. Does not include 52 on-street public parking spaces within the project site.
SOURCE: Adavant Consulting/LCW Consulting, 2026. **See Appendix TR.6**.

During the weekday midday period, the 2025 modified project would generate vehicle parking demand of between 4,355 and 4,620 spaces, depending on the analysis scenario. Thus, as shown on Table 16, during the weekday midday period there would be a parking deficit under the 2025 modified project that would range between 1,256 spaces under the High Residential scenario with the PG&E subarea, to 1,759 spaces for the High Commercial Scenario with the no PG&E scenario. With the exception of the High Commercial Scenario with the no PG&E scenario that would have a parking deficit of 1,759 spaces, the parking deficit for the remaining 2025 modified project scenarios would be less than the parking deficit of 1,729 spaces estimated for the certified FEIR project.

During the weekday evening period, the 2025 modified project would generate vehicle parking demand of between 1,941 and 2,849 spaces, depending on the analysis scenario. Under both the High Residential and High Commercial scenarios, with and without the PGE&E subarea, the parking demand during the evening period would be accommodated within the proposed supply. Thus, unlike the certified FEIR

project, with an evening parking deficit of 281 spaces, the 2025 modified project would not result in a parking deficit during the weekday evening period.

An additional analysis was conducted to determine whether the parking deficit identified for the weekday midday period would result secondary effects, such as 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 transit. Similar to the certified FEIR project, the parking deficit for the 2025 modified project during the weekday midday period would result in some drivers seeking parking farther from the site and some may switch their destinations to those available via transit, carpool, bicycle or other ways of travel.[18] Similar to the certified FEIR project, the shift in parking locations and access ways of travel would not result in secondary effects, such as potentially hazardous conditions for people walking or bicycling or inadequate access for emergency vehicles or substantially delay transit. Furthermore, the project's TDM plan and Mitigation Measure M-TR-5, which aim to reduce vehicle trips generated by the 2025 modified project, would also reduce parking demand. In addition, the 2025 modified project would be consistent with the parking ratios established within the Development Agreement for the certified FEIR project. Therefore, similar to the certified FEIR project, the 2025 modified project's weekday midday parking shortfall would not result in secondary effects.[19]

Therefore, consistent with the certified FEIR project, the 2025 modified project, with or without development of the PG&E subarea, would have less-than-significant impacts related to parking, and no mitigation measures are required. Accordingly, the 2025 modified project would not result in new significant impacts or substantially more severe impacts related to parking than were identified in the FEIR, and no new mitigation measures would be required.

CUMULATIVE IMPACTS

The FEIR determined that the certified FEIR project, in combination with cumulative projects, would not result in significant cumulative impacts related to construction-related transportation impacts, potentially hazardous conditions, accessibility, VMT, loading or parking. The FEIR identified significant cumulative impacts related to Muni transit delay that would be significant and unavoidable with mitigation. The significant cumulative transit delay impact for the certified FEIR project included both the 22 Fillmore/Route XX (i.e., the current 55 Dogpatch route) and the 48 Quintara/24th Street bus routes.

The cumulative context for the 2025 modified project would be similar to that presented in the FEIR. The cumulative conditions analysis for transportation impacts other than VMT and parking uses a list-based approach based on the projects listed in Table 8. The estimation of cumulative average daily VMT per capita used in the VMT analysis and the planning department's map-based screening area for the parking analysis is based on projected land use development and transportation network changes included in the San Francisco SF-CHAMP travel demand model. Similar to the certified FEIR project, the discussion of

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[18] Similar to the approved project, the 2025 modified program would include transit shuttle service between the project site and Caltrain's 22nd Street station and BART's 16th Street station or other destinations pending route discussions between the project sponsor and the SFMTA, and a shuttle stop/bus layover facility would be provided within the project site.

[19] The project site is located within the planning department's map-based screening area. Therefore, consistent with the San Francisco Transportation Impact Analysis Guidelines, Appendix O's screening criteria checklist, the project would not result in a substantial parking deficit that would result in secondary effects.

cumulative transportation impacts assesses the degree to which the 2025 modified project would affect the transportation network in combination with cumulative projects.

The San Francisco Housing Element 2022 Update FEIR identified significant cumulative impacts that would result from implementation of the adopted housing element related to construction, transit delay and impacts. [20] Future development consistent with the adopted housing element would not overlap spatially with the 2025 modified project. The adopted housing element projects a reduction from 2050 baseline conditions of about 5,800 housing units in the South of Market planning district, in which the project site is located. Therefore, the 2025 modified project would not contribute considerably to the significant cumulative impacts that would result from implementation of the adopted housing element.

With respect to cumulative construction-related transportation impacts, similar to the certified FEIR project, the 2025 modified project could overlap with simultaneous construction of some cumulative projects identified in Table 8, notably the Pier 70 Mixed-Use District project. Most of the cumulative projects are not located in the immediate vicinity of the project site (e.g., Seawall Lot 337/Pier 48 (Mission Rock), Potrero Hope SF Master Plan, Pier 80 Subsidence Repairs, Islais Creek Bridge Replacement). Similar to the 2025 modified project, sponsors and construction managers of development and infrastructure projects considered in the cumulative analysis would be required to comply with city requirements and SFMTA's Regulations for Working in San Francisco Streets (SFMTA blue book) and coordinate with various city departments, such as the SFMTA and public works, to address construction-related vehicle routing, traffic control, and movement of people walking and bicycling adjacent to the construction area for the duration of the project. Thus, no new significant cumulative construction-related transportation impacts would occur. Accordingly, the 2025 modified project would not result in new significant cumulative impacts or substantially more severe cumulative impacts related to construction than were identified in the FEIR, and no new mitigation measures would be required.

As presented on Tables 9 and 10, the 2025 modified project would generally generate more person and vehicle trips than the certified FEIR project during the a.m. peak hour and fewer person and vehicle trips during the p.m. peak hour. While the number of a.m. peak hour person and vehicle trips would increase under the 2025 modified project from the certified FEIR project's combined scenario, the total a.m. peak hour trips would be lower than those analyzed under the certified FEIR project and the 2025 modified project for p.m. peak hour conditions. Thus, the additional a.m. peak hour trips would not result in any new significant cumulative impacts related to potentially hazardous conditions and accessibility, or in a substantial worsening of the significant cumulative transit delay impact. Accordingly, the 2025 modified project would not result in new significant cumulative impacts or substantially more severe cumulative impacts related to potentially hazardous conditions, accessibility and transit delay impacts than were identified in the FEIR, and no new mitigation measures would be required.

The cumulative VMT analysis uses the planning department's updated Transportation Information Map values for 2050 that are based on the SF-CHAMP travel demand model runs for the adopted housing element. The SF-CHAMP model accounts for assumptions regarding cumulative transportation network projects and employment and population growth representing year 2050 conditions in San Francisco. The

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[20] San Francisco Planning Department, San Francisco Housing Element 2022 Update FEIR, Planning Department Case No. 2019-016230ENV, January 2023 and Addendum No. 1 to the FEIR, September 2025. The FEIR and Addendum are available at: https://sfplanning.org/environmental-review-documents?title=Housing+Element&field_environmental_review_categ_target_id=All&items_per_page=10.

project site meets the planning department's screening criterion; it is located in an area of the city where the future 2050 average daily VMT per capita is more than 15 percent below the 2050 regional average for residential and nonresidential uses. Other cumulative development projects listed on Table 8 also meet the screening criterion. Accordingly, the 2025 modified project would not result in new significant cumulative impacts or substantially more severe cumulative impacts related to VMT than were identified in the FEIR, and no new mitigation measures would be required.

The commercial vehicle and passenger loading demand for the 2025 modified project would be accommodated within the project site, and no cumulative development or transportation projects would contribute to either commercial vehicle or passenger loading demand or affect loading supply on the project site. Thus, no new significant cumulative impacts related to loading would occur. Similar to the certified FEIR project, the 2025 modified project's parking supply would not be expected to accommodate the projected parking demand, although the shortfall in parking supply for the 2025 modified project would generally be less than for the certified FEIR project. The project site and other cumulative development projects listed on Table 8 are located within the planning department's map-based screening area, which indicates that a substantial parking deficit that could result in secondary impacts would not occur. Thus, no new significant cumulative impacts related to parking would occur. Accordingly, the 2025 modified project would not result in new significant cumulative impacts or substantially more severe cumulative impacts related to loading and parking than were identified in the FEIR, and no new mitigation measures would be required.

Therefore, consistent with the certified FEIR project, the 2025 modified project, with or without the PG&E subarea, would have less-than-significant cumulative impacts related to construction-related transportation impacts, potentially hazardous conditions, accessibility, VMT, loading, and parking. Accordingly, the 2025 modified project would not result in new significant cumulative or substantially more severe cumulative impacts related to construction, potentially hazardous conditions, accessibility, VMT, loading and parking than were identified in the FEIR, and no new mitigation measures would be required.

Consistent with the certified FEIR project, effects of the 2025 modified project, with or without the PG&E subarea, on Muni transit delay would be significant and unavoidable with mitigation. Accordingly, the 2025 modified project would not result in new significant cumulative impacts or substantially more severe cumulative impacts related to transit delay than were identified in the FEIR, and no new mitigation measures would be required.

Noise and Vibration

Noise and vibration impacts of the certified FEIR project are described in Chapter 9, Section 9.D.6 of the FEIR, with additional noise and vibration impacts of the 2020 re-phase program (Addendum 1) described in the FEIR Addendum for 2020 re-phase program (Addendum 1). Noise and vibration impacts for the 2025 modified project as described below would be similar to those of the certified FEIR project and the changes described in the 2020 re-phase program (Addendum 1).

The 2025 modified project would not result in any new or substantially more severe noise and vibration effects than those identified for the certified FEIR project in the FEIR. As described in this section, all the noise impact significance determinations identified for the certified FEIR project in the FEIR would apply to the 2025 modified project, and the same mitigation and improvement measures required under the certified FEIR project would also be required under the 2025 modified project.

See Section 4.F of the FEIR for a more detailed description of the certified FEIR project impacts and mitigation and improvement measures. No additional noise and vibration related mitigations and improvement measures from the certified FEIR project have been identified as part of the 2025 modified project. One mitigation measure (Mitigation Measure M-NO-5) is modified for the inclusion of the Block 5 data center as part of Impact NO-5 for noise from stationary equipment.

SUMMARY OF NOISE IMPACTS OF THE CERTIFIED FEIR PROJECT

The FEIR identified that even with implementation of mitigation measures, the certified FEIR project would result in the following significant and unavoidable noise impacts: construction-related increases in ambient noise levels at sensitive receptors; permanent increases in ambient noise levels at offsite receptors due to project traffic; cumulative construction noise increases; and cumulative traffic noise increases.

The FEIR identified the following significant impacts that could be reduced to less than significant with implementation of mitigation measures: exposure to construction-related and operational noise levels in excess of standards; construction-related vibration; and permanent increases in ambient noise levels at onsite receptors due to project traffic. The FEIR determined that noise impacts in the following areas would be less than significant: offsite construction-related truck traffic noise; and exposure to noise levels from events that include outdoor amplified sound or from rooftop bars and restaurants. Impacts to Pier 70 residents to the north of the project site can be further decreased by implementing Improvement Measure I-NO-C to reduce potential disturbances by considering the design of loading docks and trash enclosures associated any non-residential uses along Craig Lane.

CONSTRUCTION IMPACTS

The primary changes associated with the 2025 modified project that could alter construction-related noise impacts are proposed changes in construction phasing and a change in gross square footage on some blocks. The 2025 modified project would consolidate six construction phases into three and modify when some of the blocks would be constructed, but these three construction phases would occur over the same 16-year duration (2020 to 2035) as the certified FEIR project excluding Block 13, which if built would occur during 2039 to 2043. This change to the project would result in an additional 8 years of construction from the approved FEIR project. As described further below, these changes are not anticipated to result in substantially different construction noise impacts from the worst-case assumptions that were used in the impact analysis in the FEIR The impacts would not significantly change because the proposed changes do not involve additional construction, such as new blocks, and the construction methodology, including the types of equipment used, would remain the same as evaluated in the FEIR. Accordingly, the 2025 modified project would not result in new significant impacts related to construction noise and vibration, nor would it result in substantially more severe impacts than those previously identified, as further described below.

EXPOSURE TO CONSTRUCTION-RELATED NOISE LEVELS IN EXCESS OF STANDARDS

The 2025 modified project would use the same types of construction equipment and quantities as the certified FEIR project, so like the certified FEIR project, project construction could expose people to or generate noise levels in excess of standards. Like the certified FEIR project, operation of some types of construction equipment under the 2025 modified project would also be expected to exceed the City's noise ordinance limit for equipment.

Therefore, like the certified FEIR project, the impacts related to construction noise levels in excess of the noise ordinance limit (Impact NO-1, FEIR pp. 9-69 and 4.F-28) would be less than significant with mitigation for the 2025 modified project, with or without development of the PG&E subarea, and implementation of identified Mitigation Measure M-NO-1, Construction Noise Control Measures (EIR p. 4.F-30), would be required.

CONSTRUCTION-RELATED AMBIENT NOISE LEVELS AT SENSITIVE RECEPTORS

Overall construction noise impacts at sensitive receptors—both planned offsite receptors at the Pier 70 site and future onsite receptors—during the daytime and nighttime hours under the 2025 modified project would be similar to the certified FEIR project as described in FEIR Chapter 4, Section 4.F under Impact NO-2 (FEIR pp. 9-70 and pp. 4.F-32 to 4.F-45).

With respect to planned offsite receptors, the 2025 modified project would alter the timing of project construction along the northern project boundary along Craig Lane. Based on the construction schedule in Table 4 building construction on Block 2 is underway with construction on Block 1 scheduled for 2027, and building construction on Block 14 to be completed in 2033, in each case the same year as the certified FEIR project. Building construction on Blocks 3 and 4 would be completed from 2030 to 2033, in each case four years later than the certified FEIR project. Despite these phasing changes, construction on Blocks 1, 3, 4, and 14 would still occur after the scheduled 2029 completion of planned offsite sensitive receptors at the Pier 70 site adjacent to this boundary. During this construction period it is assumed that the Pier 70 buildings will be in use and occupied. Therefore, construction noise impacts at these receptors would be similar to those under the certified FEIR project.

With respect to future onsite receptors, the 2025 modified project could slightly reduce potential construction noise impacts on future onsite sensitive receptors compared to the certified FEIR project because construction on some residential blocks would be delayed, while other residential blocks would be constructed earlier.

For example, the 2025 modified project would have continued construction of Block 7 from Phase 1 and 2 (2026 to 2033), which would increase the duration of construction noise impacts on future onsite sensitive receptors, such as those currently occupying the completed Block 7B portion (construction completed in 2025) and Block 8 which is expected to be finished in 2028. Delaying the start of construction on Blocks 3 and 4 until 2029 would minimize impacts from the construction of adjacent Block 8, again finished in 2028. The FEIR determined that receptors on Block 8 and Block 7 would be subject to significant construction-related noise impacts from construction during Phases 2 through 6 even with mitigation. The same conclusions and impacts that would apply to the completed Block 7B would apply with the continued construction on adjacent buildings (i.e., Block 7A). Therefore, this significant and unavoidable impact under the 2025 modified project would be equivalent, but would vary in duration than what was analyzed under the certified FEIR project.

For these reasons, the 2025 modified project, with or without development of the PG&E subarea, would still have the same significant and unavoidable with mitigation significance determination for Impact NO-2 (FEIR pp. 9-73 and 4.F-42), and all of the same noise mitigation and improvement measures identified in the certified FEIR (Mitigation Measure M-NO-1, Construction Noise Control Measures, and Improvement Measure I-NO-A, Nighttime Construction Noise Control Measures) would also apply to the 2025 modified project.

OFFSITE CONSTRUCTION-RELATED HAUL TRUCK TRAFFIC NOISE

Average construction-related haul and vendor truck traffic increases on local access streets under the 2025 modified project would be similar to what was anticipated to occur under the certified FEIR project. Under the 2025 modified project the timing of truck traffic noise increases would change along with the duration, but not their extent. Under the certified FEIR project, with or without development of the PG&E subarea, the FEIR estimated that the highest number of construction-related truck trips (equipment and materials deliveries, and haul trips) from overlapping phases was about 112 one-way truck trips per day in 2023 and 200 one-way truck trips per day in 2025. During the remaining years, the FEIR estimated that the number of truck trips were on average less than 100 one-way trips per day. The same number of haul truck trips are expected to occur for the 2025 modified project with the peak year occurring in 2028 to 2029, where the greatest number of blocks are being constructed during Phases 1 and 2.

As shown in Table 3, Comparison of Estimated Construction Schedule, the certified FEIR project would have a maximum of five blocks under concurrent vertical construction, in years 2025, 2026, and 2032. This table also shows that between 2027 and 2031; there would be five years during which the 2025 modified project would have the same or increased number of blocks under concurrent vertical construction (2027 to 2031) compared to the certified FEIR project. In the remaining years, the 2025 modified project would have the same or a reduced number of blocks under concurrent vertical construction than the certified FEIR project.

In 2028, the 2025 modified project would have eight blocks under concurrent vertical construction, compared to five blocks under the certified FEIR project. This concentration of the construction schedule is expected to increase haul route traffic but is expected to be below the worst-case maximum number analyzed in the FEIR of daily trucks of 200 trucks per day for these years, or 22 trucks per hour over a nine-hour workday (7 a.m. to 4 p.m.). The FEIR concluded that with the worst-case truck volumes the maximum noise contributions and the resulting increase would be < 3dB (assuming all trucks traveled on the same route) and would not be perceivable and would not exceed the 3-dBA (i.e., A-weighted decibels) or 5-dBA noise increase standards for traffic noise.

Concentrating the construction schedule by constructing more blocks concurrently would result in an increase in the number of years with higher potential truck volumes, but sound levels would still be within the analysis of the FEIR and would not result in increased haul truck traffic noise. Additionally, there would be a potential decrease in trucking volumes due to construction traffic from the FEIR for the years where less Blocks are constructed during a given year (years after 2032).

For the above reasons, offsite truck traffic noise increases under the 2025 modified project, with or without development of the PG&E subarea, would not be expected to exceed the maximum noise increases estimated in the FEIR (Impact NO-3, FEIR pp. 9-73 and 4.F-45). Like the certified FEIR project, this impact would be less than significant for the 2025 modified project, with or without development of the PG&E subarea.

Further, like the certified FEIR project, Improvement Measure I-NO-A, Nighttime Construction Noise Control Measures, Improvement Measure I-NO-B, Avoidance of Residential Streets, and Improvement Measure I-TR-A, Construction Management Plan and Public Updates, would be implemented under the 2025 modified project in order to minimize potential disturbance of residents in the Dogpatch

neighborhood from the construction-related truck noise increases and the combined truck noise increases resulting from the overlapping construction schedules of the 2025 modified project and Pier 70 development.

CONSTRUCTION-RELATED VIBRATION

Construction of the 2025 modified project would require similar equipment and activities as the certified FEIR project and therefore would result in similar construction-related vibration impacts (Impact NO-4, FEIR pp. 9-73 and 4.F- 46).

Therefore, the required implementation of the same mitigation measures specified in the FEIR for Impact NO-4 (Mitigation Measures M-NO-4a, Construction Vibration Monitoring, M-NO-4b, Vibration Control Measures During Controlled Blasting and Pile Driving, M-NO-4c, Vibration Control Measures During Use of Vibratory Equipment, and Mitigation Measure M-CR-5e, Historic Preservation Plan and Review Process for Alteration of Station A and the Boiler Stack) would also be required for the 2025 modified project. With implementation of these mitigation measures, like the certified FEIR project, construction-related vibration impacts would be less than significant with mitigation for the 2025 modified project, with or without development of the PG&E subarea.

OPERATIONAL IMPACTS

Operational noise impacts are related to noise from the proposed land uses and long-term vehicular traffic. Land uses on each block under the 2025 modified project would be the same as the certified FEIR project except that the 2025 modified project would create land use flexibility to develop Blocks 5 and 12 with either residential or commercial uses, permit public (P) uses throughout the project site, permit PDR uses on any building floor on Block 5, and permit internet service exchange/data center uses on Block 5 (see Figure 3, Land Use Plan above), and their gross square footage would slightly change on some blocks. In general, depending on the scenario selected (High Residential or High Commercial) the extent of potential noise exposure to noise sensitive receptors for more noise-sensitive residential and the less noise-sensitive office uses would potentially increase or decrease. Since land uses would remain the same on each block as the certified FEIR project except as noted above, land use compatibility concerns under the 2025 modified project would be the same as those identified for the certified FEIR project. The changes in land use associated with the 2025 modified project are not expected to alter the conclusions regarding community compatibility. Traffic noise impacts are not expected to change significantly, and mandatory compliance with police and health code noise standards ensures continued compatibility, as detailed in the following sections.

Additionally, potential changes in daily overall trips under the 2025 modified project would result in minor changes in traffic noise levels (based on high residential or commercial variants), as discussed in the traffic analysis sections. Accordingly, the 2025 modified project would not result in new significant impacts related to operational noise and vibration, nor would it result in substantially more severe impacts than those previously identified, as described further below.

EXPOSURE TO OPERATIONAL NOISE LEVELS IN EXCESS OF STANDARDS

Operation of onsite use of stationary equipment (i.e., heating/ventilation/air conditioning systems and emergency generators) from the 2025 modified project, with or without development of the PG&E subarea, would be similar to the certified FEIR project, with the exception of the addition of the data center on Block 5. Therefore, the increase in ambient noise levels on and near the project site would also

be similar, as identified in Impact NO-5 (FEIR pp. 9-74 and 4.F-56). The evaluation of the data center on Block 5 is discussed in more detail below. Like the certified FEIR project, this impact would be less than significant with mitigation under the 2025 modified project, with or without development of the PG&E subarea, with implementation of Mitigation Measure M-NO-5, Stationary Equipment Noise Controls.

EXPOSURE TO MECHANICAL EQUIPMENT OPERATIONAL NOISE LEVELS IN OPEN SPACES

The 2025 modified project includes an amendment of the D4D and the SUD to allow structures (such as an elevator penthouse) within privately-owned open spaces in certain circumstances where such structures are accessory to below-grade parking facilities located beneath those open spaces. The below-grade parking facilities would require mechanical equipment such as fans to regulate the parking garage air space, which would likely discharge into the parks open space. As such, these sources would be required to meet the operational noise limits established in San Francisco Police Code section 2909 (c) for Public Property, which states that no person shall produce or allow to be produced by any machine or device, or any combination of same, on public property, a noise level more than ten dBA above the local ambient at a distance of 25 feet or more.

The most conservative ambient noise level would be the nighttime sound level, which is based on the closest long term ambient sound level measurement LT-5 from the approved FEIR (FEIR p. 4.F-8, Table 4.F-2), and had a nighttime Leq of 49 dBA. Therefore, the limit at 25 feet from any source would be 59 dBA. The project sponsor has provided fan cut sheets for the various fans (See **Appendix NO** for specific details), with fan outlet sound pressure levels at 5 feet ranging from 80 dBA to 82 dBA. **Table 17** shows the required reductions for the fans to meet 59 dBA at 25 feet, based on the acoustic relative distance attenuation calculation.[21] Mitigation for ducted fans are common and would use standard fan or duct silencers to achieve the required 7 to 9 dB reduction, depending on the fan. To reduce stationary equipment noise to acceptable noise levels, Mitigation Measure M-NO-5: Stationary Equipment Noise Controls would be updated to ensure that the parking garage mechanical equipment meets the requirements of police code section 2909 (c).

Table 17 Estimated Mechanical Equipment Operational Sound Levels (Unmitigated)

Fan	Assumed Ambient Level (dBA) + 10 dB	Outlet Sound Level at 5 feet (dBA)	Outlet Sound Level at 25 feet (dBA)	Outlet Reduction Required (dB) to meet the Police Code	Outlet Sound Level at 25 feet with Mitigation (dBA)
EF-B2-01 / EF-B3-01	59	82	68	**9**	**59**
EF-B1-01	59	81	67	**8**	**59**
SF-B2-01 / SF-B3-01	59	80	66	**7**	**59**

SOURCE: Ramboll, 2026.

[21] Based on geometric spreading alone the sound level (L_{P2}) at r_2 can be calculated via the relative distance relationship, where L_{P1} is the sound level at r_1: $L_{P2} = L_{P1} - 20\log_{10}(r_2/r_1)$. For the relative distance relationship of 25 ft and 5 ft the $-20\log_{10}(r_2/r_1)$ results in a difference of -14 dB.

EXPOSURE TO DATA CENTER OPERATIONAL NOISE LEVELS IN EXCESS OF STANDARDS

The 2025 modified project proposes the addition of a data center as part of Block 5. The data center would include stationary sources that have the potential to increase sound levels at adjacent receptors. The proposed Block 5 data center must meet the operational noise limits established in police code section 2909, which is consistent with the stationary equipment requirements analyzed in the certified FEIR project (under Impact NO-5). Specifically, to prevent sleep disturbance and excessive noise, fixed noise sources cannot result in sound levels that exceed the existing ambient noise by more than 5 dBA at residential properties, or 8 dBA at commercial properties, and must not cause nighttime interior noise levels to exceed 45 dBA.

The primary potential sources of noise from the data center include standard operations from rooftop air-cooled chillers, as well as the periodic testing and maintenance of the ground-level emergency backup generators, which emit both exhaust noise and breakout sound through exterior louvers. Three generators are proposed for Block 5. Noise impacts from the data center were evaluated in a standalone noise technical memorandum, which is included in Appendix NO.[22] The noise sources from the data center were evaluated for compliance with the police code section 2909 (b) and (d). Unmitigated, these sources would potentially exceed the noise standards resulting in a significant impact, as described in Appendix NO for specific details.

Table 18 presents the unmitigated estimated sound levels from the standard cooling operations of the proposed Block 5 indicating potential exceedances of the police code. Periodic maintenance of the generators is required, which usually occurs on a monthly schedule where a single generator is run at time for a few minutes to test the generator performance and confirm the engine and generator are operating correctly. **Table 19** presents the unmitigated estimated sound levels for a single generator running for the proposed Block 5, indicating potential exceedances of the police code. Unmitigated means no mitigation measures have been applied to the assumed sound power levels used in the environmental modelling such as attenuators, barriers, silencers, and louvres.

Table 18 Data Center Estimated Stationary Equipment Operational Sound Levels. Standard Cooling Operations (Unmitigated)

Evaluation Location	Receiver	Predicted Noise Level at Receiver dBA)	Ambient Noise Level (dBA)	Cumulative Noise Level[1] (dBA)	Increase in Ambient Noise Levels (dBA)	Project Property Plane Thresholds (dBA)	Interior Noise Level at Residential Receptors[2] (dBA)
Project Property Plane	ACC South (Podium Level)	74	51	74	23	8	NA
	ACC West (Podium Level)	75	51	75	24	8	NA
	Gen South (Ground)	52	51	55	4	8	NA
	Gen West (Ground)	52	51	55	4	8	NA

[22] Ramboll, *Potrero Power Station: Block 5 Data Center – Noise and Vibration Assessment*, July 9, 2026. This report is included in Appendix NO.

Evaluation Location	Receiver	Predicted Noise Level at Receiver dBA)	Ambient Noise Level (dBA)	Cumulative Noise Level[1] (dBA)	Increase in Ambient Noise Levels (dBA)	Project Property Plane Thresholds (dBA)	Interior Noise Level at Residential Receptors[2] (dBA)
Residential Property Plane	B13	64	51	64	13	NA	49
Residential Property Plane	B1	55	51	56	5	NA	41
Residential Property Plane	2660 3rd Street	55	51	56	5	NA	41

NOTES:

1. Cumulative sound levels are the logarithmic addition of ambient plus project.
2. Interior noise levels evaluated for residential uses only and assumes a 15 dB reduction for exterior noise inside of a nearby building with windows open from the cumulative noise level.

Gray shaded indicates exceedance of applicable threshold.

NA indicates locations with no increase in ambient or interior sound requirements.

SOURCE: Ramboll, 2026. See Appendix NO.

Table 19 Data Center Estimated Stationary Equipment Operational Sound Levels. Standard Cooling Operations with Emergency Generator Testing (Unmitigated)

Evaluation Location	Receiver	Predicted Noise Level at Receiver (dBA)	Ambient Noise Level (dBA)	Cumulative Noise Level[1] (dBA)	Project Property Plane Thresholds (dBA)	Interior Noise Level at Residential Receptors[2] (dBA)
Project Property Plane	ACC South (Podium Level)	96	56	96	75	NA
	ACC West (Podium Level)	94	56	94	75	NA
	Gen South (Ground)	108	56	108	75	NA
	Gen West (Ground)	103	56	103	75	NA
Residential Property Plane	B13	88	56	88	NA	73
Residential Property Plane	B1	62	56	63	NA	48
Residential Property Plane	2660 3rd Street	80	56	80	NA	65

NOTES:

1. Cumulative sound levels are the logarithmic addition of ambient plus project.
2. Interior noise levels evaluated for residential only and assumes a 15 dB reduction for exterior noise inside of a nearby building with windows open from the cumulative noise level.

Gray shaded indicates exceedance of applicable threshold.

NA indicates locations with no property plane or interior sound requirements.

SOURCE: Ramboll, 2026. See Appendix NO.

Table 20 presents the mitigated estimated sound levels from the standard cooling operations of the proposed Block 5 indicating that the sound level limits in the police code would be met for this scenario with the prescribed noise attenuation features. Actual noise attenuation features may be different per Mitigation Measure M-NO-5 and will be developed at the time of design. Mitigation Measure M-NO-5 provides a range of feasible options to mitigate the impacts to meet the police code criteria. **Table 21** presents the mitigated estimated sound levels for a single generator running for the proposed Block 5 indicating that the sound level limits in the police code would be met for this scenario. The technical memorandum regarding the Block 5 data center is provided in Appendix NO, which provides additional details.

Table 20 Data Center Estimated Stationary Equipment Operational Sound Levels. Standard Cooling Operations (Mitigated)

Evaluation Location	Receiver	Predicted Noise Level at Receptor (dBA)	Ambient Noise Level (dBA)	Cumulative Noise Level[1] (dBA)	Increase in Ambient Noise Levels (dBA)	Project Property Plane Thresholds (dBA)	Interior Noise Level at Residential Receptors[2] (dBA)
Project Property Plane	ACC South (Podium Level)	57	51	58	7	8	NA
	ACC West (Podium Level)	58	51	59	8	8	NA
	Gen South (Ground)	35	51	51	0	8	NA
	Gen West (Ground)	35	51	51	0	8	NA
Residential Property Plane	B13	47	51	52	1	NA	37
Residential Property Plane	B1	38	51	51	0	NA	36
Residential Property Plane	2660 3rd Street	38	51	51	0	NA	36

NOTES:

1. Cumulative sound levels are the logarithmic addition of ambient plus project.
2. Interior noise levels evaluated for residential only and assumes a 15 dB reduction for exterior noise inside of a nearby building with windows open from the cumulative noise level.

Gray shaded indicates exceedance of applicable threshold.

NA indicates locations with no increase in ambient or interior sound requirements.

Results presented include a 16 dB reduction to the modelled noise sources representing the various recommended mitigation measures that may include reduced performance specifications (limiting sound power levels), acoustic louvres/silencers on air inlets and outlets; and/or rooftop barriers.

SOURCE: Ramboll, 2026. See Appendix NO.

Table 21 **Data Center Estimated Stationary Equipment Operational Sound Levels. Standard Cooling Operations with Emergency Generator Testing (Mitigated)**

Evaluation Location	Receiver	Predicted Noise Level at Receptor (dBA)	Ambient Noise Level (dBA)	Cumulative Noise Level[1] (dBA)	Project Property Plane Thresholds (dBA)	Interior Noise Level at Residential Receptors[2] (dBA)
Project Property Plane	ACC South (Podium Level)	64	56	60	75	NA
	ACC West (Podium Level)	69	56	61	75	NA
	Gen South (Ground)	75	56	64	75	NA
	Gen West (Ground)	74	56	62	75	NA
Residential Property Plane	B13	50	56	57	NA	42
Residential Property Plane	B1	38	56	56	NA	41
Residential Property Plane	2660 3rd Street	41	56	56	NA	41

NOTES:

1. Cumulative sound levels are the logarithmic addition of ambient plus project.
2. Interior noise levels evaluated for residential only and assumes a 15 dB reduction from the cumulative noise level.

Gray shaded indicates exceedance of applicable threshold.

Predicted sound levels include contribution from the mitigated ACCs.

NA indicates locations with no interior sound requirements.

Results presented include a 33 dB reduction to the modelled generator louvres and a 33 dB (total) reduction to the raw engine exhaust noise sources. These reductions represent the various recommended mitigation measures that may include acoustic treatment to the generator room by adding absorptive materials to interior surfaces, or enclosing generators in acoustic treated packages, acoustic louvres on air inlets and outlets, reduced performance specifications (limiting sound power levels), an improved interior generator exhaust silencer selection to “super-critical hospital grade”.

SOURCE: Ramboll, 2026. See Appendix NO.

Additionally, while Mitigation Measure M-NO-8 (Variant), Design of Future Noise-Sensitive Uses (EIR p. 9-76), does not directly apply to Block 5, its implementation will be required for any future nearby residential, childcare, or hotel developments and therefore future noise sensitive receptors would be required to reduce interior noise levels caused from exterior noise sources such as traffic and the Block 5 data center. These future sensitive uses must factor Block 5's mitigated operational emissions into their required acoustical studies prior to receiving vertical building permits. This ensures that façade elements and STC ratings are designed to successfully meet the mandatory 45 dBA interior noise limit, maintaining a less-than-significant cumulative impact. Generally, this would require an acoustical study prior to the issuance of a building permit for vertical construction of a residential building or a building with childcare or hotel use by a qualified acoustical consultant to determine the need to incorporate noise attenuation features into the building design in order to meet a 45-dBA interior noise limit by specifying the required STC ratings through the design of façade elements.

As the analysis demonstrates the potential to meet police code section 2909 with mitigation, the proposed Block 5 data center increases in ambient noise levels on the project site would not significantly

affect the 2025 modified project's noise sensitive uses because interior noise environments would be designed to meet a 45-dBA interior noise limit.

With mitigated noise levels not exceeding police code section 2909, namely the requirements limiting the change in ambient sound levels to less than 5 dBA at a residential property plane, 8 dBA from a commercial and industrial property plane, and 10 dBA on public property, potential noise impacts on existing off-site receptors and future onsite receptors would be less than significant with mitigation.

To reduce stationary equipment noise to acceptable noise levels at all future onsite sensitive receptors, Mitigation Measure M-NO-5: Stationary Equipment Noise Controls would be updated as follows:

Mitigation Measure M-NO-5: Stationary Equipment Noise Controls

For all stationary equipment on the project site, noise attenuation measures shall be incorporated into the design of fixed stationary noise sources to ensure that the noise levels meet section 2909 of the San Francisco Police Code. A qualified acoustical engineer or consultant shall verify the ambient noise level based on noise monitoring and shall design the stationary equipment to ensure that the following requirements of the noise ordinance are met:

- Fixed stationary equipment shall not exceed 5 dBA above the ambient noise level at the property plane ~~at the closest~~ for residential uses~~,~~ ~~(Blocks 1, 5 - 8, 13 and possibly Blocks 4, 9, 12, and 14, depending on the use ultimately developed)~~ and 8 dBA above the ambient noise level at the property plane ~~on blocks where~~for commercial/industrial uses ~~are developed (Blocks 2, 3, 10, 11, and possibly Blocks 4, 12, and 14, depending on the use ultimately developed)~~;
- Fixed stationary equipment, including mechanical equipment from underground parking garages, shall not exceed a noise level more than ten dBA above the local ambient at a distance of 25 feet or more for the open space between Block 8 and 12.
- Stationary equipment shall be designed to ensure that the interior noise levels at adjacent or nearby sensitive receptors (residential, hotel, and childcare receptors) do not exceed 45 dBA.
- Generator testing must meet 75 dBA at the source property plane.

Noise attenuation measures could include installation of critical grade silencers, sound traps on radiator exhaust, provision of sound enclosures/barriers, addition of roof parapets to block noise, increasing setback distances from sensitive receptors, provision of intake louvers or louvered vent openings, location of vent openings away from adjacent residential uses, and restriction of generator testing to the daytime hours.

The project sponsor shall demonstrate to the satisfaction of the Environmental Review Officer (ERO) that noise attenuation measures have been incorporated into the design of all fixed stationary noise sources to meet these limits prior to approval of a building permit.

Prior to approval of a building permit for the data center at Block 5, the project sponsor team shall submit documentation to the Environmental Review Officer (ERO) or the officer's designee, demonstrating with reasonable certainty that the building's fixed mechanical equipment, including the chillers and emergency generators, meet the noise limits specified in 2909 (b) and 2909 (d) of the noise ordinance (i.e., 8-dBA increase above the ambient noise level at the property

plane for commercial properties, respectively; and interior noise limits of 55 dBA and 45 dBA for daytime and nighttime hours inside any sleeping or living room in a nearby dwelling unit on a residential property, respectively). The evaluation will be prepared by a qualified acoustical engineer or consultant to verify compliance with the noise ordinance. The report will recommend noise attenuation features such as those described below for the data center design and those features will be included in the project design (see the *Potrero Power Station: Block 5 Data Center – Noise and Vibration Assessment* (Appendix NO) for recommendations of noise attenuation features). These recommended features could include but are not limited to:

- Air Chilled Coolers (Podium Roof):
  - Fully enclosed silencer solution:
    - Acoustic louvers of side air intakes.
    - Acoustic exhaust louvers.
  - Compressor Blankets/Enclosures.
  - Low Noise Aerodynamic Fans.
  - Performance Specifications (Tonality review).
  - Acoustic barriers.
- Generators Source:
  - Acoustic treatment to the generator room by adding absorptive materials to interior surfaces, or enclosing generators in acoustic treated packages.
  - Acoustic louvers on air inlets and outlets (3- to 4-foot depths will be required and need to be accounted for in early layout design).
  - Improved interior generator exhaust silencer selection to "super-critical hospital grade";
  - Reduced performance specifications (limiting sound power levels).

Upon installation of the proposed project's mechanical equipment and required noise control measures at Block 5, the project sponsor shall take noise measurements at the appropriate property plane (adjacent to noise sources) to confirm that noise levels do not exceed 8 dBA over ambient sound levels or any other stationary source noise standard listed (see above). These noise measurements shall be provided to the planning department prior to receipt of a certificate of occupancy.

With mitigated noise levels not exceeding police code section 2909, namely the requirements limiting the change in ambient sound levels to less than 5 dBA at a residential property plane, 8 dBA from a commercial and industrial property plane, and 10 dBA on public property, potential noise impacts on existing off-site receptors and future onsite receptors would be less than significant with mitigation.

VIBRATION LEVELS FROM BLOCK 5 DATA CENTER OPERATIONS

Close-proximity vibrations from data center equipment during standard operations are typically not perceivable and generally fall well below applicable vibration standards. Data center computer equipment (servers and racks) are highly sensitive to ground-borne vibration and lacks the moving mass required to

generate significant vibratory energy. While the supporting mechanical infrastructure is a potential vibration source, it is strictly internally isolated to protect the sensitive computer equipment and prevent structural transmission. Furthermore, while backup generators are capable of generating higher vibration levels, standard design inherently includes mechanical decoupling (isolation) at the generator pad.

As a result, perceptible vibration levels at off-site receptor locations are not anticipated. According to commonly referenced standards, such as ISO 2631-2[23], the threshold for human perceivability of ground-borne vibrations typically occurs at vibration velocities around 0.01 in/s to 0.02 in/s within the most sensitive frequency ranges. Standard operations at the facility are expected to generate vibration levels well below these thresholds, ensuring they remain entirely imperceptible to off-site building occupants.

Based on the information reviewed and the standard vibration isolation measures typically incorporated into this type of facility, off-site vibration impacts are not anticipated for either nearby buildings or adjacent property planes. Any vibration generated by rooftop mechanical equipment or emergency generators would be substantially attenuated through equipment isolation, structural damping, and distance before reaching off-site receptors, and therefore would not be expected to result in perceptible ground-borne vibration or building response beyond the project boundary. Therefore, based on typical design and the above considerations, vibration impacts would be less than significant from the standard operations and generator testing scenarios.

VIBRATION LEVELS FROM PROJECT OPERATIONS

Operational groundborne noise and vibration are not common environmental problems, and even large vehicles (e.g., trucks and buses) do not generally result in perceptible vibration. Therefore, no significant long-term vibration effects are expected to be associated with proposed residential, hotel, retail commercial, office, R&D/life sciences, and PDR uses, and no vibration analysis is required for operation of these proposed uses.

Entertainment uses may also result in vibration effects, such as window rattle and vibration transmission through building structures, associated with low-frequency noise from amplified bass speaker systems. The 2025 modified project would increase the number of allowed rooftop restaurants and bars, which could have amplified sound. However, where such uses comply with applicable police code section 2909 thresholds (i.e., noise from these licensed entertainment spaces may not exceed the low-frequency ambient noise level by more than 8 dBC), the potential for perceptible vibration effects from low-frequency noise would be low. Therefore, vibration impacts from stationary and entertainment sources would be less than significant.

EXPOSURE TO NOISE LEVELS FROM EVENTS THAT INCLUDE OUTDOOR AMPLIFIED SOUND

The 2025 modified project would have a similar amount of open space area as the certified FEIR project and would result in similar increases in ambient noise levels in public open spaces on the project site as those identified in Impact NO-6 (FEIR pp. 9-74 and 4.F-60). Like the certified FEIR project, compliance with noise limits established under the police and health codes (which limits residential interior noise levels to 45 dBA or less between 10 p.m. and 7 a.m.), time restrictions (i.e., amplified sound cannot be audible at 50 feet from the property line after 10 p.m.), changes over ambient (i.e., no person may produce noise

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[23] International Organization for Standardization. (2003). *Mechanical vibration and shock — Evaluation of human exposure to whole-body vibration — Part 2: Vibration in buildings (1 Hz to 80 Hz)* (ISO Standard No. 2631-2:2003). https://www.iso.org/standard/36979.html

from a machine or device on public property that is more than 10 dBA above the local ambient level when measured at a distance of 25 feet or more) and other permit requirements specified in sections 49 and 1060 of the police code would ensure that periodic and temporary noise increases from amplified sound associated with events would be less than significant under the 2025 modified project, with or without development of the PG&E subarea.

EXPOSURE TO NOISE LEVELS FROM ROOFTOP BARS AND RESTAURANTS

Like the certified FEIR project, rooftops of any nonresidential buildings under the 2025 modified project could be developed with bars and restaurants, and these uses could include amplified music in outdoor areas during the evening/nighttime hours, as described in Impact NO-7 (FEIR pp. 9-75 and 4.F-62). The 2025 modified project would not alter the land uses proposed for each block, except that the 2025 modified project would create land use flexibility to develop Blocks 5 and 12 with either residential or commercial uses, permit public (P) uses throughout the project site, permit PDR uses on any building floor on Block 5, and Internet Service Exchange/data center on Block 5.

Like the certified FEIR project, the 2025 modified project will comply with noise limits established under the police and health codes would reduce the noise impact from amplified noise in outdoor areas. The police code has specific noise requirements for places of entertainment as defined in Section 1060 of the police code. First, overall A-weighted noise cannot exceed 8 dBA above the local ambient noise level at any point outside the property plane. Second, to address low frequency noise (i.e., bass and low-frequency music rumble) noise from these licensed entertainment spaces cannot exceed the low-frequency ambient noise level by more than 8 dBC. In addition to these requirements, places of entertainment (i.e., rooftop entertainment) must still meet the police and health codes specified in the FEIR (which limits residential interior noise levels to 45 dBA or less between 10 p.m. and 7 a.m.), time restrictions (i.e., amplified sound cannot be audible at 50 feet from the property line after 10 p.m.), and other permit requirements specified in sections 49 and 1060 of the police code. Adherence to these requirements would ensure that periodic and temporary noise increases from amplified sound at rooftop bars and restaurants would be less than significant under the 2025 modified project, with or without development of the PG&E subarea.

TRAFFIC NOISE IMPACTS ON OFFSITE RECEPTORS

The 2025 modified project's High Residential scenario would generate fewer daily vehicle trips than the certified FEIR project (6 percent less or 13 percent less, with or without development of the PG&E subarea, respectively), as shown in Table 9, Certified FEIR Project and 2025 Modified Project Trip Generation by Way of Travel and Time Period – High Residential Scenario: External Trips Only. This reduction in daily vehicle trips would generally reduce the project-related traffic noise increases along roadway segments that were described for the certified FEIR project in Impact NO-8 (FEIR pp. 9-75 and 4.F-63) by up to 0.6 dBA[24]. It is noted that there is an expected increase in the a.m. peak attributed to the institutional outpatient clinic for Block 2.

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[24] The decibel (dB) change due to different traffic volumes is based on a proportional change in traffic volumes presented in the overall daily transportation analysis in Table 9 and Table 10. Holding vehicle speed and fleet mix constant, the change in traffic noise is calculated using the logarithmic relationship for daily volumes (Vehicle trips), based on the methods used in TNM such that $\Delta dB = 10\log_{10}(V_{new}/V_{FEIR})$, where V_{FEIR} is the overall daily traffic vehicle trips in the FEIR, and V_{new} is the overall daily traffic vehicle trips in the for the 2025modified program.

The 2025 modified project's High Commercial scenario would generate fewer daily vehicle trips than the certified FEIR project (3 percent less or 8 percent less, with or without development of the PG&E subarea, respectively), as shown in Table 10, Certified FEIR Project and 2025 Modified Project Trip Generation by Way of Travel and Time Period – High Commercial Scenario: External Trips Only. This change in daily vehicle trips would generally reduce the project-related traffic noise increases along roadway segments that were described for the certified FEIR project in Impact NO-8 (FEIR pp. 9-75 and 4.F-63) by up to 0.4 dBA[25] and is not expected to change the original FEIR predicted sound levels. It is noted that there is an expected increase in the a.m. peak attributed to the institutional outpatient clinic for Block 2, but that the overall daily change in sound levels would generally decrease. Individual roadway volumes and sound levels may vary from those under the certified FEIR project, but these changes are anticipated to be small and would not change the impact significance or required mitigation from the certified EIR.

The 2025 modified project, similar to the certified FEIR project, would still result in significant traffic noise increases (increases would be more than 5 dBA similar to the certified FEIR project) along three offsite street segments (22nd Street east of Illinois Street and 22nd Street and 23rd Street between Third and Illinois streets). The traffic noise impacts of the 2025 modified project, with or without development of the PG&E subarea, on existing and planned offsite receptors under Impact NO-8 would be significant and unavoidable with mitigation, the same as the certified FEIR project (see FEIR pp. 9-75 and 4.F-66). Like the certified FEIR project, Mitigation Measure M-TR-5, Implement Measures to Reduce Transit Delay, would also be required under the 2025 modified project.

TRAFFIC NOISE IMPACTS ON ONSITE RECEPTORS

As stated above, the 2025 modified project would generate fewer daily vehicle trips than the certified FEIR project for all programs and scenarios (High Residential scenario and High Commercial scenario with or without PG&E). This reduction in daily vehicle trips would generally reduce the project-related traffic noise along roadway segments that were described for the certified FEIR project in Impact NO-8 (FEIR pp. 9-75 and 4.F-63) by up to 1 dBA[26] (rounded) across the project. As discussed above, any decrease would be minimal and is expected not to change the sound levels of the certified FEIR project. It is noted that there is an expected increase in the a.m. peak attributed to the institutional outpatient clinic for Block 2, but that the overall daily change in sound levels would generally decrease. Individual roadway volumes and sound levels may vary from those under the certified FEIR project, but these changes are anticipated to be small and would not change the impact significance or required mitigation from the certified EIR.

The 2025 modified project, similar to the certified FEIR project, would still result in significant traffic noise increases (increases would be more than 5 dBA) along two onsite street segments (Humboldt Street and 23rd Street east of Illinois Street) on the western portion of the project site. However, the reduction in vehicle trips would be too small to measurably reduce onsite project-related traffic noise.

Under the 2025 modified project, residential noise compatibility would be the same as it was determined to be for the certified FEIR project, since the locations of residential uses would remain unchanged (with the exception of residential uses on Block 12 under the High Residential scenario). For the Block 12 residential land use case, noise impacts and compatibility are anticipated to be similar to those predicted for Block 8, having similar exposures to adjacent roads and volumes. For these reasons, traffic noise

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[25] Ibid.

[26] Ibid.

impacts on future onsite receptors due to the various 2025 modified project changes in land uses as discussed in Impact NO-8 would be less than significant with mitigation, similar to that described for the certified FEIR project (FEIR pp. 9-75 and 4.F-67). Implementation of the same Mitigation Measure M-NO-8 (Variant), Design of Future Noise-Sensitive Uses (EIR p. 9-76), would also be required under the 2025 modified project, with or without development of the PG&E subarea.

CUMULATIVE NOISE AND VIBRATION IMPACTS: CONSTRUCTION

Similar to the certified FEIR project, as described in Impact C-NO-1 (FEIR pp. 9-77 and 4.F-70), concurrent construction of the 2025 modified project, the adjacent Pier 70 Mixed-Use District project, and other cumulative development in the area would result in cumulative, construction-related noise impacts on certain future planned offsite and proposed and existing onsite receptors. Like the certified FEIR project, construction on Blocks 1, 2, 3, 4, 13, and 14 under the 2025 modified project may occur after the residential development on Pier 70's Parcels F, G, H1, H2, and HDY1/2 is completed and occupied, resulting in significant construction-related noise impacts on future Pier 70 sensitive receptors.

Even though Block13 would not be constructed under the no PG&E scenario, the impacts associated with construction of Blocks 1, 2, 3, 4, and 14 would still occur, so the same impact conclusion applies to this scenario. These cumulative noise increases might not be reduced to less-than-significant levels even with implementation of Mitigation Measure M-NO-1, Construction Noise Control Measures. Therefore, like the certified FEIR project, this cumulative impact would be significant and unavoidable with mitigation under the 2025 modified project, with or without development of the PG&E subarea.

The 2025 modified project's changes in construction phasing (2020 to 2035 up to the construction of Block 9, and up to 2043 for Block 13) would not alter the potential for overlap with offsite haul truck traffic generated by construction of the Pier 70 Mixed-Use District project during its proposed 11-year construction duration (2018 to 2029). Under the certified FEIR project, the FEIR estimated that two peak truck traffic increases would occur in 2023 and 2025 and could overlap with Pier 70 construction-related truck traffic.

While the 2025 modified project could shift the time when the peak truck traffic would occur, the magnitude of the peak is not expected to exceed the maximum level that was analyzed in the FEIR. Given that the project's peak truck trips would occur for a limited time (estimated to be four to six months in the FEIR), as analyzed in the FEIR, there would be a low likelihood that peak truck traffic increases from both projects would occur at the same time. Limited potential cumulative noise increases (a maximum 4.0 dBA increase on Illinois Street and 1.4 dBA increase on Third Street were estimated under the certified FEIR project on FEIR p. 9-77), and similar increases would be expected under the 2025 modified project. Therefore, cumulative haul truck traffic noise increases from both projects is considered to be less than significant for the 2025 modified project just as it was determined to be for the certified FEIR project in the FEIR. Since these less-than-significant cumulative noise increases would still increase ambient noise levels along truck routes as a result of these two projects' overlapping construction schedules and could result in disturbance of residents in the Dogpatch neighborhood, the same improvement measures that are included for the certified FEIR project (Improvement Measure I-NO-A, Avoidance of Residential Streets, and Improvement Measure I-TR-A, Construction Management Plan and Public Updates) are also included for the 2025 modified project.

Like the certified FEIR project, the 2025 modified project's contribution to cumulative vibration impacts could be reduced to less than significant with implementation of Mitigation Measure M-NO-4a, Vibration Control Measures during Controlled Blasting and Pile Driving, because this measure would establish a

performance standard that would ensure appropriate damage thresholds from the project are not exceeded at identified historic structures. Therefore, with mitigation, the 2025 modified project would not result in a considerable contribution to a cumulative vibration impact, with or without development of the PG&E subarea. This conclusion is the same as determined for the certified FEIR project in the FEIR and is less than significant with mitigation. Accordingly, the 2025 modified project would not result in new significant cumulative impacts related to construction noise and vibration, nor would it result in substantially more severe impacts than those previously identified.

CUMULATIVE NOISE IMPACTS: OPERATION

As noted above, the 2025 modified project would generate fewer daily vehicle trips than would be generated by the certified FEIR project. This decrease would minimally change the project's contribution to cumulative traffic noise increases along some roadway segments that are described in the FEIR under Impact C-NO-2 (FEIR pp. 9-78 and 4.F-73).

While traffic noise increases related to cumulative development in the area (including the combined effects of the certified FEIR project and the Pier 70 project) would be somewhat different due to the reduction in daily vehicle trips, the 2025 modified project would still result in significant traffic noise increases (increases would be more than 5 dBA) on some local street segments, a cumulatively significant impact. The significance of this impact and requirement to implement Mitigation Measure M-NO-8 (2025 Modified Project), Design of Future Noise-Sensitive Uses and Mitigation Measure M-TR-5 (2025 Modified Project), Implement Measures to Reduce Transit Delay (EIR p. 4.E-93), under the 2025 modified project, with or without development of the PG&E subarea, would be the same as the certified FEIR project, and such impact would be significant and unavoidable with mitigation. Accordingly, the 2025 modified project would not result in new significant cumulative impacts related to operational noise, nor would it result in substantially more severe impacts than those previously identified.

Air Quality

Air quality impacts of the certified FEIR project are described in the FEIR Chapter 9, Section 9.D.7 (FEIR pp. 9-78 to 9-88), and as described below, air quality impacts of the 2025 modified project would be similar. The 2025 modified project would extend the overall construction duration and revise phasing and land use assumptions. Overall, the 2025 modified project would not result in any new or substantially more severe air quality effects than those identified for the certified FEIR project in the FEIR.

SUMMARY OF AIR QUALITY IMPACTS OF THE CERTIFIED FEIR PROJECT

The FEIR identified that even with implementation of mitigation measures, the certified FEIR project would result in the following significant and unavoidable air quality impacts: construction, overlapping operational, and buildout operational emissions of criteria air pollutants. Mobile sources were the largest component of operational emissions, followed by natural gas combustion, and an estimated 14.5MW of diesel-powered backup generation power capacity. Therefore, the certified FEIR project would have cumulatively significant and unavoidable impacts on regional air quality. The FEIR identified the following significant impacts that are reduced to less than significant with implementation of mitigation measures: exposure to toxic air contaminants (TACs) during construction and operation; consistency with the Clean Air Plan; and cumulative impacts. The FEIR determined that air quality impacts related to fugitive dust emissions during construction and to odors would be less than significant.

SUMMARY OF AIR QUALITY ASSUMPTIONS FOR THE 2025 MODIFIED PROJECT

The following highlights the key assumptions for the air quality impact analysis (**Appendix AQ**) of the 2025 modified project and differences in methodology between the FEIR and the 2025 modified project:

- The air quality analysis of the 2025 modified project considers the land use and construction schedule for the High Residential Scenario with PG&E subarea and the High Commercial Scenario with PG&E subarea as presented in Tables 1 and 2 in the project description.
- The air quality analysis of the 2025 modified project follows the same methodology and impact topics described in the FEIR and Addendum 1.
- The construction criteria air pollutant emissions of the 2025 modified project are assumed to be similar to or less than those presented in the FEIR.
- The operational criteria air pollutant emissions of the 2025 modified project are assumed to be similar to those presented in the FEIR, except with the addition of the newly proposed data center on Block 5 under the High Commercial Scenario and the removal of natural gas use in all buildings.
- The cumulative impact analysis for the 2025 modified project is performed using the same methods used in the FEIR and adjusted to reflect the updated traffic and modified construction phasing and land use areas, based on the more conservative of the High Commercial and High Residential Scenarios, and includes the addition of the newly proposed data center on Block 5 under the High Commercial Scenario. The cumulative scenario uses the updated background concentrations and health risk from the citywide modeling from the City of San Francisco, and uses the same definition of the Air Pollution Exposure Zone (APEZ) as the certified FEIR.

CONSTRUCTION IMPACTS: FUGITIVE DUST EMISSIONS

Fugitive dust emissions during construction of the 2025 modified project would be substantially the same as qualitatively described for the certified FEIR project in Impact AQ-1 (FEIR pp. 9-78 to 9-79 and pp. 4.G-32 to 4.G-34). The nature and the extent of construction activities would be substantially the same, and the 2025 modified project would be subject to the same dust control regulations and requirements as those described for the certified FEIR project. Compliance with the regulations and procedures set forth by the Construction Dust Control Ordinance would ensure that impacts related to fugitive dust emissions under the 2025 modified project, with or without development of the PG&E subarea, would be less than significant. Accordingly, the 2025 modified project would not result in new significant impacts related to construction fugitive dust emissions, nor would it result in substantially more severe impacts than those previously identified.

CRITERIA AIR POLLUTANT EMISSIONS

As described in Impact AQ-2 (FEIR pp. 9-79 to 9-82 and pp. 4.G-34 to 4.G-47), criteria air pollutant emissions during project construction and overlapping operations for the certified FEIR project would be significant and unavoidable even with implementation of Mitigation Measures M-AQ-2a (Construction Emissions Minimization), M-AQ-2b (Diesel Backup Generator Specifications), M-AQ-2c (Promote Use of Green Consumer Products), M-AQ-2d (Electrification of Loading Docks), M-TR-5 (Implement Measures to Reduce Transit Delay), M-AQ-2e (Additional Mobile Source Control Measures), and M-AQ-2f (Offset Construction and Operational Emissions). Specifically, the FEIR determined that project construction and overlapping operational emissions of ozone precursors (reactive organic gases, ROG, and oxides of nitrogen, NOx) under

the certified FEIR project would exceed significance thresholds (see Tables 9-8A and 9-8b, EIR pp. 9-80 to 9-81).

As described in Impact AQ-3 (FEIR pp. 9-81 to 9-84 and pp. 4.G-47 to 4.G-51), criteria air pollutant emissions during operation of the certified FEIR project would be significant and unavoidable even with implementation of Mitigation Measures M-AQ-2b (Diesel Backup Generator Specifications), M-AQ-2c (Promote Use of Green Consumer Products), M-AQ-2d (Electrification of Loading Docks), M-TR-5 (Implement Measures to Reduce Transit Delay), M-AQ-2e (Additional Mobile Source Control Measures), and M-AQ-2f (Offset Construction and Operational Emissions). Specifically, the certified FEIR project's operational emissions of ROG and NOx would exceed significance thresholds with the implementation of the above mitigation measures.

Construction emissions of the 2025 modified project would be similar or less than those analyzed in the FEIR. The 2025 modified project would not include any new land use that would require substantially more construction activities than what was analyzed in the FEIR. While there are minor changes in construction phasing, the construction period would be extended under the 2025 modified project, therefore resulting in less annual construction activities. Furthermore, construction emissions would remain subject to construction emission control measures and the State's emission standards that are expected to be increasingly stringent over time. Therefore, annual construction emissions of criteria air pollutants would not increase substantially compared to the FEIR and are expected to decrease.

Operational emissions of the 2025 modified project would be similar to or less than those analyzed in the FEIR, as shown in **Table 22**, **Mitigated Average Daily and Maximum Annual Operational Emissions at Project Buildout**, with the addition of the proposed data center and removal of natural gas use for all buildings. Table 22 conservatively assumes that emissions from other sources remain the same as the FEIR. Although the total square footage has increased slightly by 2%–4% and minor phasing adjustments have been made, regulatory and situational developments, such as the continued turnover of older and more polluting vehicles and the State's regulations on energy use and local permitting requirements for engines, are anticipated to reduce emissions associated with future development. These regulatory improvements, which have taken effect since certification of the FEIR, were not accounted for in Table 22. The 2025 modified project, as built out under the High Commercial scenario, would contain a total of approximately 18 MW of diesel-powered backup generation power capacity, including 6.5 MW of diesel-powered backup generation associated with the data center.[27] The 2025 modified project would not utilize natural gas, which results in a reduction in ROG and NOx emissions. However, the 2025 modified project's impacts related to the operational emissions of ROG and NOx would remain significant and unavoidable and slightly decreased from the certified FEIR.

Similarly, impacts related to criteria pollutant emissions from overlapping construction phases and the 2025 modified project's operational component would remain significant and unavoidable. Because construction emissions are expected to be the same or less due to the extended schedule and fleet turnover and operational emissions are less compared to the FEIR, the overlapping construction and operational emissions would be less than those reported in the FEIR.

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[27] The 2025 modified project would exclude two backup generators that were analyzed in the FEIR, which include one at Block 2 and a second that was initially planned to be at Block 5B.

Table 22 Mitigated Average Daily and Maximum Annual Operational Emissions at Project Buildout

	Average Daily Emissions (lb/day) Certified FEIR Project/2025 Modified Project			
	ROG	NOx	PM_{10}	$PM_{2.5}$
Area Source	90/90	1.8/1.8	2.3/2.3	2.3/2.3
Natural Gas Combustion[a]	2.2/--	19/--	1.5/--	1.5/--
Mobile	11/11	55/55	33/33	10/10
Stationary Source (non-data center emergency generators)	0.27/0.27	8.7/8.7	0.066/0.066	0.066/0.066
Stationary Source (data center)[b]	--/0.16	--/5.9	--/0.042	--/0.042
Transportation Refrigeration Units	0.050/0.050	0.38/0.38	0.0023/0.0023	0.0020/0.0020
Total	**102/101**	**85/72**	**37/35**	**14/12**
Significance Threshold	54	54	82	54
Above Threshold?	**Yes**	**Yes**	No	No
	Maximum Annual Emissions (ton/year) Certified FEIR Project/2025 Modified Project			
Area Source	17/17	0.33/0.33	0.42/0.42	0.42/0.42
Natural Gas Combustion[a]	0.40/--	3.5/--	0.27/--	0.27/--
Mobile	2.0/2.0	10/10	6.0/6.0	1.8/1.8
Stationary Source (non-data center emergency generators)	0.049/0.049	1.6/1.6	0.012/0.012	0.012/0.012
Stationary Source (data center)[b]	--/0.029	--/1.1	--/0.0077	--/0.0077
Transportation Refrigeration Units	0.0091/0.0091	0.068/0.068	0.0004/0.0004	0.00037/0.00037
Total	**19/19**	**15/13**	**6.7/6.4**	**2.5/2.2**
Significance Threshold	10	10	15	10
Above Threshold?	**Yes**	**Yes**	No	No

NOTES:

a. Emissions from natural gas combustion were removed due to the elimination of natural gas from the 2025 modified project.
b. Emissions from stationary sources (data center) were added as part of the 2025 modified project.

Bolded numerical values are totals during operation. If the total exceeds a threshold, then the exceedance is identified by a **bolded** "Yes" response.

* Note that totals may not match sums of intermediate values presented in this table or Appendix AQ tables due to rounding.

SOURCE: Ramboll, Tables and Figures, 2026. (See Appendix AQ).

Implementation of Mitigation Measures M-AQ-2a through M-AQ-2e and M-TR-5 identified in the FEIR would still apply and would reduce construction-related and overlapping operational emissions associated with the 2025 modified project. Consistent with the certified FEIR project, the project sponsor would also be required to implement Mitigation Measure M-AQ-2f of the FEIR, which requires the project sponsor to implement emission offsets. However, because implementation of the emissions reduction project could be conducted by the Bay Area Air Quality Management District (air district) and is outside the jurisdiction and control of the City and not fully within the control of the project sponsor and because no specific offset project has been identified, the impact with respect to criteria air pollutants is conservatively considered significant and unavoidable with mitigation. Therefore, similar to the certified FEIR project, Impacts AQ-2 and AQ-3 for the 2025 modified project related to criteria air pollutant emissions during construction, overlapping operations and full buildout operations would be significant and unavoidable with mitigation. Accordingly, the 2025 modified project would not result in new significant impacts related to criteria air pollutant emissions, nor would it result in substantially more severe impacts than those previously identified.

TOXIC AIR CONTAMINANTS, CONSTRUCTION AND OPERATION

As described in the FEIR for the certified FEIR project (FEIR pp. 9-83 to 9-87), cancer risks due to TAC exposures during construction and operations of the certified FEIR project would be less than significant with implementation of Mitigation Measures M-AQ-2a (Construction Emissions Minimization), M-AQ-2b (Diesel Back-up Generator Specifications), and M-AQ-4 (Siting of Uses that Emit Toxic Air Contaminants). Specifically, while increased cancer risks at both onsite and offsite receptors would be significant without mitigation, implementation of Mitigation Measure M-AQ-2a alone would be sufficient to reduce the impact of the certified FEIR project to a less-than-significant level, and the excess cancer risk impact on both onsite and offsite receptors for the certified FEIR project was determined to be less than significant with mitigation. The FEIR also determined that unmitigated and mitigated maximum estimated $PM_{2.5}$ concentrations would be below the significance thresholds at both offsite and onsite receptors, and this impact would be less than significant. In addition, the FEIR indicated that the potential for future health risk impacts from laboratory emissions of the certified FEIR project would be less than significant with implementation of Mitigation Measure M-AQ-4 (Siting of Uses that Emit Toxic Air Contaminants).

The health risk assessment for the 2025 modified project was performed using the same methods used in the FEIR for the certified FEIR project. The methodology is described in detail in Appendix AQ. TAC emissions from construction activities associated with the 2025 modified project were estimated using the same methodologies and assumptions presented in the FEIR for the certified FEIR project, accounting for Mitigation Measure M-AQ-2a (Construction Emissions Minimization), and adjusting the emissions data from the certified FEIR project on a block-by-block basis to reflect the modified construction phasing and land use areas. For construction, TAC concentrations were scaled based on changes in square footage by block grading/paving areas from Addendum 1 to account for rephasing from six to three construction phases. TAC concentrations for other sources that would be the same under the 2025 modified project compared to the certified FEIR project, such as those for construction staging areas, marine construction, haul routes and operational non-data center emergency generators were taken from calculations performed in the FEIR (see Appendix AQ).

For operations, TAC emissions from the backup generators associated with the newly proposed data center were estimated for the 2025 modified project and the associated health risks and $PM_{2.5}$ concentrations evaluated. AERMOD dispersion modeling was used to estimate TAC concentrations from the generators' operations for the proposed data center. The same exposure assumptions for intake factors used in the FEIR are used for this assessment.

Health risk impacts from the Project's mobile sources were scaled from the impacts in the FEIR based on the ratio of daily trip generation between the FEIR and 2025 modified project. As described under the transportation analysis, operational trip generation under the 2025 modified project would be approximately 6% lower in the High Residential Scenario and 3% lower in the High Commercial Scenario than the certified FEIR project; therefore, risk impacts from operational traffic were reduced accordingly. Assumptions for cumulative impacts from Pier 70 construction and operations are the same as those presented in the FEIR.

Cumulative health risks were assessed based on cumulative emissions sources within 1,000 feet of the project site, inclusive of the adjacent planned Pier 70 Mixed-Use District project. The cumulative health risk assessment includes the existing background risk contribution from the 2020 Citywide Health Risk

Assessment database,[28] which is an update to the prior 2015 citywide health risk assessment used in the FEIR. This updated data indicates higher background risks in the project area than those presented in the FEIR, and these increased background risks are now considered in the health risk assessment. The cumulative analysis also considers the presence of future receptors at the adjacent Pier 70 project site, similar to the FEIR.

The 2025 modified project is compared against the same significance criteria as the FEIR and uses the same definition of the APEZ as the FEIR.

As discussed in more detail below, the 2025 modified project results in the same conclusions as the FEIR. On a receptor by receptor basis, the health risk impacts for both cancer risk and localized concentrations of fine particulate matter ($PM_{2.5}$) increased compared to the FEIR for some receptors, while other receptors have health risk impacts similar to or less than those estimated in the FEIR.

Table 23, **Cumulative Mitigated Cancer Risk at Offsite Maximally Exposed Individual Receptor Locations for the Certified FEIR Project and the 2025 Modified Project**, shows the cumulative cancer risk estimates at the offsite maximally exposed individual receptors for both the certified FEIR project and the 2025 modified project. The health risk assessment for the 2025 modified project indicated that the maximum mitigated cancer risk contributions of the 2025 modified project on an offsite receptor would be slightly greater than those of the certified FEIR project, with the overall project contribution to cancer risk increasing from 34 to 36 in one million. However, the location of the maximally exposed individual receptors on Pier 70 changed under the 2025 modified project from the certified FEIR project due to the construction phasing changes and addition of the stationary sources at Block 5, and these receptor location changes result in a change in the background cancer risk. The updated analysis also reflects changes to the background cancer risk as a result of the updated 2020 citywide health risk assessment, compared to the FEIR. The estimated increase in risk from 34 to 36 in one million at that location under the 2025 modified project is attributable to the addition of the data center proposed in Block 5 and project construction phases that would be closer in proximity to the new maximally exposed receptor.

The maximally exposed individual offsite receptor does not meet APEZ criteria under existing conditions because the background cancer risk and $PM_{2.5}$ concentration do not exceed the limits for the APEZ. Therefore, the cumulative cancer risk for this receptor is compared to the APEZ criteria of a cancer risk of 100 in one million. As shown in Table 23, the resultant cumulative risk for the 2025 modified project would still be below the APEZ criteria of a cancer risk of 100 in one million. Therefore, while the maximum estimated excess lifetime cancer risk increased as compared to the FEIR, the cumulative risk remains below the applicable threshold of significance.

Appendix AQ details estimated cancer risk at different receptor types in the area. The health risk assessment for the 2025 modified project identified the maximally exposed individual receptors and the associated locations for four receptor types: onsite residential and daycare receptors, offsite residential receptors at Pier 70, non-Pier 70 offsite residential receptors, and offsite school receptors. The locations of the maximally exposed individual receptors would change as a result of the 2025 modified project compared to the FEIR except for the location of the maximally exposed non-Pier 70 offsite residential receptors due to the changes in the project sources. For example, the location of the maximally exposed individual onsite

[28] San Francisco Department of Public Health, and San Francisco Planning Department, *San Francisco Citywide Health Risk Assessment: Technical Support Documentation*, February 2020.

receptor would shift from Block 7 to Block 8 as a result of the 2025 modified project.[29] The mitigated cancer risk contributions of the 2025 modified project would be less than those of the certified FEIR project for three of the four sensitive receptors considered in the FEIR: (1) onsite residential and daycare receptors, (2) non-Pier 70 offsite residential receptors, and (3) school receptors. These reductions in risk are attributable to the spatial relocation of construction phases compared to the certified FEIR project, as well as changes to the timing of phases.

Table 23 Cumulative Mitigated Cancer Risk at the Offsite Maximally Exposed Individual Receptor Locations for the Certified FEIR Project and the 2025 Modified Project

Source	Lifetime Excess Cancer Risk (in one million)	
	Certified FEIR Project	2025 Modified Project*
RESIDENTIAL AND DAYCARE RECEPTORS (PIER 70)[a,b,c]		
Background 2020	30	54**
Pier 70 Construction + Operation, Maximum Office Scenario (Mitigated)[b]	4.7	4.7
Project Construction – Off-road Emissions	33	33.2
Project Construction – Vehicle Traffic	0.005	0.024
Project Operation – Non-Data Center Emergency Generators	0.39	0.61
Project Operation – Data Center Emergency Generators	--	1.67
Project Operation – Vehicle Traffic	0.49	0.48
Overall Project contribution (without background)	34	36
Cumulative Total	**69**	**95**
Meets APEZ Criteria?	No	No
Cumulative Significance Threshold	100	100
Significant Cumulative Impact?	No	No

NOTES:
a. Assumes Pier 70 resident will move in while construction of the project is ongoing. The cancer risk contribution from project emissions for the Pier 70 resident assumes exposure to project emissions begins in 2029.
b. For the purpose of the cumulative analysis for the Pier 70 resident, the Pier 70 construction schedule was modified to represent a reasonable worst-case exposure scenario for potential future Pier 70 receptors. It was assumed Phase 2-5 construction emissions from Pier 70 are mitigated using Tier 4 equipment consistent with the Pier 70 EIR mitigation requirements.
c. This analysis conservatively assumes the receptor MEIs are exposed to the project and Pier 70 emissions concurrently.
* Note that totals may not match sums of intermediate values presented in this table or Appendix AQ tables due to rounding.
** Note that the 2025 modified project results in a different location for the maximally exposed receptor and uses the updated 2020 citywide health risk assessment database; and therefore the background risk is different from that under the certified FEIR project

SOURCE: Ramboll, Tables and Figures, 2026. (See Appendix AQ).

The updated citywide health risk assessment database indicates that background cancer risks at non-Pier 70 offsite residential receptors and offsite school receptors would exceed 100 in one million and meet the APEZ criteria. Therefore, the applicable threshold is the threshold within the APEZ of a project contribution of 7 in one million. For these two receptor types, the 2025 modified project's mitigated cancer risk contribution would be below 7 in one million at 6.6 in a million and 2.3 in a million respectively. The mitigated cancer risk at the maximally exposed individual onsite residential and daycare receptor for the 2025 modified project would be less than the mitigated cancer risk at the maximally exposed individual

[29] Building 7B on Block 7 completed construction in 2025 and is currently operational. Appendix AQ details how this existing building was evaluated and would have similar cancer risk to the maximally exposed onsite receptor.

onsite residential and daycare receptor for the certified FEIR project, decreasing from 39 in one million to 32 in one million. The receptor location does not meet APEZ criteria because the background cancer risk and $PM_{2.5}$ concentration do not exceed the cumulative threshold for the APEZ. Therefore, the cumulative cancer risk for this receptor is compared to the APEZ criteria of a cancer risk of 100 in one million. The resultant cumulative risk for the 2025 modified project at the onsite receptor would still be below the APEZ criteria of a cancer risk of 100 in one million at 99.1 in one million.

Therefore, the mitigated cancer risk for all maximally exposed individual receptor types would remain below the applicable threshold of significance, similar to the impact conclusions for the certified FEIR project from the FEIR.

Also, like the certified FEIR project, future land uses under the 2025 modified project could include science laboratories and PDR activities, which have the potential for TAC emissions. However, under the certified FEIR project, implementation of Mitigation Measure M-AQ-4 (Siting of Uses that Emit Toxic Air Contaminants) would reduce this impact to less than significant. The health risk assessment for the 2025 modified project indicated that the mitigated $PM_{2.5}$ concentrations due to the contribution of the 2025 modified project would be generally similar to those of the certified FEIR project, except for the onsite residential and daycare receptors (refer to Appendix AQ for details). **Table 24**, **Cumulative Mitigated $PM_{2.5}$ concentrations at Offsite Receptor Locations for the Certified FEIR Project and the 2025 Modified Project**, shows the cumulative $PM_{2.5}$ concentration estimates at the offsite maximally exposed individual receptors for both the certified FEIR project and the 2025 modified project, which are both at Pier 70. The locations of the offsite maximally exposed individual receptors would move east as a result of the 2025 modified project due to the proposed data center and the temporal and geographic changes associated with the modified construction phasing and timing. These receptor location changes also result in a change in the background $PM_{2.5}$ concentration. The updated analysis also reflects changes to the background $PM_{2.5}$ concentration for the 2025 modified project as a result of the updated 2020 citywide health risk assessment compared to the FEIR.

As shown in Table 24, the overall project contribution to $PM_{2.5}$ concentration for the offsite receptor would increase from 0.26 to 0.27 $\mu g/m^3$). The increase in $PM_{2.5}$ concentration under the 2025 modified project at the offsite receptors is attributable to the proposed data center on Block 5 and changes in the project construction phases and timing, which result in more intensive construction activity occurring closer in proximity to the new maximally exposed receptor. This receptor does not meet APEZ criteria used in the FEIR because the $PM_{2.5}$ concentration is less than 10 $\mu g/m^3$ and the cancer risk at this receptor is below 100 in a million. Therefore, this receptor is evaluated against the 10 $\mu g/m^3$ cumulative threshold for receptors that do not meet APEZ criteria. The cumulative $PM_{2.5}$ concentration for the 2025 modified project would be below 10 $\mu g/m^3$.

Appendix AQ details estimated $PM_{2.5}$ concentration at other receptor types in the area. The non-Pier 70 offsite residential receptors do not meet the APEZ criteria used in the FEIR. Therefore, the $PM_{2.5}$ concentration at this receptor is evaluated against the 10 $\mu g/m^3$ cumulative threshold. The cumulative $PM_{2.5}$ concentration is 9.6 $\mu g/m^3$, including a project contribution of 0.22 $\mu g/m^3$ in 2028. Most of the project contribution at this receptor is from operational vehicular traffic, which was conservatively estimated because the project would not be fully built out at this time. Therefore, the cumulative $PM_{2.5}$ concentration for the 2025 modified project at this receptor would also be below the 10 $\mu g/m^3$ threshold.

Table 24 Cumulative Mitigated PM2.5 Concentration at the Offsite Maximally Exposed Individual Receptor Locations for the Certified FEIR Project and the 2025 Modified Project

Source	$PM_{2.5}$ Concentration ($\mu g/m^3$)	
	Certified FEIR Project	2025 Modified Project*
RESIDENTIAL AND DAYCARE RECEPTORS (PIER 70)[a,b]		
Background 2020	8.5	8.6**
Pier 70 Construction + Operation, Maximum Office Scenario (Mitigated)[b]	0.019	0.018
Project Construction – Off-road Emissions	0.10	0.11
Project Construction – Vehicle Traffic	0.00055	0.0017
Project Operation – Non-Data Center Emergency Generators	0.00018	0.00054
Project Operation – Data Center	--	0.0022
Project Operation – Vehicle Traffic	0.16	0.16
Overall Project contribution (without background)	0.26	0.27
Cumulative Total	**8.8**	**8.9**
Meets APEZ Criteria?	No	No
Cumulative Significance Threshold	10	10
Significant Cumulative Impact?	No	No

NOTES:
a. Assumes Pier 70 resident will move in while construction of the project is ongoing.
b. For the purpose of the cumulative analysis for the Pier 70 resident, the Pier 70 construction schedule was modified to represent a reasonable worst-case exposure scenario for potential future Pier 70 receptors. It was assumed Phase 2-5 construction emissions from Pier 70 are mitigated using Tier 4 equipment consistent with the Pier 70 EIR mitigation requirements.

* Note that totals may not match sums of intermediate values presented in this table or Appendix AQ tables due to rounding.
** Note that the 2025 modified project results in a different location for the maximally exposed receptor and uses the updated 2020 citywide health risk assessment database; and therefore the background PM2.5 concentration is different from that under the certified FEIR project

SOURCE: Ramboll, Tables and Figures, 2026. (See Appendix AQ).

The updated citywide health risk assessment database indicates that background cancer risks at the offsite school maximally exposed individual receptor would exceed a cancer risk of 100 in one million. Therefore, this receptor meets APEZ criteria despite the $PM_{2.5}$ concentration being less than 10 $\mu g/m^3$. Therefore, this receptor is compared against the project-level threshold of 0.2 $\mu g/m^3$. The project $PM_{2.5}$ concentration at this receptor is 0.057 $\mu g/m^3$. Therefore, the 0.057 $\mu g/m^3$ project concentration is less than the threshold.

The maximally exposed individual onsite receptor resulted in the highest project $PM_{2.5}$ concentration at a concentration of 0.29 $\mu g/m^3$, which is an increase of the maximum onsite $PM_{2.5}$ concentration for the certified FEIR project of 0.17 $\mu g/m^3$. The location of the onsite maximally exposed individual receptors changed from Block 5 to Block 3 under the 2025 modified project due to the temporal and geographic changes associated with the modified construction phasing and timing, such as the postponed Block 13 schedule and the shift of Block 5 from Phase 3 to Phase 2. This onsite receptor does not meet the APEZ criteria used in the FEIR. Therefore, the $PM_{2.5}$ concentration at this receptor is evaluated against the 10 $\mu g/m^3$ cumulative threshold. The cumulative $PM_{2.5}$ concentration is 9.0 $\mu g/m^3$. Therefore, the cumulative $PM_{2.5}$ concentration for the 2025 modified project at this receptor would be below the 10 $\mu g/m^3$ threshold.

Indoor receptors are expected to spend a substantial fraction of their time indoors and be exposed to indoor air that would be filtered through the ventilation systems. New buildings, including those in which onsite and Pier 70 residential receptors would reside, would be required to have ventilation systems with filters rated at Minimum Efficiency Reporting Value (MERV) 13 or equivalent, required by the State's 2022 Title 24 (Building Energy Efficiency Standards). Consistent with the findings and recommendations in the San Francisco Planning's Air Quality and Greenhouse Gas Analysis Guidelines,[30] the estimated health risk impacts at these residential receptors are conservative because the analysis assumed exposure solely to outdoor air and does not account for the building filtration effects. Existing residential receptors would also experience exposure to less TACs than estimated here due to the effects of buildings' natural filtration, as discussed in the San Francisco Planning's Air Quality and Greenhouse Gas Analysis Guidelines.[31]

Furthermore, Mitigation Measure M-AQ-2a will be revised to remove section B that allowed for construction equipment requirements to be waived under certain conditions to eliminate the possibility of a change in significance due to the use of non-Tier 4 equipment. Under the 2025 modified project, this mitigation measure has been modified as shown below (modified text shown in ~~strike out~~) to ensure that the 2025 modified project would not result in a cumulatively considerable contribution to health risk impacts.

Mitigation Measure M-AQ-2a: Construction Emissions Minimization

The project sponsor or the project sponsor's contractor shall comply with the following:

A. Engine Requirements.

1. The project sponsor shall also ensure that all on-road heavy-duty diesel trucks with a gross vehicle weight rating of 19,500 pounds or greater used at the project site (such as haul trucks, water trucks, dump trucks, and concrete trucks) be model year 2010 or newer.
2. All off-road equipment (including water construction equipment used onboard barges) greater than 25 horse power shall have engines that meet Tier 4 Final off-road emission standards. Tugs shall comply with U.S. EPA Tier 3 Marine standards for Marine Diesel Engine Emissions.
3. Since grid power will be available, portable diesel engines shall be prohibited.
4. Renewable diesel shall be used to fuel all diesel engines if it can be demonstrated to the ERO that it is compatible with on-road or off-road engines and that emissions of ROG and NOx from the transport of fuel to the project site will not offset its NOx reduction potential.
5. Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions). The contractor shall 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.
6. The contractor shall instruct construction workers and equipment operators on the maintenance and tuning of construction equipment, and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.

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[30] San Francisco Planning. Air Quality and Greenhouse Gas Analysis Guidelines. 2025. Available at: https://sfplanning.org/air-quality.

[31] Ibid.

B. Waivers.

[Removed]

~~The ERO may waive the equipment requirements of Subsection (A)(1) if: a particular piece of off-road equipment is technically not feasible; the equipment would not produce desired emissions reduction due to expected operating modes; installation of the equipment would create a safety hazard or impaired visibility for the operator; or, there is a compelling emergency need to use other off-road equipment. If the ERO grants the waiver, the contractor must use the next cleanest piece of off-road equipment, according to the table below.~~

~~The ERO may waive the equipment requirements of Subsection (A)(2) if: a particular piece of off-road equipment with an engine meeting Tier 4 Final emission standards is not regionally available to the satisfaction of the ERO. If seeking a waiver from this requirement, the project sponsor must demonstrate to the satisfaction of the ERO that the health risks from existing sources, project construction and operation, and cumulative sources do not exceed a total of 10 µg/m3 or 100 excess cancer risks for any onsite or offsite receptor.~~

~~The ERO may waive the equipment requirements of Subsection (A)(3) if: an application has been submitted to initiate on-site electrical power, portable diesel engines may be temporarily operated for a period of up to three weeks until on site electrical power can be initiated or, there is a compelling emergency.~~

C. Construction Emissions Minimization Plan. Before starting onsite construction activities, the contractor shall submit a Construction Emissions Minimization Plan to the ERO for review and approval. The plan shall state, in reasonable detail, how the contractor will meet the requirements of Section A, Engine Requirements.

1. The Construction Emissions Minimization Plan shall include estimates of the construction timeline by phase, with a description of each piece of off-road equipment required for every construction phase. The description may include, but is not limited to equipment type, equipment manufacturer, equipment identification number, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used.
2. The project sponsor shall ensure that all applicable requirements of the Construction Emissions Minimization Plan have been incorporated into the contract specifications. The plan shall include a certification statement that the contractor agrees to comply fully with the plan.
3. The contractor shall make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. The contractor shall post at the construction site a legible and visible sign summarizing the plan. The sign shall also state that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. The contractor shall post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

D. Monitoring. After start of construction activities, the contractor shall submit quarterly reports to the ERO documenting compliance with the Construction Emissions Minimization Plan. After completion of construction activities and prior to receiving a final certificate of occupancy, the

project sponsor shall submit to the ERO a final report summarizing construction activities, including the start and end dates and duration of each construction phase, and the specific information required in the plan.

With the implementation of the modified Mitigation Measure M-AQ-2a, all maximally exposed individual receptors are below their respective thresholds for cancer risk and $PM_{2.5}$ concentration. The effect of building envelop infiltration would further reduce receptor's exposure to concentrations. Therefore, like the certified FEIR project, the impact related to exposure of sensitive receptors to substantial pollutant concentrations for the 2025 modified project, with or without development of the PG&E subarea, would be less than significant with mitigation. Accordingly, the 2025 modified project would not result in new significant impacts related to health risk due to toxic air contaminants, nor would it result in substantially more severe impacts than those previously identified.

CONSISTENCY WITH CLEAN AIR PLAN

As described for the certified FEIR project in the FEIR (FEIR p. 9-87), the certified FEIR project could conflict with implementation of the Bay Area 2017 Clean Air Plan. Table 4.G-12 (FEIR pp. 4.G-59 to 4.G-63) lists the consistency of the certified FEIR project with applicable control measures of the 2017 Clean Air Plan. The FEIR concluded that the certified FEIR project would have a less than significant impact with mitigation.

The same information on the consistency with applicable control measures in the 2017 Clean Air Plan is applicable to the 2025 modified project, with or without development of the PG&E subarea. Without certain mitigation measures incorporated into the 2025 modified project, the 2025 modified project would not include applicable control measures from the 2017 Clean Air Plan. Because the 2025 modified project would result in significant and unavoidable criteria air pollutant emissions, similar to the certified FEIR project, and because the 2025 modified project would not include all applicable control measures from the 2017 Clean Air Plan, this impact would be significant. However, as with the certified FEIR project, with implementation of Mitigation Measure M-AQ-5 (Include Spare the Air Telecommuting Information in Transportation Welcome Packets) (FEIR p. 4.G-58), plus the other mitigation measures identified in the FEIR, as shown in Table 4.G-12, the 2025 modified project would include applicable control strategies contained in the 2017 Clean Air Plan for the basin, and the impact would be less than significant with mitigation. Accordingly, the 2025 modified project would not result in new significant impacts related to consistency with the 2017 Clean Air Plan, nor would it result in substantially more severe impacts than those previously identified.

ODORS

Operation of the 2025 modified project at buildout would be substantially the same as under the certified FEIR project. For the same reasons described in Impact AQ-6 (FEIR pp. 9-87 and 4.G-65), the 2025 modified project, with or without development of the PG&E subarea, would not create objectionable odors that would affect a substantial number of people, and this impact would be less than significant. Accordingly, the 2025 modified project would not result in new significant impacts related to odors, nor would it result in substantially more severe impacts than those previously identified.

CUMULATIVE IMPACTS: REGIONAL AIR QUALITY

As described in the Approach to Analysis on page 4.G-31 of the FEIR, the project-level thresholds for criteria air pollutants are based on levels below which new sources are not anticipated to contribute to an air

quality violation or result in a considerable net increase in criteria air pollutants. Therefore, because the 2025 modified project's emissions are similar to or less than those of the certified FEIR project that exceed the project-level thresholds, the 2025 modified project, with or without development of the PG&E subarea, would also result in a considerable contribution to cumulative regional air quality impacts. Impact C-AQ-1 (FEIR pp. 9-88 and 4.G-66) is a significant impact for the certified FEIR project in the FEIR and would similarly be a significant impact for the 2025 modified project. As discussed above, implementation of Mitigation Measures M-AQ-2a through M-AQ-2f and M-TR-5 would reduce the severity of this impact for the 2025 modified project. However, because implementation of the emissions reduction project could be conducted by the air district and is outside the jurisdiction and control of the City and not fully within the control of the project sponsor and because no specific offset project has been identified, like the certified FEIR project, the cumulative impact of the 2025 modified project with respect to criteria air pollutants, with or without development of the PG&E subarea, is conservatively considered significant and unavoidable with mitigation. Accordingly, the 2025 modified project would not result in new significant cumulative impacts related to regional air quality, nor would it result in substantially more severe impacts than those previously identified.

CUMULATIVE IMPACTS: HEALTH RISK

The above analysis regarding the health risk impacts of the 2025 modified project conservatively focuses on cumulative impacts to demonstrate whether the 2025 modified project would result in any new or more severe impacts than the certified FEIR project. As discussed above and detailed in Appendix AQ, the 2025 modified project would result in a marginal reduction of excess cancer risk for the onsite receptor (a decreased risk of seven in one million compared to the certified FEIR project), while the 2025 modified project would result in a marginal increase of excess cancer risk for the Pier 70 offsite receptor (an increased risk of two in one million compared to the certified FEIR project). The resultant cumulative risks would still be below the air pollutant exposure zone criteria of 100 in one million with mitigation. In addition, the 2025 modified project would result in a similar level of excess $PM_{2.5}$ concentration for Pier 70 and non-Pier 70 offsite residential receptors, as well as school and day care receptors, compared to the certified FEIR project, while resulting in a marginal increase of $PM_{2.5}$ concentration for the onsite receptor (an increase in $PM_{2.5}$ concentration of 0.12 $\mu g/m^3$ compared to the certified FEIR project). The resultant cumulative $PM_{2.5}$ concentration would still be below the air pollutant exposure zone criteria of 10 $\mu g/m^3$ with mitigation.

Like the certified FEIR project, implementation of Mitigation Measure M-AQ-2a (Construction Emissions Minimization) alone would be sufficient to reduce the impact of the 2025 modified project to a less-than-significant level, and the excess cancer risk impact on both onsite and offsite receptors under Impact C-AQ-2 (EIR pp. 9-88 and 4.G-67 to 4.G-72) would be less than significant with mitigation. Accordingly, the 2025 modified project would not result in new significant cumulative impacts related to health risk, nor would it result in substantially more severe impacts than those previously identified.

Wind

SUMMARY OF WIND IMPACTS OF THE CERTIFIED FEIR PROJECT

The FEIR found that wind impacts of buildout of the certified FEIR project (described in the FEIR as the project variant) would be less than significant because the project would reduce the number of exceedances of the San Francisco Planning Code's wind hazard criterion from nine under existing conditions (over a total duration of 38 hours per year) to three with buildout of the certified FEIR project (with a total duration of

23 hours). The certified FEIR project would also reduce the average wind speed exceeded one hour per year from 28 mph under existing conditions to 23 mph. Similarly, under cumulative conditions, the number of wind hazard exceedances would also be three (over a total 19 hours annually). The average wind speed exceeded one hour per year would be 25 mph. Accordingly, the FEIR found that, at buildout, with or without the PG&E subarea, the certified FEIR project would have a less-than-significant wind impact. Improvement Measure I-WS-1, Wind Reduction Features for Block 1, was identified to minimize pedestrian-level winds created by development on Block 1. Conversely, the FEIR found that the certified FEIR project's phased construction could potentially result in localized wind conditions that could be worse than those reported for the project at full buildout during the interim phases of development, and thus the effects of phased buildout would be significant and unavoidable even with implementation of Mitigation Measure M-WS-2, Identification and Mitigation of Interim Hazardous Wind Impacts.

SUMMARY OF WIND ASSUMPTIONS FOR THE 2025 MODIFIED PROJECT

The following are the key assumptions for the wind impact analysis of the 2025 modified project and differences, if any, in methodology between the FEIR and the 2025 modified project:

- The wind analysis of the 2025 modified project is a qualitative analysis that does not include additional wind tunnel testing beyond what was performed for the FEIR.
- The wind analysis in the FEIR consisted of wind tunnel testing of a physical 3D model of the certified FEIR project at full buildout that assumed both height and massing of each block as a single massing model, including required setbacks, as proposed by the project sponsor and ultimately incorporated into the certified FEIR project's D4D document in 2020. Similarly, the wind analysis of the 2025 modified project qualitatively evaluated building height and massing as identified by the project sponsor in proposed revisions to the project's D4D document, again at full buildout. Although applicable to the entire project at buildout and not to an individual building, the wind analysis of the 2025 modified project is consistent with the intent underlying FEIR Mitigation Measure M-WS-2: Identification and Mitigation of Interim Hazardous Wind Impacts. This measure requires that subsequent development at a height of 85 feet or greater undergo a wind impact analysis by a qualified wind consultant that "shall consist of a qualitative analysis of whether the building(s) under review could result in winds throughout the wind test area (as identified in the EIR) exceeding the 26-mph wind hazard criterion for more hours or at more locations than identified for full project buildout in the EIR. That is, the evaluation shall determine whether partial buildout conditions would worsen wind hazard conditions for the project as a whole." The analysis of the 2025 modified project assumed no changes in the cumulative scenario (i.e., no revisions to the approved Pier 70 project).

2025 MODIFIED PROJECT WIND IMPACTS

To evaluate potential effects of the proposed project revisions, notably including height increases, on pedestrian-level winds, a qualified wind consultant undertook a qualitative analysis of the proposed changes, consistent with the approach set forth in Mitigation Measure M-WS-2.[32,33] The analysis

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[32] RWDI, Memorandum Regarding Potrero Power Station, San Francisco, CA, Pedestrian Wind Study. March 26, 2026. This report is included in **Appendix WS.1**.

[33] Mitigation Measure M-WS-2, Identification and Mitigation of Interim Hazardous Wind Impacts is applicable to individual buildings 85 feet in height or greater and thus is *not* applicable to the proposed 2025 Modified Program for the entire project site. However, the measure does call for a qualified wind consultant to initially undertake a qualitative analysis of whether the building(s) under review could worsen wind conditions, compared to those identified in the EIR.

determined that the potential sitewide 8-foot height increases for all residential buildings could marginally increase wind hazard speeds—by 1 to 2 mph—primarily in the western portions of the site where project buildings would be directly exposed to prevailing westerly winds.[34] In general, these potential increases in wind speeds would be unlikely to result in new exceedances of the wind hazard criterion. However, new hazard exceedances could possibly result in locations where the FEIR wind tunnel testing found that wind speeds with the certified FEIR project would be just below the hazard criterion. In particular, the qualitative analysis identified three locations proximate to Blocks 5, 13, and 15 where new wind hazard exceedances could result from the proposed 2025 modified project. Even if they were to occur, however, these three additional wind hazard exceedances would bring the total number of exceedances to six, which would still be three fewer than under existing conditions.

Other height increases proposed to individual blocks would not be expected to result in new increases of the wind hazard criterion, according to the qualitative analysis, because wind hazard speeds around the base of those blocks were generally found to be well below the hazard criterion in the FEIR wind tunnel testing. The overall height increases proposed in the western portion of the project site could also result in localized decreases in pedestrian wind speeds in the eastern portion of the site, including in and around several of the project's proposed open spaces, such as Power Station Park, Humboldt Street Plaza, and Waterfront Park.

Given the foregoing, the 2025 modified project would not result in any new or substantially more severe wind impacts at project buildout than would be the case with the certified FEIR project. As to interim conditions during project development (including the current interim condition with the buildings at Blocks 7B completed and Block 2 under construction) Mitigation Measure M-WS-2, Identification and Mitigation of Interim Hazardous Wind Impacts, would continue to apply to the project, thereby avoiding any new significant wind impacts during the course of project development.[35,36] Based on the FEIR analysis, which found that cumulative impacts would be similar to, and incrementally less severe than those of the project, no new significant cumulative wind impacts would be anticipated as a result of the 2025 modified project. Accordingly, the 2025 modified project would not result in new significant impacts related to wind, nor would it result in substantially more severe impacts than those previously identified.

Shadow

SUMMARY OF SHADOW IMPACTS OF THE CERTIFIED FEIR PROJECT

The FEIR determined that shadow impacts of the certified FEIR project (described in the FEIR as the project variant) would be less than significant: shadow cast by the certified FEIR project would not reach Esprit Park, the nearest Recreation and Park Department property, nor would project shadow fall on any other Recreation and Park Department facilities. Likewise, shadow from the certified FEIR project would not reach any of the several nearby non-Recreation and Park Department open spaces, including Woods

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[34] The wind hazard speed is the wind speed exceeded one hour per year.

[35] RWDI, Potrero Power Station Pedestrian Wind Study, RWDI # 2102548 [Block 7B], January 8, 2024. This report is included in Appendix WS.1.

[36] RWDI, Potrero Power Station, Pedestrian Wind Study, RWDI # 2102548 [Block 2]. This report is included in Appendix WS.1.

Yard Park (in front of the Muni Woods Yard bus facility), Warm Water Cove Park, Progress Park, or Minnesota Grove. Shadow from the certified FEIR project would fall on the existing San Francisco Bay Trail route along Illinois Street, Angel Alley (a landscaped strip of the Tennessee Street right-of-way adjacent to Woods Yard), and the 1201 Tennessee Street mid-block walkway (a mid-block pedestrian passage between Tennessee and Third Streets near Tubbs Street). Project shadow would fall on Angel Alley and the 1201 Tennessee Street walkway only relatively briefly in the early morning for a few weeks a year. With respect to the Bay Trail, shadow from the certified FEIR project would fall on the existing trail route—the sidewalks on Illinois Street adjacent to the project site—during portions of the morning year-round. However, because the existing trail route consists exclusively of sidewalks, it is considered relatively less sensitive to shadow than would be a trail through open space, since most sidewalk users are merely traveling from one place to another. Finally, the certified FEIR project would develop open spaces throughout the project site. However, because these open spaces do not yet exist, project shadow on these open spaces would not interfere with any existing recreational use that may rely on access to sunlight and would have no impact under CEQA. The FEIR discussed shadow on proposed project open spaces for informational purposes only. As for cumulative effects, the FEIR found that the certified FEIR project and the Pier 70 Mixed-Use District project would not combine to add shadow to any existing publicly accessible open spaces, except the existing Bay Trail route, along Illinois Street. Additionally, it is noted that the Bay Trail route would be relocated from Illinois Street to the San Francisco Bay shoreline with buildout of the proposed project and the adjacent Pier 70 project. This effect was found to be less than significant for the reason set forth above, and because the Illinois Street sidewalks would no longer be part of the trail route, cumulative effects on that location would not occur. In light of the foregoing, the FEIR found that shadow impacts of the certified FEIR project would be less than significant.

SUMMARY OF SHADOW ASSUMPTIONS FOR THE 2025 MODIFIED PROJECT

The following are the key assumptions for the shadow impact analysis of the 2025 modified project and differences, if any, in methodology between the FEIR and the 2025 modified project:

- The shadow analysis of the 2025 modified project presents a comparative analysis between the certified FEIR project and 2025 modified project by evaluating the locations and durations of net new shadow created under two scenarios:
  - Without the adjacent Pier 70 Mixed-Use District project (with-project scenario); and
  - With the fully built out Pier 70 Mixed-Use District project (cumulative scenario).
- The shadow analysis of the 2025 modified project generally follows the same methodology described in the FEIR, with minor modifications. As with the FEIR analysis, a 3D virtual model of the 2025 modified project was prepared, based on building height and massing as identified by the project sponsor in proposed revisions to the project's D4D document. The model includes the project site, along with potentially affected open spaces and the surrounding urban environment. The 2025 modified project was modeled under full buildout conditions and assumed that each block would be built to the full permitted height and would cover the entire footprint of the block. The shadow model, therefore, does not include required building setbacks at upper stories, and thus presents a worst-case scenario. The one exception to the full-massing assumption, in the case of the 2025 modified project analysis, is that the northeast portion of Block 7 was modeled based on the design

of the recently completed Sophie Maxwell Building, which is the first building to have been developed on the project site.[37]

2025 MODIFIED PROJECT SHADOW IMPACTS

An update to the FEIR shadow study was completed to analyze potential shadow impacts of the proposed project revisions, notably including height increases.[38] The updated analysis found that the 2025 modified project would not add new shadow to any offsite public open spaces that were unaffected by shadow cast by the certified FEIR project. This includes Esprit Park, a Recreation and Park Department facility, as well as Woods Yark Park, Warm Water Cove Park, Progress Park, and Minnesota Grove, none of which would be shaded by the 2025 modified project. Like the certified FEIR project, the 2025 modified project would shade the project's own proposed open spaces, with similar lengths and durations of shadow on Louisiana Paseo, Power Station Park, and the Humboldt Street Plaza, and slight increases in afternoon shadow along the bayfront Waterfront Park and Potrero Point Park; however, as with the certified FEIR project, because these open spaces do not currently exist, project shadow on these open spaces would not interfere with any existing recreational use that may rely on access to sunlight and would have no impact under CEQA. The overall areal extent of new shadow cast by the 2025 modified project would be about 10 percent greater than shadow cast by the certified FEIR project; however, most of the increase would fall on San Francisco Bay in the late afternoon. This is because existing buildings would preclude most of the 2025 modified project's longest new shadow from reaching new locations, but there are, of course, no existing buildings on the bay. **Figure 9**, **Annual Shadow Impact: 2025 Modified Program (Addendum) Compared to Certified FEIR Project**, compares annual shadow cast by the 2025 modified project, by location and average daily duration, to that cast by the certified FEIR project.

Cumulative shadow impacts of the 2025 modified project would generally be similar to those of the certified FEIR project. The 2025 modified project would not add new shadow to any open spaces that would not be shaded by the certified FEIR project. However, in addition to the changes described above, the 2025 modified project would result in very small incremental increases in shadow to two proposed open spaces at the Pier 70 project site, Slipway Commons and Irish Hill Playground. At Slipway Commons, the 2025 modified project would add additional shadow to a small area of the park's northwest quadrant for no more than 15 minutes per day over about 10 weeks around the winter solstice. At Irish Hill Playground, the 2025 modified project would add additional shadow to a small area at the southeastern corner and a smaller area near the southwestern corner for up to two hours per day over about four months in late fall and early winter.

Because shadow cast by the 2025 modified project would be generally similar to, and in some cases only incrementally greater than, shadow cast by the certified FEIR project, the 2025 modified project would not result in any new or substantially more severe shadow impacts than would the certified FEIR project.

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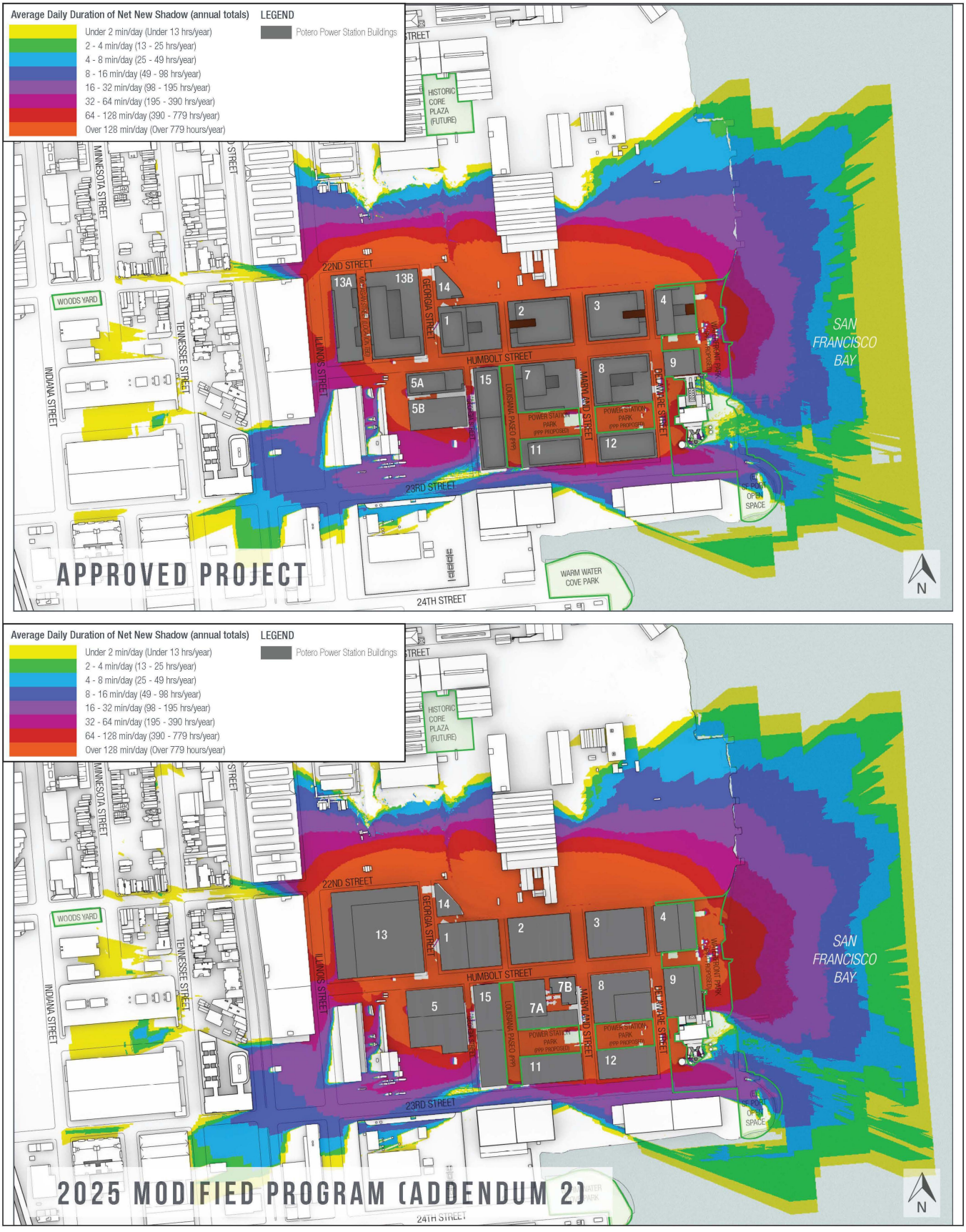
[37] An approved building on Block 2, being developed for the University of California, San Francisco, began construction just as the 2025 shadow analysis was completed and is therefore not considered. However, the approved design for Block 2 will not exceed the full-massing assumption for that block, and therefore the 2025 shadow analysis likewise provides a conservative analysis of this block.

[38] PreVision Design, Potrero Power Station Shadow Analysis Update (REF: 2017-011878ENV), September 2, 2025. This report is included in **Appendix WS.2**.



SOURCE: PreVision Design, 2025

Potrero Power Station 2025 Modified Project

Figure 9
Annual Shadow Impact: 2025 Modified Program (Addendum 2) Compared to Approved Project

Other Resource Topics

Impacts related to all other resource topics, listed below, would be similar to, or not substantially more severe, under the proposed 2025 modified project compared to the certified FEIR project, and no new significant impacts would result from the 2025 modified project. Therefore, for the reasons noted, the analysis, conclusions, and significance determination of the impacts of the certified FEIR project identified in the FEIR for the following resource areas would also apply to the 2025 modified project, with or without development of the PG&E subarea.

- **Aesthetics** — Section 4.A, *Impact Overview*, of the FEIR states the project is subject to CEQA Statute section 21099(d), which eliminates consideration of impacts related to aesthetics and parking in determining the significance of physical environmental impacts under CEQA for residential, mixed-use residential, or employment-center projects on infill sites within transit priority areas.

  The 2025 modified project meets the criteria listed in CEQA Statute section 21099(d). Therefore, as with the certified FEIR project, the 2025 modified project's aesthetics impacts would be exempt from determination of project impacts under CEQA.

- **Land Use and Land Use Planning** — The FEIR determined the certified FEIR project would not result in a physical division of a community, and consequently this impact was determined to be less than significant, with no mitigation required. The FEIR also determined that the certified FEIR project could conflict with certain City policy direction related to historic preservation, noise, pedestrian exposure to hazardous winds, and transit demand. However, the FEIR concluded the certified FEIR project would not conflict with land use plans and policies such that a substantial adverse physical change in the environment related to land use would result. For this reason, the certified FEIR project was determined to have a less-than-significant land use effect related to conflict with a land use plan, policy, or regulation, with no mitigation measures required.

  The 2025 modified project would not result in changes to the certified FEIR project's street grid, dimensions or locations of blocks proposed under the certified FEIR project. Therefore, like the certified FEIR project, the 2025 modified project, with or without development of the PG&E subarea, would result in a less-than-significant impact on physical division of an established community, with or without the PG&E subarea, with no mitigation measures required.

  Since publication of the FEIR, the San Francisco General Plan Urban Design Element Map 04, "Urban Design Guidelines for the Height of Buildings," has been updated and the project site's height designation is "High Density Residential and Mixed-Use Neighborhoods, Lower Scale High-Rise Districts," which generally includes 8- to 25-story buildings.[39] The 2025 modified project conforms with this height designation, and no amendments to the general plan height map would be required.

  As discussed in the project description above, the 2025 modified project would require amendments to the Development Agreement, Potrero Power Station SUD, and Zoning Map. If the San Francisco Board of Supervisors finds that amendments to the Planning Code are warranted to allow for implementation of the project, conflicts between the Planning Code would be resolved through a legislative amendment of the Planning Code.

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[39] San Francisco Planning Department, *Urban Design Element*, Map 04, "Urban Design Guidelines for the Height of Buildings," amended December 2025.

Similar to the certified FEIR project, the 2025 modified project has the potential to conflict with certain City policy directions related to historic preservation (associated with historic building demolition), noise (associated with project construction and operational noise sources), pedestrian exposure to hazardous winds (associated with increases in building height limits), and transit demand (associated with increases in project transit delays); please see the analysis of those issues in the respective sections, above. Conflicts with plans, policies, and regulations do not necessarily indicate a significant environmental impact under CEQA with respect to land use, unless the project substantially conflicts with a land use plan/policy that was adopted for the purpose of avoiding or mitigating an environmental effect, such that a substantial adverse physical change in the environment related to land use would result. To the extent that such substantial physical environmental impacts may result from such conflicts, this Addendum discloses and analyzes these physical impacts under the relevant environmental topic sections.

The 2025 modified project would not conflict with land uses plans and policies such that a substantial adverse physical change in the environment related to land use would result. For this reason, and similar to the conclusion reached for the certified FEIR project, the 2025 modified project with or without development of the PG&E subarea, would have a less-than-significant land use effect related to conflict with a land use plan, policy, or regulation; no mitigation measures would be required. Accordingly, the 2025 modified project would not result in new significant impacts related to land use and land use planning, nor would it result in more severe impacts than those previously identified.

- **Population and Housing** — The FEIR found that the certified FEIR project would not induce substantial population growth beyond growth planned for San Francisco or the region, and therefore, this impact was determined to be less than significant. The FEIR also found that the certified FEIR project would not displace existing housing or substantial numbers of people, and therefore, was determined to have no impact on this issue.

  As under the certified FEIR project, the proposed changes in the 2025 modified project would have a minimal effect on the assumptions, analysis, and results of the population and housing impact analysis in the FEIR. Construction impacts of the 2025 modified project on population and housing were based solely on construction of the project as a whole through buildout, and the change in approach to construction phasing would not affect any of the assumptions or analysis used in evaluating construction impacts.

  Operational impacts of the 2025 modified project were based on reasonable worst-case buildout assumptions, and the proposed changes in type of land uses and gross square footage would not affect the analysis or conclusion of operational impacts with respect to population and housing. Based on the residential population estimates presented in Table 7 above, under the High Residential scenario for the 2025 modified project, the residential population would be incrementally higher (3 percent) than under the Maximum Residential scenario for the certified FEIR project. In addition, under the High Commercial scenario for the 2025 modified project, the employment population increase would potentially be up to 4 percent greater than under the Maximum Office scenario for the certified FEIR project. However, as under the certified FEIR project, the residential and population increases under the 2025 modified project would not exceed residential and employment growth anticipated for the City by City and regional planning documents; and the project site would be located within one block of a major transit corridor (Third Street), and in proximity to local and regional

roadway networks and rail options. In addition, similar to the certified FEIR project, the 2025 modified project would not displace existing housing or substantial numbers of people.

Therefore, the population and housing impacts of the 2025 modified project, with or without development of the PG&E subarea, would be similar to or incrementally greater—but not substantially more severe—than what is described for the certified FEIR project in the FEIR, and would be less than significant, with no mitigation measures required. Accordingly, the 2025 modified project would not result in new significant impacts related to population and housing, nor would it result in substantially more severe impacts than those previously identified.

- **Historic Architectural Resources** — The FEIR found even with implementation of mitigation measures, the certified FEIR project would have a significant and unavoidable impact with respect to demolition of individually significant buildings; and with the demolition, or alteration and rehabilitation of, contributing buildings to the Third Street Industrial District. The FEIR also found that with implementation of mitigation measures, the certified FEIR project would have a less-than-significant impact with respect to the effect of infill construction on contributing buildings to the Third Street Industrial District. Lastly, the FEIR determined that the certified FEIR project would have a less-than-significant impact on the Union Iron Works Historic District, with no mitigation required.

  As discussed in the project description, the 2025 modified project would increase the permitted maximum streetwall height on Blocks 11 and 12 from 70 to 75 feet. With respect to the potential significant impact of the certified FEIR project to the Third Street Industrial District, the FEIR identified Mitigation Measure M-CR-6: *Design Controls for New Construction*, which required the SUD and D4D document to contain design standards and guidelines to ensure that new construction and site development within the SUD shall be compatible with the character of the Third Street Industrial District. Mitigation Measure M-CR-6 outlined multiple Third Street Industrial District Frontage Design Controls for the D4D document, including:

  > "*Height + Massing along 23rd and Illinois street frontages.* In order for 23rd and Illinois streets to appear balanced on either side, new construction shall respect existing heights of contributors to the Third Street Industrial District by referencing their heights with an upper level 10-foot setback at approximately 65 feet."

  The D4D document refined the Mitigation Measure M-CR-6 language to state:

  > *6.11.2 Third Street Industrial District Height and Massing.* In order for 23rd and Illinois Streets to appear balanced on either side, new construction shall respect existing heights of contributors to the Third Street Industrial District by including an upper level 10-foot setback at 65 feet on Block 15, and 70 feet on Blocks 11 and 12, as required by Section 6.4.1 Building Setbacks.[40]

  From the perspective of compatibility with nearby historic buildings, the warehouses on the south side of 23rd Street are much shorter (2 to 3 stories) than the buildings proposed on the north side of 23rd Street under the 2025 modified project. The streetwall height established for the new buildings is not dictated by the warehouses. In the D4D document, Block 15 (Station A), adjacent to Block 11 on the west, has a streetwall height of 65 feet. There is a 30-foot setback at the 70-foot streetwall height on the west side of Block 11 facing Station A, likely to provide additional deference to the historic

[40] *Potrero Power Station Design for Development*, page 276, February 26, 2020,

building. Each new building would be separated by a street and not placed immediately adjacent to a historic building.[41]

The additional 5 feet to the point of setback on 23rd Street under the 2025 modified project would not significantly affect the new construction's relationship or compatibility with the adjacent historic buildings compared to the 70-foot setback height included in the D4D document. Instead of 5 feet taller than the roofline of Station A, the adjacent building on Block 11 across Louisiana Paseo would be 10 feet taller, which from the pedestrian perspective would not appear to be a significant change.[42] Consequently, the 2025 modified project would not substantially affect any conclusions previously reached in the FEIR with respect to the effect of infill construction on contributing buildings to the Third Street Industrial District, and no changes to FEIR Mitigation Measure M-CR-6 are required.

Otherwise, none of the proposed changes that would occur under the 2025 modified project would substantially affect the features of the certified FEIR project that were used in the FEIR analysis of historical architectural impacts. The 2025 modified project would affect the timing of construction at various locations within the project site, but would not affect the type, magnitude, or overall geographic area of construction of the certified FEIR project. Therefore, the impacts described in the FEIR related to historic architectural resources would apply to the 2025 modified project, with or without development of the PG&E subarea; and associated mitigation measures would apply. Accordingly, the 2025 modified project would not result in new significant impacts related to historic architectural resources, nor would it result in more severe impacts than those previously identified.

- **Archaeological Resources, Human Remains and Tribal Cultural Resources** — The FEIR found that with the implementation of mitigation measures, the certified FEIR project would not cause a substantial adverse change in the significance of archaeological or tribal cultural resources, or disturb human remains, and therefore, these impacts were determined to be less than significant. Mitigation Measure M-CR-1 would require the development of an archeological testing program to determine the presence or absence of archeological resources and an evaluation of whether any archeological resource encountered constitutes a historical resource under CEQA. Mitigation Measure M-CR-1 would also ensure that work would halt if archeological resources are inadvertently discovered during project implementation and that proper procedures are followed to ensure appropriate treatment of significant archeological resources. Mitigation Measure M-CR-3 would require either preservation-in-place of the tribal cultural resources, if determined effective and feasible, or an interpretive program regarding the tribal cultural resources developed in consultation with affiliated Native American tribal representatives.

  None of the proposed changes in the 2025 modified project would affect the features of the certified FEIR project that were relied upon in the FEIR analysis of archaeological resources, human remains and tribal cultural resources impacts, because those impacts are dependent on building footprints and excavation, neither of which is proposed for revision. The 2025 modified project would affect the timing of construction at various locations within the project site, but would not affect the type, magnitude, depth of construction, or overall geographic area of construction of the certified FEIR project. Therefore, the impacts described in the FEIR related to archaeological resources, human remains and tribal cultural resources would be similar and apply to the 2025 modified project, with or

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[41] Page & Turnbull, *Potrero Power Station – Streetwall Change in Height at Blocks 11 and 12,* October 9, 2025.

[42] *Ibid.*

without development of the PG&E subarea; and associated mitigation measures would apply. Accordingly, the 2025 modified project would not result in new significant impacts related to archaeological resources, human remains, and tribal cultural resources, nor would it result in more severe impacts than those previously identified.

- **Greenhouse Gas Emissions** — The FEIR found that the certified FEIR project would not generate greenhouse gas emissions that may have a significant impact on the environment, or conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases, and no mitigation was required. As such, the FEIR determined that the certified FEIR project's impact on greenhouse gases would be less than significant, and no mitigation was required.

  None of the proposed changes in the 2025 modified project would be expected to alter the FEIR's conclusions regarding the analysis of greenhouse gas emissions impacts. The 2025 modified project would not use natural gas, which would further reduce impacts with respect to greenhouse gas emissions. The additional proposed changes would affect only the timing of construction at various locations within the project site, but they would not substantially affect the nature or magnitude of construction activities, and long-term operations of the 2025 modified project at buildout would be substantially the same as what is expected to occur under the certified FEIR project, with only minor differences in gross square footage of development and population. Therefore, the impacts of the 2025 modified project related to greenhouse gas emissions would be similar to or less than what is described in the FEIR, and the less than significant impact conclusions would apply to the 2025 modified project, with or without development of the PG&E subarea, with no mitigation required. Accordingly, the 2025 modified project would not result in new significant impacts related to greenhouse gas emissions, nor would it result in more severe impacts than those previously identified.

- **Recreation** —The FEIR found that the certified FEIR project would not increase the use of neighborhood and regional facilities such that substantial physical deterioration would occur or be accelerated; would not include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment; and would not physically degrade existing recreational resources. As such, the FEIR determined these recreational impacts would be less than significant, and no mitigation measures were required.

  None of the proposed changes in the 2025 modified project would be expected to alter the affect the FEIR's conclusions regarding the FEIR's conclusion regarding recreational resources. With the exception of the removal of the rooftop soccer field, the 2025 modified project would not make any changes to the open space or other recreational resources included in the certified FEIR project. As described above under Population and Housing, the proposed changes in certain land uses would result in an incrementally greater increase in residential population than the maximum resident growth scenario that was analyzed in the FEIR. The increase in recreational demand would not be sufficient to require new recreational facilities or expansion of existing facilities with potentially significant environmental effects. Therefore, the impacts of the proposed 2025 modified project related to recreational resources would be similar to or incrementally more severe—but not substantially more severe—than what is described in the FEIR, and the less-than-significant impact conclusions would apply to the 2025 modified project, with or without development of the PG&E subarea, with no mitigation measures required. Accordingly, the 2025 modified project would not result in new significant impacts related to recreation, nor would it result in substantially more severe impacts than those previously identified.

- **Utilities and Service Systems** — The FEIR found that the certified FEIR project would not exceed wastewater treatment requirements of the Regional Water Quality Control Board and would not require new water or wastewater treatment facilities or stormwater drainage facilities, or expansion of existing facilities that would cause significant environmental effects. The FEIR found that there would be sufficient water supply to serve the project from existing water supply resources or entitlements based on the results of a Water Supply Assessment (WSA) completed by the San Francisco Public Utilities Commission (SFPUC).[43]The FEIR also found that the project would not result in insufficient wastewater treatment capacity at the Southeast Water Pollution Control Plant, would be served by landfill facilities with sufficient permitted capacity, and would comply with applicable solid waste statutes and regulations. As such, the FEIR determined these utilities and service system impacts would be less than significant, and no mitigation measures were required.

  Given the 2025 modified project would result in a change in certain land uses and minor changes in square footage, and thus would have the potential to increase potable water demand beyond that water demand of the certified FEIR project, a request was made for the SFPUC to determine whether an updated WSA was required for the 2025 modified project. To make this determination, the SFPUC reviewed the 2025 modified project description and the updated water demand estimates for the 2025 modified project's High Residential and High Commercial scenarios provided by the project sponsor, which are 0.314 million gallons per day (mgd) and 0.309 mgd, respectively. Both estimates are less than the 0.325 mgd estimate associated with the Maximum Residential Development Program that was analyzed in the approved WSA for the certified FEIR project.[44] Based on these results, and because none of the other factors listed in Water Code section 10910(h) warranting a revised WSA are applicable, the SFPUC determined that a revised WSA is not necessary for the 2025 modified project.[45] Therefore, as confirmed by the SFPUC, existing and planned water supplies serving the City and County of San Francisco would be sufficient to meet the projected water demand for the 2025 modified project, and no new or expanded water supply resources would be required.

  During construction activities, water may be used for soil compaction and dust control activities. However, San Francisco Public Works Code Article 21 restricts the use of potable water for soil compaction and dust control activities undertaken in conjunction, unless permission is obtained from the SFPUC. Consistent with the FEIR, this water use would be intermittent and temporary, terminating with the completion of construction. The 2025 modified project would be required to comply with the City's Recycled Water Ordinance, adopted as article 22 of the public works code. The 2025 modified project would be required to include all necessary plumbing for the future use of recycled water for non-potable applications, including, but not limited to, toilet flushing and irrigation. As described in the FEIR, a graywater diversion, treatment, and reuse system would provide non-potable water. Based on the highest water demand scenario estimated above for the 2025 modified project and assuming the sewer demand would be 95 percent of the indoor potable water demand as analyzed in the FEIR, the maximum average dry-weather wastewater flow generated by the 2025 modified project would be approximately 0.30 million gallons per day (mgd), slightly less

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[43] SFPUC, *Water Supply Assessment for the Potrero Power Station Project*, April 24, 2018.

[44] The water demand calculations considered by SFPUC were completed in August 2025 and assumed a larger data center in the High Commercial scenario than the 4-MW data center studied in this addendum. As such, the WSA water demands with the High Commercial scenario account for approximately 19.1 million gallons annually (52,330 mgd) based on an assumed hybrid water cooled and air-cooled system. The 4-MW data center analyzed in this addendum would have negligible water use because the system would utilize air-cooled chillers only.

[45] SFPUC, Response to Potrero Power Station Request for Water Supply Assessment Determination, October 20, 2025.

than the 0.31 mgd estimated in the certified FEIR. When considering the adequate remaining wastewater treatment capacity of the Southeast Plant (84.5 mgd), the 2025 modified project's average dry-weather wastewater demand would be well within the remaining capacity of the plant. Therefore, impacts related to exceeding the wastewater treatment requirements of the plant during operation would be less than significant, and no mitigation is necessary. Otherwise, the 2025 modified project would not include any substantial changes to the infrastructure improvements included in the certified FEIR project, including, but not limited to, stormwater improvements.

As described in the project description, proposed changes in certain land uses under the 2025 modified project would result in correlating changes in residential population and employment population compared to the certified FEIR project. Because the employee-waste-generation rate is higher than that for residential use, this analysis considers the high commercial scenario as worst-case scenario for project-generated solid waste. The annual solid waste generation for the 2025 modified project estimated at 8,743 tons of solid waste[46] would be slightly higher (2 percent) than that which would be generated by the certified FEIR project (8,546 tons). The total operational solid waste that would be generated under the 2025 modified project that requires disposal in a landfill would represent approximately 2 percent of City's generated landfill waste, and approximately 1 percent of the landfill's 2,400-tons maximum throughput per day. When considering the Recology Hay Road Landfill has a reported remaining landfill capacity of approximately 30.4 million cubic yards, with an anticipated closure in 2077, there would be sufficient permitted capacity to accommodate the solid waste disposal needs of the 2025 modified project through its duration, same as under the certified FEIR project.

Therefore, the impact of the 2020 modified plan on utilities and service systems would be, depending on issue, similar to, or incrementally less than or greater than what is described for the certified FEIR project in the FEIR, and would be similarly less than significant, with no mitigation measures required. Accordingly, the 2025 modified project would not result in new significant impacts related to utilities and service systems, nor would it result in more severe impacts than those previously identified.

- **Public Services** — The FEIR found that the certified FEIR project would not result in substantial adverse physical impacts associated with the provision of, or the 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 public services such as fire protection, police protection, schools, parks, or other services. As such, the FEIR determined that impacts on these public services would be less than significant, and no mitigation measures were required.

  The proposed changes in the 2025 modified project would have minimal effect on the assumptions, analysis, and results of the public services impact analysis in the FEIR. The 2025 modified project would include minor changes in the gross square footages for various land uses, incrementally greater residential population increase, and a potentially greater employment increase than under the maximum resident and employee growth scenarios that were analyzed in the FEIR. Therefore, the impacts of the proposed 2025 modified project related to police protection, fire protection, schools and other services would be similar to or incrementally greater, but not substantially more severe, than what is described for the certified FEIR project in the FEIR, and would be similarly less than

[46] Using the same methodology as used in the FEIR, the total sum of annual operational waste under the 2025 modified program is conservatively estimated as follows: (5,033 residents x 3.7 pounds/day) + (6,367 employees x 4.6 pounds/day) = 47,910 pounds/day, or (45,910 pounds/day x 365 days/year)/2,000 pounds) = 8,743 tons.

significant, with no mitigation required. Accordingly, the 2025 modified project would not result in new significant impacts related to public services, nor would it result in substantially more severe impacts than those previously identified.

- **Biological Resources** — The FEIR found that with the implementation of mitigation measures, the certified FEIR project would not result in substantial adverse impacts on migratory and special-status bird and bat species or special-status marine species; would not result in substantial adverse impacts on state or federally protected wetlands and waters; and would not substantially interfere with movement of fish or wildlife species or migratory wildlife corridors, and therefore, these impacts were determined to be less than significant. The FEIR also determined that the certified FEIR project would have a less than significant impact related to riparian habitat or other sensitive communities; would not conflict with local plans and ordinances protections related to biological resources; or conflict with the provisions of an adopted habitat conservation plan or natural community conservation plan, with no mitigation measures required.

  None of the proposed changes in the 2025 modified project would affect the features of the certified FEIR project that were relied upon in the FEIR analysis of biological resources impacts. The 2025 modified project would make no changes to the certified FEIR project's plans for demolition of existing structures, shoreline improvements, infrastructure and building improvements, and open space. Therefore, the impacts of the proposed 2025 modified project related to biological resources would be the same as what is described in the FEIR, and the impact conclusions would apply to the 2025 modified project, with or without development of the PG&E subarea, and the same mitigation measures would apply. Accordingly, the 2025 modified project would not result in new significant impacts related to biological resources, nor would it result in more severe impacts than those previously identified.

- **Geology, Soils, and Paleontological Resources** — The FEIR found that with incorporation of design features proposed as part of the project and compliance with applicable regulatory requirements, the certified FEIR project would not exacerbate the potential for the project to expose people or structures to substantial adverse effects from seismic groundshaking or seismically induced ground failure or landslides; would not result in substantial erosion or loss of topsoil; would not be located on a geologic unit or soil that is unstable; would not create substantial risks from building on expansive or corrosive soils; and would not substantially change the topography or any unique geologic or physical features of the site. As such, the FEIR determined these potential geology and soil impacts would be less than significant, with no mitigation measures required. In addition, the FEIR determined that due to the nature of the certified FEIR project, potential impacts related to soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems would not be applicable. The FEIR also found that with the implementation of mitigation, the certified FEIR project's potential impacts on unique paleontological resources or sites would be less than significant.

  None of the proposed changes under the 2025 modified project would affect the project features with the potential to affect geological resources since there would be no changes to the type, magnitude, depth of construction, or overall geographic area of construction, or in the structural design of the buildings and foundations. Therefore, the impacts described in the FEIR related to geology, soils, and paleontological resources would apply to 2025 modified project, with or without development of the PG&E subarea; and associated paleontological mitigation would apply. Accordingly, the 2025 modified project would not result in new significant impacts related to geology, soils, and paleontological resources, nor would it result in more severe impacts than those previously identified.

- **Hydrology and Water Quality** —The FEIR found that with incorporation of design features proposed as part of the project and compliance with applicable regulatory requirements, the certified FEIR project would not violate water quality standards or waste discharge requirements, or degrade water quality; would not substantially alter the existing drainage pattern of the site; would not impede flood flows within a flood zone; and would not expose people or structures to substantial risk due to inundation by seiche or tsunami, and no mitigation measures were required.

  None of the proposed changes in the 2025 modified project would affect the features of the certified FEIR project that were relied upon in the FEIR analysis of hydrology and water quality impacts since there are no changes to the type, magnitude, depth of construction, or overall geographic area of construction. Similarly, building and stormwater design and operation at buildout would be essentially the same, and the 2025 modified project would also rely on the same design guidelines and requirements for construction within a flood zone. Therefore, the impacts described in the FEIR related to hydrology and water quality would apply to the 2025 modified project, with or without development of the PG&E subarea, with no mitigation measures required. Accordingly, the 2025 modified project would not result in new significant impacts related to hydrology and water quality, nor would it result in more severe impacts than those previously identified.

- **Hazards and Hazardous Materials** — The FEIR detailed that the project site has a history of industrial use, resulting in hazardous materials in the soil, groundwater, and soil vapor. PG&E has been managing the investigation and cleanup under the San Francisco Regional Water Quality Control Board's (the "Water Board") oversight. The status of these efforts was provided in the FEIR, published in May 2018 and updated in January 2019.

  The FEIR found that with incorporation of design features proposed as part of the project and compliance with applicable regulatory requirements, the certified FEIR project would not create a significant hazard through routine transport, use or disposal of hazardous materials; would not expose workers or the public to hazardous building materials or result in a release of these materials into the environment; would not create a significant hazard to the public or the environment through upset and accident conditions involving the release of hazardous materials into the environment; would not handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school; and would not expose people or structures to significant risk or loss, injury or death involving fires, or impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no mitigation measures were required.

  In December 2020, the Water Board approved a Sitewide Risk Management Plan. On May 12, 2022, the Board issued a Sitewide Land Use Covenant (LUC), and on February 22, 2023, it released a Certificate of Completion stating that PG&E has satisfactorily completed the site remediation.

  Appendix HZ of this FEIR addendum provides details on the Water Board's environmental approvals. The Certificate of Completion now enables the project sponsor to modify the construction phasing approach and schedule. Future construction must comply with the protocols, conditions, and restrictions in the Sitewide Risk Management Plan and LUC, which the Water Board will enforce.

  None of the proposed changes in the 2025 modified project would affect the features of the certified FEIR project that were used in the FEIR analysis of hazards and hazardous materials impacts since there are no changes to the relied upon, magnitude, depth of construction, or overall geographic area of construction, or in the structural design of the buildings and foundations. The approach for addressing contamination encountered during the course of development activities set forth in the approved

Sitewide Risk Management Plan approved in December 2020 (as described in Appendix HZ to this Addendum) is consistent with the approach described in the FEIR. In addition, the Sitewide LUC that was issued in February 2022 requires implementation of the risk management measures by current and future land owners and limits future land uses at the site. Therefore, the impacts described in the FEIR related to hazards and hazardous materials would be similar to the 2025 modified project, with or without development of the PG&E subarea, with no mitigation measures required. Accordingly, the 2025 modified project would not result in new significant impacts related to hazards and hazardous materials, nor would it result in more severe impacts than those previously identified.

- **Mineral and Energy Resources** — The FEIR found that based on United States Geological Survey mapping of mineral resources, potential impacts related to the loss of availability of mineral resources or mineral resource recovery site would not be applicable to the certified FEIR project. The FEIR project also found that the certified FEIR project would not encourage activities that would result in large amounts of fuel, water or energy, or use these in a wasteful manner, and a result, this impact would be less than significant, with no mitigation measures required.

  None of the proposed changes in the 2025 modified project would affect the overall geographic area or depth of construction of the certified FEIR project. Therefore, as with the certified FEIR project, impacts on mineral resources would not be applicable to the 2025 modified project, with or without development of the PG&E subarea.

  The 2025 modified project would affect only the timing of construction at various locations within the project site, but it would not affect the nature or magnitude of construction activities, and long-term operations of the 2025 modified project at buildout would be substantially the same as what is expected to occur under the certified FEIR project. Similar to the certified FEIR project, the modified 2025 modified project would comply with applicable Title 24 requirements and the 2016 San Francisco Green Building Code. Also similar to the certified FEIR project, the 2025 modified project would be designed to Leadership in Energy and Environmental Design (LEED) Gold standards, consistent with the green building code. Therefore, consistent with the certified FEIR project, the 2025 modified project would not result in wasteful or inefficent energy use or conflict with state or local renewable energy plans. The 2025 modified project, with or without development of the PG&E subarea, would not result in new significant energy impacts, nor would it result in more severe impacts than those previously identified. No new mitigation measures are required.

- **Agriculture and Forestry Resources** — The FEIR indicated that the project site is not located in an urbanized area, is not designated by the Department of Conservation as agricultural land, or is defined by the State Public Resources code as forest land/timber land. As a result, potential impacts related to loss or conversion of farmland or forest land; conflict with existing zoning for agricultural use, forest land or timberland; or conflict with a Williamson Act contract would not be applicable to the certified FEIR project.

  Similarly, potential impacts related to agriculture and forestry resources would not be applicable to the 2025 modified project.

- **Alternatives** — Because the 2025 modified project would not result in any new significant impacts or substantially more severe environmental impacts compared to those identified in the FEIR, the alternatives analysis presented in the FEIR also applies to the 2025 modified project, with or without development of the PG&E subarea, and no further alternatives analysis is required.

Conclusion

Based on the foregoing, it is concluded that the analyses conducted and the conclusions reached in the FEIR adopted and issued on January 30, 2020, remain valid and that no supplemental environmental review is required. The proposed revisions to the project would not cause new significant impacts not identified in the FEIR, and no new mitigation measures would be necessary to reduce significant impacts. No changes have occurred with respect to circumstances surrounding the 2025 modified project that would cause significant environmental impacts to which the project would contribute considerably, and no new information has become available that shows that the project would cause significant environmental impacts. Therefore, no supplemental environmental review is required beyond this Addendum.

I do hereby certify that the above determination has been made pursuant to State and local requirements.



July 16, 2026

Lisa Gibson
Environmental Review Officer

Date of Determination:

cc: Molly Maybrun, Fifth Space
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